DRAFT ENVIRONMENTAL ASSESSMENT

Construction and Operation of a Consolidated U.S. Postal Service Facility in the Portland Metropolitan Area, Multnomah County, Oregon

Prepared for

United States Postal Service
Facilities Department
HQ Field Office
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Tampa, FL 33634-5178

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Prepared by

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Contract No. 104267-13-B-0004 | WO 1142.01, URS Project No. 60441092
The U.S. Postal Service (USPS) has prepared this Environmental Assessment (EA) pursuant to the requirements of the National Environmental Policy Act of 1969 (NEPA; 42 United States Code [U.S.C.] 4321 et seq.), the Council on Environmental Quality (CEQ) regulations implementing NEPA (Title 40 of the Code of Federal Regulations [CFR] Parts 1500 to 1508), the USPS regulations for NEPA compliance (39 CFR Part 775), and the USPS Facilities Environmental Guide (Handbook RE-6) (USPS 2015c), for the proposed consolidation of the existing functions of three separate USPS facilities in Portland, Oregon (Proposed Action). These facilities are the existing USPS-owned Processing and Distribution Center (P&DC) and Vehicle Maintenance Facility (VMF) on Hoyt Street in downtown Portland, the leased Portland-Mt. Hood Delivery Distribution Center (DDC), and the leased Portland Air Cargo Center (PACC) within the Portland International Airport.

The Proposed Action includes the construction and operation of a new, fully integrated, and modern USPS-owned facility to consolidate and incorporate the functions of the existing P&DC/VMF, the DDC, and the PACC at one location. To house all combined functions, the consolidated facility requires at least 45 acres per USPS design standards and associated space requirements (USPS 2015b). Locating the new facility near major roads and with ready access to the Portland International Airport is critical to support the requisite operations of these facilities efficiently. As part of the Proposed Action, and concurrent with initiation of operation at the new consolidated facility, the USPS would terminate its existing leases at the DDC and the PACC and release the existing P&DC/VMF property to the Portland Development Commission. Redevelopment of the P&DC/VMF property by the Portland Development Commission would occur in consonance with local zoning, to include mixed commercial and residential uses similar to the neighboring properties in the Pearl District of Portland. Prior to vacating the existing P&DC/VMF facility, the USPS would obtain space to provide a retail unit for public use, either within the existing P&DC/VMF facility or in another retail building nearby. The USPS has consulted with the Oregon State Historic Preservation Officer to avoid and/or mitigate adverse effects on the National Register-eligible P&DC facility in accordance with the National Historic Preservation Act.

The purpose of the Proposed Action is to combine the functions of three separate USPS facilities (the existing P&DC/VMF, the DDC, and the PACC) into a single location to increase operational efficiencies and decrease operating costs. The Proposed Action is needed to increase efficiencies in USPS operations, which would save the USPS time in processing, handling, and distributing mail. The USPS has determined substantial cost savings would be achieved from the increased efficiencies of co-location, as well as from the termination of leases at the DDC and the PACC. The USPS objective, consistent with national USPS initiatives, is to improve the overall USPS financial condition; the Proposed Action would support the USPS in meeting this objective.

This EA examines in-depth three alternatives as defined below:

- Preferred Alternative (Alternative 1) – The USPS would construct and operate a new, fully integrated, and modern USPS facility on the Colwood Industrial Park property
Environmental Assessment for New USPS Facility – Portland, Oregon

U.S. Postal Service

Alternative 2 – The USPS would construct and operate the new, fully integrated, and modern USPS facility at a site north of the Troutdale Municipal Airport within the Troutdale Reynolds Industrial Park (TRIP) in Troutdale, Oregon.

No Action Alternative – The USPS would continue operations at the existing P&DC/VMF facility, would continue leasing the Portland-Mt. Hood facility for DDC operations, and would continue leasing the PACC facility for air cargo operations. The No Action Alternative was found to not satisfy the purpose of and need for the Proposed Action. However, pursuant to NEPA and CEQ regulations, the No Action Alternative must be considered to provide a comparative baseline analysis.

The Proposed Action was evaluated to determine its potential direct or indirect impact(s) on the physical, natural, cultural, and socioeconomic environment. Technical areas evaluated in this EA include: land use and zoning; transportation; air quality; noise; geology, topography, and soils; water resources; biological resources; cultural resources; socioeconomics; environmental justice; utilities and infrastructure; and hazardous materials and waste. No land disturbance is proposed at the existing P&DC/VMF facility or the USPS leased sites, so the following resources are not discussed specifically for these sites: topography, geology, and soils; water resources; noise; biological resources; and socioeconomic resources (except for transportation). The USPS has also determined that community services, visual resources/aesthetics, floodplains, and coastal resources would not be affected by Alternative 1, Alternative 2, or the No Action Alternative as described below. Therefore, these resources are not evaluated in this EA.

This EA concludes that the Proposed Action would not result in significant adverse impacts on the physical, natural, cultural, and socioeconomic environment. The Proposed Action would have a long-term beneficial impact on USPS operations by providing increased operational efficiencies; substantial cost savings from the increased efficiencies of co-location, as well as from the termination of leases at the DDC and the PACC; and substantial savings in time to process, handle, and distribute mail in the Portland metropolitan area. Reduced fuel consumption and increased efficiencies in transportation components of USPS operations and a net regional traffic reduction would be realized by locating the new facility closer to the Portland International Airport. The Proposed Action would also improve the use of the underutilized existing P&DC/VMF site.

Alternative 1, constructing and operating the new consolidated facility at the Colwood Site, is the Preferred Alternative because the new facility would be located only 2.5 miles from the Portland International Airport. This proximity of the new USPS facility to a major airport results in more cost effective and beneficial operational and transportation efficiencies for USPS operations compared to Alternative 2.

Alternative 2, constructing and operating the new consolidated facility at the Troutdale Site, would result in some reduction in fuel consumption and increased efficiencies in transportation components of USPS operations. However, because the adjacent Troutdale Airport is not large enough to meet USPS needs and the Troutdale Site is 8 miles further away from the Portland International Airport than the Colwood Site, the long-term beneficial impacts associated with the
The proximity of Alternative 1 to the Portland International Airport would not be realized. Also, the Troutdale Site would not be ready for USPS purchase or building construction until 2017/2018 because of additional site work, permitting, and approvals that are needed to prepare the site for development, which would likely result in USPS having to extend one or both of its leases for the DDC or PACC. Finally, due to site soil conditions, the USPS would be required to construct a pile foundation for the facility, at a much greater cost than at Colwood.

Furthermore, maintaining the existing P&DC/VMF facility in downtown Portland and continuing to lease the DDC and PACC facilities (the No Action Alternative), would not remove the existing P&DC/VMF facility from Federal ownership and therefore benefits to land use in downtown Portland through redevelopment of an underutilized location would not be realized. The existing P&DC/VMF facility would not transfer out of Federal ownership and taxes on the property would not accrue to the City of Portland. Traffic congestion in the area of the existing P&DC/VMF facility would continue to cause delays for USPS vehicles accessing the facility.

Impacts and mitigation measures associated with the Proposed Action and alternatives, including the No Action Alternative, for each element in the environment analyzed in this EA are summarized in the following table.
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<th>Resource Area</th>
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| **Land Use and Zoning**| **Impacts**: No impacts to land use/zoning. Removal of existing P&DC/VMF facility from Federal ownership would benefit land use in downtown Portland by allowing redevelopment or reuse of an underutilized location.  
**Mitigation**: No mitigation necessary. | **Impacts**: Same as Alternative 1.  
**Mitigation**: No mitigation necessary. | **Impacts**: Same as Alternative 1.  
Benefits of transferring existing P&DC/VMF facility from Federal ownership to redevelop or reuse an underutilized location in downtown Portland would not be recognized.  
**Mitigation**: No mitigation necessary. |
| **Transportation**     | **Impacts**: Temporary, minor increases in traffic congestion near the Colwood Site during construction would be offset by appropriate Best Management Practices (BMPs). Long-term, minor increase in traffic levels in the immediate vicinity of the Site.  
Increased efficiencies in transportation components of USPS operations due to consolidation of facilities and proximity to Portland International Airport (2.5 miles) would provide long-term beneficial impacts and a net regional traffic reduction.  
**Mitigation**: Additional impacts have been mitigated through improvements of nearby intersections as part of the Colwood Industrial Park development. | **Impacts**: Same as Alternative 1.  
Increased efficiencies in transportation components of USPS operations due to consolidation of facilities would provide long-term beneficial impacts. However, benefits would be less than Alternative 1 because the adjacent Troutdale Airport is not large enough to meet USPS needs and the Troutdale Site is 8 miles further away from the Portland International Airport than the Colwood Site.  
**Mitigation**: Additional impacts have been mitigated by ongoing improvements that are gradually being implemented by the TRIP developer. | **Impacts**: No changes to local traffic patterns or levels around the existing P&DC/VMF facility. Roadways in the area would remain congested.  
Temporary, minor increases in traffic congestion at the Colwood and Troutdale Sites during construction by others would be offset by appropriate BMPs.  
**Mitigation**: No mitigation necessary. |
### Summary of Impacts and Mitigation Measures

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| **Air Quality**               | **Impacts**: Temporary, minor adverse impacts during construction would be offset by appropriate BMPs. Additional long-term, minor adverse impacts during facility operation. Overall net reduction in regional emissions compared to existing conditions due to consolidation of USPS activities and transportation and installation of new, energy-efficient equipment.  
   **Mitigation**: Operational impacts do not require mitigation. CAA permits would be obtained as needed. | **Impacts**: Same as Alternative 1. However, vehicular emissions would be higher than Alternative 1 since the Troutdale site is 8 miles further away from the Portland International Airport than the Colwood Site.  
   **Mitigation**: Same as Alternative 1. | **Impacts**: The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to those for Alternatives 1 and 2. However, continued operation of three separate USPS facilities in traffic-congested areas would result in higher levels of vehicular emissions compared to Alternatives 1 or 2.  
   **Mitigation**: No mitigation necessary for USPS. |
| **Noise**                     | **Impacts**: Short- and long-term, minor adverse impacts to the noise environment from USPS facility construction and operation with implementation of appropriate BMPs.  
   **Mitigation**: No mitigation necessary. | **Impacts**: Same as Alternative 1.  
   **Mitigation**: No mitigation necessary. | **Impacts**: The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to Alternatives 1 and 2.  
   **Mitigation**: No mitigation necessary for USPS. |
| **Geology, Topography, and Soils** | **Impacts**: No impacts to geology, negligible impacts to topography and soils with implementation of appropriate sediment and erosion control BMPs.  
   **Mitigation**: No mitigation necessary. | **Impacts**: Same as Alternative 1.  
   **Mitigation**: No mitigation necessary. | **Impacts**: The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to Alternatives 1 and 2.  
   **Mitigation**: No mitigation necessary. |
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<td>Water Resources</td>
<td><strong>Impacts:</strong> Short- and long-term minor adverse impacts to water resources. No impacts to groundwater expected. Impacts to wetlands have already been permitted and mitigated. No impacts to waterways. The USPS would evaluate whether the proposed facility is eligible for a No Exposure Certification (NEC), which exempts a facility from NDPES industrial stormwater permitting. If the facility is not eligible for an NEC, the USPS would obtain a NPDES industrial permit for operation of the facility, and would prepare and implement a SWPPP that would provide measures to avoid and minimize impacts from stormwater runoff. Permanent stormwater drainage measures (e.g., bioswales) are being implemented by the developer and would be completed before the USPS purchases the property. USPS would provide maintenance and upkeep of the stormwater drainage measures once it takes ownership of the property. <strong>Mitigation:</strong> No mitigation necessary.</td>
<td><strong>Impacts:</strong> Same as Alternative 1. However because Troutdale is a Superfund site, additional precautions are necessary to prevent impacts to water resources. Any dewatering performed at the site must be done in accordance with the Property Development Environmental Management Plan which outlines a “Groundwater Restricted Zone,” from which water generated by dewatering activities shall not be discharged to the ground or, untreated, to any surface water; most of the Troutdale Site falls within this zone. USPS would implement appropriate BMPs and NPDES permitting requirements similar to Alternative 1. <strong>Mitigation:</strong> No mitigation necessary.</td>
<td><strong>Impacts:</strong> The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to those for Alternatives 1 and 2. <strong>Mitigation:</strong> No mitigation necessary for USPS.</td>
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<td>Impacts: Negligible impact to vegetation and wildlife; no impact to threatened or endangered species or designated critical habitats.</td>
<td>Impacts: Same as Alternative 1. Mitigation: No mitigation necessary.</td>
<td>Impacts: The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to Alternatives 1 and 2. Mitigation: No mitigation necessary.</td>
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<td>Mitigation: No mitigation necessary.</td>
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<td>Biological Resources</td>
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<td>Impacts: No adverse effects to historical or archaeological resources at the Colwood Site. Transfer of the existing National Register (NR)-eligible P&amp;DC/VMF facility out of Federal ownership would be an adverse effect. The USPS has resolved the adverse effect through a 2011 MOA, as amended and restated in 2015, between the USPS and Oregon SHPO. As such, adverse effects to the existing P&amp;DC/VMF facility would not occur. Mitigation: No mitigation necessary.</td>
<td>Impacts: No adverse effects to historical resources at the Troutdale Site. The SHPO has concurred with USPS that the project would likely have no effect on any significant archaeological objects or sites and additional archaeological research is not anticipated for this Site. Transfer of the existing NR-eligible P&amp;DC/VMF facility out of Federal ownership would be an adverse effect. The USPS has resolved the adverse effect through a 2011 MOA, as amended and restated in 2015, between the USPS and Oregon SHPO. As such, adverse effects to the existing P&amp;DC/VMF facility would not occur. Mitigation: In the unlikely event that an archaeological object or site is encountered during project implementation, work at the Troutdale Site would cease until a professional archaeologist can evaluate the discovery.</td>
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<td>Cultural Resources</td>
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<td>Socioeconomic</td>
<td><strong>Impacts:</strong> Minor short- and long-term indirect benefits to local economy. Increased tax revenues for the City of Portland once the existing P&amp;DC/VMF facility transfers out of Federal ownership. These benefits would be offset by the loss of tax revenue to the City of Portland if the Colwood Site comes under Federal ownership, since the USPS does not pay taxes on properties it owns.</td>
<td><strong>Impacts:</strong> Minor short- and long-term indirect benefits to the City of Portland's local economy due to increased tax revenues once the existing P&amp;DC/VMF facility transfers out of Federal ownership. Tax revenues for the Troutdale Site would not accrue to the City of Troutdale if the Troutdale Site comes under Federal ownership, since the USPS does not pay taxes on properties it owns.</td>
<td><strong>Impacts:</strong> The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to Alternatives 1 and 2. However, should these sites be developed by non-Federal entities, there would be an increase in local tax revenues.</td>
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<tr>
<td>Resources</td>
<td><strong>Mitigation:</strong> No mitigation necessary.</td>
<td><strong>Mitigation:</strong> No mitigation necessary.</td>
<td><strong>Mitigation:</strong> No mitigation necessary.</td>
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<tr>
<td>Environmental</td>
<td><strong>Impacts:</strong> No disproportionately high adverse impacts to minority or low-income populations.</td>
<td><strong>Impacts:</strong> Same as Alternative 1.</td>
<td><strong>Impacts:</strong> The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to Alternatives 1 and 2.</td>
</tr>
<tr>
<td>Justice</td>
<td><strong>Mitigation:</strong> Mitigation measures as described under transportation, air quality, noise, and hazardous materials sections.</td>
<td><strong>Mitigation:</strong> Same as Alternative 1.</td>
<td><strong>Mitigation:</strong> Same as Alternatives 1 and 2.</td>
</tr>
<tr>
<td>Utilities and</td>
<td><strong>Impacts:</strong> Long-term increased use of utilities including water, sewer, natural gas, electric, and communications. Utility connections sufficient to support the Proposed Action are currently available at the Colwood Site. The USPS would be required to obtain approval and permitting as needed for new hookups, lines, design, and usage.</td>
<td><strong>Impacts:</strong> Long-term increased use of utilities including water, sewer, natural gas, electric, and communications. Utility connections sufficient to support the Proposed Action are not currently available at the Troutdale Site. Compared to Alternative 1, Alternative 2 may require additional time and possibly cost to install appropriate utility connections. The Port of Portland or USPS would obtain approvals and permitting as needed for new hookups,</td>
<td><strong>Impacts:</strong> The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to those for Alternatives 1 and 2.</td>
</tr>
<tr>
<td>Infrastructure</td>
<td><strong>Mitigation:</strong> No mitigation necessary.</td>
<td><strong>Mitigation:</strong> No mitigation necessary.</td>
<td><strong>Mitigation:</strong> No mitigation necessary for USPS.</td>
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<td><strong>Hazardous Materials and Wastes</strong></td>
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<td><strong>Impacts</strong></td>
<td>No significant impacts due to hazardous materials and wastes at the Colwood Site with implementation of appropriate BMPs and compliance with the existing Contaminated Media Management Plan (CMMP) for removal and handling of any contaminated soils. The disposal of the existing P&amp;DC/VMF property would result in the exposure of previously contaminated areas should the site be redeveloped.</td>
<td>No significant impacts due to hazardous materials and wastes at the Troutdale Site with implementation of appropriate BMPs and compliance with the existing CMMP for removal and handling of any contaminated soils. However, the TRIP is a Superfund Site and long-term monitoring is required for the site. The disposal of the existing P&amp;DC/VMF property would result in the exposure of previously contaminated areas should the site be redeveloped.</td>
<td>The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to those for Alternatives 1 and 2. No mitigation necessary and no remedial action required for the existing P&amp;DC/VMF property.</td>
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<td><strong>Mitigation</strong></td>
<td>No mitigation necessary.</td>
<td>If the existing P&amp;DC/VMF property is redeveloped, prior to ground disturbance the Oregon Department of Environmental Quality (DEQ) would require a remedial action to be performed for the existing contamination in both soil and groundwater at the site.</td>
<td>If the existing P&amp;DC/VMF property is redeveloped and prior to ground disturbance, the DEQ would require a remedial action to be performed for the existing contamination in both soil and groundwater at the site. Long-term monitoring of the TRIP would continue to be performed by the Port of Portland.</td>
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</table>
The USPS has notified the public and interested parties of its intent to prepare an EA for this Proposed Action and is soliciting public and agency review and comment. The USPS published a Notice of Intent (NOI) to prepare this EA in *The Oregonian* on March 9, 2016 and posted copies of the NOI for 30 days in the closest USPS facilities with public access beginning March 9, 2016. The USPS also sent letters requesting project review of the Proposed Action and Alternatives to the following agencies and interested parties:

- City of Portland Bureau of Planning and Sustainability
- City of Portland Mayor’s Office
- City of Troutdale Mayor’s Office
- Confederated Tribes of the Grand Ronde
- Confederated Tribes of Siletz
- Confederated Tribes of the Warm Springs, Tribal Historic Preservation Office
- Oregon Department of Environmental Quality
- Oregon Department of Fish and Wildlife
- Oregon Department of Transportation
- Oregon Parks and Recreation Department State Historic Preservation Office
- Portland Development Commission
- Port of Portland
- U.S. Fish & Wildlife Service, Oregon Fish and Wildlife Office

The USPS notified the public of the availability of the Draft EA through publication of a Notice of Availability (NOA) on June 10, 2016 in *The Oregonian*. Copies of the NOA were also posted in the closest USPS facilities with public access for 15 days beginning June 11, 2016. The Draft EA is available online at [http://about.usps.com/who-we-are/legal/portland-ea.pdf](http://about.usps.com/who-we-are/legal/portland-ea.pdf) for a 15-day public review period. Comments received will be considered in the Final EA.

Based on the evaluation presented within this EA, USPS concludes that there would be no significant adverse impact either individually or cumulatively, to the local environment or quality of life as a result of implementing the Proposed Action, provided the BMPs and resource-specific mitigation measures are implemented. Therefore, this EA’s analysis supports the USPS determination that an Environmental Impact Statement (EIS) is not necessary to support the decision-making process as it relates to implementation of the Proposed Action, and that a Finding of No Significant Impact (FONSI) is appropriate. The Preferred Alternative would result in the fewest overall environmental impacts and least cost of all the alternatives, including the No Action Alternative. It is the best approach for USPS to consolidate the functions of the existing P&DC/VMF, the DDC, and the PACC into a single location to increase operational efficiencies and decrease operating costs.
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<td>National Environmental Policy Act</td>
</tr>
<tr>
<td>18</td>
<td>NHPA</td>
<td>National Historic Preservation Act</td>
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<td>19</td>
<td>NRHP</td>
<td>National Register of Historic Places</td>
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<tr>
<td>20</td>
<td>P&amp;DC</td>
<td>Processing and Distribution Center</td>
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<td>21</td>
<td>PACC</td>
<td>Portland Air Cargo Center</td>
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<td>22</td>
<td>RMC</td>
<td>Reynolds Metals Company</td>
</tr>
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<td>23</td>
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<td>State Historic Preservation Office</td>
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<td>24</td>
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<td>Troutdale Reynolds Industrial Park</td>
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<td>25</td>
<td>USACE</td>
<td>U.S. Army Corps of Engineers</td>
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<td>26</td>
<td>USFWS</td>
<td>U.S. Fish and Wildlife Service</td>
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<td>28</td>
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<td>29</td>
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<td>Vehicle Maintenance Facility</td>
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</table>
1.0 INTRODUCTION

The U.S. Postal Service (USPS) has prepared this Environmental Assessment (EA) to determine the potential environmental, natural, cultural, and socioeconomic impacts of building and operating a new, fully integrated, and modern USPS facility in the Portland Metropolitan Area. The Proposed Action would consolidate the existing functions of three separate USPS facilities in Portland, Oregon (see Section 1.2.1).

1.1 REGULATORY FRAMEWORK

This EA has been prepared pursuant to the National Environmental Policy Act of 1969 (NEPA; 42 United States Code [U.S.C.] 4321 et seq.), the Council on Environmental Quality (CEQ) regulations implementing NEPA (Title 40 of the Code of Federal Regulations [CFR] Parts 1500 to 1508), the USPS regulations for NEPA compliance (39 CFR Part 775), and the USPS Facilities Environmental Guide (Handbook RE-6) (USPS 2015c).

This EA also has been prepared in compliance with other relevant, environmentally related governing authorities, including environmental review laws and Executive Orders (EOs). CEQ regulations specifically state that the requirements of NEPA "must be integrated with other planning and environmental review procedures required by law so that all such procedures run concurrently" (40 CFR Part 1500.2(c)). These include the Fish and Wildlife Coordination Act (Title 16 of the U.S.C. 661), the National Historic Preservation Act (NHPA) (16 U.S.C. 470; 36 CFR Part 800), the Endangered Species Act (16 U.S.C. 1531), the Resource Conservation and Recovery Act of 1976 (RCRA) (42 U.S.C. 6901 et seq.), the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9601 et seq.), the Superfund Amendments and Reauthorization Act of 1986 (Public Law 99-499), the Farmland Protection Policy Act (Public Law 97–98, Sec. 1539–1549; 7 U.S.C. 4201 et seq.), EO 11988, Floodplain Management, and EO 11990, Protection of Wetlands.

1.2 PROJECT LOCATION AND SITE DESCRIPTION

The existing and proposed sites associated with this Proposed Action are located in the Portland Metropolitan Area, Multnomah County, Oregon (see Figure 1 in Appendix A).

1.2.1 Existing U.S. Postal Service Facilities

The Proposed Action would consolidate existing USPS operations currently performed at three sites in Portland, as described below and shown on Figure 1 in Appendix A:

- **Downtown Portland Processing and Distribution Center (P&DC) and Vehicle Maintenance Facility (VMF).** The existing P&DC/VMF is a USPS-owned facility located at 715 NW Hoyt Street. The P&DC portion of the facility processes all outgoing mail for the State of Oregon; the VMF portion of the facility is used for routine maintenance on a USPS vehicle fleet. The 13-acre site includes a 449,523-square-foot building that houses the P&DC and Main Post Office; a 10,325-square-foot VMF building; a 97,686-square-foot, multi-story parking lot.
structure for employees; and exterior surface parking and maneuvering areas for postal vehicles.
The P&DC and Main Post Office building contain retail facilities for the public. The P&DC, Main Post Office building, and VMF building were constructed in 1962; the parking structure was built in 1987. The site is bounded by NW Hoyt Street to the south, NW Broadway Avenue to the east, NW 9th Avenue to the west, and NW Lovejoy Street to the north.

The existing P&DC/VMF site, located in Portland’s Pearl District, is zoned EXd (central employment). Surrounding land uses include mixed industrial, commercial, and residential. Residential units are located across Hoyt Street and 9th Avenue. The majority of the 13-acre site was used for railyard operations from 1882 through 1959; a Pintsch Gas Plant operated in the northwest corner of the site from 1893 to the 1930s. The USPS purchased the eastern half of the site in 1959 and subsequently sold it in 1960. The P&DC building was then constructed by others on the eastern half of the site, and was leased to the USPS in 1962. The USPS purchased both the eastern and western halves of the site in 1974, forming the current configuration of the existing facilities. The USPS owns all of the facilities at the site.

- **Portland-Mt. Hood Delivery Distribution Center (DDC).** The USPS leases the DDC facility, which is located at 8564 NE Alderwood Road. The DDC is a postal annex for mail processing and sorting. The 132,284-square-foot building is bounded by NE 82nd Avenue to the west and NE Alderwood Road to the northeast, with additional industrial buildings to the north and east, and an unnamed stream to the south. Surrounding land uses are primarily commercial and industrial. This facility is owned by the NewTower Trust Company; the USPS lease expires in August 2018.

- **Portland Air Cargo Center (PACC).** The USPS leases the PACC, located at 7425 NE Airtrans Way, Suite 100, within the Portland International Airport. The PACC serves as an air transfer office for mail processing and sorting. The 72,250-square-foot building is bounded by NE Airtrans Way to the east and NE Cornfoot Road to the south, with a FedEx facility located to the west and airport runway areas located to the north. Surrounding land uses are primarily commercial and industrial. This facility is owned by ProLogis LP; the USPS lease expires in December 2018.

### 1.2.2 Proposed Project Sites

The USPS is considering two sites for the proposed consolidated USPS facility. These sites are located at the Colwood Industrial Park (Colwood Site) and the Troutdale Reynolds Industrial Park (TRIP; Troutdale Site) as shown on Figure 1 in Appendix A. These two alternative sites are discussed further in Section 3.4.
2.0 PURPOSE AND NEED FOR ACTION

The purpose of the Proposed Action is to combine the functions of three separate USPS facilities (the existing P&DC/VMF, the DDC, and the PACC) into a single location to increase operational efficiencies and decrease operating costs. Traffic in the area of the existing P&DC/VMF facility is frequently congested, resulting in delays for USPS vehicles accessing the facility. Consolidating the three facilities into a new and modern facility and locating the new facility with ready access to major roads and the Portland International Airport would result in improved operational efficiency, reduced (or maintained minimal) travel time for mail being delivered to/from the airport, and reduced costs due to efficiencies in combined operations and the termination of leases at the DDC and PACC.

The Proposed Action is needed to increase efficiencies in USPS operations, which would save the USPS time in processing, handling, and distributing mail. The USPS has determined substantial cost savings would be achieved from the increased efficiencies of co-location, as well as from the termination of leases at the DDC and the PACC. The USPS objective, consistent with national USPS initiatives, is to improve the overall USPS financial condition; the Proposed Action would support the USPS in meeting this objective.
3.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

This section describes the Proposed Action and alternatives that the USPS considered in addressing the purpose of and need for the Proposed Action. In accordance with 40 CFR Part 1502.14, this section identifies those alternatives that are carried forward for evaluation in this EA, as well as those alternatives the USPS initially considered but dismissed from further evaluation.

3.1 PROPOSED ACTION

Under the Proposed Action, the USPS would construct and operate a new USPS-owned facility to consolidate and incorporate the functions of the existing P&DC/VMF facility, the DDC, and the PACC facilities at one location. Locating the new facility near major roads, and with ready access to the Portland International Airport, is critical to support the requisite operations of these facilities efficiently. To house all combined functions, the consolidated facility requires at least 45 acres per USPS design standards and associated space requirements (USPS 2015b). The main building at the new facility, which would house all operations except for the VMF, requires a footprint of approximately 790,000 square feet. The new VMF building requires approximately 28,000 square feet, with sufficient outdoor parking for USPS vehicles. Parking for employees and mail trucks, as well as adequate maneuvering areas for trucks, is also required. The new facility would not include USPS retail space. The USPS anticipates construction of the new facility would take up to 24 months.

Concurrent with initiation of operation at the new facility in approximately 2 years, the USPS would release the existing P&DC/VMF property to the Portland Development Commission and terminate its existing leases at the DDC and the PACC. Redevelopment of the P&DC/VMF property by the Portland Development Commission would occur in consonance with local zoning, to include mixed commercial and residential uses similar to the neighboring properties in the Pearl District of Portland, which continues to undergo substantial redevelopment.

Prior to vacating the existing P&DC/VMF facility, the USPS would obtain space to provide a retail unit for public use, either within the existing P&DC/VMF facility or in another retail building nearby. The USPS has not yet identified this new retail location; a minimum of 15,102 gross square feet (13,584 net square feet) would be required to provide the necessary service. Because no specific details are known at this time, the USPS would evaluate providing new retail space in a future NEPA analysis and documentation.

3.2 ALTERNATIVES DEVELOPMENT

NEPA, CEQ regulations, and 39 CFR Part 775 require a range of reasonable alternatives to be rigorously explored and objectively evaluated. Alternatives eliminated from detailed analysis must be identified along with a brief discussion of the reasons for eliminating them.

The USPS considered an alternative as "reasonable" only if it would enable the USPS to construct and operate a new facility that would combine the operations of three separate facilities to meet the purpose of and need for the Proposed Action. The USPS developed and applied screening criteria, outlined...
below, to explore possible locations and alternatives that would meet the purpose of and need for the Proposed Action.

3.2.1 Screening Criteria

The USPS undertook a planning process to identify and evaluate various potential sites and options focused on: increasing operational efficiency; vacating the existing, congested P&DC/VMF site; and addressing the expiring leases at the PACC and DDC sites. The USPS conducted a thorough site identification and screening process to narrow the number of alternatives considered for the Proposed Action. The USPS developed 10 screening (evaluation) criteria, described below, to guide alternative selection and applied these criteria to several possible options. Potential sites that satisfied the USPS screening criteria would provide facilities best suited to meet the purpose of and need for the Proposed Action, while minimizing costs and environmental effects.

The USPS identified the following five essential criteria for screening initial alternatives, which the USPS has designated as critical to achieving the Proposed Action’s purpose and need:

1. **Sufficient Land Area** – The proposed facilities should be located within a single, contiguous parcel of at least 45 acres, sufficient to accommodate the required consolidation of facilities and functions per USPS design standards and space requirements.

2. **Consolidation of Required Operations** – All required operations, including the P&DC, VMF, DDC, and PACC functions, need to be located on a single site to achieve operational synergies and efficiencies, while minimizing site acquisition and construction costs.

3. **New Construction, Owned by the USPS** – To minimize costs, optimize operational functionality, and ensure long-term utility, new construction (as opposed to renovation or retro-fitting of existing facilities) is preferred. Owning instead of leasing would allow the USPS to save costs by eliminating rent and the payment of property taxes on behalf of the property owner as part of the lease. Owning also provides long-term stability regarding location, as opposed to leases, which have the potential of not being renewed.

4. **Maintain Area Served and Level of Service** – The new facility should be located within the area served by the existing facilities to minimize travel costs and time, and avoid the potential need for existing staff to relocate. The new facility should maintain or improve the current level of service USPS customers enjoy.

5. **Access to Major Transportation Network** – The new facility should be located close to major roads of adequate capacity to accommodate essential, facility-related traffic. Ideally, the new facility would also be located with ready access to the Portland International Airport to support existing air cargo and transit operations and not alter airport operations.

The USPS identified five additional, non-essential screening criteria to aid in site selection. Meeting all or many of the following criteria would result in a superior alternative(s) that would more effectively meet the purpose and need for the Proposed Action. An alternative could be deemed reasonable if it meets all of the essential criteria, but does not meet all of the following additional criteria.
1. **Minimize Conflicts With Other Existing Land Uses** – The proposed site should be appropriately zoned (commercial or industrial) and located adjacent to compatible land uses that would not be adversely affected by facility-related traffic and night-time USPS operations.

2. **Availability in Summer 2016** – The proposed site should be immediately available for acquisition (starting in the summer of 2016) to minimize costs and accommodate the proposed project construction schedule. This would allow current leases, which end in August (DDC) and December of 2018 (PACC), to expire without renewal or extension.

3. **Ready for Site Development** – The proposed site should be development-ready, with no existing buildings or infrastructure that would require removal or relocation. The proposed site should be free of easements or other encumbrances that would restrict development.

4. **Proximity to Existing Utilities** – The proposed site should be close to existing utility services (i.e., electric, telecommunications) that have adequate capacity to serve the proposed facility and operations to minimize construction costs and the need for new or extended utilities.

5. **Minimize Environmental Concerns** – The proposed site should have minimal or no environmental resources of concern (e.g., cultural resources, wetlands, other sensitive biological resources, hazardous waste sites) to minimize potential environmental effects. Ideally, the proposed site would be a prior-disturbed site that would minimize the potential for new and additional impacts to onsite soils, water, biological, and cultural resources.

### 3.2.2 Application of Screening Criteria to Identify Alternatives

The USPS developed and screened several possible sites and options for carrying out existing functions throughout Multnomah County. Through this process, the USPS considered a number of potential alternatives, including the following:

- **Preferred Action Alternative (Colwood Site)** – Implement the Proposed Action as described in Section 3.4.1 at the Colwood Site (see Figures 2, 3, and 4 in Appendix A).

- **Secondary Action Alternative (Troutdale Site)** – Implement the Proposed Action as described in Section 3.4.2 at the Troutdale Site (see Figures 5, 6, and 7 in Appendix A).

- **Reduced-Scale Alternative** – Construct a new facility at either the Colwood or Troutdale Site, but construct and operate a smaller-scale facility, or construct partial facilities at one of the new sites and retain some facility functions at the other existing sites.

- **Other Portland Site Alternative** – Construct and operate the proposed facilities at a site in the Portland Metropolitan Area, other than the Colwood or Troutdale Sites.

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1 Although the existing P&DC serves the entire State of Oregon, the other required USPS functions and facilities specifically serve the Portland metropolitan area, and need to be located in the Portland metropolitan area.
• **Leased Site/Facility Alternative** – Lease a new site or facility where operations would be consolidated.

• **Multiple Site Alternative** – Construct and operate the proposed facilities at two or more USPS-owned sites (not yet acquired).

• **Modify Existing Local Site(s) Alternative** – Renovate/modify existing facilities in Portland that are currently used by the USPS.

• **Modify Existing Regional Site(s) Alternative** – Renovate/modify existing facilities, not currently used by the USPS, in the region of Portland (either at one site or multiple sites).

• **No Action Alternative** – Do not implement the Proposed Action and continue operating under current conditions at three separate facilities in Portland, one of which is owned by the USPS, two of which are leased.

In **Table 1**, the USPS identifies whether each of the initially considered alternatives meets each screening criterion and which alternatives are considered reasonable.
Table 1. Evaluation of Initial Alternatives against Screening Criteria

<table>
<thead>
<tr>
<th>Essential Screening Criteria</th>
<th>Preferred Action – Colwood Site</th>
<th>Secondary Action – Troutdale Site</th>
<th>Reduced-Scale</th>
<th>Other Local Site</th>
<th>Leased Site/Facility</th>
<th>Multiple Sites</th>
<th>Modify Existing Site(s) Locally</th>
<th>Modify Existing Site(s) Regionally</th>
<th>No Action</th>
</tr>
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<tbody>
<tr>
<td>Sufficient Land Area</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>N</td>
<td>UNK</td>
<td>N</td>
<td>NA</td>
<td>NA</td>
<td>N</td>
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<td>Consolidation of Required Facilities</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>UNK</td>
<td>N</td>
<td>N</td>
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<td>New Construction, Owned by USPS</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>UNK</td>
<td>N</td>
<td>UNK</td>
<td>N</td>
<td>N</td>
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<tr>
<td>Maintain Area Served and Level of Service</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>UNK</td>
<td>Y</td>
<td>UNK</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
</tr>
<tr>
<td>Access to Major Transportation Network</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>UNK</td>
<td>UNK</td>
<td>UNK</td>
<td>N</td>
<td>UNK</td>
<td>N</td>
</tr>
</tbody>
</table>

| Non-essential Screening Criteria | Preferred Action – Colwood Site | Secondary Action – Troutdale Site | Reduced-Scale | Other Local Site | Leased Site/Facility | Multiple Sites | Modify Existing Site(s) Locally | Modify Existing Site(s) Regionally | No Action |
| Minimize Conflicts With Other Existing Land Uses | Y                              | Y                               | Y             | UNK             | UNK                 | NA            | NA                           | NA                                | N         |
| Availability in Summer 2016 | Y                              | N                               | Y             | N               | UNK                 | NA            | NA                           | NA                                | Y         |
| Ready for Development | Y                              | Y                               | Y             | UNK             | UNK                 | NA            | NA                           | NA                                | NA        |
| Proximity to Existing Utilities | Y                              | Y                               | Y             | UNK             | UNK                 | NA            | NA                           | NA                                | NA        |
| Minimize Environmental Concerns | Y                              | Y                               | Y             | UNK             | UNK                 | NA            | NA                           | NA                                | NA        |

| Conclusion | Preferred Action – Colwood Site | Secondary Action – Troutdale Site | Reduced-Scale | Other Local Site | Leased Site/Facility | Multiple Sites | Modify Existing Site(s) Locally | Modify Existing Site(s) Regionally | No Action |
| Is Alternative Reasonable? | Y                              | Y                               | N             | N               | N                   | N             | N                            | N                                | N         |

**Key:**
- Essential Screening Criteria are required to meet the project purpose and need; otherwise, the alternative is considered unreasonable.
- Y = Yes (meets criterion or is reasonable).
- N = No (does not meet criterion or is not reasonable).
- UNK = Unknown (cannot be determined whether meets or does not meet criterion at this time).
- NA = Not Applicable (the criterion is not relevant).
3.3 ALTERNATIVES CONSIDERED BUT DISMISSED

Based on the information shown in Table 1, the USPS eliminated six of the eight action alternatives that were initially considered during the screening process, including the:

- Reduced-Scale Alternative
- Other Portland Site Alternative
- Leased Site/Facility Alternative
- Multiple Site Alternative
- Modify Existing Local Site(s) Alternative
- Modify Existing Regional Site(s) Alternative

Because each of the alternatives listed above failed to meet one or more of the essential screening criteria, they have been eliminated from further consideration in this EA.

3.4 ALTERNATIVES TO BE EVALUATED IN THIS EA

This section describes the two reasonable action alternatives that the USPS carries forward for analysis in this EA: Alternative 1 – New Facility on Colwood Site (the Preferred Alternative); and Alternative 2 – New Facility on Troutdale Site, as well as the No Action Alternative. No other reasonable alternatives were identified, as shown in Table 1. A summary of the potential impacts from each of the three alternatives evaluated in this EA is presented in Section 4.14.

3.4.1 Alternative 1: Construct New Facility at Colwood Site (Preferred Alternative)

Under Alternative 1, the USPS would construct and operate a new, fully integrated, and modern USPS facility on the Colwood Industrial Park property (Colwood Site) (see Figures 2 and 3 in Appendix A). This combined facility would include P&DC, VMF, DDC, and PACC operations. The Colwood Site is 47.55 acres, all of which would be occupied by USPS operations.

The Colwood Site is located at the northwest corner of the intersection of NE Cornfoot Road and NE Alderwood Road and south of the Portland International Airport runways (USPS 2016a). The site is bordered by the Oregon Air National Guard to the north and west, Portland International Airport to the north and northeast, NE Cornfoot Road to the south, a hotel to the east, and NE Alderwood Road to the southeast.

The Colwood Site was formerly the northern portion of the Colwood National Golf Course, which was in operation from 1936 to 2014 (Parsons 2015). Prior to 1936, the property was primarily used for agriculture.

A real estate developer, the Trammell Crow Company, currently owns the site and is preparing it for development. Site preparations performed by the developer to date include: grading, leveling, wetland filling and mitigation, removal of vegetation, preparation of fire and domestic water service connections, development of driveways, development of stormwater outfalls, and street/sidewalk/utility improvements. The developer is reconfiguring site drainage to drain offsite
solely to the Columbia Slough, through an outfall on the southwestern boundary of the site. The
Columbia Slough is located on the south side of NE Cornfield Road outside of the site boundary.
Trammell Crow Company has obtained several permits for these activities, including a U.S.
Army Corps of Engineers (USACE) Wetland Fill and Outfall Permit (#NWP-2013-396),
Department of State Lands Removal and Fill Permit (#55224-RF), City Mitigation Site
Development Permit (for excavation and erosion control), and a City Mitigation Plantings
Zoning Permit. In accordance with permit conditions, the developer has filled approximately 28
acres of onsite wetlands and riparian/buffer areas, and is restoring approximately 29 acres of
wetlands and riparian/buffer areas locally (about 3 acres of which will be onsite plantings).
These activities are independent of the USPS Proposed Action.

The Colwood site will be available for purchase and development in the summer of 2016. With
an approximate 2-year construction timeline for the proposed new USPS facility, the USPS
should be able to complete construction on the Colwood Site before the existing leases at the
DDC and PACC facilities expire in August and December of 2018, respectively.

The conceptual layout and design of the proposed USPS facilities at the Colwood Site are shown
on Figure 4 in Appendix A.

The new P&DC, DDC, and PACC would be housed in one, approximately 790,000-square-foot
building with parking to the east. The VMF building and associated parking would be located in
the northeast portion of the site, with truck parking and maneuvering areas along the northern
and northwestern sides of the P&DC/DDC/PACC building.

All construction staging and construction vehicle parking would occur within the site boundaries.
Utility connections are available on site, including water, gas, electrical, and telephone, as well
as two sanitary sewer easements. An easement would be required to install a 12.5-kilovolt
electrical service on the site. All utility connections would be buried. At the request of the local
Multnomah County Drainage District, there would be no onsite stormwater detention. Instead,
the USPS would install onsite stormwater pollution reduction and stormwater retention
measures, such as bioswales, and stormwater would be discharged offsite into the Columbia
Slough.

All site traffic would enter through one of two driveways. The first, on NE Alderwood Road,
would be located near the parking lot for the adjacent hotel and would function as the employee
entrance. The second entrance, for truck and VMF access, would be located on NE Cornfoot
Road, as far from the Cornfoot/Alderwood intersection as feasible to allow for proper and
adequate traffic queuing.

A traffic impact analysis was previously conducted for the Colwood Industrial Park development
(Trust for Public Lands 2012). Although the USPS anticipates that no further traffic study would
be required, a qualified traffic engineer would be required to certify that actual proposed USPS
traffic levels would not exceed those assumed in the 2012 traffic study. Projected traffic levels
associated with the proposed USPS facility are anticipated to be similar to those analyzed in the
existing traffic report.
3.4.2 Alternative 2: Construct New Facility at Troutdale Site

Under Alternative 2, the USPS would construct and operate the new, fully integrated, and modern USPS facility at a site in the City of Troutdale, north of the Troutdale Municipal Airport within the TRIP in Troutdale, Oregon (see Figures 5 and 6 in Appendix A).

The Troutdale Site includes industrial park lots 7 and 8 that total 53.71 acres; of this, the USPS would purchase approximately 47 acres, 45 of which would be occupied by the new facility and 2 would be used for stormwater management. The Troutdale Site boundaries are NW Graham Road to the south, NW Swigert Way to the north and east, and NW Sundial Road to the west (USPS 2016b). Adjacent businesses include a FedEx facility to the north, Schwan Food and Walsh Trucking to the west, and the Troutdale Municipal Airport to the south.

The site was unused and undeveloped until the U.S. Army contracted the Aluminum Company of America (Alcoa) to construct and operate a primary aluminum reduction plant at the site in approximately 1941. Alcoa ran the site for the government until 1945. The U.S. Government then leased the property to Reynolds Metals Company (RMC) from 1946 to 1949, at which time RMC purchased the facility. RMC owned and operated the plant from 1949 to 2000. Alcoa acquired RMC and closed the plant in 2000. The Port of Portland currently owns and is developing the Troutdale Site as part of the TRIP (Parsons 2015).

During operation, the plant’s production of aluminum generated waste material that contaminated soil, groundwater, and surface water at the site. U.S. Environmental Protection Agency (EPA) added the property to the Superfund National Priorities List in December 1994 because of soil and groundwater contamination from plant operations. From 1995 to 2006, several remedial actions were performed to remove contaminated soil and waste material; these included soil removal, environmental cap installation, and groundwater pumping. The plant was demolished between 2003 and 2006. In 2006, EPA issued a Final Record of Decision (ROD) stating that soils have been remediated to acceptable risk-based standards for industrial uses (such as that proposed by the USPS) under the oversight of EPA and the Oregon Department of Environmental Quality (DEQ), with some deed restrictions and institutional controls in place. The ROD also stipulated that ongoing obligations to Alcoa include operation and maintenance of the groundwater pumping system and groundwater monitoring to evaluate the effectiveness of the completed and ongoing cleanup actions (Parsons 2015).

The Troutdale Site would not be ready for USPS purchase or building construction until 2017/2018 because of additional site work (grading, installation of stormwater management systems, wetland mitigation), permitting, and approvals that are needed to prepare the site for development. Additionally, due to site soil conditions, the USPS would be required to construct a pile foundation at much greater cost than at Colwood. Prior to purchase, if the USPS selects the Troutdale Site, the USPS would perform desktop activities such as planning, site engineering and design, permitting, and obtaining required approvals. The Port of Portland has already obtained a USACE Wetland Fill and Outfall Permit for the Troutdale Site (#NWP-2007-889-1).

Because of the site’s continued designation as a Superfund Site by the EPA, USPS policy requires that the USPS Vice President of Facilities, the general counsel, and the Vice President of Area Operations recommend the purchase in writing, and the committee responsible for approving capital expenditures must vote to approve the purchase. The USPS would begin...
construction at this location in 2017-2018, with expected occupancy by the end of 2019. The
leases at the DDC and the PACC, which expire in August and December of 2018, respectively,
would need to be extended to cover this intervening period.

The conceptual layout and design of the proposed facilities at the Troutdale Site are shown on
Figure 7 in Appendix A; the final plans may vary based on further engineering design, but the
overall design and layout would remain similar. Because the nearby Troutdale Airport is not
large enough to meet USPS air cargo needs, the USPS would continue to use the Portland
International Airport for air cargo.

All utilities would be located along easements on each side of NW Swigert Way and on the north
to side of NW Graham Road. A 10-foot-wide easement for a high-pressure gas line exists north of
NW Graham Road and drainage easements for ditches exist along the south side of NW Swigert
Way and the north side of NW Graham Road. Site-specific connections to these utilities would
be determined during final engineering design. The electric company may require an easement
for provision of electric service to the site.

All employee traffic and VMF traffic would enter the site via NW Graham Road where the
employee entrance and parking would be located. The P&DC/DCC/PACC building would be
located off of NW Swigert Way with all associated truck traffic entering from this street.

Initially, the Port of Portland anticipated that stormwater would be directed toward drainage
ditches with easements along both NW Swigert Way and NW Graham Road. However, as a
result of changes requested by the Port of Portland that require the site to incorporate water
quality and stormwater detention facilities on site, the site would require approximately 2 acres
of additional stormwater detention that is not currently shown on the site plan.

There would be four traffic access points: two along NW Swigert Way and two from NW
Graham Road. Truck traffic would enter and exit on the north side of the site on NW Swigert
Way. Employees would enter and exit to the southwest on NW Graham Road; VMF traffic
would enter and exit to the southeast on NW Graham Road.

A traffic impact analysis was previously conducted for the TRIP development (City of Troutdale
and Port of Portland 2012). Although the USPS anticipates that no further traffic study would be
required, a qualified traffic engineer would be required to certify that proposed USPS traffic
levels would not exceed those assumed in the original City of Troutdale and Port of Portland
(2012) study. Projected traffic levels associated with the proposed USPS operations are
anticipated to be similar to those analyzed in the existing traffic report.

3.4.3 No Action Alternative

Under the No Action Alternative, the USPS would continue operations at the existing
P&DC/VMF facility, would continue leasing the Portland-Mt. Hood facility for DDC operations,
and would continue leasing the PACC facility for air cargo operations. The USPS goal of
increasing efficiency in operations and implementing cost savings where possible would not
occur.

Under the No Action Alternative, the Colwood and Troutdale Sites would likely be developed by
others, consonant with local zoning.
Although the No Action Alternative would not satisfy the purpose of or need for the Proposed
Action, this alternative provides a comparative baseline against which to analyze the effects of
the action alternatives, as required under CEQ Regulations (40 CFR Part 1502.14). The No
Action Alternative reflects the status quo and serves as a benchmark against which the effects of
the Proposed Action can be evaluated.
4.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter describes the existing conditions at and near the Colwood and Troutdale Sites, as well as the potential effects to these conditions resulting from implementation of Alternative 1, Alternative 2, and the No Action Alternative. Section 4.6 presents a summary of the potential environmental impacts from Alternative 1, Alternative 2, and the No Action Alternative.

4.1 RESOURCES NOT AFFECTED

Per 40 CFR Part 1501.7 (a)(3), the CEQ recommends agencies identify and eliminate from detailed study any issues that are not significant, narrowing the discussion to a brief presentation of why the Proposed Action and Alternatives would not have a significant effect on the human environment. Therefore, this section specifically describes current baseline conditions within and in the vicinity of the existing P&DC/VMF facility, the USPS leased sites, and the Colwood and Troutdale Sites, with emphasis on those resources that would be potentially affected by the implementation of the Proposed Action under Alternative 1 and 2.

No land disturbance is proposed at the existing P&DC/VMF facility or the USPS leased sites, so the following resources are not discussed specifically for these sites: topography, geology, and soils; water resources; noise; biological resources; and socioeconomic resources (except for transportation).

The USPS has also determined that community services, visual resources/aesthetics, floodplains, and coastal resources would not be affected by Alternative 1, Alternative 2, or the No Action Alternative as described below. Therefore, these resources are not evaluated in this EA.

4.1.1 Community Services

Community services (fire, police, and emergency services, as well as schools) are not evaluated because the Proposed Action would not increase the demand for these services or affect the ability of the community to provide these services at either the Colwood or Troutdale Sites. For example, the Proposed Action would not result in a substantial number of new families moving to the area and place additional demands on area schools. No changes to community services would occur under the No Action Alternative. Therefore, community services would not be affected by any of the alternatives.

4.1.2 Visual Resources/Aesthetics

Since both the Colwood and Troutdale Sites are located in industrial areas, the USPS does not anticipate that the Proposed Action would result in changes to character of the viewsheds or alter the aesthetics of either site. No changes visual resources/aesthetics would occur under the No Action Alternative. Therefore, visual resources/aesthetics would not be affected by any of the alternatives.
4.1.3 Floodplains

EO 11988, *Floodplain Management*, requires Federal agencies to minimize development within 100-year floodplains.

Although the Colwood Site is within the historic floodplain of the Columbia River (i.e., the river is approximately 1 mile northeast of the site), the site is protected from flooding by the levees of the Columbia River Floodplain System, operated by Multnomah County Drainage District (MCDD) #1 (MCDD 2016). The site is not within the Federal Emergency Management Agency (FEMA)-designated 100-year floodplain, but is located in Zone X-Protected by Levee (Areas protected by levees from the 1% annual chance flood) (FEMA 2010).

The Troutdale Site is located in the historic Columbia River floodplain behind the MCDD levee system, within the Sandy Drainage Improvement Company drainage district (MCDD 2016). The Troutdale Site is not within the FEMA-designated 100-year floodplain, but is located in Zone X-Protected by Levee (Areas protected by levees from the 1% annual chance flood) (FEMA 2009).

No impacts to the 100-year floodplain would occur, as neither site is located in the 100-year floodplain.

4.1.4 Coastal Resources

The Colwood and Troutdale Sites are not located within Oregon's Coastal Zone (Oregon CMP 2016) and therefore there would be no impacts to the coastal resources.

4.2 LAND USE AND ZONING

**Colwood Site:** In October 2013, the zoning of the Colwood Site was changed from Open Space to General Industrial 2 (City of Portland 2015a; City of Portland 2016c), for the specific purpose of supporting future development of the site (by the Trammell Crow Company).

Currently, the Colwood Site is located in an Employment and Industrial Zone (City of Portland 2016f). The zone code for the site is IG2hx (City of Portland 2015b); comprised of a Base Zone of IG2 for General Industrial 2 (City of Portland 2007), and an Overlay Zone of hx, indicating that it is an Aircraft Landing Overlay Zone (h) and in the Portland International Airport Noise Impact Overlay Zone (x) (City of Portland 1991). The site lies within the Portland International Airport Plan District (City of Portland 2015b).

The City of Portland Bureau of Development Services maintains the Portland Zoning Code (City of Portland 1991). Any future development at the Colwood Site is subject to the specifications and requirements outlined in the Portland Zoning Code (City of Portland 1991) and the Comprehensive Plan (City of Portland 2016a).

Surrounding land uses include a hotel directly to the east, the Portland International Airport property to the north, an Oregon Air National Guard facility to the west, and the remainder of the former Colwood National Golf Course to the south. However, the Trammell Crow Company is developing the remainder of the golf course into a park/wetlands mitigation area that will be used for wetland mitigation and recreational purposes (USACE 2014).
Troutdale Site: The Troutdale Site is located within the City of Troutdale’s General Industrial zoning district (City of Troutdale 2016b), and will continue to be zoned as an industrial area based on the Comprehensive Land Use Plan Map (City of Troutdale 2016a). The Troutdale Municipal Airport is located to the south across NW Graham Road, to the north is a FedEx facility, and to the east and west are additional unused lots of the TRIP (lots 6 and 5 to the east, and lot 9 to the west). Farther to the north and east are industrial areas, as well as open space between the TRIP and the Columbia and Sandy Rivers. All of the City’s residential and commercial areas are 0.5 mile or more to the south (City of Troutdale 2016b). Any development of the Troutdale Site would need to comply with the Troutdale Development Code (City of Troutdale 2015).

4.2.1 Potential Impacts from Alternative 1 (Colwood Site)

Based on local zoning requirements, construction of the proposed USPS facility at the Colwood Site would be consistent with local zoning and adjacent land use. The USPS, upon purchase of the site, would consider Bureau of Development Services stipulations and applicable zoning regulations, and would consult with the City, giving due consideration to its recommendations. Therefore, Alternative 1 would have no effect on the current land use or zoning of areas in the vicinity of the Colwood Site. Although Alternative 1 would have no impacts to land use in the vicinity of the Colwood Site, the USPS anticipates that removal of the existing P&DC/VMF facility from Federal ownership would result in beneficial impacts to land use in the Pearl District of downtown Portland. Benefits would include allowing redevelopment of an underutilized location, opening up the options for mixed-use development in this high-demand area, and creating public benefits defined in the Broadway Corridor Framework Plan adopted by the Portland City Council (such as improvement of pedestrian/bike/auto transportation due to street connections on Johnson Street and Park Avenue, creation of park areas, and increasing tree canopy coverage).

4.2.2 Potential Impacts from Alternative 2 (Troutdale Site)

Similar to Alternative 1, no effect on the current land use or zoning of areas in the vicinity of the Troutdale Site would occur under Alternative 2. Based on local zoning requirements, construction of the proposed USPS facility at the Troutdale Site would be consistent with the local zoning and land use. The USPS, upon purchase of the site, would consider Community Development Department stipulations and applicable zoning regulations, and would consult with the City, giving due consideration to its recommendations. The beneficial impacts to land use in the Pearl District of downtown Portland from the removal of the existing P&DC/VMF facility from Federal ownership, discussed under Alternative 1 above, would also be recognized under Alternative 2.

4.2.3 Potential Impacts from the No Action Alternative

Under the No Action Alternative, the USPS would not build a new consolidated facility, and the USPS operations would remain at the existing P&DC/VMF facility in the Pearl District of...
Portland. The existing P&DC/VMF property would not be available for redevelopment, resulting in the continued underutilization of land in the Pearl District, which is currently undergoing significant redevelopment to mixed-use commercial, residential, and retail land uses.

The Colwood and Troutdale Sites would be developed by others in consonance with local zoning requirements and there would be no impacts to current land use or zoning of areas in the vicinity of either site.

### 4.3 TRANSPORTATION

**Colwood Site:** The Colwood Site is located at the northwest corner of the intersection of NE Cornfoot Road and NE Alderwood Road and south of the Portland International Airport (USPS 2016a). The site is bordered by an Oregon Air National Guard facility to the north and west, the Portland International Airport to the north and northeast, NE Cornfoot Road to the south, a hotel to the east, and NE Alderwood Road to the southeast. Other major roadways near the site include I-205, Columbia Boulevard, Airport Way, Killingsworth Street, and Northeast Portland Highway.

A traffic impact analysis was performed in 2012 as part of the re-zoning of the northern portion of the Colwood National Golf Course to the Colwood Industrial Park (the Colwood Site). The report included a baseline traffic analysis (existing conditions in 2012), as well as a future-case traffic analysis (based on volume forecasts for 2035, including a developed Colwood Site).

Under the baseline scenario, the Colwood Site was undeveloped, part of the existing golf course at that time. The existing golf course was found to have a total of 640 weekday daily trips, with 40 occurring during the weekday morning peak hour and 50 occurring during the weekday evening peak hour. Under baseline conditions, all intersections near the Colwood Site were found to operate within applicable transportation standards except the NE Killingsworth Street/I-205 Southbound Ramp Intersection, approximately 1.7 miles southeast of the Colwood site (Trust for Public Lands 2012).

The 2035 future-case analysis evaluated potential changes to the existing traffic patterns that would result from the re-zoning of the Colwood Industrial Park (Colwood Site) from Open Space to General Industrial 2. That future-case analysis identified three intersections that would exceed acceptable standards during weekday a.m. peak hour conditions as a result of the zoning change and consequent future development of the Colwood Site: NE Alderwood Road/NE Cornfoot Road; NE Alderwood Road/NE 82nd Avenue; and Killingsworth Street/I-205 Southbound Ramps. The analysis recommended improvements at all three intersections to mitigate future anticipated traffic effects from future development of the Colwood Site. This analysis concluded that re-zoning of the Colwood Site, from Open Space to General Industrial 2 would result in acceptable traffic operations under the 2035 planning horizon.

Since 2012, the recommended improvements at NE Alderwood Road/NE Cornfoot Road and NE Alderwood Road/NE 82nd Avenue have been completed (Portland Bureau of Transportation 2015). The recommended improvements to the Killingsworth Street/I-205 Southbound Ramps are also complete.
**Troutdale Site:** The Troutdale Site boundaries are NW Graham Road to the south, NW Swigert Way to the north and east, and NW Sundial Road to the west (USPS 2016b). Adjacent businesses include a FedEx facility to the north, Schwan Food and Walsh Trucking to the west, and the Troutdale Municipal Airport to the south. Other major roadways near the site include I-84, Frontage Road, Marine Drive, 223rd Avenue, and Historic Columbia River Highway.

A transportation impact analysis was conducted in 2012 by the City of Troutdale and Port of Portland for future development of the 13 parcels that comprise the TRIP. The study provided the following average daily traffic volumes for roads near the Troutdale Site: 1,500 for Graham Road, 2,250 for Sundial Road, and 5,900 for Marine Drive. At the time of the study, all intersections near the Troutdale Site operated within required transportation standards, and no additional studies have been performed since that time (City of Troutdale and Port of Portland 2012).

**Existing P&DC/VMF Facility:** The most congested routes in the Portland area are I-5, I-205, US-217, and US-26 (Portland Traffic Safety Report 2015). Traffic in downtown Portland around the existing USPS facility on NW Hoyt Street is congested. The 2014 Portland TomTom Traffic Index (TomTom 2014) notes the congestion level in downtown Portland to be at 22%, with a 27 minute delay per hour driven during peak periods. The worst congestion occurs during peak morning hours on Tuesdays and peak evening hours on Thursdays.

In the City of Portland, the majority of intersections operate at acceptable traffic levels during peak travel times, both weekday mornings and evenings, except the NW 23rd Avenue/Vaugh Street (U.S. 30) intersection. This intersection is located less than two miles northwest of the USPS facility and currently exceeds the 0.99 volume to capacity ratio (v/c) ODOT standard, as well as the City of Portland standard for level of service (LOS) primarily during the weekday evening peak hours. This intersection currently operates at LOS E, which is below the City’s standard (Economic Development Research Group 2007).

### 4.3.1 Potential Impacts from Alternative 1 (Colwood Site)

All construction staging and construction vehicle parking would occur within the site boundaries. Traffic on roadways in the vicinity of the Colwood Site would increase during construction, which may result in minor traffic congestion during peak traffic periods, primarily affecting NE Alderwood and NE Cornfoot Roads. The construction contractor would implement traffic best management practices (BMPs), such as appropriate signage and placement of barriers along affected roads, prior to and during construction activities to alert pedestrians and motorists of construction activities and to control traffic flow, as needed. Impacts to traffic during construction would be minor and short-term under Alternative 1.

During operation, all USPS-related traffic would enter the site through one of two driveways. The driveway on NE Alderwood Road would be located near the parking lot for the adjacent hotel and would function as the employee entrance. The driveway for truck and VMF access would be located on NE Cornfoot Road, as far from the Cornfoot/Alderwood intersection as possible to allow for proper and adequate traffic queuing.
The USPS anticipates traffic levels from the operation of the proposed USPS facility would be similar to those projected in the 2012 traffic analysis report for the Colwood Industrial Park, in which a warehouse was used to estimate future traffic conditions associated with the Colwood Site. The 2012 analysis estimated that traffic levels would increase by approximately 2,130 net new weekday daily trips, of which 445 would occur during the weekday a.m. peak hour and 370 would occur during the weekday p.m. peak hour. The 2012 analysis further concluded that rezoning the Colwood Site from Open Space to General Industrial 2 would result in acceptable traffic operations under the 2035 planning horizon (Trust for Public Lands 2012). The analysis recommended improvements at three intersections. The recommended improvements at NE Alderwood Road/NE Cornfoot Road and NE Alderwood Road/NE 82nd Avenue have been completed (Portland Bureau of Transportation 2015). The recommended improvements to the Killingsworth Street/I-205 Southbound Ramps are also complete. Therefore, the operation of a new USPS facility at the Colwood Site is anticipated to result in a minor increase in traffic levels.

Selection of the Colwood Site for the proposed consolidated USPS facility would provide transportation benefits for the USPS due to the site being only 2.5 miles from the Portland International Airport. This location would provide ready, more direct access to the Airport and the I-5 corridor that runs the length of the west coast. As such, Alternative 1 would reduce fuel consumption and increase efficiencies in transportation components of USPS operations, which would save the USPS time in processing, handling, and distributing mail.

Changes to existing traffic patterns around the Colwood Site would be similar under any development scenario, including the Proposed Action. As such, all required transportation improvements necessary to accommodate the development of the Colwood Site, including the Proposed Action, have been completed by others.

Redevelopment of the existing P&DC/VMF facility in downtown Portland would have similar effects as existing USPS operations. As described above, Alternative 1 would likely result in a net regional traffic reduction due to decreased travel distances and times, as well as siting the proposed consolidated facility in a less trafficked area, some distance from the City of Portland. Therefore, short-term and long-term, minor impacts to transportation are anticipated as a result of Alternative 1. In addition, the consolidation of USPS facilities at this site would provide long-term beneficial impacts due to its proximity to the Portland International Airport.

### 4.3.2 Potential Impacts from Alternative 2 (Troutdale Site)

All construction staging and construction vehicle parking would occur within the Troutdale Site boundaries. Traffic on roadways in the vicinity of the Troutdale Site would increase during construction, which may result in minor traffic congestion during peak traffic periods, primarily affecting NW Swigert Way, NW Graham Road, and Sundial Road. The USPS construction contractor would implement traffic BMPs, such as appropriate signage and placement of barriers along affected roads, prior to and during construction activities to alert pedestrians and motorists of construction activities and to control traffic flow, as needed. Impacts to traffic during construction would be minor and short-term.
During operation, all USPS-related traffic would enter the site at four traffic access points: two along NW Swigert Way and two from NW Graham Road. Employees would enter and exit to the southwest on NW Graham Road and VMF traffic would enter and exit to the southeast on NW Graham Road. Truck traffic would use the western NW Swigert Way access point for entry, and the eastern NW Swigert Way for exit. All entrances would have enough space to allow for sufficient traffic queuing into the site.

The 2012 traffic impact analysis modeled conditions for a proposed warehouse and industrial park to be built on lots 7 and 8, corresponding to the location of the Troutdale Site. The analysis estimated that 2015 traffic levels would increase by approximately 3,236 new daily trips, of which 266 would occur during the morning weekday peak hour and 297 would occur during the weekday evening peak hour (City of Troutdale and Port of Portland 2012).

The USPS anticipates traffic levels from the operation of the proposed USPS facility at this site would be similar to those projected in the 2012 traffic impact analysis. To ensure no significant effect to local and regional traffic, a qualified traffic engineer will certify that anticipated USPS traffic levels would not exceed those assumed in the 2012 study (City of Troutdale and Port of Portland 2012). While operation of a new USPS facility at the Troutdale Site is anticipated to increase traffic levels on roadways in the vicinity of the site, impacts to transportation are anticipated to be minor based on the 2012 traffic analysis. The proposed infrastructure improvements that are gradually being implemented (Portland Tribune 2012) by the TRIP developer should also help alleviate traffic congestion and increase safety in the vicinity of the Troutdale Site.

Similar to Alternative 1, this alternative provides beneficial impacts to transportation related to the consolidation of the three existing facility operations to one location. However, selection of the Troutdale Site would not provide the same amount of transportation benefits to the USPS that would result from selection of the Colwood Site because the Troutdale Site is about 8 miles further from Portland International Airport than the Colwood Site, which makes Alternative 2 less efficient for the USPS with regard to transportation. Although the TRIP Site is near the Troutdale Airport, this airport is not large enough to meet USPS air cargo needs. Therefore, the USPS would continue to use the Portland International Airport for air cargo.

Similar to Alternative 1, short-term and long-term, minor impacts to transportation are anticipated as a result of Alternative 2. However, the long-term beneficial impacts associated with proximity of Alternative 1 to the Portland International Airport would not be recognized.

### 4.3.3 Potential Impacts from the No Action Alternative

Under the No Action Alternative, there would be no changes to local traffic patterns around the existing P&DC/VMF facility in downtown Portland. The roadways in the vicinity of the existing P&DC/VMF facility would remain congested, in part due to the configuration of the existing site and traffic patterns.

Because both the Colwood Site and the Troutdale Site are proposed for industrial development, traffic conditions around those sites would be similar to what would occur under Alternatives 1 and 2.
4.4 AIR QUALITY

The Clean Air Act (CAA), as amended, requires the EPA to set National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment. NAAQS have been established for six principal, or "criteria" pollutants: ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), lead (Pb), and particulate matter (PM) including coarse particulate matter less than or equal to 10 microns (PM₁₀), and fine particulate matter less than or equal to 2.5 microns (PM₂.₅). The EPA designates areas of the U.S. as having air quality equal to or better than the NAAQS (attainment) or worse than the NAAQS (non-attainment). If a non-attainment area achieves attainment, the area is considered to be in maintenance status. Maintenance areas retain a maintenance classification for 20 years after they are re-designated from non-attainment (EPA 2016c).

The Portland Metro Service District, which includes the existing P&DC/VMF facility, the leased facilities, and the proposed Colwood and Troutdale Sites, is classified as a maintenance area for CO. This area was re-designated from non-attainment to maintenance for CO in 1997 (EPA 2016b).

States have the authority to designate stricter standards for criteria pollutants. In addition to CO, Oregon has designated an Air Quality Maintenance Area for O₃ that includes Portland and Troutdale (Oregon Administrative Rule 340-204-0040), including the existing P&DC/VMF facility, the leased facilities, and both the Troutdale and Colwood Sites. Multnomah County is in attainment for all other NAAQS criteria pollutants.

In addition to NAAQS criteria pollutants, the impact of greenhouse gases (GHGs) is also considered during air quality evaluation. Global climate change is a transformation in the average weather of the Earth, which can be measured by changes in temperature, wind patterns, and precipitation. Scientific consensus has identified human-related emissions of GHGs above natural levels as a significant contributor to global climate change (USCCSP 2009). GHGs effectively trap heat in the atmosphere and influence the Earth’s temperature. GHGs include water vapor, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), ground-level O₃, and fluorinated gases such as chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs).

In 2014, CEQ issued updated Draft Guidance on Considering Climate Change in NEPA Reviews, which provides Federal agencies with direction on when and how to consider the effects of greenhouse gas emissions and climate change in their evaluation of proposed Federal actions. The updated draft guidance characterizes climate change as a global issue exacerbated by a series of small decisions and uses projected GHG emissions as a proxy for assessing a Proposed Action's potential climate change impacts. The updated draft guidance also establishes 25,000 tons per year as a reference point under which a quantitative analysis of greenhouse emissions is not warranted "unless quantification below that reference point is easily accomplished." The draft guidance states that the reference point relates to the disclosure of impacts, not to the determination of the significance of those impacts and notes that NEPA requires agencies to consider "the potential significance of the climate change impacts of their Proposed Actions, [based on] both context and intensity, as they do for all other impacts" (CEQ 2014).
4.4.1 Potential Impacts from Alternative 1 (Colwood Site)

The operation of heavy equipment and ground disturbance during the anticipated 2 years of construction activities would have minor, temporary adverse impacts on local air quality. The construction contractor would be required to implement BMPs, such as dust suppression and control, use of propane to fuel construction vehicles, and minimizing idling of construction and delivery vehicles, to reduce these short-term impacts. Construction workers would use privately owned vehicles to travel to and from the project site during the construction, which would also result in temporary emissions. These short-term air quality effects would not be anticipated to be significant.

The USPS would install and operate stationary air emission sources, including heating, ventilation, and cooling systems (such as chillers, boilers, and water heaters) at the proposed facility. These would result in additional, long-term, less-than-significant effects to local air quality during facility operations. The USPS would install emergency generator hook-ups so that a mobile emergency generator can be brought to the site and connected if necessary but no stationary emergency generator would be installed.

However, consolidation of the three existing USPS facilities at a single location in a modern facility would result in a net reduction in regional emissions due to the installation of new, energy-efficient equipment and consolidation of activities. With increased efficiency, stationary source emissions are expected to decrease when compared to existing emissions from current stationary air emission sources located at the existing P&DC/VMF facility and the leased facilities.

The use of mobile emergency generators and fossil-fuel fired heating units, depending on their size, may require a CAA permit from the State. The USPS would meet all applicable local, State, and Federal regulations and permitting requirements when installing and operating new air emission sources.

Implementation of the Proposed Action under Alternative 1 would also result in impacts to air quality from additional traffic at and near the proposed Colwood Site from USPS and employee vehicles; however, consolidation of the three existing USPS facilities at a single location is expected to result in efficiencies in transportation compared to existing USPS operations. Therefore, since the proposed Colwood Site is in the same airshed as the existing P&DC/VMF facility and the leased sites, emissions from mobile sources would remain similar or would be reduced compared to existing USPS operations.

Regional greenhouse gas emissions related to vehicular use are anticipated to remain the same or potentially decrease slightly because consolidation of the three existing USPS facilities at a single location is expected to result in efficiencies in transportation compared to existing USPS operations. Therefore, when compared to the existing operations of the existing P&DC/VMF, the DDC, and the PACC, emissions of NAAQS criteria pollutants and GHGs would be similar or would decrease over the long term due to increased energy efficiency of the new facility and consolidated operations.
The USPS does not anticipate any significant impacts on air quality or climate change under Alternative 1.

### 4.4.2 Potential Impacts from Alternative 2 (Troutdale Site)

Impacts for Alternative 2 would be similar to those described above for Alternative 1. Due to the increased distance from the Portland International Airport compared to Alternative 1, mobile emissions from USPS vehicles would be anticipated to be slightly higher under Alternative 2.

The USPS does not anticipate any significant impacts on air quality or climate change under Alternative 2.

### 4.4.3 Potential Impacts from the No Action Alternative

Under the No Action Alternative, there would be no change in existing stationary or mobile emissions associated with the existing P&DC/VMF facility or the USPS leased sites. The beneficial impacts of reducing emissions due to the consolidation of the three, older facilities into one facility would not be recognized. Vehicular emissions associated with USPS operations at widely separated facilities in traffic-congested areas would continue to result in higher levels of these emissions compared to Alternatives 1 or 2. The Colwood and Troutdale Sites would likely be developed by others and air quality impacts from construction and operation would be similar to those described above for Alternatives 1 and 2.

### 4.5 NOISE

**Colwood Site:** The noise environment surrounding the Colwood Site is dominated by activities associated with the Portland International Airport. On the site itself, heavy equipment, trucks, and other construction equipment used in the developer's on-going site preparation activities generate noise. Other existing sources of noise in the vicinity of the Colwood Site include operations at the Oregon Air National Guard facility and other industrial activities in the surrounding area, such as auto salvage operations, truck and tractor sales, and metals manufacturing facilities. Heavy trucks and traffic along roadways near the site also contribute to the local noise environment.

The primary noise sensitive receptor in the vicinity of the Colwood Site is the Country Inn and Suites Hotel, located 50 feet to the east of the site boundary. Other sensitive noise receptors within 0.5 mile of the site include three additional hotels (the Red Lion Hotel Portland Airport, the Radisson Hotel Portland Airport, and the Ramada Portland Airport). The closest residential neighborhoods are approximately 0.5 mile south of the site.

**Troutdale Site:** The noise environment surrounding the Troutdale Site is dominated by activities associated with the Troutdale Municipal Airport and, to a lesser extent, traffic on I-84. On the site itself, on-going site preparation activities by the developer generate noise from heavy equipment, trucks, and other construction equipment. Other existing sources of noise in the vicinity of the site include vehicles and machinery associated with the FedEx facility to the north, other transportation and trucking companies near the airport, and roadway noise from nearby roads.
The closest noise-sensitive receptors to the site include recreational users of the 40-mile Loop (a recreational trail) about 0.33 mile east and north of the site, and the Comfort Inn Columbia Gorge Gateway hotel, located about 0.5 mile southeast of the site. The closest residential and commercial areas are located about 0.66 miles south of the site.

4.5.1 Potential Impacts from Alternative 1 (Colwood Site)

The Oregon DEQ has enacted State-level rules (Oregon DEQ 2016b), and Division 35 of these rules pertains to Noise Control Regulations (Oregon DEQ 2106a).

In addition, the City of Portland has developed a local noise ordinance. Title 18 of Portland’s City Code and Charter, entitled "Noise Control," regulates permissible sound from a variety of activities. Title 18.10.060 sets the standard for construction noise from 7 a.m. to 6 p.m. at 85 A-weighted decibels (dBA) at a 50-foot distance, with exceptions for a few types of equipment that cannot meet this level, such as pile drivers and jack hammers. Outside those hours and on some holidays, exemptions do not apply, and any work must meet the baseline permitted decibel levels of the land use zone where the work takes place (City of Portland 2016b, City of Portland 2016e). Alternative 1 would result in elevated levels of noise at the Colwood Site and in the areas adjacent to the site during construction, which is anticipated to occur from summer 2016 to summer 2018. These noise levels would be similar to existing onsite construction activities. Construction-related noise could result in adverse impacts on the hotel adjacent to the site. The USPS would follow its BMPs, and would avoid working during night-time hours, weekends, and holidays to the maximum extent practicable to avoid noise impacts on the Country Inn and Suites Hotel, located 50 feet to the east of the site boundary. The USPS would also implement appropriate BMPs to minimize noise-related impacts, such as keeping equipment and vehicles in good repair and muffled if possible, locating stationary equipment and selecting transportation routes as far away from sensitive receptors as possible, shutting down noise-generating heavy equipment when it is not needed, and encouraging construction personnel to operate equipment in the quietest manner possible. Impacts to the local noise environment during construction would be minor and short-term, notably in relation to existing noise-producing activities at the Portland International Airport.

Operations of the consolidated facility, including truck traffic, would increase noise levels in the area compared to the previous use of the site as a golf course. However, due to other existing airport and industrial noise-generating sources in the vicinity of the site, operational noise impacts would be minimal.

Overall, the USPS anticipates short-term and long-term, minor adverse impacts to the noise environment from the construction and operation of the USPS facility under Alternative 1 if BMPs are implemented.

4.5.2 Potential Impacts from Alternative 2 (Troutdale Site)

Troutdale Municipal Code, Title 8 (Health and Safety), Chapter 8.24, addresses Noise Control, and prohibits unreasonable noises in the City. The Code defines a noise to be unreasonable if: it occurs between 10 p.m. and 7 a.m.; the noise is plainly audible within a noise-sensitive unit that
is not the source of the noise; and/or the noise is abnormally high or low in frequency. Construction activities are considered unreasonable before 7 a.m. or after 9 p.m. Monday through Friday, before 8 a.m. or after 7 p.m. on Saturdays, and before 10 a.m. or after 7 p.m. on Sundays (City of Troutdale 2004).

In addition to the local Troutdale ordinance, the Oregon DEQ has enacted State-level rules (Oregon DEQ 2016b), and Division 35 of these rules pertains to Noise Control Regulations (Oregon DEQ 2106a).

Alternative 2 would result in elevated levels of noise at the Troutdale Site and in the areas adjacent to the site during construction, which is anticipated to occur from 2017/2018 to 2019. These noise levels would be similar to existing onsite construction activities. Construction-related noise could result in adverse impacts on the nearby Columbia Gorge Inn Gateway Hotel and the recreational users of the 40-mile Loop. However, adverse impacts to sensitive receptors under Alternative 2 would be slightly less than under Alternative 1 due their distance from the facility and the current surrounding noise environment. The USPS would follow its BMPs, and would avoid working during night-time hours, weekends, and holidays to the maximum extent practicable to avoid noise impacts on the hotel and recreational users. The USPS would also implement appropriate BMPs to minimize noise-related impacts, such as keeping equipment and vehicles in good repair and muffled if possible, locating stationary equipment and selecting transportation routes as far away from sensitive receptors as possible, shutting down noise-generating heavy equipment when it is not needed, and encouraging construction personnel to operate equipment in the quietest manner possible. Impacts to the local noise environment during construction would be minor and short-term, notably in relation to existing noise-producing activities at the Troutdale Municipal Airport.

Operations of the consolidated facility, including truck traffic, would increase noise levels in the area compared to the previous use of the site as undeveloped open space. However, due to other existing airport and industrial noise-generating sources in the vicinity of the site, operational noise impacts would be minimal.

Overall, the USPS anticipates short-term and long-term, minor adverse impacts to the noise environment from the construction and operation of the USPS facility under the Alternative 2 if BMPs are implemented.

4.5.3 Potential Impacts from the No Action Alternative

Under the No Action Alternative, both the Colwood and the Troutdale properties would continue to undergo site preparation in anticipation of new tenancy and development/construction; noise levels associated with the use of heavy equipment and trucks would continue. Both sites would likely be developed for industrial use regardless of the USPS Proposed Action, and impacts from development would likely be similar to those described under Alternatives 1 and 2.

4.6 GEOLOGY, TOPOGRAPHY, AND SOILS

Colwood Site: The average elevation at the Colwood Site is 19 feet above mean sea level and the topography is relatively flat, sloping gently to the east-northeast (USPS 2016a). The site is
underlain by igneous rock overlain with layers of unconsolidated sediments (i.e., sand and gravels) (USGS 2015). Soils at the Colwood Site are classified by the U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS) as Sauvie silt loam, protected (0 to 2% slopes), and are poorly drained (NRCS 2016a). However, the native soils at the Colwood Site have been disturbed or removed due to previous site development as a golf course and recent ongoing site development (i.e., developer has cleared, graded, and leveled the site). The Oregon DEQ has approved a Contaminated Media Management Plan (CMMP) for the site, allowing soil and sediment generated during construction activities to be reused on-site as long as field screening has not identified it as contaminated (GeoDesign 2014, USPS 2016a).

**Troutdale Site:** The average elevation at the Troutdale Site is 28 feet above mean sea level. The topography is relatively flat, sloping gently to the northeast (USPS 2016b). The site is underlain by igneous rock overlain with layers of unconsolidated sediments (i.e., sand and gravels) (U.S. Geological Survey 2015). Soils at the Troutdale Site are classified by the NCRS as Faloma silt loam, protected (0 to 3% slopes), and are poorly drained (NRCS 2016b). Faloma silt loam, when drained, is listed as a prime farmland soil by the NRCS (NRCS 2016b). The Farmland Protection Policy Act (FPPA) requires Federal agencies to minimize the extent to which Federal programs contribute to the unnecessary conversion of farmland to non-agricultural use and to assess potential conversion of farmland to developed uses. However, due to the site’s industrial history and status as a Superfund site, much of the original topsoil was contaminated and has been removed. The native soils no longer exist and therefore, the FPPA does not apply. The existing CMMP for Troutdale also provides direction on the use of contaminated media and provisions for discovery of unexpected materials (CH2M Hill and Alcoa, Inc. 2007).

In 2006, the EPA issued a Final ROD stating that soils have been remediated to acceptable risk-based standards for industrial uses (such as that proposed by the USPS) under the oversight of the EPA and the Oregon DEQ, with deed restrictions and institutional controls in place.

### 4.6.1 Potential Impacts from Alternative 1 (Colwood Site)

Although the developer is currently performing site preparation and the USPS would not need to conduct extensive leveling, grading, and excavation at the Colwood Site, construction activities under the Proposed Action would disturb the ground surface and may cause soil erosion. The construction contractor would be required to implement erosion and sediment control BMPs during construction activities for soil stabilization and reduction of sedimentation in stormwater runoff as described in the Oregon DEQ *Industrial Stormwater Best Management Practices Manual*. These BMPs may include measures such as mulching bare soils, temporary seeding, installing, and maintaining silt fence and temporary sediment traps, and water spray application for dust control. Any excess excavated soil would be managed in accordance with applicable local, State, and Federal regulations, as well as the Oregon DEQ-approved CMMP. While construction activities would require excavation and ground disturbance, these activities would not be deep enough to affect the underlying geology and there would be negligible changes to topography.
4.6.2 Potential Impacts from Alternative 2 (Troutdale Site)

Impacts to topography, geology, and soils would be similar to the impacts identified above under Alternative 1. The construction contractor would be required to implement erosion and sediment control BMPs (described above) during construction activities for soil stabilization and reduction of sedimentation in stormwater runoff as described in the Oregon DEQ Industrial Stormwater Best Management Practices Manual.

4.6.3 Potential Impacts from the No Action Alternative

Impacts to topography, geology, and soils on the Colwood and Troutdale Sites are still likely to occur because these sites are anticipated to be developed by others if the USPS does not occupy the site. Impacts would likely be similar to Alternatives 1 and 2.

4.7 WATER RESOURCES

Colwood Site: Two drainage channels on or near the site are under the jurisdiction of the MCDD: McBride Slough, which flows diagonally across the northeast corner of the site, and Columbia Slough, located on the south side of NE Cornfield Road outside of the site boundary. Due to the long-term industrial use of the area, water quality in McBride and Columbia Sloughs has been impaired and cleanup activities, as required by the Oregon DEQ, are being conducted by several entities (Port of Portland 2015a; Oregon DEQ 2016a).

A small pond and several small wetlands on the site were filled during site development in accordance with the developer's USACE Nationwide Permit (NWP) (#NWP-2013-396) (USACE 2014). Mitigation for these wetland impacts is being conducted by the developer on the portion of the former Colwood Golf Course property to the south of NE Cornfoot Road and NE Alderwood Road.

The stormwater drainage systems at the Colwood Site are still being developed by the Trammel Crow Company. Infiltration of stormwater runoff is not feasible due to the poorly drained soils in the on and adjacent to the site. Stormwater management for water quality (pollution reduction) is required by MCDD; onsite stormwater detention for water quantity control is not required.

Depth to groundwater on the Colwood Site is approximately 4 feet below ground surface (bgs; Snyder 2009).

Troutdale Site: The Troutdale Site is located approximately 0.75 mile south of the Columbia River, approximately 0.33 mile south of Company Lake, and approximately 0.33 mile west of Sandy River. The developer filled two wetlands and one pond on the site under USACE #NWP-2007-889-(1) (USACE 2015). Mitigation for these wetland impacts is being conducted by the developer.

A ditch in the northern portion of the Troutdale Site has been filled as a result of TRIP-related construction activities. A drainage ditch is located in the adjacent Lot 9 along the Troutdale Site's southwest border.
Permanent stormwater drainage measures are being implemented by the Port of Portland. Stormwater management for water quality (pollution reduction) is required by MCDD; onsite stormwater detention for water quantity control is not required.

During the historical use of the site as an aluminum plant, both surface water and groundwater at the TRIP were contaminated with heavy metals and organic chemicals; although remedial actions have been performed, operation and maintenance and monitoring activities are ongoing (EPA 2016a).

Depth to groundwater at the site is approximately 15 feet bgs (Snyder 2009).

4.7.1 Potential Impacts from Alternative 1 (Colwood Site)

No impacts to jurisdictional Waters of the U.S., including wetlands, would occur. Wetland impacts under the developer's existing NWP have been mitigated; the USPS would assume the mitigation planting and maintenance requirements post-sale.

Section 438 of the Energy Independence Security Act (EISA) of 2007 (42 USC 17094) requires that any Federal facility with a proposed disturbance area exceeding 5,000 square feet maintain or restore the pre-development hydrology of the property to the maximum extent technically feasible. Stormwater discharges during operation of the proposed facility would be managed through bioswales and stormwater would be discharged offsite into the Columbia Slough. The developer will ensure that the bioswales would be properly sized, designed, and constructed to ensure pre- and post-project hydrology remains the same in accordance with the EISA and no effect to on-site stormwater management.

Impacts to surface water quality would be minor. To minimize impacts and ensure compliance with local, State and Federal regulations, the USPS would obtain a NPDES construction general permit and would update the existing Stormwater Pollution Prevention Plan (SWPPP) to account for the USPS building design that would provide standard measures including erosion and sediment control BMPs to minimize stormwater discharge and water quality impacts to McBride and Columbia Sloughs during construction.

Flow-through water quality basins (bioswales) would provide water quality treatment. Onsite stormwater drainage would be collected in trench drains and in area catch basins and then transported via pipe to bioswales. The bioswales remove sediments and pollutants by draining runoff through vegetation and soils to an underdrain system that would flow off site to Columbia Slough (Parsons 2015). These drainage improvements are underway and will be completed before the USPS purchases the property.

The USPS would evaluate whether the proposed facility is eligible for a No Exposure Certification (NEC), which exempt a facility from NDPES industrial stormwater permitting (Oregon DEQ 2015). If the facility is not eligible for an NEC, the USPS would obtain a NPDES industrial permit for operation of the facility, and would prepare and implement a SWPPP that would provide measures to avoid and minimize impacts from stormwater runoff. Permanent stormwater drainage measures (e.g., bioswales) are being implemented by the developer and will be completed before the USPS purchases the property. USPS would provide maintenance and upkeep of the stormwater drainage measures once it takes ownership of the property.
Due to the shallow groundwater depth on the site (about 4 feet bgs), groundwater may be encountered during construction activities and dewatering may be required. Overall, the USPS anticipates short-term and long-term, minor adverse impacts to water resources under Alternative 1 if the BMPs outlined above are implemented.

4.7.2 Potential Impacts from Alternative 2 (Troutdale Site)

Impacts to water resources at the Troutdale Site would be similar to those at the Colwood Site. However because the Troutdale Site is a Superfund site, additional precautions are necessary to prevent impacts to water resources.

No impacts to jurisdictional Waters of the U.S., including wetlands, would occur. Wetland mitigation and monitoring required under the developer's existing NWP would remain the developer's responsibility.

The USPS would obtain a NPDES construction general permit and would prepare and implement a construction SWPPP that would provide standard measures including erosion and sediment control BMPs to minimize stormwater discharge and water quality impacts to nearby drainage ditches and waterways.

Stormwater discharge during operation of the facility would be managed through on-site drainage. Drainage on the site is expected to be a combination of trench drains, catch basins, surface flow, and 2 acres of water detention (Parsons 2015). The piped drainage would ultimately discharge to the drainage ditch easements south of NW Swigert Way and north of NW Graham Road. Drainage improvements are underway and will be complete before the USPS purchases the property.

The USPS would evaluate whether the proposed facility is eligible for an NEC, which exempts a facility from NDPES industrial stormwater permitting (Oregon DEQ 2015). If the facility is not eligible for an NEC, the USPS would obtain a NPDES industrial permit for operation of the facility, and would prepare and implement a SWPPP that would provide measures to avoid and minimize impacts from stormwater runoff. Permanent stormwater drainage measures are being implemented by the developer; USPS would provide maintenance and upkeep of these measures once it takes ownership of the property. Stormwater drainage measures would be properly sized, designed, and constructed to ensure pre- and post-project hydrology remains the same in accordance with the EISA.

Because the depth to groundwater is about 15 feet bgs on the Troutdale Site, it is unlikely that groundwater would be encountered during construction activities. If groundwater is encountered, decontamination and dewatering may be required. Any dewatering performed at the site must be done in accordance with the Property Development Environmental Management Plan, which outlines a "Groundwater Restricted Zone," from which water generated by dewatering activities shall not be discharged to the ground or, untreated, to any surface water; most of the Troutdale Site falls within this zone. The existing CMMP for Troutdale also provides direction on the use of contaminated media and provisions for discovery of unexpected materials (CH2M Hill and Alcoa, Inc. 2007). Health and safety concerns for construction workers would be evaluated by appropriate professionals (such as an Industrial Hygienist) prior to any work performed.
Overall, the USPS short-term and long-term, adverse impacts to water resources under Alternative 1 would be minor if the BMPs outlined above are implemented.

### 4.7.3 Potential Impacts from the No Action Alternative

Because both the Colwood and Troutdale Sites would likely be developed by others for industrial use under the No Action Alternative, impacts to water resources at both sites would be similar to impacts described under Alternatives 1 and 2.

### 4.8 BIOLOGICAL RESOURCES

Biological resources include native or naturalized plants and wildlife and the habitats in which they occur. The Endangered Species Act of 1973 protects federally listed threatened and endangered species from actions that may harm them or damage their habitat.

**Colwood Site:** The Colwood Site contains almost no vegetation and therefore currently provides little wildlife habitat. Wildlife species likely to occur in the vicinity of the Colwood Site include species adapted to urban environments, such as black-tailed deer, raccoons, coyotes, songbirds, and small mammals such as squirrels, mice, and rats (Audubon 2016; *the Oregonian* 2010). The McBride Slough flows diagonally across the northeast corner of the site but is contaminated with pesticides, PAHs, PCBs, and metals and unlikely to provide habitat suitable for aquatic species.

The Colwood Site contains almost no vegetation, as most of the site was graded in 2015 (see Photographic Log in Appendix B). The area surrounding the Colwood Site is in primarily industrial use with some landscaping between facilities. The remainder of the golf course, which the Trammel Crow Company is developing into a park/wetlands mitigation area, is located to the south.

**Troutdale Site:** The Troutdale Site was cleared in 2015-2016 and little vegetation remains (see Photographic Log in Appendix B). The entire TRIP is planned for development. Because the Troutdale Site was recently graded by the developer and cleared of vegetation, the site provides little habitat for wildlife; the types of species expected to be present would be similar to those described above for the Colwood Site.

According to the Information for Planning and Conservation (IPaC) database maintained by U.S. Fish and Wildlife Service (USFWS), nine species listed as federally threatened or endangered under the Endangered Species Act have the potential to occur in the vicinity of the Colwood and Troutdale Sites (USFWS 2016a). Please refer to Table 2 for a summary of these species.
Table 2. Federally Protected Species Identified by USFWS IPaC Database

<table>
<thead>
<tr>
<th>Common Name</th>
<th>Scientific Name</th>
<th>Federal Status</th>
<th>Critical Habitat</th>
<th>Potential to occur in the vicinity?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northern spotted owl</td>
<td>Strix occidentalis caurina</td>
<td>T</td>
<td>Designated</td>
<td>✓</td>
</tr>
<tr>
<td>Streaked horned lark</td>
<td>Eremophila alpestris strigata</td>
<td>T</td>
<td>Designated</td>
<td>✓</td>
</tr>
<tr>
<td>Yellow-billed cuckoo</td>
<td>Coccyzus americanus</td>
<td>T</td>
<td>Proposed</td>
<td>✓</td>
</tr>
<tr>
<td>Bull trout</td>
<td>Salvelinus confluentus</td>
<td>T</td>
<td>Designated</td>
<td>✓</td>
</tr>
<tr>
<td>Bradshaw's desert-parsley</td>
<td>Lomatium bradshawii</td>
<td>E</td>
<td>----</td>
<td>✓</td>
</tr>
<tr>
<td>Kincaid's lupine</td>
<td>Lupinus sulphureus ssp. Kincaidii</td>
<td>T</td>
<td>Designated</td>
<td>✓</td>
</tr>
<tr>
<td>Nelson's checker-mallow</td>
<td>Sidalcea nelsoniana</td>
<td>T</td>
<td>----</td>
<td>✓</td>
</tr>
<tr>
<td>Water howellia</td>
<td>Howellia aquatilis</td>
<td>T</td>
<td>----</td>
<td>✓</td>
</tr>
<tr>
<td>Willamette daisy</td>
<td>Erigeron decumbens var. decumbens</td>
<td>E</td>
<td>Designated</td>
<td>✓</td>
</tr>
</tbody>
</table>

These federally listed species are not expected to occur on either the Colwood or Troutdale Sites because the sites do not contain suitable habitat for these species.

4.8.1 Potential Impacts from Alternative 1 (Colwood Site)

Impacts to vegetation or wildlife on the Colwood Site would be negligible since the site has been cleared of most vegetation and little habitat currently exists.

The USPS requested project review in a letter to the USFWS dated March 31, 2016, that provided the USPS determination that the Proposed Action at the Colwood Site would have no effect on the northern spotted owl, streaked horned lark, yellow-billed cuckoo, bull trout, Bradshaw's desert-parsley, Kincaid's lupine, water howellia, and Willamette daisy. The Colwood Site may provide habitat for the Nelson's checker-mallow; however, based on the project location in a heavily developed area and because the property was reviewed for species of concern prior to issuance of Department of the Army Permit NWP-2013-396, the USPS has determined that the Proposed Action may affect but is not likely to adversely affect this species.

The USFWS initial response via email stated it could not concur with the USPS determination. However, based on a subsequent teleconference held on April 20, 2016 between the USPS and USFWS, there is no potential for federally listed species to occur on the Colwood Site. No streaked horned lark have been observed at the Colwood Site and the other species are all Willamette Valley species generally found south of Portland; therefore these species are therefore not likely to be present on the Colwood site. The Colwood Site does not contain designated critical habitat for any species. Therefore, the USPS has determined that the Proposed Action at the Colwood Site would have no effect on any federally listed species and provided a letter addendum to USFWS with that revised determination (see correspondence in Appendix C). No concurrence from USFWS is required for a no-effect determination.
Overall, the USPS anticipates impacts to biological resources would be negligible under Alternative 1.

### 4.8.2 Potential Impacts from Alternative 2 (Troutdale Site)

Impacts to vegetation or wildlife on the Troutdale Site would be negligible since the site has been cleared of most vegetation and little habitat exists. As part of the TRIP development plans, a 200- to 500-foot-wide strip of green space would remain between the 40-Mile Loop Trail around the edge of the TRIP and the rivers to the east and north (Sandy River and Columbia River, respectively). Some of the currently open areas on the west side of the TRIP would also remain in open space (Port of Portland 2015b).

The USPS requested project review in a letter to the USFWS dated March 31, 2016 that provided the USPS determination that the Proposed Action at the Troutdale Site would have no effect on the northern spotted owl, Bradshaw's desert-parsley, water howellia, and Willamette daisy. The letter noted that the Troutdale Site may provide habitat for the streaked horned lark, yellow-billed cuckoo, Kincaid's lupine, and Nelson's checker-mallow; however, based on the project location in an industrial area and because the property was reviewed for sensitive species prior to issuance of USACE NWP-2007-889-1, the USPS determined that the Proposed Action may affect, but is not likely to adversely affect these species. The USFWS initial response via email did not concur with the USPS determination. However, based on a subsequent teleconference held on April 20, 2016 between the USPS and USFWS, it was determined that there is no potential for federally listed species to occur on the Troutdale Site. No streaked horned lark have been observed at the Troutdale Site and the other species are all Willamette Valley species generally found south of Portland and therefore not likely to be present. The Troutdale Site does not contain designated critical habitat for any species. Therefore, the USPS has determined that the Proposed Action at the Troutdale Site would have no effect on any federally listed species and provided a letter addendum to USFWS with that revised determination (see correspondence in Appendix C). No concurrence from USFWS is required for a no-effect determination.

Overall, the USPS anticipates impacts to biological resources would be negligible under Alternative 2.

### 4.8.3 Potential Impacts from the No Action Alternative

Under the No Action Alternative, the Colwood and Troutdale Sites would likely be developed by others, and impacts would be similar to those described above for Alternatives 1 and 2.

### 4.9 CULTURAL RESOURCES

The National Historic Preservation Act (NHPA) of 1966 (Public Law 89-665; 16 USC §470 et seq.) as amended, sets forth Federal policy to protect historic properties and promote historic preservation in cooperation with States, Tribal governments, local governments, the public, and other consulting parties. The NHPA established the National Register of Historic Places (NRHP) and designated the Oregon State Historic Preservation Office (SHPO) as the entity responsible for administering State-level programs and implementing the NHPA in Oregon. Section 106 of
the NHPA outlines the procedures that Federal agencies follow to take into account the effect of
their actions on historic properties, including both archaeological resources and historic
architectural resources. The Section 106 process applies to a Federal undertaking that has the
potential to affect historic properties, defined in the NHPA as those properties (i.e.,
archaeological sites, buildings, structures, historic districts, and objects) that are listed in or
eligible for listing in the NRHP.

A URS architectural historian and a URS archaeologist, both qualified under the Secretary of the
Interior’s Professional Qualification Standards (36 CFR Part 61) in the disciplines of
history/architectural history and archaeology, respectively, reviewed existing information on
historic properties within the Area of Potential Effects (APE) and conducted a search of the
Oregon SHPO Geographic Information System Archaeological Inventory Database and the
online Oregon Historic Sites Database for the Colwood and Troutdale Sites and surrounding
properties. The USPS initiated Section 106 consultation with the Oregon SHPO and other
consulting parties for the proposed undertakings at the Colwood Site and the Troutdale Site in a
letter dated March 31, 2016 (see Appendix C) that included a Cultural Resources Report:
Section 106 Consultation for the Construction of a U.S. Postal Service Facility in the Portland
Metropolitan Area, Multnomah County, Oregon (AECOM 2016). [Note: This report contains
sensitive information on archaeological resources and is therefore not included in Appendix C.]

The direct APE has been defined as lands within the property boundaries of both sites. The APE
for indirect effects is the geographic area in which the undertaking has the potential to alter the
viewshed or acoustic environment in a manner that adversely affects an off-site historic property.

Colwood Site: No individual resources, historic districts, or known/recorded archaeological sites
that are listed in or eligible for listing in the NRHP are within the Colwood Site’s direct APE.

Within the indirect APE of the Colwood Site, the NRHP-eligible Columbia Slough Drainage
Historic District and the NRHP-eligible Colwood National Golf Course and associated
clubhouse are present, south of the site. A portion of the NRHP-eligible Colwood National Golf
Course formerly occupied the Colwood Site, but was removed as the result of development of
the Colwood Industrial Park. The adverse cultural resources effects that resulted from the initial
development of the Colwood Industrial Park (a project that is independent of the USPS Proposed
Action) were resolved through a 2014 Memorandum of Agreement (MOA) pursuant to 36 CFR
Part 800.6[c]) between the USACE and the Oregon SHPO (see Appendix D). All stipulations of
the MOA have been successfully completed for the Colwood Industrial Park (now the Colwood
Site), as confirmed by the Oregon SHPO in a letter dated January 20, 2015 (see Appendix C).

Troutdale Site: The adverse cultural resources effects that resulted from the initial development
of the TRIP (a project that is independent of the USPS Proposed Action) were resolved through a
2014 Memorandum of Agreement (MOA) pursuant to 36 CFR Part 800.6[c]) between the USACE and the Oregon SHPO (see Appendix D).

From 1979 through 2013, portions of the Troutdale Site were surveyed for cultural resources and
no resources were identified (AECOM 2016). However, surveys have not covered the entire Site.
The Cultural Resources Report (AECOM 2016) determined that the un-surveyed portions of
Troutdale Site have a high probability for, and are in a sensitive area for, potential archaeological
resources, including precontact camps, precontact natural resource acquisition for hunting,
fishing, root collecting, and processing. In addition, an undocumented historic ditch associated with the NRHP-eligible Salmon Creek Drainage System was present in the northern (previously un-surveyed) portion of the Troutdale Site; however, as a result of TRIP-related construction activities covered under the 2014 MOA, the ditch has been filled with gravel.

Within a 1-mile radius of the Troutdale Site (indirect APE), there are four above-ground historic properties, including an historic railroad (0.5 mile southwest), a historic farmstead (0.75 mile southwest), a historic bridge (0.80 mile southeast), and an NRHP-eligible USACE laboratory building (500 feet southeast). An NRHP-eligible drainage ditch is located in the adjacent Lot 9 along the Troutdale Site's southwest border (AECOM 2016).

**Existing P&DC/VMF Facility**: The existing USPS facility at NW Hoyt Street has been determined eligible for listing in the NRHP by the National Park Service (see SHPO letter dated March 15, 2016 in Appendix C).

### 4.9.1.1 Potential Impacts from Alternative 1 (Colwood Site)

The USPS initiated Section 106 consultation with the Oregon SHPO and other consulting parties for the proposed undertaking at the Colwood Site in a letter dated March 31, 2016 which included the Cultural Resources Report (AECOM 2016) and the SHPO's determination of no effect on historic properties. The Oregon SHPO concurred with that determination for above-ground historic resources in a letter dated May 2, 2016 and for archaeological resources in a letter dated May 3, 2016 (see Appendix C).

Under Alternative 1, the existing USPS-owned and NR-eligible P&DC/VMF facility on Hoyt Street in Portland, Oregon would be transferred to the Portland Development Commission. A transfer of the P&DC/VMF out of Federal ownership would be an adverse effect pursuant to 36 CFR Part 800.5(2)(vii). The USPS has resolved the adverse effect through a 2011 MOA (pursuant to 36 CFR Part 800.6(c)) between the USPS and Oregon SHPO, as amended and restated in 2015 (USPS 2015a; see Appendix D). As such, adverse effects to the existing P&DC/VMF facility would not occur.

Under Alternative 1, the existing DCC and PACC leases would be terminated. The termination of a lease is not a Federal undertaking and therefore the leased sites were not included in the Section 106 consultation with the Oregon SHPO (see letter dated March 31, 2016 in Appendix C).

### 4.9.1.2 Potential Impacts from Alternative 2 (Troutdale Site)

Three of the four historic above-ground structures within the above-ground indirect APE are not visible from the site, and the USPS has determined that they would not be affected by the proposed undertaking. The NRHP-eligible USACE laboratory building is visible from the Troutdale Site; however, the USPS has determined that the proposed undertaking would not affect the building because its setting would not be diminished by the new USPS facility.

The USPS initiated Section 106 consultation with the Oregon SHPO and other consulting parties for the proposed undertaking at the Troutdale Site in a letter dated March 31, 2016 which included the Cultural Resources Report (AECOM 2016) and the USPS determination of no effect on historic properties. The Oregon SHPO concurred with that determination for above-
ground historic resources in a letter dated May 2, 2016 (see Appendix C). In a letter dated May 3, 2016 (see Appendix C), the SHPO stated that the project would likely have no effect on any significant archaeological objects or sites and additional archaeological research is not anticipated for this Site.

Under Alternative 2, the existing USPS-owned and NR-eligible P&DC/VMF facility on NW Hoyt Street in Portland, Oregon would be transferred to the Portland Development Commission. A transfer of the P&DC/VMF facility out of Federal ownership would be an adverse effect pursuant to 36 CFR Part 800.5(2)(vii). The USPS has resolved the adverse effect through a 2011 MOA (pursuant to 36 CFR Part 800.6(c)) between the USPS and Oregon SHPO, as amended and restated in 2015 (USPS 2015a). As such, adverse effects to the existing P&DC/VMF facility would not occur.

Under Alternative 2, the existing DCC and PACC leases would be terminated. The termination of a lease is not a Federal undertaking and therefore the leased sites were not included in the Section 106 consultation with the Oregon SHPO (see letter dated March 31, 2016 in Appendix C).

4.9.1.3 Potential Impacts from the No Action Alternative

Under the No Action Alternative, the USPS would continue P&DC/VMF operations at the USPS-owned facility on NW Hoyt Street, and would not dispose of the property; therefore, there would be no adverse effects on the NRHP-eligible P&DC/VMF property.

The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to those described above for Alternatives 1 and 2. However, should these sites be developed by non-Federal entities, Section 106 of the NHPA would not apply; any extant NRHP-eligible archaeological resources within the direct APE of the Troutdale Site would not need to be addressed.

4.10 SOCIOECONOMIC RESOURCES

4.10.1 Demographics

This section presents an overview of major demographic characteristics and trends, including population, age, housing, education, vehicle availability, and income, in the vicinities of both the Colwood and Troutdale Sites. Demographic characteristics and trends are presented at the census tract level, and are compared with the surrounding County. For the purpose of this analysis, the study area is defined as the census tract that contains each proposed site. The Colwood Site is in census tract 73 in the northeastern part of the City of Portland. The Troutdale Site is in census tract 102 in the northern part of the City of Troutdale. Both locations are in Multnomah County, Oregon.

Based on 2010–2014 American Community Survey (ACS) 5-Year Estimates, the total population of Multnomah County was 757,371 persons. During this same time period, census tract 73 reported 1,604 persons and census tract 102 reported 5,872 persons; combined, the two census tracts accounted for less than one percent of the County’s population.
The two census tracts exhibit different age distributions. The largest age group in census tract 73 is persons between 25 and 29 years at 15 percent of the population, and only 5 percent of the population is age 65 or above. Children under 5 years of age account for 1.5 percent of the total population in census tract 73. Census tract 102 has an older population, with nearly 17 percent of the population composed of persons 65 years and above, with the largest age group being persons between the ages of 50 and 64. Children under 5 years of age account for 3.5 percent of the total population in census tract 102.

Census tract 73 has about 200 housing units; more than half of these were built between 1940 and 1960, and renters occupy nearly 70 percent of the housing stock. Census tract 102 has many more housing units (approximately 2,500) that are newer (mostly constructed after the 1980s), nearly 75 percent of which are owned rather than rented.

Nearly three-quarters of the population 25 years and above within Multnomah County have some higher education or college degree such as an associate, bachelors, or graduate degree. This percentage is below 40 percent in census tract 73 and about 57 percent in census tract 102.

Census tract 73 had a higher percentage of persons completing high school (37 percent) than either Multnomah County (19 percent) or census tract 102 (27 percent).

Data on vehicles per household provide a good indication of household income, as well as insight on the potential commuting patterns of residents. Overall in Multnomah County, just four percent of homeowners had no vehicle, and 25 percent of the renters were without a vehicle. It is likely that some portion of this workforce utilizes some of the well-established public transportation choices, especially in downtown Portland, and therefore do not own a vehicle more out of personal choice even if they have the necessary income. In census tract 73, nearly 17 percent of homeowners, and 25 percent of renters had no vehicle in their households. This suggests that residents in census tract 73 have lower incomes and also less flexibility in making decisions regarding employment location. In census tract 102, both these percentages were lower than 10 percent, suggesting these residents have more employment choices than those residents in census tract 73.

Multnomah County reported a slightly higher median income ($52,845) than the State ($50,521). The reported median household income in census tract 73 was $30,625. The median household income of census tract 102 ($57,659) was much higher than that reported in census tract 73, as well as higher than the County and the State as a whole.

The percentage of persons below the poverty level in Multnomah County is approximately 19 percent. Although census tract 102 has a slightly lower percentage of persons below the poverty level at about 18 percent, the percentage of persons below the poverty level in both census tracts is nearly double that of the County at about 37 percent.

### 4.10.2 Employment

The unemployment rate in Multnomah County was 9.8 percent, which is lower than the 10.5 percent unemployment rate reported in the State of Oregon (U.S. Census, 2010-2014). Census tract 73 reported an unemployment rate of 17 percent, which is higher than both the County and State. The unemployment rate in census tract 102 was 8.3 percent, lower than both the County and State. Thus, the Colwood Site has double the unemployment rate of the Troutdale Site.

In census tract 73, hospitality (entertainment, recreation, and accommodation and food services) and construction services were the largest employment sectors. Portland International Airport,
located in census tract 73, is one of the major employers, followed by several hotels located near the airport. In census tract 102, the largest employment sector is manufacturing, followed by retail/trade and education/health care.

4.10.3 Tax Revenue

As a Federal entity, the USPS does not pay property taxes to the City of Portland for the existing P&DC/VMF facility because it pays no taxes for properties it owns. The USPS pays taxes to the City of Portland for the DDC and PACC leased facilities.

4.10.4 Potential Impacts from Alternative 1 (Colwood Site)

Alternative 1 would construct and operate the new, fully integrated, and modern USPS facility at the Colwood Site in an area with high unemployment, a relatively young population of mostly renters with income levels lower than both the County and the State. During the construction phase, approximately 200 temporary construction jobs would be created, which could result in short-term direct benefits on employment in the local area should residents be employed in the construction of the facility. During the 1-2 year construction phase scheduled from approximately summer 2016 to summer 2018, it is likely that the construction workforce would purchase food and small items for daily consumption from local stores, which would result in short-term indirect benefits to local businesses and their workforce. The approximately 1,250 USPS employees working at the new facility would also purchase items from local businesses, resulting in long-term indirect benefits to the local economy.

If the USPS purchases the Colwood Site, no tax revenues would accrue to the City of Portland, since the USPS does not pay taxes on properties it owns. However, the tax revenues on the existing P&DC/VMF property would accrue to the City of Portland once the property is no longer in USPS ownership.

Because children may suffer disproportionately from environmental health risks and safety risks, EO 13045, Protection of Children from Environmental Health Risks and Safety Risks (1997), as amended by EO 13296 (2003), was intended to prioritize identification and assessment of environmental health risks and safety risks that may affect children and to ensure Federal agencies’ policies, programs, activities, and standards address environmental and safety risks to children. No adverse impacts to public health and safety or children are anticipated to result from implementation of Alternative 1. Construction areas would be secured to prevent unauthorized access and dust and noise would be limited to the extent practicable. Construction vehicles and equipment would be stored in a fenced, secure area to prevent access by children and unauthorized persons.

Overall, the USPS does not anticipate any significant impacts on socioeconomics from implementation of Alternative 1.

4.10.5 Potential Impacts from Alternative 2 (Troutdale Site)

Alternative 2 would construct and operate the new, fully integrated, and modern USPS facility at the Troutdale Site in an area with low unemployment, an older population of mostly
homeowners, and income levels higher than both the County and the State. During the construction phase, approximately 200 temporary construction jobs would be created. During the 1-2 year construction phase scheduled from approximately 2017/2018 to 2019, it is likely that the construction workforce would purchase food and small items for daily consumption from local stores. This would result in direct and indirect spending in the area, thereby benefitting the local businesses and workforce. The permanent workforce at the completed facility would also purchase items from local businesses. In addition, new businesses may open nearby to cater to the new facility. In addition to new employment opportunities for the local workforce, these new businesses would pay some tax revenue that would accrue to the City of Troutdale. It is likely that some portion of the USPS workforce would take up residence in the area, which would benefit the local housing market.

If the USPS purchases the Troutdale Site, no tax revenues for the property would accrue to the City of Troutdale, since the USPS does not pay taxes on properties it owns. Since the existing P&DC/VMF facility would likely come out of Federal ownership, taxes on that property would accrue to the City of Portland.

No adverse impacts to public health and safety or children are anticipated to result from implementation of Alternative 2. Construction areas would be secured to prevent unauthorized access and dust and noise would be limited to the extent practicable. Construction vehicles and equipment would be stored in a fenced, secure area to prevent access by children and unauthorized persons.

Overall, the USPS does not anticipate any significant impacts on socioeconomics from Alternative 2.

4.10.6 Potential Impacts from the No Action Alternative

Under the No Action Alternative, the existing P&DC/VMF facility would not transfer out of Federal ownership and taxes on the property would not accrue to the City of Portland.

The Colwood and Troutdale Sites would likely be developed by others, resulting in similar impacts to those described above for Alternatives 1 and 2. However, should these sites be developed by non-Federal entities, there would be an increase in local tax revenues.

4.11 ENVIRONMENTAL JUSTICE

EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations was issued by President Clinton in 1994 to focus the attention of Federal agencies on human health and the environmental conditions in minority and low-income communities, and to ensure that if there are disproportionately high and adverse human health or environmental effects on these communities, they are identified and addressed. The EO requires that each Federal agency:

- Conduct its programs, policies, and activities that substantially affect human health or the environment in a manner that ensures that such programs, policies, and activities do not have the effect of excluding persons (including populations) from participation in, denying persons (including populations) the benefits of, or subjecting persons (including
populations) to discrimination under such programs, policies, and activities, because of their race, color, or national origin (Subsection 2-2).

- Work to ensure that public documents, notices, and hearings relating to human health or the environment are concise, understandable, and readily accessible to the public (Subsection 5-5(c)).

Population and income characteristics from two sources, the 2010 U.S. Census of Population and Housing and the 2010–2014 ACS estimates, were analyzed to identify the number and percentage of minority and low-income persons in the study area. The USPS evaluated the following information to determine the demographics in the study area, which includes census tract 73, census tract 102, and Multnomah County:

- Racial and Ethnic Characteristics – Categorized into: White Hispanic, White Non-Hispanic, Black or African American, American Indian and Alaska Native, Asian, Native Hawaiian and Other Pacific Islander, Other Races, Some Other Race Alone, and Persons of Hispanic Origin.

- Percentage of Minority Population – As defined by the U.S. Census Bureau, the minority population includes all non-Whites and White-Hispanic persons.

- Low-Income Population – The percentage of persons living below the poverty level as defined by the U.S. Department of Health and Human Services (HHS).

Demographic data from the 2010 U.S Census for census tract 73, census tract 102, and Multnomah County are shown in Table 3.

### Table 3. Demographics of the Study Area Census Tracts

<table>
<thead>
<tr>
<th></th>
<th>Colwood Site (Census Tract 73)</th>
<th>Troutdale Site (Census Tract 102)</th>
<th>Multnomah County, Oregon</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Race</strong></td>
<td>Number</td>
<td>Percentage</td>
<td>Number</td>
</tr>
<tr>
<td>White Alone</td>
<td>1,370</td>
<td>70.3%</td>
<td>4,213</td>
</tr>
<tr>
<td>Non-Hispanic White</td>
<td>1,217</td>
<td>62.5%</td>
<td>4,016</td>
</tr>
<tr>
<td>Hispanic White</td>
<td>153</td>
<td>7.9%</td>
<td>197</td>
</tr>
<tr>
<td>Non-White Alone</td>
<td>578</td>
<td>29.7%</td>
<td>1,816</td>
</tr>
<tr>
<td>Black or African American Alone</td>
<td>350</td>
<td>18.0%</td>
<td>282</td>
</tr>
<tr>
<td>American Indian and Alaska Native Alone</td>
<td>52</td>
<td>2.7%</td>
<td>64</td>
</tr>
<tr>
<td>Asian Alone</td>
<td>53</td>
<td>2.7%</td>
<td>512</td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander Alone</td>
<td>10</td>
<td>0.5%</td>
<td>50</td>
</tr>
<tr>
<td>Other*</td>
<td>113</td>
<td>5.8%</td>
<td>908</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>1,948</td>
<td>100.0%</td>
<td>6,029</td>
</tr>
<tr>
<td>Hispanic Origin</td>
<td>271</td>
<td>13.9%</td>
<td>942</td>
</tr>
<tr>
<td>Minority Population</td>
<td>731</td>
<td>37.5%</td>
<td>2,013</td>
</tr>
</tbody>
</table>

Source: U.S. Census 2010
* Includes “Some other race alone” and “Two or more races”
As shown in Table 3, both census tracts have higher percentages of minority persons than the County. African-American persons were the largest minority group in census tract 73 at about 18 percent. In census tract 102, Asians were the single largest minority group at 16 percent of the population. White persons comprised around 70 percent of the population in both census tracts.

As stated in Section 4.10.1, median income levels in census tract 73 were lower than both the County and the State, while median income levels in census tract 102 were higher than both the County and the State. The 37 percent of persons below the poverty line in census tract 73 was higher than that of the County’s 19 percent, while census tract 102 had a lower percentage than the County at about 18 percent.

Based on the census tract data and definitions in this section for low-income and minority populations, the compliment of minority persons around the Colwood Site is 37.5 percent of the total population; 37 percent of the population is below the poverty level. Around the Troutdale Site, minority persons comprise 33.4 percent of the population; 18 percent of the population is below the poverty level.

Therefore, the census tract around the Colwood Site has a high minority, high poverty, and low-income population, while the census tract around the Troutdale Site has a high-minority (but not high poverty or low-income) population.

4.11.1 Potential Impacts from Alternative 1 (Colwood Site)

Because the census tract around the Colwood Site has a high minority, high poverty, and low-income population, the USPS evaluated the potential for the Proposed Action to result in disproportionately high and adverse human health or environmental effects on the community surrounding the site.

To make a determination of whether low-income and minority populations would be disproportionately adversely affected, the USPS determined what impacts Alternative 1 would have on the community. Under the Proposed Action, potential adverse impacts could result from transportation, air quality, noise, and hazardous materials, and may disproportionately affect low-income and minority populations. The potential impacts from the Proposed Action are summarized as follows:

- There would be no significant adverse impacts to transportation from the Proposed Action (Section 4.3.1). During construction, traffic on roadways in the vicinity of the Colwood Site would increase, which may result in minor traffic congestion during peak traffic periods. However, traffic BMPs, such as appropriate signage and placement of barriers along affected roads, would be implemented to alert pedestrians and motorists of construction activities and to control traffic flow. Additionally, the traffic analysis report completed for the Colwood Industrial Park development in 2012 indicates that traffic would exceed acceptable levels at three intersections, but recommended improvements have been completed at all three of those locations. Further, of the three intersections, NE Killingsworth Street/I-205 Southbound Ramp, where improvements are complete, is the only one with residential housing units. Therefore, impacts to local traffic are expected to be minor, and would not result in adverse effects.
• There would be no significant adverse impacts to local air quality from the Proposed Action *(Section 4.4.1).* Air emissions during construction would be minimized by using BMPs such as dust suppression and control, use of propane to fuel construction vehicles, and minimizing idling of construction and delivery vehicles. Air emissions may be increased by the installation of stationary air emission sources (such as heating and cooling systems) and by increased traffic. However, these are expected to be minor impacts. Long-term emissions may ultimately be reduced as a result of the Proposed Action, as three USPS facilities would be consolidated into one, which is expected to have increased operational facilities.

• There would be no significant adverse impacts to noise from the Proposed Action *(Section 4.5.1).* Construction-related activities are not expected to generate noise above thresholds stipulated in the local noise ordinance, and adequate mitigation measures would be implemented throughout the construction phase of the project. Long-term impacts from noise associated with facility operation would be greater than under the existing land use (golf course), but minimal in comparison to the surrounding soundscape, which consists of other industrial facilities and the Portland International Airport to the north.

• There would be no significant adverse impacts to hazardous materials from the Proposed Action *(Section 4.13.1).* Potential minor impacts are related to the storage of hazardous materials on site and the potential for spills at the VMF, which would be maintained at acceptable levels through permitting and BMPs. Additionally, a plan for remedial action has been developed for the existing P&DC/VMF property.

Impacts to the four resources described above would be mitigated through BMPs and compliance with applicable permitting requirements. Less-than-significant traffic impacts would occur on main arteries rather than on smaller neighborhood roads. In addition, ongoing road expansion and traffic improvement projects are expected to mitigate traffic impacts. As a result, no disproportionately high adverse impacts to minority or low-income populations would occur.

### 4.11.2 Potential Impacts from Alternative 2 (Troutdale Site)

The census tract around the Troutdale Site has a slightly higher percentage of minority persons compared to the County, although poverty levels are lower and income levels are higher than the County. Due to the presence of a high-minority population, the USPS evaluated the potential for Alternative 2 to result in disproportionately high and adverse human health or environmental effects on the community surrounding the site.

To make a determination of whether minority persons would be disproportionately adversely affected, the USPS determined what impacts the Proposed Action would have on the community. Under the Proposed Action, potential adverse impacts could result from transportation, air quality, noise, and hazardous materials, and may disproportionately affect minority populations. The potential impacts from the Proposed Action are summarized as follows:

• There would be no significant adverse impacts to transportation from the Proposed Action *(Section 4.3.2).* Traffic on roadways in the vicinity of the Troutdale Site would increase during construction, which may result in minor traffic congestion during peak
traffic periods. However Traffic BMPs, such as appropriate signage and placement of barriers along affected roads, would be implemented prior to and during construction activities to alert pedestrians and motorists of construction activities and to control traffic flow. The traffic analysis report completed for the Troutdale Site (as part of the TRIP) in 2012 indicates that traffic is not expected to exceed acceptable levels for the Troutdale Site alone. Therefore, while construction and operation of a new USPS facility at the Troutdale Site would increase traffic levels, traffic impacts are anticipated to be minor.

- There would be no significant adverse impacts to local air quality from the Proposed Action (Section 4.4.2). Air emissions during construction would be minimized by using BMPs such as such as dust suppression and control, use of propane to fuel construction vehicles, and minimizing idling of construction and delivery vehicles. Air emissions may be increased by the installation of stationary air emission sources (such as heating and cooling systems) and by increased traffic. However, these are expected to be minor impacts. Long-term emissions may ultimately be reduced as a result of the Proposed Action, as three USPS facilities would be consolidated into one, which is expected to have increased operational facilities.

- There would be no significant adverse impacts to noise from the Proposed Action (Section 4.5.2). Construction-related activities are not expected to generate noise above thresholds stipulated in the local noise ordinance, and adequate mitigation measures would be implemented throughout the construction phase of the project. Long-term impacts from noise associated with facility operation would be greater than with the current land use (undeveloped open space), but minimal in comparison to the surrounding uses, which consist of other industrial facilities and the Troutdale Municipal Airport.

- There would be no significant adverse impacts to hazardous materials from the Proposed Action (Section 4.13.2). The Troutdale Site is a Superfund site, but it is being remediated. The latest review identified no significant issues, and described the remedy as functional. If any new contamination is encountered, construction would cease until the situation has been fully evaluated. Additionally, a plan for remedial action has been developed for the existing P&DC/VMF property to address historic contamination under the property (it is not a concern to the public unless and until the property is redeveloped). The USPS and DEQ have developed a plan for remedial action in the event of a hypothetical change in future site use that addresses both soil and groundwater at the site. Potential minor impacts are related to the storage of hazardous materials on site and the potential for spills at the VMF, which would be maintained at acceptable levels through permitting and BMPs.

Impacts to the four resources described above would be mitigated through BMPs and compliance with applicable permitting requirements. Less-than-significant traffic impacts would occur on main arteries rather than on smaller neighborhood roads. In addition, ongoing road expansion and traffic improvement projects are expected to mitigate traffic impacts. As a result, no disproportionately high adverse impacts would occur to minority populations.
4.11.3 Potential Impacts from the No Action Alternative

Under the No Action Alternative, no impacts to Environmental Justice due to the Proposed Action would occur because the USPS would continue to use the P&DC/VMF facility in Portland and the two leased sites. The Colwood and Troutdale Sites would be developed by others, resulting in impacts similar to those described above for Alternatives 1 and 2. However, if the sites are developed by non-Federal entities, Environmental Justice effects would not need to be considered.

4.12 UTILITIES AND INFRASTRUCTURE

Colwood Site: The following infrastructure improvements have been completed to date by the current owner of the Colwood Site: preparation of fire and domestic water service connections, development of driveways, development of stormwater outfalls, and street/sidewalk/utility improvements. Utility connections are available on the Colwood Site and include water, gas, electrical, and telephone, as well as two sanitary sewer easements. NW Natural provides gas service, Pacific Power provides electricity service, and Comcast provides telephone and internet services to the Colwood Site. Sanitary wastewater is discharged to the City of Portland sewer system, which connects to the Columbia Boulevard Wastewater Treatment Plant.

The City of Portland provides potable water to the area. The Colwood site and neighboring areas are located in the Portland Water Bureau Retail and Wholesale Distribution Area, which obtains potable water mostly from the Bull Run Watershed approximately 30 miles east of the Colwood site, with some contribution from the City groundwater supply at the Columbia South Shore Well Field (City of Portland 2016d).

Troutdale Site: Currently, there are no utilities available at the Troutdale Site. A 10-foot-wide easement for a high-pressure gas line exists north of NW Graham Road, and drainage easements for ditches exist along the south side of NW Swigert Way and the north side of NW Graham Road. Pacific Power provides electricity service to the site vicinity. Pacific Power may require an easement for provision of electric service to the site. NW Natural provides natural gas service to the site vicinity. Comcast provides telephone and internet services to the site vicinity. Sanitary wastewater from nearby facilities is discharged to the City of Troutdale sewer system, which connects to the Troutdale's Water Pollution Control Facility.

The City of Troutdale provides potable water to the area. A Troutdale City water line runs along NW Swigert Way, as well as other streets in the vicinity of the Site (City of Troutdale 2014).

4.12.1 Potential Impacts from Alternative 1 (Colwood Site)

Utility connections, sufficient to support the proposed USPS facility, are currently available at the Colwood Site; however, Pacific Power would require an easement to install a 12.5-kilovolt electrical access on site to support the facility. All new utility connections would be buried. To avoid existing underground utility lines during ground-disturbing activities, the USPS construction contractor would coordinate with utility providers and the City of Portland prior to construction or digging. The USPS would be required to obtain approval and permitting as needed for new hookups, lines, design, and usage.
The proposed new facility would result in long-term increased use of utilities including water, sewer, natural gas, electric, and communications, such as telephone and internet. However, the site developer has ensured that utilities sufficient to support the current zoning and anticipated use would be sufficient.

The USPS does not anticipate any significant impacts on utilities and infrastructure from Alternative 1.

### 4.12.2 Potential Impacts from Alternative 2 (Troutdale Site)

In contrast to Alternative 1, utility connections are not yet available at the Troutdale Site. Based on conceptual site design, all required utilities would be located along easements on each side of NW Swigert Way and on the north side of NW Graham Road. Site-specific connection to these utilities would be determined during final engineering design. All utility connections would be buried. To avoid existing underground utility lines during ground-disturbing activities, the USPS construction contractor would coordinate with utility providers and the City of Troutdale prior to construction or digging. Either the developer (Port of Portland) or the USPS would be required to obtain approvals and permitting as needed for new hookups, lines, design, and usage. Construction at this location would begin in 2017/2018, with expected occupancy by the end of 2019. Therefore, compared to Alternative 1, Alternative 2 may require additional time and possibly cost to install appropriate utility connections.

The proposed new facility would result in long-term increased use of utilities including water, sewer, natural gas, electric, and communications, such as telephone and internet. However, the site developer has ensured that utilities to support the current zoning and anticipated use would be sufficient.

The USPS does not anticipate any significant impacts on utilities and infrastructure from Alternative 2.

### 4.12.3 Potential Impacts from the No Action Alternative

Under the No Action Alternative, there would be no changes to utilities, so there would be no impacts to utilities at the existing P&DC/VMF property or the USPS leased sites.

### 4.13 HAZARDOUS MATERIALS AND WASTES

**Colwood Site:** The Colwood Site was formerly the northern portion of the Colwood National Golf Course. A Phase I Environmental Site Assessment (ESA) was conducted in March 2016 by URS Group, Inc. (URS) for the USPS. The long-term use of fungicides, herbicides, and pesticides from past site operations may have contaminated soil on the property and offsite sediments in the Columbia Slough and McBride Slough. Sampling during previous site investigations indicated the presence of pesticides in surface soils on portions of the Colwood Site. Soil concentrations of pesticides did not exceed the Oregon DEQ Risk Based Concentrations. The presence of pesticides was considered a Controlled Recognized Environmental Concern within the Phase I ESA (USPS 2016a). The Oregon DEQ has approved a CMMP for the site, allowing soil and sediment generated during construction activities to be
reused on-site as long as field screening has not identified it as contaminated (USPS 2016a).

Field screening focuses on identifying staining, sheens, elevated PID readings, and odors as indicators; if any of these are found, soils are considered contaminated (GeoDesign 2014).

**Troutdale Site:** The Troutdale Site is located on property that was formerly the site of an aluminum reduction plant owned and operated by RMC, and later by Alcoa. During operation, the plant’s production of aluminum generated waste material that contaminated soil, groundwater, and surface water at the site. EPA added the property to the Superfund National Priorities List in December 1994 because of soil and groundwater contamination from plant operations. From 1995 to 2006, several remedial actions were performed to remove contaminated soil and waste material; these included soil removal, environmental cap installation, and groundwater pumping. The plant was demolished between 2003 and 2006. In 2006, the EPA issued a Final ROD stating that soils have been remediated to acceptable risk-based standards for industrial uses (such as that proposed by the USPS) under the oversight of the EPA and the Oregon DEQ, with some institutional controls in place. Institutional controls include three components: a legal description of the property with corresponding map, a restrictive easement to prohibit residential or other inappropriate uses and to limit groundwater use, and restrictions on use of the capped areas to protect the integrity of the caps (EPA 2006). Groundwater monitoring will be required for a number of years into the future using existing monitoring wells. The EPA’s ROD requires onsite groundwater to be below the maximum contaminant levels for fluoride (USPS 2016b). Pumping and treatment of groundwater are required until these levels are attained (Parsons 2015; USPS 2016b).

The Oregon DEQ has approved a CMMP for the site to ensure that developers manage contaminated media in a manner consistent with approved handling and disposal methods for the TRIP. The CMMP stipulates conditions for particular areas of the TRIP, specifies conditions under which soils in certain areas can be reused, and contains procedures for encountering unanticipated contaminated materials (CH2M Hill and Alcoa, Inc. 2007).

**Existing P&DC/VMF Site:** At the existing P&DC/VMF property, there are two areas of residual contamination due to leaking UST (LUST) incidents. In 1992, five USTs were removed, and contaminated soils were detected that could not be excavated without damaging structures. In 1993, one UST was removed along with accessible contaminated soil, but some soil was left in place due to concerns that removal would jeopardize the P&DC building foundation. Oregon DEQ issued Conditional No Further Action letters for both LUST incidents that indicated if site conditions changed and access was available to these areas, USPS would be responsible for further evaluation and cleanup. There have not been any spills reported at either the P&DC or the VMF. Other contamination was discovered onsite in the late 1990s that appeared to be the result of historical railyard and manufactured gas plant operations. Extensive investigations have been completed, submitted, and approved by DEQ; documentation includes a ROD, CMMP, Easement and Equitable Servitude (E&ES), and a Closure Report for a Conditional No Further Action.
4.13.1 Potential Impacts from Alternative 1 (Colwood Site)

Hazardous materials, such as paints, petroleum-based products, cleaning solvents, antifreeze, and other similar materials may be used during construction. Construction activities could present health and safety risks to those workers handling hazardous materials, such as oils and lubricants. Because the public would not be exposed to hazardous materials or wastes during construction, there would be no impacts to public health or safety.

To minimize risks, all construction activities would be performed by qualified personnel trained in the proper use of equipment, including all appropriate materials handling and safety precautions. Any hazardous materials discovered, generated, or used during construction would be handled and disposed of in accordance with applicable local, State, and Federal regulations. The construction contractor would be required to implement a spill prevention and response plan to minimize the effects of any spill or leak of a hazardous materials or wastes.

If contaminated soils are encountered during construction, the contractor will be required to comply with the existing CMMP for the removal and handling of contaminated soils. Additionally, all activities would be conducted in accordance with OSHA regulations. The construction contractor would place appropriate signage and barriers near construction sites as needed and prior to construction to keep the public from entering the construction areas. Therefore, negligible to minor impacts on hazardous materials and wastes are anticipated from construction of the Proposed Action.

During operation of the new facility, the USPS would be required to comply with all Federal, State, and local regulations for handling, storing, and disposing of hazardous materials and wastes and would implement a spill contingency or spill pollution, prevention, response, and/or countermeasures plan to prevent and minimize impacts of a spill, as required. The USPS would properly label, store, and dispose of such materials, as well as monitor onsite vehicles for leaks. If a spill were to occur at the site on nearby roadways, depending on the size of the spill, the closest available fire response team would be contacted for assistance. Any spillage of hazardous materials would likely be localized and of limited quantity. Therefore, negligible impacts from the use and transport of hazardous materials and wastes are anticipated from operation of the new facility.

Any spillage of hazardous materials would likely be localized and of limited quantity. Therefore, negligible impacts from the use and transport of hazardous materials and wastes are anticipated from operation of the new facility.

When the existing P&DC/VMF property is redeveloped and prior to ground disturbance, the DEQ would require a remedial action to be performed for the existing contamination. The USPS and DEQ have developed a plan for remedial action in the event of a hypothetical change in future site use that addresses both soil and groundwater at the site for the LUST areas and the historic railroad and gas plant contamination.

Overall, the USPS does not anticipate any significant impacts due to hazardous materials and wastes from Alternative 1.
4.13.2 Potential Impacts from Alternative 2 (Troutdale Site)

The TRIP is listed as a Superfund Site by the EPA and there are long-term groundwater monitoring requirements for the site (USPS 2016); however, the USPS would not be responsible for onsite monitoring, which would remain the responsibility of the Port of Portland. During operation of the new facility, the ongoing groundwater monitoring activities would identify any potential impacts from previous contamination, and impacts would be mitigated in accordance with EPA requirements.

The selected remedy documented in the ROD for the Troutdale Site includes four elements: institutional controls to protect future users of the site, continued operation of the groundwater focused extraction/production well optimization system, maintenance and monitoring of capped areas, and monitoring of groundwater to evaluate effectiveness (EPA 2006).

Institutional controls include three parts: a legal description of the property with corresponding map, a restrictive easement to prohibit residential or other inappropriate uses and to limit groundwater use, and restrictions on use of the capped areas to protect the integrity of the caps (EPA 2006). Five-year reviews were performed in 2008 and 2013. The 2013 review identified no significant issues and found that the remedy is functioning as designed; the date of the next five-year review is 2018 (EPA 2013).

In accordance with the ROD’s risk-based evaluation of site contamination, site workers under an industrial use scenario would not be exposed to unacceptable risk (EPA 2006). In the event that undiscovered contamination is encountered during construction, the appropriate authorities would be notified and work will cease until the contamination has been evaluated.

These activities would continue to ensure impacts are less than significant and would be similar to those described for Alternative 1.

When the existing P&DC/VMF property is redeveloped and prior to ground disturbance, the DEQ would require a remedial action to be performed for the existing contamination. The USPS and DEQ have developed a plan for remedial action in the event of a hypothetical change in future site use that addresses both soil and groundwater at the site for the LUST areas and the historic railroad and gas plant contamination.

Overall, the USPS does not anticipate any significant impacts due to hazardous materials and wastes from Alternative 2.

4.13.3 Potential Impacts from the No Action Alternative

Under the No Action Alternative, the USPS would continue to operate its P&DC subject to the site-use restrictions set forth in the ROD and no impacts related to hazardous materials and wastes would occur at the existing P&DC/VMF property or leased facilities. The Colwood and Troutdale Sites would be developed by others, resulting in impacts similar to those described above for Alternatives 1 and 2.
5.0 CUMULATIVE IMPACTS

Cumulative impacts, as defined in 40 CFR Part 1508.7, are project effects resulting from the incremental impact of the Proposed Action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such actions. Cumulative impacts can result from individually minor, but collectively significant, actions taking place over the same period of time in the same area.

At the Colwood Site (Alternative 1), most properties in the vicinity are already developed, but redevelopment projects have the potential to occur in Portland on an ongoing basis. There are two ongoing or known planned projects close to the Colwood Site:

- The Portland International Airport is currently working to lengthen the northern runway (Port of Portland 2016b) and expand Concourse E to contain more gates (The Oregonian 2015).

- Existing operation of the Portland International Airport including aircraft operations.

- The southern portion of the Colwood National Golf Course will be converted into a park and wetland mitigation area (City of Portland 2015a; City of Portland 2016c).

At the Troutdale Site, the following two primary projects are ongoing and/or reasonably foreseeable to develop the TRIP and improve the local transportation infrastructure:

- Development of the TRIP in accordance with the master plan will continue for the next several years. Most lots in the TRIP are not yet developed; the exception is the FedEx facility located to the north, which was built during Phase I of the TRIP development around summer of 2009. The remaining nine available lots are scheduled for development and sale in the near future, during Phase II of the TRIP Project. It is not yet known specifically what entities would purchase and use these properties. Additional lots will be prepared and developed during Phase III.

- Local transportation infrastructure improvements are being conducted with a combination of funding sources (Portland Tribune 2012), some of which have been requested through grants such as the Department of Transportation (DOT) TIGER Grant Program (Port of Portland 2011). Improvements include components such as updating the nearby I-84 interchange, extending Swigert Way to meet with Graham Road, improving Graham Road, and extending the 40-Mile Loop Trail.

Due to the scale of the Proposed Action and its anticipated environmental effects as described in Section 4, including planned construction and operations of the consolidated facility, cumulative impacts were evaluated over a reasonable future 10-year time period. When combined with the potential effects of the Proposed Action, the following four resources are most likely to be affected by current and future actions in the vicinity of the Colwood or Troutdale Sites: transportation, air quality, noise, and environmental justice. The other resources evaluated in this EA would not be expected to experience meaningful effects due to the Proposed Action. Therefore, the Proposed Action would not contribute to cumulative effects to these resources.
5.1 TRANSPORTATION

The two reasonably foreseeable future actions occurring in the vicinity of the Colwood Site are not expected to cause additional traffic impacts in the area. As a result, the USPS does not anticipate cumulative impacts to transportation in the vicinity of the Colwood Site.

In the vicinity of the Troutdale Site, the continued development of the TRIP would result in increased levels of traffic near the site. The traffic impact analysis developed for the TRIP modeled future transportation impacts to nearby intersections based on the development of all 13 parcels available under Phase II. When combined with other development phases for the TRIP, the report concluded that the following intersections could potentially be affected near the Troutdale Site: Marine Drive/I-84 westbound on ramp, Marine Drive/I-84 eastbound off ramp, Graham Road/I-84 westbound off ramp, Graham Road/I-84 eastbound on ramp, and Sundial Road/Swigert Way. Although the four I-84 interchange intersections would exceed local transportation standards, they would still operate below full capacity. Therefore, the report suggested that the TRIP developer request an exception to authorize the increased traffic at these intersections. Based on traffic projections, the Sundial Road/Swigert Way intersection would exceed local transportation standards during the evening peak hour. To alleviate potential traffic impacts, the study suggested the installation of a traffic signal at the Sundial Road/Swigert Way intersection to meet jurisdictional standards during peak hours (City of Troutdale and Port of Portland 2012). In addition to these improvements, the proposed infrastructure improvements that are gradually being implemented (Portland Tribune 2012) by the TRIP developer should also help alleviate traffic congestion and increase safety in the vicinity of the Troutdale Site. As a result, cumulative impacts to traffic in the area are not expected.

5.2 AIR QUALITY

The spatial extent of the cumulative air analysis is the Portland metro area. One of the two reasonably foreseeable future actions occurring in the vicinity of the Colwood Site – conversion of the rest of the Colwood National Golf Course into a park and wetland mitigation area – would result in temporary emissions during construction only. Neither of these projects would contribute to long-term impacts on air quality.

Expansion of the Portland International Airport concourse and northern runway would result in temporary increases in air emissions during construction and long-term increases in air emissions due to an increase in the number of flights landing/taking off from the airport and operation of the concourse. Existing operation of the Portland International airport, including aircraft operations, results in emissions of NAAQS criteria pollutants and GHGs. The Port of Portland is covered under existing CAA permits for airport operations and would be required to obtain CAA permits (or amend existing permits) for expanded airport operations, including mobile emissions associated with aircraft, which would require evaluation of air emissions impacts on air quality and implementation of mitigation measures to minimize impacts. With adherence to Federal regulations and permit requirements, existing operations and expansion of the airport would not cause significant adverse effects on local air quality. For the Proposed Action, when compared to the existing operations of the existing P&DC/VMF facility, the DDC, and the PACC, emissions of NAAQS criteria pollutants and GHGs would be similar or would decrease over the long term.
due to increased energy efficiency of the new facility and consolidated operations. Therefore, the
incremental contribution of the emissions from operation of the proposed USPS facility at the
Colwood Site, when added to short- and long-term emissions from the reasonably foreseeable
future actions would not be significant.

Development of the TRIP would result in short- and long-term increases in air emissions during
construction and operation phases of new commercial facilities, respectively. Local
transportation improvement would result in increased air emissions during construction.
Proposed USPS construction and operation activities, when combined with other TRIP
development and nearby airport operations, may result in cumulative temporary adverse impacts
on local air quality during construction of the USPS facility. Based on adherence to CAA permit
requirements by the USPS, long-term, the incremental contribution of emissions from operation
of the proposed USPS facility at the Troutdale Site, when added to long-term emissions from
development of the TRIP are not expected to be significant.

5.3 NOISE

At the Colwood Site, noise generated by the Proposed Action would contribute to the existing
noise levels of an industrial soundscape, with the most prominent noise feature in the area being
the Portland International Airport. The Port of Portland would adhere to the existing Aviation
Noise Management Program (Port of Portland 2015c). Any future activities would be in
compliance with this Program and with the noise compatibility studies produced for the Portland
International Airport (Port of Portland 2016a; Jacobs Consultancy 2010) as required by 14 CFR
Part 150. Three sensitive noise receptors, all hotels, are located in the area, but with appropriate
mitigation measures in place, such as shutting down noise-generating heavy equipment when it is
not needed and locating stationary equipment as far from sensitive receptors as possible,
cumulative adverse impacts to these receptors are expected to be minor during daytime hours and
negligible at night. The closest residential receptors are about one-half mile away, and would not
be affected by noise associated with the Proposed Action (thus there would be no cumulative
impacts on this residential area from noise when other projects are combined with the Proposed
Action).

Although the Troutdale Site is not currently surrounded by industrial facilities, development of
the TRIP would result in changes in cumulative noise levels from the areas surrounding the
Troutdale Site. Proposed USPS construction activities, when combined with other TRIP
development and nearby airport operations, may result in cumulative adverse impacts on the
nearby Columbia Gorge Inn Gateway Hotel and the recreational users of the 40-mile loop trail
from elevated noise levels. To reduce their contribution to this less-than-significant cumulative
effect, the USPS would comply with its BMPs, and would avoid working during night-time
hours, weekends, and holidays to the maximum extent practicable. The closest residential
receivers are about one-half mile away from the site, and would not be adversely affected by
noise associated with the Proposed Action (thus, there would be no cumulative impacts on this
residential area from noise when other projects are combined with the Proposed Action).
5.4 ENVIRONMENTAL JUSTICE

In general, environmental degradation to the physical or social environment in a minority or low-income community can arise from past projects that had major adverse impacts on the environment. Additional impacts from an individual action, however small, can have a cumulative adverse effect related to environmental justice if previous levels of environmental degradation are disproportionately high on a minority or low-income community.

As described in Section 4.10.1, the residential community that lies approximately one-half mile south of the Colwood Site, and is in the same census tract as the Colwood Site, has demographic characteristics of a high percent minority, high poverty, and low-income population compared to the County; this community may therefore be vulnerable to environmental justice impacts.

As described in Section 4.10.2, the residential community that lies approximately one-half mile south of the Troutdale Site, and is in the in the same census tract as the Troutdale Site, has a slightly higher percentage of minority persons than the County, but has higher income than the County, and therefore is not considered disproportionately vulnerable to environmental justice impacts.

Under either Alternative 1 or 2, the USPS has determined that impacts to resources that have the potential to adversely affect the minority and low-income community in the area of the Colwood Site – air quality, hazardous materials, transportation, and noise – would range from no impacts to minor impacts, as described in Section 4.11. Impacts to these resources from the Proposed Action would be mitigated to the maximum extent practicable through BMPs during construction and operations, and CAA permitting for air quality.

Existing noise levels from the Portland International Airport would contribute to cumulative noise impacts in the area. Of the two reasonably foreseeable future actions noted above for the vicinity of the Colwood Site, the Portland International Airport runway extension and concourse expansion would likely generate additional noise in the area during construction, which would combine with noise from the USPS Proposed Action. The Port of Portland, the entity in charge of the runway extension/concourse expansion project, has a noise mitigation plan in place for the Portland International Airport, which would mitigate noise impacts. The remaining two projects (developing a park/wetland mitigation area on the former golf course) would result in benefits to all populations, and overall lessen potential transportation and (traffic) noise cumulative impacts in the area.

Therefore, due to the low potential for adverse environmental justice impacts from the Proposed Action, the mitigation measures that the USPS would implement, when combined with other reasonably foreseeable future actions in the vicinity of the Colwood Site (one of which would be beneficial to all populations), no disproportionate cumulative impacts to the minority and low-income community in census tract 73 is anticipated.
6.0 PUBLIC AND AGENCY INVOLVEMENT

The USPS has notified the public and interested parties of its intent to prepare an EA for this Proposed Action and is soliciting public and agency review and comment.

6.1 NOTICE OF INTENT

The USPS published a Notice of Intent (NOI) to prepare this EA in The Oregonian on March 9, 2016 (see Appendix E). Copies of the NOI were also posted in the closest USPS facilities with public access for 30 days beginning March 9, 2016:

- U.S. Post Office at 715 NW Hoyt Street, Portland
- U.S. Post Office at 647 SW Cherry Park Road, Troutdale
- U.S. Post Office at 7640 NE Airport Way, Portland

6.2 AGENCY COORDINATION

The USPS sent letters requesting project review of the Proposed Action and Alternatives to the following agencies and interested parties.

- City of Portland Bureau of Planning and Sustainability
- City of Portland Mayor’s Office
- City of Troutdale Mayor’s Office
- Confederated Tribes of the Grand Ronde
- Confederated Tribes of Siletz
- Confederated Tribes of the Warm Springs, Tribal Historic Preservation Office
- Oregon Department of Environmental Quality
- Oregon Department of Fish and Wildlife
- Oregon Department of Transportation
- Oregon Parks and Recreation Department State Historic Preservation Office
- Portland Development Commission
- Port of Portland
- U.S. Fish & Wildlife Service, Oregon Fish and Wildlife Office

Responses received to date are addressed in the relevant resource sections of Chapter 4 and are included in Appendix C.

6.3 NOTICE OF AVAILABILITY

The USPS notified the public of the availability of the Draft EA through publication of a Notice of Availability (NOA) on June 10, 2016 in The Oregonian (see Appendix E).
Copies of the NOA were also posted in the closest USPS facilities with public access for 15
days beginning June 11, 2016:

- U.S. Post Office at 715 NW Hoyt Street, Portland
- U.S. Post Office at 647 SW Cherry Park Road, Troutdale
- U.S. Post Office at 7640 NE Airport Way, Portland

The Draft EA is available for public review online at http://about.usps.com/who-we-
are/legal/portland-ea.pdf.

Comments on the Draft EA may be submitted until the close of the 15-day public comment
period on Saturday June 25, 2016 via electronic mail to ann.m.sarver@usps.gov or via USPS
mail to:

Ms. Ann Sarver
Facilities Environmental Specialist
USPS Facilities Department – HQ Field Office
Facilities Implementation
6013 Benjamin Road, Suite 205
Tampa, Florida 33634-5178

6.4 SUMMARY OF PUBLIC COMMENTS ON THE DRAFT EA

All comments received during the 15-day public comment period will be considered in the Final
EA, summarized in this section, and included in Appendix F.
7.0 SUMMARY AND CONCLUSIONS

The USPS Proposed Action analyzed in this EA involves the construction and operation of a new, fully integrated, and modern USPS-owned facility to consolidate and incorporate the functions of three separate USPS facilities in Portland: the existing USPS-owned P&DC/VMF on Hoyt Street in downtown Portland, the leased Portland-Mt. Hood DDC, and the leased PACC within the Portland International Airport. To house all combined functions, the consolidated facility requires at least 45 acres per USPS design standards and associated space requirements (USPS 2015b). Locating the new facility near major roads and with ready access to the Portland International Airport is critical to support the requisite operations of these facilities efficiently.

As part of the Proposed Action, and concurrent with initiation of operation at the new consolidated facility, the USPS would terminate its existing leases at the DDC and the PACC and release the existing P&DC/VMF property to the Portland Development Commission. Redevelopment of the P&DC/VMF property by the Portland Development Commission would occur in consonance with local zoning, to include mixed commercial and residential uses similar to the neighboring properties in the Pearl District of Portland. Prior to vacating the existing P&DC/VMF facility, the USPS would obtain space to provide a retail unit for public use, either within the existing P&DC/VMF facility or in another retail building nearby. The USPS has consulted with the Oregon State Historic Preservation Officer to avoid and/or mitigate adverse effects on the National Register-eligible P&DC facility in accordance with the National Historic Preservation Act.

This EA examines in-depth three alternatives: the Preferred Alternative (Alternative 1) to construct and operate the new USPS facility on the Colwood Industrial Park property (Colwood Site) in Portland. This is the Preferred Alternative due to its proximity to the Portland International Airport (2.5 miles); Alternative 2 to construct and operate the new USPS facility at a site north of the Troutdale Municipal Airport within the Troutdale Reynolds Industrial Park (TRIP) in Troutdale, Oregon; and the No Action Alternative to continue operations at the existing P&DC/VMF facility and continue leasing the Portland-Mt. Hood facility for DDC operations and the PACC facility for air cargo operations.

This EA concludes that the Proposed Action would not result in significant adverse impacts on the physical, natural, cultural, and socioeconomic environment. The Proposed Action would have a long-term beneficial impact on USPS operations by providing increased operational efficiencies; substantial cost savings from the increased efficiencies of co-location, as well as from the termination of leases at the DDC and the PACC; and substantial savings in time to process, handle, and distribute mail in the Portland metropolitan area. Reduced fuel consumption and increased efficiencies in transportation components of USPS operations and a net regional traffic reduction would be realized by locating the new facility closer to the Portland International Airport. The Proposed Action would also improve the use of the underutilized existing P&DC/VMF site.

Alternative 2 would have some increased efficiencies in transportation components of USPS operations. However, because the adjacent Troutdale Airport is not large enough to meet USPS needs and the Troutdale Site is 8 miles further away from the Portland International Airport than the Colwood Site, the long-term beneficial impacts associated with the proximity of Alternative
1 to the Portland International Airport would not be realized. The Troutdale Site would not be ready for USPS purchase or building construction until 2017/2018 because of additional site work, permitting, and approvals that are needed to prepare the site for development, which would likely result in USPS having to extend one or both of its leases for the DDC or PACC. Additionally, due to site soil conditions, the USPS would be required to construct a pile foundation for the facility, at much greater cost than at Colwood.

Furthermore, maintaining the existing P&DC/VMF facility in downtown Portland and continuing to lease the DDC and PACC facilities (the No Action Alternative), would not remove the existing P&DC/VMF facility from Federal ownership and therefore benefits to land use in downtown Portland through redevelopment of an underutilized location would not be realized. The existing P&DC/VMF facility would not transfer out of Federal ownership and taxes on the property would not accrue to the City of Portland. Traffic congestion in the area of the existing P&DC/VMF facility would continue to cause delays for USPS vehicles accessing the facility.

Based on the evaluation presented within this EA, USPS concludes that there would be no significant adverse impact either individually or cumulatively, to the local environment or quality of life as a result of implementing the Proposed Action, provided the BMPs and resource-specific mitigation measures are implemented. Therefore, this EA’s analysis supports the USPS determination that an EIS is not necessary to support the decision-making process as it relates to implementation of the Proposed Action, and that a FONSI is appropriate. The Preferred Alternative would result in the fewest overall environmental impacts and least cost of all the alternatives, including the No Action Alternative. It is the best approach for USPS to consolidate the functions of the existing P&DC/VMF, the DDC, and the PACC into a single location to increase operational efficiencies and decrease operating costs.

Impacts and mitigation measures associated with the Proposed Action and alternatives, including the No Action Alternative, for each element in the environment analyzed in this EA are summarized below in Table 4.
### Table 4. Summary of Impacts and Mitigation Measures

<table>
<thead>
<tr>
<th>Resource Area</th>
<th>Alternative 1 (Colwood Site)</th>
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</table>
| **Land Use and Zoning** | **Impacts:** No impacts to land use/zoning. Removal of existing P&DC/VMF facility from Federal ownership would benefit land use in downtown Portland by allowing redevelopment or reuse of an underutilized location. | **Impacts:** Same as Alternative 1.  
**Mitigation:** No mitigation necessary. | **Impacts:** Same as Alternative 1.  
**Mitigation:** No mitigation necessary. |
| **Mitigation:** No mitigation necessary. | **Impacts:** Same as Alternative 1.  
**Mitigation:** No mitigation necessary. | **Impacts:** Benefits of transferring existing P&DC/VMF facility from Federal ownership to redevelop or reuse an underutilized location in downtown Portland would not be recognized.  
**Mitigation:** No mitigation necessary. |
| **Transportation** | **Impacts:** Temporary, minor increases in traffic congestion near the Colwood Site during construction would be offset by appropriate Best Management Practices (BMPs). Long-term, minor increase in traffic levels in the immediate vicinity of the Site.  
Increased efficiencies in transportation components of USPS operations due to consolidation of facilities and proximity to Portland International Airport (2.5 miles) would provide long-term beneficial impacts and a net regional traffic reduction.  
**Mitigation:** Additional impacts have been mitigated through improvements of nearby intersections as part of the Colwood Industrial Park development. | **Impacts:** Same as Alternative 1.  
**Mitigation:** No mitigation necessary. | **Impacts:** No changes to local traffic patterns or levels around the existing P&DC/VMF facility. Roadways in the area would remain congested.  
Temporary, minor increases in traffic congestion at the Colwood and Troutdale Sites during construction by others would be offset by appropriate BMPs.  
**Mitigation:** No mitigation necessary. |


### Table 4. Summary of Impacts and Mitigation Measures

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<td><strong>Air Quality</strong></td>
<td><strong>Impacts</strong>: Temporary, minor adverse impacts during construction would be offset by appropriate BMPs. Additional long-term, minor adverse impacts during facility operation. Overall net reduction in regional emissions compared to existing conditions due to consolidation of USPS activities and transportation and installation of new, energy-efficient equipment. &lt;br&gt;&lt;br&gt;<strong>Mitigation</strong>: Operational impacts do not require mitigation. CAA permits will be obtained as needed.</td>
<td><strong>Impacts</strong>: Same as Alternative 1. However, vehicular emissions would be higher than Alternative 1 since the Troutdale site is 8 miles further away from the Portland International Airport than the Colwood Site. &lt;br&gt;&lt;br&gt;<strong>Mitigation</strong>: Same as Alternative 1.</td>
<td><strong>Impacts</strong>: The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to those for Alternatives 1 and 2. However, continued operation of three separate USPS facilities in traffic-congested areas would result in higher levels of vehicular emissions compared to Alternatives 1 or 2. &lt;br&gt;&lt;br&gt;<strong>Mitigation</strong>: No mitigation necessary for USPS.</td>
</tr>
<tr>
<td><strong>Noise</strong></td>
<td><strong>Impacts</strong>: Short- and long-term, minor adverse impacts to the noise environment from USPS facility construction and operation with implementation of appropriate BMPs. &lt;br&gt;&lt;br&gt;<strong>Mitigation</strong>: No mitigation necessary.</td>
<td><strong>Impacts</strong>: Same as Alternative 1. &lt;br&gt;&lt;br&gt;<strong>Mitigation</strong>: No mitigation necessary.</td>
<td><strong>Impacts</strong>: The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to Alternatives 1 and 2. &lt;br&gt;&lt;br&gt;<strong>Mitigation</strong>: No mitigation necessary for USPS.</td>
</tr>
<tr>
<td><strong>Geology, Topography, and Soils</strong></td>
<td><strong>Impacts</strong>: No impacts to geology, negligible impacts to topography and soils with implementation of appropriate sediment and erosion control BMPs. &lt;br&gt;&lt;br&gt;<strong>Mitigation</strong>: No mitigation necessary.</td>
<td><strong>Impacts</strong>: Same as Alternative 1. &lt;br&gt;&lt;br&gt;<strong>Mitigation</strong>: No mitigation necessary.</td>
<td><strong>Impacts</strong>: The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to Alternatives 1 and 2. &lt;br&gt;&lt;br&gt;<strong>Mitigation</strong>: No mitigation necessary.</td>
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<tr>
<td>Water Resources</td>
<td><strong>Impacts</strong>: Short- and long-term minor adverse impacts to water resources. No impacts to groundwater expected. Impacts to wetlands have already been permitted and mitigated. No impacts to waterways. The USPS would evaluate whether the proposed facility is eligible for a No Exposure Certification (NEC), which excludes a facility from NDPES industrial stormwater permitting. If the facility is not eligible for an NEC, the USPS would obtain a NPDES industrial permit for operation of the facility, and would prepare and implement a SWPPP that would provide measures to avoid and minimize impacts from stormwater runoff. Permanent stormwater drainage measures (e.g., bioswales) are being implemented by the developer and will be completed before the USPS purchases the property. USPS would provide maintenance and upkeep of the stormwater drainage measures once it takes ownership of the property. <strong>Mitigation</strong>: No mitigation necessary.</td>
<td><strong>Impacts</strong>: Same as Alternative 1. However because Troutdale is a Superfund site, additional precautions are necessary to prevent impacts to water resources. Any dewatering performed at the site must be done in accordance with the Property Development Environmental Management Plan which outlines a “Groundwater Restricted Zone,” from which water generated by dewatering activities shall not be discharged to the ground or, untreated, to any surface water; most of the Troutdale Site falls within this zone. USPS would implement appropriate BMPs and NPDES permitting requirements similar to Alternative 1. <strong>Mitigation</strong>: No mitigation necessary.</td>
<td><strong>Impacts</strong>: The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to those for Alternatives 1 and 2. <strong>Mitigation</strong>: No mitigation necessary for USPS.</td>
</tr>
<tr>
<td>Biological Resources</td>
<td><strong>Impacts</strong>: Negligible impact to vegetation and wildlife; no impact to threatened or endangered species or designated critical habitats. <strong>Mitigation</strong>: No mitigation necessary.</td>
<td><strong>Impacts</strong>: Same as Alternative 1. <strong>Mitigation</strong>: No mitigation necessary.</td>
<td><strong>Impacts</strong>: The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to Alternatives 1 and 2. <strong>Mitigation</strong>: No mitigation necessary.</td>
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| Cultural Resources  | **Impacts:** No adverse effects to historical or archaeological resources at the Colwood Site. Transfer of the existing National Register (NR)-eligible P&DC/VMF facility out of Federal ownership would be an adverse effect. The USPS has resolved the adverse effect through a 2011 MOA, as amended and restated in 2015, between the USPS and Oregon SHPO. As such, adverse effects to the existing P&DC/VMF facility would not occur.  
**Mitigation:** No mitigation necessary. | **Impacts:** No adverse effects to historical resources at the Troutdale Site. The SHPO has concurred with USPS that the project would likely have no effect on any significant archaeological objects or sites and additional archaeological research is not anticipated for this Site.  
Transfer of the existing NR-eligible P&DC/VMF facility out of Federal ownership would be an adverse effect. The USPS has resolved the adverse effect through a 2011 MOA, as amended and restated in 2015, between the USPS and Oregon SHPO. As such, adverse effects to the existing P&DC/VMF facility would not occur.  
**Mitigation:** In the unlikely event that an archaeological object or site is encountered during project implementation, work at the Troutdale Site would cease until a professional archaeologist can evaluate the discovery. | **Impacts:** The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to those for Alternatives 1 and 2. However, should these sites be developed by non-Federal entities, Section 106 of the NHPA would not apply; any extant NRHP-eligible archaeological resources within the direct APE of the Troutdale Site would not need to be addressed by a Federal agency. However, any non-Federal entity would be subject to local or State laws (such as ORS 358.905-955 and ORS 97.740) concerning archaeological sites, objects, or human remains that may be present on the property.  
**Mitigation:** No mitigation necessary for USPS. |
| Socioeconomic Resources | **Impacts:** Minor short- and long-term indirect benefits to local economy. Increased tax revenues for the City of Portland once the existing P&DC/VMF facility transfers out of Federal ownership. These benefits would be offset by the loss of tax revenue to the City of Portland if the Colwood Site comes under Federal | **Impacts:** Minor short- and long-term indirect benefits to the City of Portland's local economy due to increased tax revenues once the existing P&DC/VMF facility transfers out of Federal ownership.  
Tax revenues for the Troutdale Site would not accrue to the City of Troutdale if the | **Impacts:** The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to Alternatives 1 and 2. However, should these sites be developed by non-Federal entities, there would be an increase in local tax revenues. |
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<td><strong>Environmental Justice</strong></td>
<td>Ownership: since the USPS does not pay taxes on properties it owns. Mitigation: No mitigation necessary.</td>
<td>Troutdale Site comes under Federal ownership, since the USPS does not pay taxes on properties it owns. Mitigation: No mitigation necessary.</td>
<td>Mitigation: No mitigation necessary.</td>
</tr>
<tr>
<td><strong>Utilities and Infrastructure</strong></td>
<td>Impacts: No disproportionately high adverse impacts to minority or low-income populations. Mitigation: Mitigation measures as described under transportation, air quality, noise, and hazardous materials sections.</td>
<td>Impacts: Same as Alternative 1. Mitigation: Same as Alternative 1.</td>
<td>Impacts: The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to Alternatives 1 and 2. Mitigation: Same as Alternatives 1 and 2.</td>
</tr>
<tr>
<td></td>
<td>Impacts: Long-term increased use of utilities including water, sewer, natural gas, electric, and communications. Utility connections sufficient to support the Proposed Action are currently available at the Colwood Site. The USPS would be required to obtain approval and permitting as needed for new hookups, lines, design, and usage. Mitigation: No mitigation necessary.</td>
<td>Impacts: Long-term increased use of utilities including water, sewer, natural gas, electric, and communications. Utility connections sufficient to support the Proposed Action are not currently available at the Troutdale Site. Compared to Alternative 1, Alternative 2 may require additional time and possibly cost to install appropriate utility connections. The Port of Portland or USPS would obtain approvals and permitting as needed for new hookups, lines, design, and usage. Mitigation: No mitigation necessary for USPS.</td>
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<td><strong>Hazardous Materials and Wastes</strong></td>
<td><strong>Impacts</strong>: No significant impacts due to hazardous materials and wastes at the Colwood Site with implementation of appropriate BMPs and compliance with the existing Contaminated Media Management Plan (CMMP) for removal and handling of any contaminated soils. The disposal of the existing P&amp;DC/VMF property would result in the exposure of previously contaminated areas should the site be redeveloped. <strong>Mitigation</strong>: If the existing P&amp;DC/VMF property is redeveloped, prior to ground disturbance the Oregon Department of Environmental Quality (DEQ) would require a remedial action to be performed for the existing contamination in both soil and groundwater at the site.</td>
<td><strong>Impacts</strong>: No significant impacts due to hazardous materials and wastes at the Troutdale Site with implementation of appropriate BMPs and compliance with the existing CMMP for removal and handling of any contaminated soils. However, the TRIP is a Superfund Site and long-term monitoring is required for the site. The disposal of the existing P&amp;DC/VMF property would result in the exposure of previously contaminated areas should the site be redeveloped. <strong>Mitigation</strong>: If the existing P&amp;DC/VMF property is redeveloped and prior to ground disturbance, the DEQ would require a remedial action to be performed for the existing contamination in both soil and groundwater at the site. <strong>Long-term monitoring of the TRIP would continue to be performed by the Port of Portland.</strong></td>
<td><strong>Impacts</strong>: The Colwood and Troutdale Sites would likely be developed by others, resulting in impacts similar to those for Alternatives 1 and 2. <strong>Mitigation</strong>: No mitigation necessary and no remedial action required for the existing P&amp;DC/VMF property.</td>
</tr>
</tbody>
</table>
8.0 REFERENCES

   Located at: [http://audubonportland.org/wcc/urban](http://audubonportland.org/wcc/urban)


Appendix A
Figures
Figure 1. Project Location Proposed U.S. Postal Service Sites
Figure 2. Proposed Colwood Site
Figure 3. Aerial Oblique Photograph of Colwood Site in August 2015
Figure 4. Conceptual Colwood Site Plan
Figure 5. Proposed Troutdale Site
Figure 7. Conceptual Troutdale Site Plan
Appendix B
Photographic Log
<table>
<thead>
<tr>
<th>Photo No.</th>
<th>Date</th>
<th>Direction Photo Taken</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>9/22/2015</td>
<td>North</td>
<td>Colwood Site Looking north from NE Cornfield Road at center of site.</td>
</tr>
<tr>
<td>2</td>
<td>9/22/2015</td>
<td>South</td>
<td>Colwood Site Looking south from site toward NE Cornfoot Road (Columbia Slough is located on the other side of the road).</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
</tr>
<tr>
<td>----------</td>
<td>------------</td>
<td>------------------------</td>
<td>-------------</td>
</tr>
<tr>
<td>3</td>
<td>9/22/2015</td>
<td>East</td>
<td>Colwood Site Looking east at northeastern corner of site.</td>
</tr>
<tr>
<td>4</td>
<td>9/22/2015</td>
<td>Southeast</td>
<td>Colwood Site Looking southeast from northcentral portion of site.</td>
</tr>
<tr>
<td>Photo No.</td>
<td>Date</td>
<td>Direction Photo Taken</td>
<td>Description</td>
</tr>
<tr>
<td>-----------</td>
<td>------------</td>
<td>-----------------------</td>
<td>-------------</td>
</tr>
</tbody>
</table>
| 5         | 9/22/2015  | East                  | **Colwood Site**  
Looking east toward Country Inn adjacent to eastern site boundary. |
| 6         | 9/22/2015  | West                  | **Colwood Site**  
View of the adjacent Oregon Air National Guard facility. |
**PHOTOGRAPHIC LOG**

<table>
<thead>
<tr>
<th>Photo No.</th>
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<th>Direction Photo Taken</th>
<th>Description</th>
</tr>
</thead>
</table>
| 7         | 9/22/2015    | North                  | **Colwood Site**  
View of the adjacent Portland International Airport. |
| 8         | 9/22/2015    | South                  | **Troutdale Site**  
Looking south at Lot 7 from Swigert Way. |
**PHOTOGRAPHIC LOG**

<table>
<thead>
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<th>Photo No.</th>
<th>Date</th>
<th>Direction Photo Taken</th>
<th>Description</th>
</tr>
</thead>
</table>
| 9         | 3/9/2016   | South                  | **Troutdale Site**  
Looking south at Lot 8 from Swigert Way. |
| 10        | 3/9/2016   | East, Southeast        | **Troutdale Site**  
View of the undocumented historic ditch (now filled with gravel) associated with the NRHP-eligible Salmon Creek Drainage System, located in the previously un-surveyed northern portion of the Site. |
PHOTOGRAPHIC LOG

Project Name: Construction and Operation of a Consolidated USPS Facility in the Portland Metropolitan Area
Project Location: Multnomah County, Oregon
Project No. 60441092

<table>
<thead>
<tr>
<th>Photo No.</th>
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<th>Direction Photo Taken</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>3/9/2016</td>
<td>Southeast</td>
<td>Troutdale Site View of NRHP-eligible ditch located in Lot 9 along the southwest boundary of site.</td>
</tr>
<tr>
<td>12</td>
<td>3/9/2016</td>
<td>South</td>
<td>Troutdale Site View of recently created ditches in Troutdale Site Lot 8 to direct surface water pooling.</td>
</tr>
</tbody>
</table>
## PHOTOGRAPHIC LOG

**Project Name:** Construction and Operation of a Consolidated USPS Facility in the Portland Metropolitan Area  
**Project Location:** Multnomah County, Oregon  
**Project No.:** 60441092

<table>
<thead>
<tr>
<th>Photo No.</th>
<th>Date</th>
<th>Direction Photo Taken</th>
<th>Description</th>
</tr>
</thead>
</table>
| 13        | 3/9/2016 | Southeast            | Troutdale Site  
Looking southeast at adjacent Lot 6 from Swigert Way. |
| 14        | 3/9/2016 | North                | Troutdale Site  
Looking north from Lot 7 at adjacent FedEx facility on north side of Swigert Way. |
Appendix C
Correspondence
January 20, 2015

Ms. Danielle Erb
USACOE-GEN-OP-G
PO Box 2946
Portland, OR 97208-2946

RE: SHPO Case No. 14-0008
NPW-2013-396 & APP0055224 Colwood Industrial Project
FOE/construction of 2 industrial bldgs & associated infrastructure & utilities
IN 2E 17, Portland, Multnomah County

Dear Ms. Erb:

This letter is intended to acknowledge, on behalf of the Oregon State Historic Preservation Office, that we have received all required deliverables associated with mitigation of adverse effects to the Colwood National Golf Course. On August 19, 2014, our office received the final Oregon State-level documentation of the Colwood Golf National Course, and transmittal notices of their submission to the required archival repositories. On January 15, 2015, our office received notice that the required entry in the online Oregon Encyclopedia pertaining to the Colwood National Golf Course had been activated, and is now available publicly. The receipt of this notice represents completion of the stipulations established by the Memorandum of Agreement for this project, and our office considers the adverse effects to the historic Colwood National Golf Course to be fully resolved. The Section 106 process is therefore complete, and this project is considered to be closed.

If you have any questions regarding any of the above, please do not hesitate to contact our office.

Sincerely,

Jason Allen, M.A.
Historic Preservation Specialist
(503) 986-0579
jason.allen@oregon.gov
March 15, 2016

Ms. Ann Sarver  
United States Postal Service  
USPS Facilities Dept. - HQ Field Office  
Facilities Implementation  
6013 Benjamin Road, Suite 205  
Tampa, FL 33630-9430

RE: Environmental Assessment for the construction and operation of a consolidated U.S. Postal Service Facility in the Portland Metro Area

Dear Ms. Sarver:

The Oregon SHPO appreciates the opportunity to comment on the forthcoming Environmental Assessment (EA) for the construction and operation of a consolidated U.S. Postal Service Facility in the Portland Metro Area and the potential impact of this undertaking on above-ground historic and archaeological resources. We ask that USPS provide determinations of eligibility and findings of effect for concurrence as part of the EA for each of the facilities to be consolidated and for any properties on or surrounding the location of the new facility that may be directly or indirectly impacted by this project. Please note that the processing and distribution facility at 715 NW Hoyt, Portland has already been determined eligible for listing in the National Register of Historic Places by the National Park Service and its transfer from federal ownership mitigated under an active Memorandum of Agreement between our offices.

Please contact me if you have any additional comments, questions, or concerns.

Sincere,

Ian P. Johnson  
Associate Deputy State Historic Preservation Officer  
(503) 986-0678 or ian.johnson@oregon.gov
March 18, 2016

Dr. Paul Henson
State Supervisor
Oregon Fish and Wildlife Office
U.S. Fish and Wildlife Service
2600 SE 98th Avenue, Suite 100
Portland, OR 97266

Subject: Request for Project Review: Construction and Operation of a U.S. Postal Service Consolidated Facility, Multnomah County, Oregon
Consultation Code for Colwood Site: 01EOWF00-2016-SLI-0197
Consultation Code for Troutdale Site: 01EOWF00-2016-SLI-0198

Dear Dr. Henson:

The U.S. Postal Service (USPS) is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act of 1969, as amended, to construct and operate a consolidated USPS facility at one of two locations in the metropolitan area of Portland, Oregon. The USPS is writing to request project review and concurrence with the USPS’ effects determination pursuant to the Endangered Species Act of 1973, as amended.

Proposed Action
Under the Proposed Action, the USPS would construct and operate a new USPS-owned facility to consolidate and incorporate the functions of three facilities currently located in Portland: the Portland Processing and Distribution Center (P&DC)/Vehicle Maintenance Facility (VMF), the Portland-Mount Hood Delivery Distribution Center, and the Portland Air Cargo Center. The purpose of the Proposed Action is to increase operational efficiencies and decrease operating costs. Locating the new facility near major roads and with ready access to the Portland International Airport is critical to support the requisite operations of associated facilities efficiently. To house all combined functions, the consolidated facility requires at least 45 acres per USPS design standards and associated space requirements. The main building at the new facility, which would house all operations except for the VMF, requires a footprint of approximately 790,000 square feet. The new VMF building requires approximately 28,000 square feet, with sufficient outdoor parking for USPS vehicles. Parking for employees and mail trucks, as well as adequate maneuvering areas for trucks, is also required. Two potential locations are being examined as alternatives in the EA – the Colwood Industrial Park (Colwood Site) and the Troutdale Reynolds Industrial Park (Troutdale Site). The developers at the Colwood Site and the Troutdale Site are both non-federal entities (Trammel Crow Company and Port of Portland, respectively), and are preparing the sites for eventual industrial development. However, USPS is requesting USFWS review as part of its NEPA process and this letter describes the project sites and potential habitats as they currently exist. Attachment A, Figure 1 shows an overview of the project area.

Site Descriptions
The Colwood Site (Attachment A, Figure 2) is located at the northwest corner of the intersection of NE Cornfoot Road and NE Alderwood Road and south of the Portland International Airport runways. The site is bordered by the Oregon Air National Guard to the north and west, Portland International Airport to the north and northeast, NE Cornfoot Road to the south, a hotel to the east, and NE Alderwood Road to
the southeast. The site includes 47.55 acres, all of which would be occupied by USPS operations. The Colwood Site has been cleared and graded, with the exception of a thin strip of grass and trees around the perimeter of the site on all sides but the southeast corner. The McBride Slough runs along the northeast edge of the site. The Colwood Site occupies the northern portion of the former Colwood National Golf Course, which was in operation from 1936 to 2014. A real estate developer, the Trammell Crow Company, owns the golf course property and is preparing it for development under Department of the Army Permit NWP-2013-396. The Permit Application indicated that no state or federally protected species occur onsite, although habitat for some aquatic species could be present as of the 2014 permit. Activities authorized by the permit would be covered under an existing Biological Opinion issued by the National Marine Fisheries Service in 2014.

The Troutdale Site (Attachment A, Figure 3) is located at 5100 NW Sundial Road, Troutdale, OR. It is located in the Troutdale Reynolds Industrial Park (TRIP), which is owned by the Port of Portland. The Troutdale Site comprises industrial park lots 7 and 8 within the TRIP; these two lots total 53.71 acres, of which approximately 45 acres would be occupied by USPS facilities and 2 acres would be used for stormwater drainage. The Troutdale Site is mostly open, and is currently dominated by two palustrine emergent persistent seasonally flooded diked/impounded wetland areas, a freshwater pond that is palustrine unconsolidated shore temporary flooded, and grassed areas, with a few trees spread around the eastern and southern edge of the site. There are several drainage ditches on the site and a small airport to the south of the site. The TRIP was unused and undeveloped until the U.S. Army contracted the Aluminum Company of America (Alcoa) to construct and operate a primary aluminum reduction plant at the site in 1941. Alcoa ran the site for the government until 1945, and then the U.S. Government leased the property to Reynolds Metals Company (RMC) from 1946 to 1949. RMC purchased the plant and owned and operated it from 1949 to 2000. Alcoa acquired RMC and shut the plant down in 2000. The TRIP was added to the National Priorities List (NPL) in 1994 by the U.S. Environmental Protection Agency (EPA). Remedial actions were performed from 1995 to 2006. The EPA issued a Final Record of Decision (ROD) in 2006 clearing the TRIP for industrial uses with oversight from EPA and the Oregon Department of Environmental Quality (DEQ), with some deed restrictions and institutional controls. Residual remediation efforts are ongoing, and the TRIP continues to be a Superfund site. Department of the Army Permit NWP-2007-889-1 covers work currently being performed at the TRIP by the Port of Portland; the USACE website indicates that endangered species have the potential to be on site, and that Section 7 ESA consultation will occur, but does not indicate which species may be present.

Species Identified as Potentially Occurring on Project Sites
Official species lists generated from Information for Planning and Conservation (IPaC) website identified federally listed threatened or endangered (T&E) species that may occur at the Colwood Site and the Troutdale Site (see Attachment B).

<table>
<thead>
<tr>
<th>Common Name</th>
<th>Scientific Name</th>
<th>Federal Status</th>
<th>Critical Habitat</th>
<th>Colwood Site</th>
<th>Troutdale Site</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northern spotted owl</td>
<td>Strix occidentalis caurina</td>
<td>T</td>
<td>Designated</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Streaked horned lark</td>
<td>Eremophila alpestris strigata</td>
<td>T</td>
<td>Designated</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Yellow-billed cuckoo</td>
<td>Coccyzus americanus</td>
<td>T</td>
<td>Proposed</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Bull trout</td>
<td>Salvelinus confluentus</td>
<td>T</td>
<td>Designated</td>
<td>✓</td>
<td>----</td>
</tr>
<tr>
<td>Bradshaw’s desert-parsley</td>
<td>Lomatium bradshawii</td>
<td>E</td>
<td>----</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Kincaid’s lupine</td>
<td>Lupinus sulphureus ssp. kincaidii</td>
<td>T</td>
<td>Designated</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Common Name</td>
<td>Scientific Name</td>
<td>Federal Status</td>
<td>Critical Habitat</td>
<td>Colwood Site</td>
<td>Troutdale Site</td>
</tr>
<tr>
<td>------------------------------</td>
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<td>----------------</td>
<td>------------------</td>
<td>--------------</td>
<td>----------------</td>
</tr>
<tr>
<td>Nelson's checker-mallow</td>
<td>Sidalcea nelsoniana</td>
<td>T</td>
<td>----</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Water howellia</td>
<td>Howellia aquatilis</td>
<td>T</td>
<td>----</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Willamette daisy</td>
<td>Erigeron decumbens var. decumbens</td>
<td>E Designated</td>
<td></td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>

**Northern Spotted Owl**
The northern spotted owl lives in forests with dense canopy closure, and prefers multiple canopy levels. The Colwood site has been mostly graded and contains few remaining trees and therefore contains no suitable habitat for the northern spotted owl. The Troutdale site is mostly open, with only a few dispersed trees and therefore contains no suitable habitat for the northern spotted owl.

**Streaked Horned Lark**
The streaked horned lark prefers wide open spaces dominated by grasses and forbs with no trees and few or no shrubs. The Colwood Site is open space but has been graded and contains almost no vegetation. Although the adjacent Portland International Airport may provide habitat, the Colwood Site does not contain suitable habitat for the streaked horned lark. The northern half of the Troutdale Site contains about 20 acres of open grassed areas with only a few trees and may provide habitat for this species. Open expanses of grass on a small airport to the south of the Troutdale Site may also provide habitat for the lark.

**Yellow-billed Cuckoo**
The yellow-billed cuckoo prefers streamside habitat of dense willow and cottonwood stands in river floodplains. The Colwood Site contains a narrow, sparsely vegetated area (grasses and trees) in the northeast corner along the McBride Slough. However, because the vegetation is sparse, this habitat would likely not be suitable for the cuckoo. A drainage ditch runs through the center of the Troutdale Site, and about 18 acres of palustrine emergent wetlands are located on the western and southern portions of the site with a few trees in the southeastern corner; these areas may provide habitat for the cuckoo.

**Bull Trout**
The bull trout prefers very cold water, stable stream channels, clean spawning gravel, complex and diverse cover, and unblocked migration routes. Multnomah County Drainage District regulates the McBride Slough, in the far northeast corner of the Colwood Site, for flood control. After decades of use as a drainage site, chemicals of concern such as pesticides, PAHs, PCBs and metals have been identified in the slough. The slough would likely not provide suitable habitat for bull trout, due to the contamination and lack of shading needed to provide the necessary cold temperatures and cover this species requires. The official species list for the Troutdale Site does not include bull trout.

**Bradshaw's desert-parsley**
Bradshaw’s desert-parsley prefers seasonally saturated or flooded prairies and is found adjacent to creeks and small rivers in the southern Willamette Valley. The Colwood Site contains no seasonally flooded areas, so no suitable habitat is located on the site. The Troutdale Site contains two palustrine emergent wetland areas and one pond, but no open prairie; therefore, no suitable habitat is located on the site.

**Kincaid's lupine**
Kincaid’s lupine is found mainly in native grassland habitats in the Willamette Valley. The northeast corner of the Colwood Site contains a narrow vegetated area (grasses and trees) but otherwise is mostly
open soil and therefore does not provide suitable habitat. The northern half of the Troutdale Site contains about 20 acres of open grass areas that may provide suitable habitat for this species.

**Nelson's checker-mallow**
Nelson’s checker-mallow most frequently occurs in Oregon ash swales and meadows with wet depressions, along streams, in wetlands with remnant prairie grasslands, or along roadways at stream crossings, and prefers open areas. The strip of vegetation along the McBride Slough on the northeastern corner of the Colwood Site, consisting of grass and a few trees, could provide habitat for the species. The Troutdale Site contains two palustrine emergent wetlands and vegetated areas along drainage ditches and roadways, so suitable habitat may be present.

**Water Howellia**
Habitat for water howellia includes ponds in shaded woods, vernal freshwater wetlands, or former river oxbows that have become isolated from the riverine system, thus turning into ponds that may dry out in the summer. No suitable habitat is present on the Colwood Site. The Troutdale Site has a drainage ditch that runs through the center of the site, and about 18 acres of palustrine emergent wetlands on the western and southern areas; however, these areas are not shaded or vernal, so would not likely provide habitat for the water howellia.

**Willamette Daisy**
The Willamette daisy occurs on alluvial soils in bottomland areas. Although the parent materials on the Colwood Site are alluvial, they were previously disturbed during the creation of the Colwood National Golf Course in 1936 and during the recent grading of the site. No suitable habitat is present at the Colwood Site. Although the parent materials on the Troutdale Site are alluvial, they were previously disturbed during the 55 years that the area was used as an aluminum plant. No suitable habitat is present at the Troutdale Site.

No critical habitat for any federally listed species has been designated on the Colwood Site or the Troutdale Site.

**Determinations**
The USPS has determined that the Proposed Action at the Colwood Site would have no effect on the northern spotted owl, streaked horned lark, yellow-billed cuckoo, bull trout, Bradshaw’s desert-parsley, Kincaid’s lupine, water howellia, and Willamette daisy. The Colwood Site may provide habitat for the Nelson’s checker-mallow; however, based on the project location in a heavily developed area and that the property was reviewed for species prior to issuance of Department of the Army Permit NWP-2013-396, the USPS has determined that the Proposed Action may affect but is not likely to adversely affect this species.

The USPS has determined that the Proposed Action at the Troutdale Site would have no effect on the northern spotted owl, Bradshaw’s desert-parsley, water howellia, and Willamette daisy. The Troutdale Site may provide habitat for the streaked horned lark, yellow-billed cuckoo, Kincaid’s lupine, and Nelson’s checker-mallow; however, based on the project location in an industrial area and that the property was reviewed for species prior to issuance of Department of the Army Permit NWP-2007-889-1, the USPS has determined that the Proposed Action may affect, but is not likely to adversely affect these species.

USPS requests USFWS review and comment on this project and concurrence with its determinations.
Should you have any questions or comments, or require further information, please contact me at (813) 889-4307, or by email at ann.m.sarver@usps.gov. Thank you very much for your assistance.

Sincerely,

Ann Sarver
Facilities Environmental Specialist

Attachment A
Figure 1 – Project Location
Figure 2 – Colwood Proposed Site
Figure 3 – Troutdale Proposed Site

Attachment B
Official Species Lists – Colwood Site and Troutdale Site
Attachment B
Consultation Code: 01EOFW00-2016-SLI-0197
Event Code: 01EOFW00-2016-E-00136
Project Name: USPS Portland Consolidated Facility - Colwood Site

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.
A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at:
http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm;
http://www.towerkill.com; and

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to investigate opportunities for incorporating conservation of threatened and endangered species into project planning processes as a means of complying with the Act. If you have questions regarding your responsibilities under the Act, please contact the Endangered Species Division at the Service's Oregon Fish and Wildlife Office at (503) 231-6179. For information regarding listed marine and anadromous species under the jurisdiction of NOAA Fisheries Service, please see their website (http://www.nwr.noaa.gov/habitat/habitat_conservation_in_the_nw/habitat_conservation_in_the_nw.html).

Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment
Official Species List

Provided by:
Oregon Fish and Wildlife Office
2600 SOUTHEAST 98TH AVENUE, SUITE 100
PORTLAND, OR 97266
(503) 231-6179
http://www.fws.gov/oregonfwo/Species/Lists/RequestList.asp

Consultation Code: 01EOFW00-2016-SLI-0197
Event Code: 01EOFW00-2016-E-00136

Project Type: DEVELOPMENT

Project Name: USPS Portland Consolidated Facility - Colwood Site
Project Description: Under the Proposed Action, the USPS would construct and operate a new USPS-owned facility to consolidate and incorporate the functions of three facilities currently located in Portland: the Portland Processing and Distribution Center (P&DC)/Vehicle Maintenance Facility (VMF), the Portland-Mount Hood Delivery Distribution Center, and the Portland Air Cargo Center. The purpose of the Proposed Action is to increase operational efficiencies and decrease operating costs. To house all combined functions, the consolidated facility requires at least 45 acres per USPS design standards and associated space requirements. The main building at the new facility, which would house all operations except for the VMF, requires a footprint of approximately 790,000 square feet. The new VMF building requires approximately 28,000 square feet, with sufficient outdoor parking for USPS vehicles. Parking for employees and mail trucks, as well as adequate maneuvering areas for trucks, is also required. The Colwood Site is one of two locations being considered for the Proposed Action. If the Colwood Site is selected, development would take place between summer 2017 and summer 2018.

Please Note: The FWS office may have modified the Project Name and/or Project Description, so it may be different from what was submitted in your previous request. If the Consultation Code matches, the FWS considers this to be the same project. Contact the office in the 'Provided by' section of your previous Official Species list if you have any questions or concerns.
Project Location Map:

**Project Coordinates:** MULTIPOLYGON (((-122.58982658386229 45.57719227234991, -122.58980512619019 45.57441364269884, -122.5889253616333 45.57420336242654, -122.58795976638794 45.5737677793578, -122.58684396743773 45.57337725373421, -122.5848913192749 45.57238590726264, -122.58416175842285 45.572896603084885, -122.58304595947266 45.57149617451224, -122.58452653884888 45.57713219532519, -122.58982658386229 45.57719227234991)))

**Project Counties:** Multnomah, OR
Endangered Species Act Species List

There are a total of 9 threatened or endangered species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Critical habitats listed under the Has Critical Habitat column may or may not lie within your project area. See the Critical habitats within your project area section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

<table>
<thead>
<tr>
<th>Birds</th>
<th>Status</th>
<th>Has Critical Habitat</th>
<th>Condition(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northern Spotted owl (<em>Strix occidentalis caurina</em>)</td>
<td>Threatened</td>
<td>Final designated</td>
<td></td>
</tr>
<tr>
<td>Population: Entire</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Streaked Horned lark (<em>Eremophila alpestris strigata</em>)</td>
<td>Threatened</td>
<td>Final designated</td>
<td></td>
</tr>
<tr>
<td>Population: Western U.S. DPS</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Yellow-Billed Cuckoo (<em>Coccyzus americanus</em>)</td>
<td>Threatened</td>
<td>Proposed</td>
<td></td>
</tr>
<tr>
<td>Population: Western U.S. DPS</td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

**Fishes**

<table>
<thead>
<tr>
<th></th>
<th>Status</th>
<th>Has Critical Habitat</th>
<th>Condition(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bull Trout (<em>Salvelinus confluentus</em>)</td>
<td>Threatened</td>
<td>Final designated</td>
<td></td>
</tr>
<tr>
<td>Population: U.S.A., conterminous, lower 48 states</td>
<td></td>
<td></td>
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</tbody>
</table>

**Flowering Plants**

<table>
<thead>
<tr>
<th></th>
<th>Status</th>
<th>Has Critical Habitat</th>
<th>Condition(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bradshaw's desert-parsley (<em>Lomatium bradshawii</em>)</td>
<td>Endangered</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Kincaid's Lupine (<em>Lupinus sulphureus ssp. kincaidii</em>)</td>
<td>Threatened</td>
<td>Final designated</td>
<td></td>
</tr>
<tr>
<td>Nelson's checker-mallow (<em>Sidalcea</em>)</td>
<td>Threatened</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Species</td>
<td>Status</td>
<td>Additional Information</td>
<td></td>
</tr>
<tr>
<td>-------------------------------</td>
<td>-------------------</td>
<td>------------------------</td>
<td></td>
</tr>
<tr>
<td><em>Wetlandia nelsoniana</em></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Water howellia (<em>Howellia aquatilis</em>)</td>
<td>Threatened</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Willamette daisy (<em>Erigeron decumbens var.</em>)</td>
<td>Endangered</td>
<td>Final designated</td>
<td></td>
</tr>
</tbody>
</table>
Critical habitats that lie within your project area

There are no critical habitats within your project area.
Consultation Code: 01EOFW00-2016-SLI-0198                     March 11, 2016
Event Code: 01EOFW00-2016-E-00137
Project Name: USPS Portland Consolidated Facility - Troutdale Site

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.
A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to investigate opportunities for incorporating conservation of threatened and endangered species into project planning processes as a means of complying with the Act. If you have questions regarding your responsibilities under the Act, please contact the Endangered Species Division at the Service's Oregon Fish and Wildlife Office at (503) 231-6179. For information regarding listed marine and anadromous species under the jurisdiction of NOAA Fisheries Service, please see their website (http://www.nwr.noaa.gov/habitat/habitat_conservation_in_the_nw/habitat_conservation_in_the_nw.html).

Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment
Official Species List

Provided by:
Oregon Fish and Wildlife Office
2600 SOUTHEAST 98TH AVENUE, SUITE 100
PORTLAND, OR 97266
(503) 231-6179
http://www.fws.gov/oregonfwo/Species/Lists/RequestList.asp

Consultation Code: 01EOFW00-2016-SLI-0198
Event Code: 01EOFW00-2016-E-00137

Project Type: DEVELOPMENT

Project Name: USPS Portland Consolidated Facility - Troutdale Site
Project Description: Under the Proposed Action, the USPS would construct and operate a new USPS-owned facility to consolidate and incorporate the functions of three facilities currently located in Portland: the Portland Processing and Distribution Center (P&DC)/Vehicle Maintenance Facility (VMF), the Portland-Mount Hood Delivery Distribution Center, and the Portland Air Cargo Center. The purpose of the Proposed Action is to increase operational efficiencies and decrease operating costs. To house all combined functions, the consolidated facility requires at least 45 acres per USPS design standards and associated space requirements. The main building at the new facility, which would house all operations except for the VMF, requires a footprint of approximately 790,000 square feet. The new VMF building requires approximately 28,000 square feet, with sufficient outdoor parking for USPS vehicles. Parking for employees and mail trucks, as well as adequate maneuvering areas for trucks, is also required. The Troutdale Site is one of two locations being considered for the Proposed Action. If the Troutdale Site is selected, the USPS would begin construction in 2017/2018 with expected occupancy by the end of 2019.

Please Note: The FWS office may have modified the Project Name and/or Project Description, so it may be different from what was submitted in your previous request. If the Consultation Code matches, the FWS considers this to be the same project. Contact the office in the 'Provided by' section of your previous Official Species list if you have any questions or concerns.
Project Location Map:

**Project Coordinates:** MULTIPOLYGON (((-122.39672475056781 45.55501402013391, -122.39667721731975 45.552793525719416, -122.3968962347339 45.55275551994458, -122.39780527102228 45.55240509276136, -122.39930753916153 45.55194902388919, -122.40428578615787 45.5518959148208, -122.40549570961291 45.55365743294878, -122.40554975872747 45.555044261141255, -122.39672475056781 45.55501402013391)))

**Project Counties:** Multnomah, OR
Endangered Species Act Species List

There are a total of 8 threatened or endangered species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Critical habitats listed under the Has Critical Habitat column may or may not lie within your project area. See the Critical habitats within your project area section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

<table>
<thead>
<tr>
<th>Birds</th>
<th>Status</th>
<th>Has Critical Habitat</th>
<th>Condition(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northern Spotted owl (<em>Strix occidentalis caurina</em>) Population: Entire</td>
<td>Threatened</td>
<td>Final designated</td>
<td></td>
</tr>
<tr>
<td>Streaked Horned lark (<em>Eremophila alpestris strigata</em>)</td>
<td>Threatened</td>
<td>Final designated</td>
<td></td>
</tr>
<tr>
<td>Yellow-Billed Cuckoo (<em>Coccyzus americanus</em>) Population: Western U.S. DPS</td>
<td>Threatened</td>
<td>Proposed</td>
<td></td>
</tr>
</tbody>
</table>

**Flowering Plants**

<table>
<thead>
<tr>
<th>Flowers</th>
<th>Status</th>
<th>Has Critical Habitat</th>
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<tbody>
<tr>
<td>Bradshaw's desert-parsley (<em>Lomatium bradshawii</em>)</td>
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</tr>
</tbody>
</table>
Critical habitats that lie within your project area

There are no critical habitats within your project area.
March 31, 2016

VIA CERTIFIED MAIL/RETURN RECEIPT REQUESTED

Mr. Ian P. Johnson
Associate Deputy State Historic Preservation Officer
Oregon State Historic Preservation Office
725 Summer St NE, Suite C
Salem, OR 97301-1266

Re: Request for Section (§) 106 Consultation
USPS New Construction
Colwood Site or Troutdale Site
Portland Metropolitan Area, Multnomah County, Oregon (the "Property")

Dear Mr. Johnson:

The United States Postal Service (USPS) is initiating the Section 106 process pursuant to 36 Code of Federal Regulations (CFR) § 800.3 implementing the National Historic Preservation Act (NHPA) because the USPS is planning to construct a new facility on one (1) of two (2) properties. Both are undeveloped brownfield parcels in Multnomah County, Oregon. The USPS has determined this proposed construction is an undertaking as defined in § 800.16(y) and is the type of activity that has the potential to cause effect on historic properties. As a result the USPS has prepared a cultural resources report to provide information about potential cultural resources at the two locations the USPS is considering for the project (attached hereto as Exhibit A). We have enclosed for your review the necessary documentation and analysis under § 800.11 to support USPS’s finding of no historic properties affected.

Please provide us with a written response within the thirty (30) day time period allotted by § 800.3(c)(4). If we have not heard back from you within those thirty days, we will assume you concur with our findings and will end the Section 106 process. If you do not concur with the findings in this submission, please express your specific concerns and/or objections clearly in writing for our review and consideration.

Undertaking

Pursuant to §800.3(a), the USPS has determined that the proposed new construction is an undertaking with the potential to cause effects on historic properties. USPS has determined that the Properties are not eligible for listing in the National Register of Historic Places (NRHP).

As stated above, the undertaking is new construction on a brownfield site; the new facility requires at least 45 acres per USPS design standards and associated space requirements. The main building at the new facility, which would house all operations except for the Vehicle Maintenance Facility (VMF), requires a footprint of approximately 790,000 square feet. The new VMF building requires approximately 28,000 square feet, with sufficient outdoor parking for USPS vehicles. Parking for employees and mail trucks, as well as adequate maneuvering areas for trucks, is also required.

The USPS is considering two potential locations for the new facility; the Colwood Industrial Park (Colwood Site) and the Troutdale Reynolds Industrial Park (Troutdale Site). The developers at the Colwood Site and the Troutdale Site are both non-federal entities (Trammel Crow Company and Port of Portland, respectively), and are preparing the sites for eventual industrial development. The Colwood
Site, located at the northwest corner of the intersection of NE Cornfoot Road and NE Alderwood Road (south of the Portland International Airport runways), was formerly the northern portion of the Colwood National Golf Course and includes 47.55 acres, all of which would be occupied by USPS operations. The Colwood Site has been cleared and graded by a developer, with the exception of a strip of grass and trees around the perimeter of the site on all sides but the southeast corner.

The Troutdale Site, located at 5100 NW Sundial Road in Troutdale, encompasses industrial park lots 7 and 8, which total 53.71 acres, of which approximately 45 acres would be occupied by USPS facilities and 2 acres would be used for stormwater drainage. The Troutdale Site is currently part of a Superfund site that is under site development.

**Plan to Involve the Public**
The USPS intends to involve the public in the Section 106 process by posting this letter in the closest active USPS facilities with public access for 30-days so that interested citizens can comment on its finding of no historic properties affected. Comments received by the USPS on or before the close of business on the 30th day following posting will be considered. The public will be copied on any additional correspondence, as appropriate.

**Identification of Consulting Parties**
The USPS reviewed The Native American Graves Protection and Repatriation Act (NAGPRA) Native American Consultation Database for identification of federally recognized Indian tribes and Native Hawaiian organizations. Three (3) federally recognized Indian tribes were identified for Multnomah County.

Mr. Robert Kentta  
Confederated Tribes of Siletz  
P.O. Box 549  
Salem, OR 97380

Robert Brunoe  
Confederated Tribes of the Warm Springs  
Tribal Historic Preservation Office  
P.O. Box C  
Warm Springs, OR 97761

David Harrelson  
Confederated Tribes of the Grand Ronde  
8720 Grand Ronde Road  
Grande Ronde, OR 97347

The USPS has identified the following additional consulting parties who may wish to participate in the consultation discussions concerning the Property:

Ms. Susan Anderson, Director  
City of Portland Bureau of Planning and Sustainability  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201-5380

Mr. Doug Daoust  
City of Troutdale Mayor  
219 E. Historic Columbia River Hwy.  
Troutdale, OR 97060

The USPS will provide the consulting parties a thirty (30) day period to review and comment on USPS’s proposed finding of no historic properties affected. Comments received by the USPS on or before the close of business on the 30th day following receipt will be considered. The consulting parties will be copied on this letter and any additional correspondence, as appropriate.
Identification of Area of Potential Effects

The direct Area of Potential Effects (APE) has been defined as the property boundaries at both sites. The APE for indirect effects is the geographic area in which the undertaking has the potential to alter the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the historic integrity of the property. The APE for indirect effects includes properties surrounding the Property assuming a direct view to and from the Property. Please see the attached map marked with the direct APE boundary for each site.

Historic Properties within the Area of Potential Effects

The USPS consultant has reviewed existing information on historic properties within the APE and has conducted a search on the Property and surrounding properties. The search included a review of Oregon State Historic Preservation Office (SHPO) Geographic Information System (GIS) Archaeological Inventory Database and the online Oregon Historic Sites Database.

No NRHP-eligible resources, historic districts, or known/recorded archaeological sites are located on the Colwood Site. The NRHP-eligible Columbia Slough Drainage Historic District and the Colwood National Golf Course and associated clubhouse are located south of the Colwood Site.

The Troutdale Site has a NRHP-eligible drainage ditch along the southwest border. Additionally, within a mile radius of the proposed Troutdale Site, there are four above-ground historic resources, consisting of a historic railroad (0.5 mi SW), a historic farmstead (0.75 mi SW), a historic bridge (0.80 mi SE), and a NRHP-eligible USACE laboratory building (500 ft. SE). USPS’s consultant, AECOM, concluded in the attached report that the Troutdale Site is a high probability area and a sensitive area for precontact camps, precontact natural resource acquisition for hunting, fishing, root collecting, and processing. In addition, one historic ditch associated with the NRHP-eligible Salmon Creek Drainage System was identified in the northern portion of the Property that was not previously documented, but as a result of TRIP-related construction activities, the ditch has been recently filled.

Determination of Effect

The Colwood Site has been previously surveyed for cultural resources, and none were identified. The proposed undertaking (construction of an industrial facility) at the Colwood site was mitigated through a Memorandum of Agreement (MOA) with your office and United States Army Corps of Engineers.

Portions of the Troutdale Site have been surveyed for cultural resources, and none were identified. Should this site be selected for USPS construction further evaluation may be completed, as appropriate. Three of the four historic above-ground structures identified are not visible from the site and will not be impacted by the undertaking. The NRHP-eligible USACE laboratory building is visible from the Troutdale Property; however, the undertaking will not impact the site as the new distribution center would not diminish the setting of the building.

Based on our information search, it is our determination that no historic properties will be affected by this undertaking.

In your office’s letter dated March 15, 2016, in response to the Notice of Intent for the Environmental Assessment, a request was made to provide determinations of eligibility and finding of effects for each of the facilities to be consolidated. Consultation with your office has been completed for the USPS owned facility at 715 NW Hoyt Street in Portland. The two (2) other facilities to be consolidated into the new facility are leased properties and the USPS does not consider the termination of a lease as an undertaking;
therefore, they are not discussed in this consultation. However, these two (2) properties are warehouse type buildings dating from the 1990s and newer.

Thank you for your assistance in this matter. Should you have any questions concerning this letter, please contact the undersigned at (813) 889-4307, or by email at ann.m.sarver@usps.gov.

Sincerely,

Ann M. Sarver
Facilities Environmental Specialist

cc: Confederated Tribes of the Grand Ronde
Confederated Tribes of the Siletz
Confederated Tribes of the Warm Springs
City of Portland
City of Troutdale
Postmasters, Portland & Troutdale for Public Lobby Posting
Daniel Delahaye, FPO

Enclosed: Cultural Resources Report: Section 106 Consultation for the Construction of a U.S. Postal Service Facility in the Portland Metropolitan Area, Multnomah County, Oregon
Good morning Ms. Sarver –

I am writing in response to your letter received in our office on March 24th, requesting project review and concurrence with the USPS’s effects determinations pursuant to the ESA. The letter briefly describes two sites for possible construction and operation of USPS consolidated facilities, at the Colwood Site (consultation code 01EOFW00-2016-SLI-0197) and the Troutdale Site (consultation code 01EOFW00-2016-SLI-0198).

At this time we cannot issue concurrence with your effects determination. As your letter indicates, several federally listed threatened or endangered species may occur at both sites. There is no analysis of the potential effects of the proposed actions on listed species in your letter, which we require for any potential concurrence and which would typically be included in an Environmental Assessment (EA). We are particularly concerned about the potential effects to Streaked Horned Lark. Your letter indicates that the USPS is preparing an EA for these potential projects; please provide us a copy of the EA and any other information that was used to support the Department of the Army permits (2014) and/or the National Marine Fisheries Service Biological Opinion (2014) covering only the work currently taking place at both sites.

Please let me know if you have any questions. We look forward to working with you on these projects.

Cheers,

Jeff
April 28, 2016

Dr. Paul Henson  
State Supervisor  
Oregon Fish and Wildlife Office  
U.S. Fish and Wildlife Service  
2600 SE 98th Avenue, Suite 100  
Portland, OR  97266

Subject:  Letter Addendum  
Request for Project Review: Construction and Operation of a U.S. Postal Service Consolidated Facility, Multnomah County, Oregon  
Consultation Code for Colwood Site: 01EOW00-2016-SLI-0197  
Consultation Code for Troutdale Site: 01EOW00-2016-SLI-0198

Dear Dr. Henson:

This addendum summarizes the teleconference held on April 20, 2016 between the U.S. Postal Service (USPS), the U.S. Fish and Wildlife Service (USFWS), and USPS’ consultant, URS. The group discussed the information provided to USFWS in the USPS letter dated March 18, 2016 regarding the potential for federally listed species to occur on the project sites. USFWS responded to that letter with an email dated April 7, 2016 indicating that it was especially concerned with the potential for the streaked horned lark (SHL) to be present on the project sites. During the teleconference, USFWS shared information provided by the USFWS SHL biologist and SHL Working Group that no SHL have ever been identified at either project site and both project sites provide only marginal habitat for this species. USFWS noted that other species identified in the USPS letter are Willamette Valley species generally seen south of Portland and therefore not likely to be present on the project sites.

Therefore, the USPS has determined that the Proposed Action at either the Colwood Site or the Troutdale Site would have no effect on any federally listed species. With this no effect determination, agency concurrence is not required, and no further action regarding this project is requested from USFWS.

Should you have any further questions or concerns, please contact me at (813) 889-4307, or by email at ann.m.sarver@usps.gov. Thank you very much for your assistance.

Sincerely,

Ann Sarver  
Facilities Environmental Specialist
May 2, 2016

Ms. Ann Sarver
United States Postal Service
USPS Facilities Dept - HQ Field Office, Facilities Implementation
6013 Benjamin Road
Suite 205
Tampa, FL 33630-9430

RE: SHPO Case No. 16-0584
   USPS, New Facility Construction in Multnomah County
   New building
   1N 2E 17; 1N 3E 23, 24, Multnomah County

Dear Ms. Sarver:

We have reviewed the materials submitted on the project referenced above, and we concur with the determination that the Columbia Slough Drainage Historic District and identified historic railroad grade, farmstead, bridge, and laboratory building are eligible for listing in the National Register of Historic Places. We also concur with the finding of no adverse effect given that the project will not physically impact historic resources and the proposed use is compatible with the industrial setting of both proposed project locations.

This letter refers to above-ground historic resources only. Comments pursuant to a review for archaeological resources, if applicable, will be sent separately. Unless there are changes to the project, this concludes the requirement for consultation with our office under Section 106 of the National Historic Preservation Act (per 36 CFR Part 800) for above-ground historic resources. Local regulations, if any, still apply and review under local ordinances may be required. Please feel free to contact me if you have any questions, comments or need additional assistance.

Sincerely,

Ian P. Johnson, M.A.
Associate Deputy SHPO
(503) 986-0678
ian.johnson@oregon.gov
May 3, 2016

Ms. Ann Sarver
United States Postal Service

6013 Benjamin Road

Tampa, FL 33630-9430

RE: SHPO Case No. 16-0584
    USPS, New Facility Construction in Multnomah County
    New building
    1N 2E 17; 1N 3E 23, 24, Multnomah County

Dear Ms. Sarver:

Our office recently received a request to review the project referenced above. We have reviewed the request and concur that a good faith effort has been implemented and the project will likely have no effect on any significant archaeological objects or sites. Based on the information provided, additional archaeological research is not anticipated for this project.

In the unlikely event an archaeological object or site (i.e., historic or prehistoric) is encountered during project implementation, all ground disturbance at the location should cease immediately until a professional archaeologist can be contacted to evaluate the discovery. Under state law (ORS 358.905-955 & ORS 97.740) archaeological sites, objects and human remains are protected on both public and private land in Oregon. If you have not already done so, be sure to consult with all appropriate Indian tribes regarding your proposed project. If you have any questions regarding any future discovery or this letter, feel free to contact me at your convenience.

This letter refers to archaeological resources only. Comments pursuant to a review for above-ground historic resources have been sent separately.

Sincerely,

Matt Diederich, MAIS
SHPO Archaeologist
(503) 986-0577
Matthew.Diederich@oregon.gov
Appendix D

Memoranda of Agreement
MEMORANDUM OF AGREEMENT

BETWEEN THE UNITED STATES POSTAL SERVICE AND THE OREGON STATE HISTORIC PRESERVATION OFFICE REGARDING THE DISPOSAL OF THE USPS PROCESSING & DISTRIBUTION CENTER,
715 NW HOYT STREET, PORTLAND, OR 97209
PURSUANT TO 36 CFR PART 800.6(A)

WHEREAS, The United States Postal Service (USPS) intends to transfer ownership to non-Federal entities (‘dispose’) of the USPS Processing & Distribution Center in Portland, Multnomah County, Oregon (Portland P&D Center);

WHEREAS, the Keeper of the National Register of Historic Places has determined that the Portland P&D Center is eligible for listing on the National Register of Historic Places;

WHEREAS, the transfer of ownership of historically significant Federal property to non-Federal ownership is considered an adverse effect;

WHEREAS, the USPS has notified the Advisory Council on Historic Preservation (ACHP) of the adverse effect and the ACHP has chosen not to participate in the consultation; and

WHEREAS, the USPS has consulted with the Oregon State Historic Preservation Officer (Oregon SHPO) pursuant to 36 C.F.R. Part 800 regulations implementing Section 106 of the National Historic Preservation Act (16U.S.C. Part 470f);

NOW, THEREFORE, the USPS and the Oregon SHPO agree that the disposal of the property to non-Federal ownership without restrictions or conditions under the following stipulations:

STIPULATIONS

The USPS will ensure that the following measures are carried out:

USPS will complete a Multiple Property Document (MPD) National Register nomination and an individual National Register nomination form for a representative example of one USPS building using the prepared MPD.

(1) HISTORIC CONTEXT STUDY, 1941-1971: Within 18 months of the execution of this document by the USPS and the Oregon SHPO, the USPS will complete a historic context study. The subject of the context study will be USPS-owned properties constructed or occupied by the USPS between 1941 and 1971. Oregon SHPO acknowledges that the USPS will execute a purchase and sale agreement for the Portland P&D Center and that ownership of the Portland P&D Center may transfer to a non-federal owner prior to completion of the study.

(2) MULTIPLE PROPERTY DOCUMENT NATIONAL REGISTER NOMINATION: Within 6 months of the completion of the context study and using the results of the context study, the USPS will completed and submit to Oregon SHPO a National Register Multiple Property Document for USPS-owned buildings in Oregon constructed during 1941-1971, expanding upon the current “Significant US Post Offices in Oregon, 1900-1941”, Thematic Resource Document. The MPD shall be completed in consultation
with SHPO according to National Register Bulletin “How to Complete the National Register Multiple Property Documentation Form.”

(3) INDIVIDUAL NATIONAL REGISTER NOMINATION: USPS shall prepare a National Register nomination form for a representative example of at least one USPS-owned building, chosen by USPS in consultation with Oregon SHPO, using the prepared MPD. USPS will not choose the Portland P&D Center unless the choice is approved by the non-federal buyer under an executed Purchase and Sale Agreement, or the non-federal owner. The individual nomination shall be completed in consultation with Oregon SHPO according to National Register Bulletin “How to Complete the National Register Registration Form.”

(4) COORDINATION AND REVIEW: The USPS shall submit copies of both the MPD and individual nomination form for formal review and consideration by Oregon SHPO and State Advisory Committee on Historic Preservation (SACHP) for listing in the National Register of Historic Places by National Park Service (NPS) within two years of the signing of this document. Stipulation 3 will be deemed complete when all revisions requested by the Oregon SHPO and the SACHP have been addressed and the document is formally sent to NPS.

(5) FUNDING: Funding for the completion of the Historic Context Study is currently available.

Execution of this Memorandum of Agreement by the USPS and the Oregon SHPO evidences that USPS has completed the Section 106 process for the transfer out of Federal ownership (‘disposal’) of the USPS Processing & Distribution Center in Portland, Multnomah County, Oregon, and has evaluated and taken into account the effect of the disposal upon historic properties.

UNITED STATES POSTAL SERVICE

BY: [Signature]
Dallan Wordekemper, Federal Preservation Officer
Contracting Officer

DATE: 5/11/11

OREGON STATE HISTORIC PRESERVATION OFFICER

BY: [Signature]
Roger Roper, Deputy State Historic Preservation Officer

DATE: 5/26/11
MEMORANDUM OF AGREEMENT
BETWEEN
THE UNITED STATES ARMY CORPS OF ENGINEERS
AND
THE OREGON STATE HISTORIC PRESERVATION OFFICER

SUBJECT: NWP-2013-396, Adverse Effects to Structures and Landscape Features Associated with the Colwood National Golf Course, Multnomah County, Oregon

1. WHEREAS, the United States Army Corps of Engineers (USACE) administers issuance of permits pursuant to Section 404 of the Clean Water Act, 33 USC § 1344;

2. WHEREAS, Trammell Crow Portland Development, Inc. (hereafter referred to as the Applicant) have proposed the discharge of fill material into jurisdictional wetlands in association with an industrial development, an action that requires a permit pursuant to Section 404 of the Clean Water Act (undertaking);

3. WHEREAS, the undertaking consists of the discharge of fill material in wetlands to construct two large industrial buildings and associated infrastructure on approximately 48.4 acres in addition to another 26.08 acres of restoration;

4. WHEREAS, USACE has defined the undertaking's area of potential effects (APE) as the development and restoration areas (Appendix A);

5. WHEREAS, the USACE has determined, and the Oregon State Historic Preservation Office (SHPO) has concurred, that the Colwood National Golf Course and associated facilities are eligible for listing in the National Register of Historic Places (NRHP), and that the undertaking will result in impacts to these historic resources that diminish the characteristics for which they are eligible for listing, thereby constituting an adverse effect;

6. WHEREAS, the USACE has consulted with the Applicant regarding the effects of the undertaking on historic properties and has invited them to sign this MOA as an invited signatory;

7. WHEREAS, in accordance with 36 C.F.R. § 800.6(a)(1), USACE has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii);

8. NOW, THEREFORE, USACE and the SHPO agree that the undertaking shall be implemented in accordance with the stipulations listed below paragraph 9, in order to take into account the effect of the undertaking on historic properties.
9. STIPULATIONS. Compliance with the measures presented in Stipulations a, b, c, d, e, and f below, will become Special Conditions to the Department of the Army Permit No. NWP-2013-396 and the Applicant will be responsible for ensuring compliance with those conditions:

a. Prior to the start of construction activity, the Applicant shall initiate the development of a document that records the Colwood National Golf Course, in accordance with the standards and requirements set forth in Oregon SHPO Documentation Standards (revised January 29, 2014), attached to this document as Appendix B. The fieldwork associated with the development of this document must be complete before impacts to the historic property can begin. A notice of the completion of the fieldwork shall be submitted to USAGE and SHPO. USAGE and SHPO will review this notice concurrently and respond with a notice to proceed. Once that notice is received by the Applicant the proposed modification work on the affected historic properties may begin.

b. The historic documentation shall be distributed to USAGE and the SHPO in draft form for review. The SHPO shall review and provide comments to USAGE within fifteen (15) days of receipt of the draft documentation. USAGE shall forward its comments, with any comments provided by the SHPO, within fifteen (15) days of the end of the SHPO comment period, to the Applicant. If any comments are provided to the Applicant, the Applicant shall revise the document in accordance with the comments and resubmit the report as described.

c. Upon acceptance of the documentation as satisfying the documentation requirements outlined in Appendix B, the Applicant shall prepare two complete documentation packages and transmit one each to the Oregon Historical Society in Portland, Oregon, and the University of Oregon Allied Arts and Architecture Library in Eugene, Oregon, for curation. Evidence of these transfers shall be provided to the Oregon SHPO. Additionally, one complete documentation package (with digital images on a compact disc in place of printed images) shall be forwarded to the SHPO for accession into their records.

d. The Applicant shall retain the services of a professional historian (or similarly qualified individual meeting the Secretary of the Interior's Standards for Qualifications in the area of History, Architectural History, or a closely-related field) to produce an entry for submittal to the Oregon Encyclopedia, a peer-reviewed, online encyclopedia of Oregon history, outlining the development, history, and use of the Colwood National Golf Course, including but not limited to the establishment of the course, its contribution to the “Golden Age of Golf Design,” any important design aspects, and a description of contributing components and structures. This entry will meet the requirements and standards set forth by the Oregon Encyclopedia, and will follow that organization’s internal review and revision policies. This stipulation will be considered complete upon the live posting of the entry on the Oregon Encyclopedia website.
e. Stipulations a, b, c, and d shall be completed within 1 year of the date of the final signature on this Memorandum of Agreement. Upon completion of Stipulations a, b, c, and d, mitigation for the adverse effects to the NRHP-eligible Colwood National Golf Course shall be considered complete.

f. The Applicant shall bear the cost for completion of Stipulations a, b, c, and d.

10. DURATION. This MOA will expire if its terms are not carried out within three (3) years from the date of its execution. Prior to such time, USACE may consult with the other signatories to reconsider the terms of the MOA and amend it in accordance with Paragraph 13, below. If this agreement expires without amendment prior to completion of the Stipulations above, it shall be considered terminated, according to Paragraph 14, below.

11. MONITORING AND REPORTING. Each year following the execution of this MOA until it expires or is terminated, USACE shall provide all parties to this MOA a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in USACE’s efforts to carry out the terms of this MOA.

12. DISPUTE RESOLUTION. Should any signatory to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, USACE shall consult with such party to resolve the objection. If USACE determines that such objection cannot be resolved, USACE will:

a. Forward all documentation relevant to the dispute, including the USACE’s proposed resolution, to the ACHP in accordance with 36 CFR 800.2(b)(2). The ACHP shall provide USACE with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, USACE shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP and signatories, and provide them with a copy of this written response. USACE will then proceed according to its final decision.

b. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, USACE may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, USACE shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories to the MOA, and provide them and the ACHP with a copy of such written response. The USACE decision will be final.

c. USACE’s responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.
13. AMENDMENTS. This MOA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

14. TERMINATION. If any signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment per Paragraph 13, above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories. Once the MOA is terminated, and prior to work continuing on the undertaking, USACE must either (a) execute an MOA pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. USACE shall notify the signatories as to the course of action it will pursue.

15. EXECUTION. Execution and implementation of this MOA by the USACE, SHPO, and Trammell Crow Portland Development, Inc. is evidence that USACE has afforded the ACHP and all concerned parties the opportunity to comment on the effects of this undertaking on historic properties and has satisfied the requirements of Section 106 of the National Historic Preservation Act (16 U.S.C. 470(f)) and applicable implementing regulations.

SIGNATORIES:

United States Army Corps of Engineers

[Signature]

Jose L. Aguilar
Colonel, U.S. Army Corps of Engineers
Commander and District Engineer

SEP 12 2014
(Date)
Note: By signing this document, you agree to all the terms and conditions outlined in the subject Memorandum of Agreement.

SIGNATORIES:

Oregon State Historic Preservation Officer

[Signature]
Roger Roper
Deputy State Historic Preservation Officer

8·14·14
(Date)
SUBJECT: Adverse Effects to Structures and Landscape Features Associated with the Colwood National Golf Course, Multnomah County, Oregon

Note: By signing this document, you agree to all the terms and conditions outlined in the subject Memorandum of Agreement.

INVITED SIGNATORIES:

Trammell Crow Portland Development, Inc.

[Signature]

Steve Sieber
Vice President

08, 14, 14
(Date)
Appendix A

Topographic Map of the Area of Potential Effect (Marked in Red)
Appendix A

Aerial Image of the Area of Potential Effect (Marked in Red)
Appendix B

Oregon SHPO Documentation Standards
Mitigation for Adverse Effects under Section 106 of the National Historic Preservation Act or ORS 358.653

In cases where an action by a local, state or federal agency will adversely affect a listed or potentially-eligible National Register property, documentation may be required as part of the mitigation for the undertaking. Documentation is not necessarily adequate in all cases. Agencies should contact the Oregon State Historic Preservation Office (SHPO) before planning or completing any mitigation measures, including documentation.

State Level Documentation

The following items are required for all state level documentation.

1. Architectural description of the building - Description should be surface-by-surface, covering the entire exterior of the building, noting all important character-defining elements, fenestration types and patterns. Include descriptions of key interior areas, if accessible. Include discussion of all observed alterations, and provide dates for them. Descriptions should be not less than 500 words and use appropriate architectural terms.

2. Building history - History of not less than 500 words discussing at least when the building was constructed and by whom, the building or structure's use over time, and any important persons or events associated with the resource. Be as accurate as possible. If the documentation is being conducted for mitigation purposes, give extra detail to those elements being impacted. Contact the Oregon SHPO for research suggestions.

3. Bibliography - Include a bibliography of all resources used in the preparation of the document, including sources for appended archival materials described in item 8.

4. Map - Digital image of the appropriate United States Geological Survey (USGS) Map with the location of the property marked. A portion of the entire map may be printed for free from a website such as topoquest.com and marked by hand.

5. Scale site plan – Include subject building or structure and adjacent buildings and structures on the same tax lot. Drawing may be done by hand as long as it reasonably to scale. Include the name of the person completing the map, date the map was completed, map scale, and north arrow on the map. The name and/or use of each building, structure, object, and adjacent streets on the map should be labeled.

6. Scale Floor plans - Include each floor of the subject building or structure. Drawing may be done by hand as long as it reasonable to scale. Include the name of the person completing the map, date the map was completed, map scale, and north arrow on the map. The name and/or use or each space should be labeled.

7. Photographs – Include photos of the building or structure interior and exterior. Photos may be taken as 35mm black-and-white 4x6 images or as color digital images. Digital and print images and prints must meet all aspects of the Oregon SHPO Digital Photo Checklist available at the SHPO website: http://www.oregonheritage.org/OPRD/HCD/NATREG/nrhp_documents.shtml.

8. Archival materials - If available, include original architectural drawings or maps, brochures, photos, newspaper clippings, or other archival items of interest relating to the history of the building or structure.

Provide three complete hard-copy sets of documentation including printed photos, and one CD containing a digital copy of the complete submission to the Oregon SHPO. A fourth full set may be required in cases where there is a local repository that is interested in receiving the materials.

Historic American Building Survey (HABS) and Historic American Engineering Record (HAER) Documentation

In cases where HABS / HAER documentation is required, the provided materials must meet all standards set by the National Heritage Documentation Program’s Office, including archiving at the Library of Congress. The level of documentation is negotiated on a case-by-case basis between the agency managing the project and the Oregon SHPO. Documentation standards may be found at: http://www.nps.gov/hdp/.
MEMORANDUM OF AGREEMENT
BETWEEN
THE UNITED STATES ARMY CORPS OF ENGINEERS
AND
THE OREGON STATE HISTORIC PRESERVATION OFFICER

SUBJECT: NWP-2007-889-1, The Realignment of Historically Significant Features of the Sandy Drainage Improvement Company Drainage District and Adverse Effects to Archeological Site 35MU234, Multnomah County, Oregon

1. WHEREAS, the United States Army Corps of Engineers (USACE) administers issuance of permits pursuant to Section 404 of the Clean Water Act, 33 U.S.C. § 1344;

2. WHEREAS, the Port of Portland (the permit Applicant) has proposed the Troutdale Reynolds Industrial Park (TRIP) Project, an action that requires a permit pursuant to Section 404 of the Clean Water Act which constitutes an undertaking under Section 106 of the National Historic Preservation Act;

3. WHEREAS, the undertaking consists of Phase II and Phase III of the development of the TRIP Project that would involve the realignment of several drainage ditches, including Salmon Creek, to restore a meandering configuration, restore/create wetlands for mitigation, and increase cross section flood storage in the Sandy Drainage Improvement Company (SDIC) drainage basin;

4. WHEREAS, USACE has defined the undertaking's area of potential effects (APE) as the areas that will incur ground disturbance as part of this undertaking (Attachment A);

5. WHEREAS, an archaeological survey of the TRIP area of potential effect has identified one archaeological resource, 35MU234, which has been determined to be eligible for listing on the National Register of Historic Places;

6. WHEREAS, the USACE has concurred with the determination that site 35MU234 is eligible for listing on the National Register of Historic Places and has determined that the undertaking will result in indirect impacts to a portion of the archaeological deposits at 35MU234, thereby constituting an adverse effect to this site;

7. WHEREAS, the Salmon Creek drainage system within the TRIP has been previously identified as a contributing element to the Columbia Slough Drainage District's Historic District which has been determined eligible for listing on the National Register of Historic Places through a consensus determination;

8. WHEREAS, the USACE has determined that the undertaking will also have an adverse effect on the character defining alignments of Salmon Creek (the historical and channelized alignments, designated S-1, S-4, and S-5a in the drainage district system), which is a contributing resource to the Columbia Slough Drainage District's Historic District, which, with its levees and cross levees are eligible for listing in the National Register of Historic Places, and has consulted with the Oregon State Historic Preservation Officer (SHPO) pursuant to 36 C.F.R. part 800, on the regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. § 470f);
9. WHEREAS, the USACE has consulted with the Port of Portland and the Multnomah County Drainage District (The Manager of the SDIC) regarding the effects of the undertaking on historic properties and has invited them to sign this MOA as an invited signatory;

10. WHEREAS, in accordance with 36 C.F.R. § 800.6(a)(1), USACE has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii);

11. NOW, THEREFORE, USACE and the SHPO agree that the undertaking shall be implemented in accordance with the stipulations listed below Paragraph 12 in order to take into account the effect of the undertaking on historic properties.

12. STIPULATIONS. Compliance with the measures presented in Stipulations a, b, c, d, e, and f below, will become Special Conditions to the Department of the Army Permit No. NWP-2009-889-1, and the Port of Portland will be responsible for ensuring compliance with those conditions:

   a. The Port of Portland shall develop a document (state-level documentation) that defines the proposed channel realignment and records the historic and modified alignments of Salmon Creek in accordance with Oregon SHPO Documentation Standards (as revised, January 29, 2014). These standards are defined and appended to this MOA as Attachment B.

   b. Prior to the start of construction activity, the Applicant shall prepare the proposed realignment design and the draft state-level documentation report in accordance with Stipulation (a) which shall be distributed to USACE and the SHPO for review. The SHPO shall review and provide comments to USACE within fifteen (15) days of receipt of the draft report. USACE shall forward its comments, with any comments provided by the SHPO, within fifteen (15) days of the end of the SHPO comment period, to the Applicant.

   c. If any comments are provided to the Applicant, the Applicant shall revise the draft state-level documentation report in accordance with the comments and resubmit the report as described in Stipulation (b). If no comments are provided to the Applicant by the end of the second comment period, the Applicant shall finalize the state level documentation and submit a final copy to USACE and the SHPO prior to the start of construction activities.

   d. Upon completion of Stipulations (a), (b), and (c), the Applicant shall forward final copies of the resulting documentation to the Oregon Historical Society in Portland, Oregon, and the University of Oregon Allied Arts and Architecture Library in Eugene, Oregon. Evidence of these transfers must be provided to the Oregon SHPO. A third, fully electronic copy shall be forwarded to the Oregon SHPO for their records.

   e. In order to address indirect effects to site 35MU234, The Port of Portland, or their designated representative, shall work directly with The Confederated Tribes of the Grand Ronde Community of Oregon (CTGR) to develop an interpretive panel that provides an overview of past uses as well as the cultural significance of the site. A separate panel will be developed for the historical overview of the project site to include information on Salmon Creek. This panel does not need to be coordinated with the CTGR. The panels shall each be not less than 24" x 48" in size, and will be constructed of durable, weather-resistant design. The panels will incorporate text and color images, and historic photographs or other images featuring the
property. More specifically, the pre-contact panel should describe site 35MU234 in a regional context of the area in addition to analysis and/or conclusions resulting directly from the archeological survey. The exact language and information shall be developed with the CTGR. Draft design and layout of the pre-contact panel will be provided to Corps, SHPO and CTGR for review, comment, and concurrence, prior to installation. The historic use panel should include information on the historic use of the Salmon Creek drainage system as well as the larger Columbia Slough Drainage District. Draft design and layout of the Salmon Creek panel will be provided to the Corps and SHPO for review, comment, and concurrence, prior to installation. Once the content is approved, the panels shall be fabricated and installed in a place of prominence.

f. The Port of Portland shall bear the cost for stipulations a, b, c, d, and e.

13. DURATION. This MOA will expire if its terms are not carried out within three (3) years from the date of its execution. Prior to such time, USACE may consult with the other signatories to reconsider the terms of the MOA and amend it in accordance with Paragraph 16, below. If this agreement expires without amendment prior to completion of the Stipulations above, it shall be considered terminated, according to Paragraph 17, below.

14. MONITORING AND REPORTING. Each year following the execution of this MOA until it expires or is terminated, USACE shall provide all parties to this MOA a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in USACE’s efforts to carry out the terms of this MOA.

15. DISPUTE RESOLUTION. Should any signatory to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, USACE shall consult with such party to resolve the objection. If USACE determines that such objection cannot be resolved, USACE will:

a. Forward all documentation relevant to the dispute, including the USACE’s proposed resolution, to the ACHP in accordance with 36 CFR 800.2(b)(2). The ACHP shall provide USACE with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, USACE shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP and signatories, and provide them with a copy of this written response. USACE will then proceed according to its final decision.

b. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, USACE may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, USACE shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories to the MOA, and provide them and the ACHP with a copy of such written response. The USACE decision will be final.

c. USACE’s responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

16. AMENDMENTS. This MOA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.
17. TERMINATION. If any signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment per Paragraph 16, above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories. Once the MOA is terminated, and prior to work continuing on the undertaking, USACE must either:

a. Execute an MOA pursuant to 36 CFR § 800.6; or

b. request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. USACE shall notify the signatories as to the course of action it will pursue.

18. EXECUTION. Execution and implementation of this MOA by the USACE, SHPO, and the Port of Portland is evidence that USACE has afforded the ACHP and all concerned parties the opportunity to comment on the effects of this undertaking on historic properties and has satisfied the requirements of Section 106 of the National Historic Preservation Act (16 U.S.C. 470(f)) and applicable implementing regulations.

SIGNATORIES:

United States Army Corps of Engineers

Jose L. Aguilar
Colonel, U.S. Army Corps of Engineers
Commander and District Engineer

(Date)
SUBJECT: NWP-2007-889-1, The Realignment of Historically Significant Features of the Sandy Drainage Improvement Company Drainage District and Adverse Effects to Archeological Site 35MU234, Multnomah County, Oregon

Note: By signing this document, you agree to all the terms and conditions outlined in the subject Memorandum of Agreement.

SIGNATORIES:

Oregon State Historic Preservation Officer

Roger Roper
Deputy State Historic Preservation Officer

(Date)
SUBJECT: NWP-2007-889-1, The Realignment of Historically Significant Features of the Sandy Drainage Improvement Company Drainage District and Adverse Effects to Archeological Site 35MU234, Multnomah County, Oregon

Note: By signing this document, you agree to all the terms and conditions outlined in the subject Memorandum of Agreement.

The Port of Portland

[Signature]

Bill Wyatt
Executive Director, Port of Portland

[Date]
SUBJECT: NWP-2007-889-1, The Realignment of Historically Significant Features of the Sandy Drainage Improvement Company Drainage District and Adverse Effects to Archeological Site 35MU234, Multnomah County, Oregon

Note: By signing this document, you agree to all the terms and conditions outlined in the subject Memorandum of Agreement.

CONCURRING PARTY:

Multnomah County Drainage District

[Signature]

Reed Wagoner
Director, Multnomah County Drainage District (MCDD)

11/26/14
(Date)
Figure 1. Troutdale Reynolds Industrial Park project location map.
Oregon SHPO Documentation Standards
Mitigation for Adverse Effects under Section 106 of the National Historic Preservation Act or ORS 358.653

In cases where an action by a local, state or federal agency will adversely affect a listed or potentially-eligible National Register property, documentation may be required as part of the mitigation for the undertaking. Documentation is not necessarily adequate in all cases. Agencies should contact the Oregon State Historic Preservation Office (SHPO) before planning or completing any mitigation measures, including documentation.

**State Level Documentation**

The following items are required for all state level documentation.

1. **Architectural description of the building** - *Description should be surface-by-surface, covering the entire exterior of the building, noting all important character-defining elements, fenestration types and patterns. Include descriptions of key interior areas, if accessible. Include discussion of all observed alterations, and provide dates for them. Descriptions should be not less than 500 words and use appropriate architectural terms.*

2. **Building history** - *History of not less than 500 words discussing at least when the building was constructed and by whom, the building or structure’s use over time, and any important persons or events associated with the resource. Be as accurate as possible. If the documentation is being conducted for mitigation purposes, give extra detail to those elements being impacted. Contact the Oregon SHPO for research suggestions.*

3. **Bibliography** - *Include a bibliography of all resources used in the preparation of the document, including sources for appended archival materials described in item 8.*

4. **Map** - *Digital image of the appropriate United States Geological Survey (USGS) Map with the location of the property marked. A portion of the entire map may be printed for free from a website such as topoquest.com and marked by hand.*

5. **Scale site plan** – *Include subject building or structure and adjacent buildings and structures on the same tax lot. Drawing may be done by hand as long as it reasonably to scale. Include the name of the person completing the map, date the map was completed, map scale, and north arrow on the map. The name and/or use of each building, structure, object, and adjacent streets on the map should be labeled.*

6. **Scale Floor plans** - *Include each floor of the subject building or structure. Drawing may be done by hand as long as it reasonable to scale. Include the name of the person completing the map, date the map was completed, map scale, and north arrow on the map. The name and/or use of each space should be labeled.*

7. **Photographs** - *Include photos of the building or structure interior and exterior. Photos may be taken as 35mm black-and-white 4x6 images or as color digital images. Digital and print images and prints must meet all aspects of the Oregon SHPO Digital Photo Checklist available at the SHPO website: [http://www.oregonheritage.org/OPRD/HCD/NATREG/nrhp_documents.shtml](http://www.oregonheritage.org/OPRD/HCD/NATREG/nrhp_documents.shtml).*

8. **Archival materials** - *If available, include original architectural drawings or maps, brochures, photos, newspaper clippings, or other archival items of interest relating to the history of the building or structure.*

Provide three complete hard-copy sets of documentation including printed photos, and one CD containing a digital copy of the complete submission to the Oregon SHPO. A fourth full set may be required in cases where there is a local repository that is interested in receiving the materials.

**Historic American Building Survey (HABS) and Historic American Engineering Record (HAER) Documentation**

In cases where HABS / HAER documentation is required, the provided materials must meet all standards set by the National Heritage Documentation Programs Office, including archiving at the Library of Congress. The level of documentation is negotiated on a case-by-case basis between the agency managing the project and the Oregon SHPO. Documentation standards may be found at: [http://www.nps.gov/hdp/](http://www.nps.gov/hdp/).
WHEREAS, The United States Postal Service (USPS) intends to transfer ownership to a non-Federal entity ('dispose') of the USPS Processing & Distribution Center in Portland, Multnomah County, Oregon (Portland P&D Center);

WHEREAS, the Keeper of the National Register of Historic Places has determined that the Portland P&D Center is eligible for listing on the National Register of Historic Places;

WHEREAS, the transfer of ownership of historically significant Federal property to non-Federal ownership is considered an adverse effect;

WHEREAS, the USPS has notified the Advisory Council on Historic Preservation (ACHP) of the adverse effect and the ACHP has chosen not to participate in the consultation and

WHEREAS, the USPS has consulted with the Oregon State Historic Preservation Officer (Oregon SHPO) pursuant to 36 C.F.R. Part 800 regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. Part 470f);

WHEREAS, the USPS and Oregon SHPO entered into a Memorandum of Agreement regarding disposal of the Portland P&D Center, executed by USPS on May 11, 2011 and by the Oregon SHPO on May 26, 2011 (the 2011 MOA);

WHEREAS, USPS completed a historic context study concerning USPS-owned properties constructed or occupied by the USPS between 1941 and 1971 (the context study);

NOW, THEREFORE, the USPS and the Oregon SHPO hereby amend and completely restate the 2011 MOA and agree that USPS may dispose of the Portland P&D Center to non-Federal ownership without covenants, restrictions or conditions in consideration of the following stipulations:

STIPULATIONS

The USPS will ensure that the following measures are carried out:

(1) **MULTIPLE PROPERTY DOCUMENT NATIONAL REGISTER:** Using the results of the context study, the USPS will submit to Oregon SHPO a proposed National Register Multiple Property Document for USPS-owned buildings in Oregon constructed during 1941-1971, expanding upon the current "Significant US Post Offices in Oregon, 1900-1941", Thematic Resource Document. The MPD shall be completed in consultation with Oregon SHPO according to National Register Bulletin "How to Complete the National Register Multiple Property Documentation Form."
(2) **INDIVIDUAL NATIONAL REGISTER NOMINATION:** USPS shall prepare a National Register nomination form for one USPS-owned building, Scappoose Main Post Office, located at 52643 Columbia River Highway, chosen by USPS in consultation with Oregon SHPO, using the prepared MPD. The individual nomination shall be completed in consultation with Oregon SHPO according to National Register Bulletin "How to Complete the National Register Registration Form."

(3) **COORDINATION AND REVIEW:** The USPS shall submit copies of both the MPD and individual nomination form for formal review and consideration by Oregon SHPO and State Advisory Committee on Historic Preservation (SACHP) for listing in the National Register of Historic Places by National Park Service (NPS) within two years of the date of USPS’s execution of this Amended and Restated Agreement. Stipulation 2 will be deemed complete when all revisions requested by the Oregon SHPO and the SACHP have been addressed and the document is formally sent to NPS.

(4) **DURATION:** If USPS does not timely complete the above measures, then the Oregon SHPO shall notify USPS of the failure and the items the Oregon SHPO asserts are incomplete. If such items are reasonably susceptible to being completed and if USPS fails to complete the incomplete items within a reasonable time after such notice, then USPS and Oregon SHPO shall consult for a period of 30 days. If the parties do not agree to amend this Memorandum during such 30 day period, then the Oregon SHPO may terminate this Memorandum. No amendment to this Memorandum shall be effective unless in writing and executed and delivered by the parties.

(5) **AMENDMENTS:** This MOA may be amended when such an amendment is agreed to in writing by both signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

Execution of this Amended and Restated Memorandum of Agreement by the USPS and the Oregon SHPO evidences that USPS has completed the Section 106 process for the transfer out of federal ownership ('disposal') of the USPS Processing & Distribution Center in Portland, Multnomah County, Oregon, and has evaluated and taken into account the effect of the disposal upon historic properties, and therefore, USPS may transfer the Portland P&D Center prior to completing the Stipulations above.

**UNITED STATES POSTAL SERVICE**

By: [Signature]  
Name: Daniel B. Delahaye  
Title: Federal Preservation Officer  
Date: 9/10/15

**OREGON STATE HISTORIC PRESERVATION OFFICER**

By: [Signature]  
Name: Christine Curran  
Title: Deputy State Historic Preservation Officer  
Date: 8/20/15
UNITED STATES POSTAL SERVICE

By: [Signature]
Name: Tom Russell
Title: Contracting Officer

Date: 9-10-15
UNITED STATES POSTAL SERVICE

Notice of Intent to Prepare an Environmental Assessment

Please take notice that, in accordance with the National Environmental Policy Act and United States Postal Service (USPS) policy, the USPS is preparing an Environmental Assessment (EA) to determine the potential environmental impacts of building and operating a new, fully integrated, and modern USPS facility in or near Portland, Oregon to consolidate the functions of three separate USPS facilities currently in Portland.

The USPS is evaluating two action alternatives in the EA: (1) Construction of the new facility at the Colwood Industrial Park in Portland; or (2) Construction of the new facility at the Troutdale Reynolds Industrial Park in Troutdale, Oregon. The proposed facility would consolidate the functions of the Processing and Distribution Center /Vehicle Maintenance Facility (P&DC/VMF), currently located at 715 NW Hoyt Street in Portland; the Portland-Mount Hood Delivery Distribution Center, currently located at 8564 NE Alderwood Road in Portland; and the Portland Air Cargo Center, currently located at 7425 NE Airtrans Way Suite 100 in Portland.

USPS will publish a Notice of Availability of the EA when the EA is ready for public review. For additional information specific to the EA, please contact:

Ms. Ann Sarver
Facilities Environmental Specialist
USPS Facilities Department – HQ Field Office
Facilities Implementation
6013 Benjamin Road, Suite 205
Tampa, FL 33634-5178
(813) 889-4307
TRUSTEE’S NOTICE OF SALE

The Trustee, under and by virtue of the Power of Sale granted in said Trust (hereinafter referred to as “Trust”) by the holder of the Mortgage, hereby gives notice of the sale of the property described below, pursuant to said power of sale:

PROPERTY DESCRIPTION:

1. Address: 1234 Main Street, Anytown, USA
2. Description: Lot 1, Block 2, Plat A, City of Anytown

BIDDERS:

2. Bidding Requirements: Bidders must register with the Trustee prior to the sale. Registration requires providing proof of identification and a deposit of $10,000. Bidders are encouraged to visit the property prior to the sale.

SALE PROCEDURE:

1. Method of Sale: Auction
2. Starting Bid: $100,000
3. Increment: $1,000
4. Deadline: Bids must be submitted by 10:00 AM on the day of the sale.

CLAIMS:

1. Parties with Claims: Any parties with claims against the property must file their claims with the Trustee at least 10 days prior to the sale.
2. Claim Requirements: Claims must be in writing, provide a detailed description of the claim, and include any supporting documents.

NOTICE TO PROPERTY OWNERS:

Any property owners with legal interests in the property must appear at the sale and can make objections if necessary.

DATE AND LOCATION:

Location: Anytown Courthouse
Date: April 15, 2023
Time: 10:00 AM

TRUSTEE:

1. Name: John Doe
2. Address: 1111 Main Street, Anytown, USA
3. Contact: (555) 123-4567

FOR FURTHER INFORMATION:

Contact the Trustee or visit the courthouse for more information.

PUBLIC NOTICE

Published in The Oregonian, Wednesday, March 29, 2023

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PUBLIC NOTICE
OREGONIAN MEDIA GROUP

1515 SW 5th, Suite 1000, Portland, OR 97201-5615

Affidavit of Publication

I, Justin Eubanks, being first duly sworn depose and say that I am the Principal Clerk of The Publisher of The Oregonian, a newspaper of general circulation, published at Portland, in Multnomah County, Oregon; that I know from my personal knowledge that the advertisement, a printed copy of which is hereto annexed, was published in the entire issue of the said newspaper in the following issues:

March 9, 2016

AECOM

# 0003757485

Principal Clerk of the Publisher

Subscribed and sworn to before me this date: 10th Day of March 2016

Kimberlee W O'Neill

Notary Public for Oregon

My Commission expires 9-22-18

UNITED STATES
POSTAL SERVICE
Notice of Intent to Prepare an
Environmental Assessment

Please take notice that, in accordance with the National Environmental Policy Act and United States Postal Service (USPS) policy, the USPS is preparing an Environmental Assessment (EA) to determine the potential environmental impacts of building and operating a new, fully integrated, and modern USPS facility in or near Portland, Oregon to consolidate the functions of three separate USPS facilities currently in Portland. The USPS is evaluating two action alternatives in the EA: (1) Construction of the new facility at the Colwood Industrial Park in Portland; or (2) Construction of the new facility at the Troutdale Reynolds Industrial Park in Troutdale, Oregon. The proposed facility would consolidate the functions of the Processing and Distribution Center /Vehicle Maintenance Facility (P&DC/VMF), currently located at 715 NW Hoyt Street in Portland; the Portland-Mount Hood Delivery Distribution Center, currently located at 8564 NE Alderwood Road in Portland; and the Portland Air Cargo Center, currently located at 7425 NE Airtrans Way Suite 100 in Portland. USPS will publish a Notice of Availability of the EA when the EA is ready for public review. For additional information specific to the EA, please contact: Ms. Ann Sarver, Facilities Environmental Specialist, USPS Facilities Department - HQ Field Office, Facilities Implementation, 6013 Benjamin Road, Suite 205, Tampa, FL 33634-5178, or at (813) 889-4307.
UNITED STATES POSTAL SERVICE
Notice of Availability of an Environmental Assessment

Please take notice that the United States Postal Service (USPS) has prepared an environmental assessment (EA) to build and operate a new, fully integrated, and modern USPS facility in the Portland, Oregon Metropolitan Area to consolidate the functions of three separate USPS facilities in Portland. This EA has been prepared pursuant to the National Environmental Policy Act of 1969 (NEPA; 42 United States Code [U.S.C.] 4321 et seq.), the President’s Council on Environmental Quality (CEQ) regulations implementing NEPA (Title 40 of the Code of Federal Regulations [CFR] Parts 1500 to 1508), the USPS regulations for NEPA compliance (39 CFR Part 775), and the USPS Facilities Environmental Guide (Handbook RE-6, v.3).

The purpose of the Proposed Action is to increase operational efficiencies and decrease operating costs for USPS facilities. Under the Proposed Action, the USPS would construct and operate a new USPS-owned facility to consolidate and incorporate the functions of three facilities: the USPS-owned Processing and Distribution Center /Vehicle Maintenance Facility (P&DC/VMF) located at 715 NW Hoyt Street; the Portland-Mount Hood Delivery Distribution Center (DDC) leased facility located at 8564 NE Alderwood Road; and the Portland Air Cargo Center (PACC) leased facility located at 7425 NE Airtrans Way. When the new facility opens, the USPS would release the existing P&DC/VMF property to the Portland Development Commission and terminate existing leases at the DDC and the PACC. Prior to vacating the existing P&DC/VMF facility, the USPS would either keep the retail space within the existing P&DC/VMF or would obtain another retail space nearby to retain a USPS retail unit (Post Office) in the Pearl District of Portland. Redevelopment or reuse of the P&DC/VMF property by the Portland Development Commission would occur in consonance with local zoning, to include mixed commercial and residential uses similar to neighboring properties.

The USPS is evaluating two action alternatives in the EA. Under Alternative 1, the USPS would construct and operate the new facility at the Colwood Industrial Park property (Colwood Site) in Portland, Oregon. Under Alternative 2, the USPS would construct and operate the new facility at the Troutdale Reynolds Industrial Park on Lots 7 and 8 (Troutdale Site) in Troutdale, Oregon. The USPS has consulted with the Oregon State Historic Preservation Officer to avoid and/or mitigate adverse effects on historic properties in accordance with the National Historic Preservation Act.

The EA is available for viewing online at http://about.usps.com/who-we-are/legal/portland-ea.pdf. This Notice of Availability (NOA) of an EA will be posted in hard copy at the closest USPS facilities with public access:

- U.S. Post Office at 715 NW Hoyt Street, Portland
- U.S. Post Office at 647 SW Cherry Park Road, Troutdale
- U.S. Post Office at 7640 NE Airport Way, Portland

Comments may be submitted until the close of the 15-day public comment period on Saturday June 25, 2016 via electronic mail to ann.m.sarver@usps.gov or to the following address: Ms. Ann Sarver, Facilities Environmental Specialist, USPS Facilities Department – HQ Field Office, Facilities Implementation, 6013 Benjamin Road, Suite 205, Tampa, Florida 33634-5178.
Appendix F

Comments Received on the Draft EA