
H.B. Van Duzer Forest Corridor – Steel Bridge Road

**ORE 18/ORE 22
Polk County**

Revised Environmental Assessment

**Oregon Department of Transportation
Federal Highway Administration**

July 2004

Conversion Factors

English Units	Multiply By	Metric Units
foot (ft)	0.3048	meter (m)
mile (mi)	1.609	kilometer (km)
cubic yard	0.7646	cubic meter
acre (ac)	0.4047	hectare (ha)
miles per hour (mph)	1.609	kilometers per hour (km/h)

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Oregon

Theodore R. Kulongoski, Governor

Department of Transportation

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July 21, 2004

File Code:

TO INTERESTED PARTIES OF THE

**H.B. Van Duzer Forest Corridor—Steel Bridge Road Project
Oregon 18/22
Polk County
Key No. P00001**

This **Finding of No Significant Impact** for the **H.B. Van Duzer Forest Corridor—Steel Bridge Road** project is being distributed for your information, per state and federal regulations.

If you wish to comment further on the project or its impacts, please address your comments within 30 days to:

**Federal Highway Administration
The Equitable Center, Suite 100
530 Center Street N.E.
Salem, Oregon 97301**

I would also appreciate a copy of your comments.

Thank you,

(for)
David McAllister,
Operations Manager





FEDERAL HIGHWAY ADMINISTRATION

FINDING OF NO SIGNIFICANT IMPACT

for

H.B. Van Duzer Forest Corridor—Steel Bridge Road Project ORE18/22 in Polk County, Oregon Key No. P00001

The Federal Highway Administration (FHWA) has determined that this project will not have a significant adverse impact on the human or natural environment. This finding is based on information provided in the Environmental Assessment (October 2002) and the attached Revised Environmental Assessment, which have been found to adequately and accurately disclose the environmental impacts of the proposed project. The impact analysis presented in the Environmental Assessment and updated in the attached Revised Environmental Assessment is based on general project locations. These documents provide sufficient evidence and analysis for determining that an environmental impact statement is not required.

The **Build Alternative with modifications** has been selected for implementation. The Environmental Assessment contains descriptions of estimated impacts associated with projects proposed to improve approximately 9 miles of ORE 18 and ORE 22 between the H. B. Van Duzer Forest Corridor (MP 18.79) and Steel Bridge Road (MP 28.21). The project consists of the replacement of three intersections with three grade-separated interchanges, highway widening, new local service/access roads, installation of nontraversable medians, and three bridge replacements within a 9-mile stretch of ORE 18/22 near the communities of Grand Ronde, Fort Hill, and Valley Junction. The project will improve safety and traffic flow by reducing congestion at the current intersection areas along Oregon 18/22 and increasing capacity throughout the 9-mile project corridor. Estimated impacts include the removal of private accesses, up to 10 acres of wetlands impacts, right-of-way acquisitions and land use conversions, minor wildlife habitat loss, and minimal water quality impacts. Impacts are also expected to threatened and endangered fish and plant species. Mitigation is required to offset impacts to these resources. Little to no impacts are expected to cultural resources. No impacts are expected to air quality.

Construction is planned to begin in 2006 beginning with Phase 1 work in the Fort Hill area consisting of a new interchange, local service roads, and highway widening with installation of nontraversable medians. Future construction phases of the project will be built as funding becomes available. Each construction phase is required to be developed in compliance with all federal, state, and local regulations, and will include mitigation as necessary.

The FHWA takes full responsibility for the accuracy, scope, and content of the attached Revised Environmental Assessment.

7/8/04
Date


Federal Highway Administration Official
Oregon Division, Salem

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Acronyms and Abbreviations

BA	Biological Assessment
BMP	Best Management Practices
BO	Biological Opinion
C.F.R.	Code of Federal Regulations
CO	carbon monoxide
DEQ	Oregon Department of Environmental Quality
DLCD	Oregon Department of Land Conservation and Development
DOE	Determination of Eligibility
EA	environmental assessment
EFU	Exclusive Farm Use
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
ESUs	Evolutionarily Significant Units
FHWA	Federal Highway Administration
LCDC	Oregon Land Conservation and Development Commission
LUO	Limited Use Overlay (Polk County)
NEPA	National Environmental Policy Act
NRHP	National Register of Historic Places
OAR	Oregon Administrative Rule
ODFW	Oregon Department of Fish and Wildlife
ODOT	Oregon Department of Transportation
ODSL	Oregon Division of State Lands
OHP	Oregon Highway Plan
OR 18	Oregon Route 18 (old convention)
ORE 18	Oregon Route 18 (new convention)
OR 22	Oregon Route 22 (old convention)
ORE 22	Oregon Route 22 (new convention)
ORS	Oregon Revised Statutes
OTP	Oregon Transportation Plan
PCB	polychlorinated biphenyl
REA	revised environmental assessment
RPS	Regional Problem Solving

SHPO	State Historic Preservation Office
SIP	Safety Improvement Program
SPIS	State Priority Index System
STIP	Statewide Transportation Improvement Program
TAC	Technical Advisory Committee
TDM	Transportation Demand Management
TPR	Transportation Planning Rule
TSM	Transportation System Management
TSP	Transportation Systems Plan
USACE	U.S. Army Corps of Engineers
U.S.C.	U.S. Code
USFWS	U.S. Fish and Wildlife Service
USGS	United States Geological Survey
v/c	volume-to-capacity ratio
VE	value engineering

Glossary

Access management	Methods that regulate physical connections to streets, roads, and highways from public roads and private driveways. Requires balancing access to developed land while ensuring movement of traffic in a safe and efficient manner.
Access road	Low volume public roads that principally provide access to property or as specified in an acknowledged comprehensive plan. Also referred to as “local access road” or “local service road” in H.B. Van Duzer Forest Corridor – Steel Bridge Road Environmental Assessment.
Alignment	Geometric arrangement of a roadway (e.g., curvature).
Alternative modes	Modes such as rail, transit, carpool, walking, and bicycle that provide transportation alternatives to the use of single-occupancy automobiles.
Capacity	Maximum volume of traffic that the roadway section is able to carry on a sustained basis.
Clear zone	The total roadside border area, starting at the edge of the traveled way, available for safe use by errant vehicles.
Deviation	A departure from an access management standard, requiring a design exception.
Environmental Assessment (EA)	A public document that describes existing conditions, identifies potential effects of a project, and proposes measures to minimize or offset significant negative effects. It is used by state and federal agencies to determine whether a proposed project has significant environmental impacts.
Expressway	Highways that provide for safe and efficient high speed and high volume traffic movements.
Highway	A public way for purposes of travel, including the entire area within the public right-of-way.
Highway-Rail Crossing	An intersection between railroad tracks and a road. Crossings can be either “at-grade” (at the same level) or separated grade, where the road uses either a tunnel or a bridge to avoid crossing the rail tracks.
In Attainment	An area with air quality that meets or exceeds the U.S. Environmental Protection Agency health standards used in the Clean Air Act.

Interchange	A crossing of two roadways with one elevated above the other and access between them controlled by connecting ramps.
Interchange access management area	The area defined by a distance along both the mainline and crossroads in all directions extending beyond the end of the interchange ramp terminal intersections, or the end of the ramp merge lane tapers.
Limited use overlay	A Polk County zoning provision that intends to limit permitted uses activities in a specific location allowed in the underlying zone to only those uses which are justified in a required “reasons exception” to one or more of the Statewide Planning Goals. See Polk County Zoning Ordinance, Chapter 184.
Median	That portion of the roadway which separates opposing traffic streams.
Mitigation	Actions taken to minimize or offset negative effects of preferred projects or actions.
National Highway System (NHS)	A system of statewide and interstate highways and intermodal connectors meeting federal criteria (approximately 155,000 miles total), designated by Congress in the National Highway System Designation Act of 1995.
Oregon Administrative Rules (OAR)	Rules written by a government agency intended to clarify the intent of an adopted law.
Oregon Revised Statutes (ORS)	The laws passed by the legislature to govern the state of Oregon.
Pedestrian	A person on foot, in a wheelchair, or walking a bicycle.
Phases	The unit of organization by which projects or groups of projects composing the selected alternative would be constructed.
Preservation	Any treatment to the roadway that extends the period before modernization is required.
Regional Problem Solving (RPS) Committee	The RPS committee consisted of state agency representatives, Polk County and Yamhill County representatives, Tribal representatives, local citizens, and representatives of the City of Willamina. The group was formed by the Oregon State Legislature as a method to allow a regional group to create a regional land use plan.
Revised Environmental Assessment (REA)	A public document that describes the Preferred Alternative and the reasons for its selection, lists mitigation measures to be taken, summarizes public involvement in the project development process, and responds to public comments on the EA.

Right-of-Way	A general term denoting publicly owned land, property, or interest therein, usually in a strip. The entire width between the exterior right-of-way lines including the paved surface, shoulders, ditches, and other drainage facilities in the border area between the ditches or curbs and right-of-way line.
Section 4(f)	Section 4(f) of the <i>Department of Transportation Act of 1966</i> mandates avoidance of significant historic sites unless there is no “feasible and prudent” alternative. This law is now codified as 23 U.S.C. Section 138 “Preservation of Parklands.”
Section 106	Section 106 of the <i>National Historic Preservation Act</i> requires federal agencies to consider the effect of federally funded or licensed projects on properties and districts eligible for the National Register of Historic Places.
Sight Triangle	The area adjacent to the highway needed for unobstructed views for driver’s safety.
State Highway System	Public roads owned and operated by the state of Oregon through the Oregon Department of Transportation. The state highway system does not include state-owned roads managed by State Parks, State Forests, Oregon Department of Fish and Wildlife, college campuses, or other state institutions.
Transportation Demand Management (TDM)	Actions and policies that encourage people to modify their travel behavior so that the highway system has reduced peak-period single occupant vehicle traffic. Examples of TDM include rideshare programs, discounted transit passes, pricing strategies, and flexible work hours.
Transportation System Management (TSM)	Techniques and technologies applied to the transportation system to improve traffic flow. Examples include ramp metering, automated sign controls, bus priority signaling, automated sign control, video surveillance, and incident response services.
Volume-to-capacity ratio (v/c ratio)	A measure of roadway congestion, calculated by dividing the number of vehicles passing through a section of highway during the peak hour by the capacity of the section.

Introduction

Project Name: H.B. Van Duzer Forest Corridor – Steel Bridge Road
County: Polk
Highways: Salmon River and Three Rivers
Highway Nos.: ORE 18 and 22

Funding Source: National Highway System¹
Cost Estimate: \$60.5 million
ODOT Region: 2
Begin: MP 18.8
End: MP 28.2
Length: 9.4 miles

This Revised Environmental Assessment (REA) for the H.B. Van Duzer Forest Corridor – Steel Bridge Road project along Oregon 18 (ORE 18)/Oregon 22 (ORE 22) in Polk County, Oregon, completes the Environmental Assessment (EA) that was released in September 2002. The REA is not intended to be read as a stand-alone document, but rather as a continuation of the EA. Information stated in the EA and not substantially changed since its release is therefore not repeated in the REA.

Copies of the EA and REA are available upon request from:

Oregon Department of Transportation (ODOT)
Environmental Services Section
1158 Chemeketa St. NE
Salem, OR 97301

Copies of the EA and REA have also been placed on ODOT's Web site. They can be downloaded from http://www.odot.state.or.us/region2public/Van_Duzer.htm.

Please refer to the EA for a list of preparers and technical reports developed for the project. Acronyms, abbreviations, and notable terms used in this REA are explained in the front of this document, starting on page vii. The majority of the figures included in this REA were part of the EA, or have been updated since the publication of the EA. The EA figure numbering is included for reference on each of the figures in this REA.

This REA describes the Preferred Alternative that was selected for implementation. It also provides the reasons for selecting the Preferred Alternative and a section listing the additions and changes made to the EA. Land use findings of consistency with local plans are

¹ For the Fort Hill to Wallace Bridge Section

included along with a section summarizing mitigation and conservation measures and a description of public and agency coordination conducted for the project. A project conclusion is also provided. Appendixes to the REA consist of (A) a summary of public involvement and agency coordination; (B) summarized responses to public and agency comments; (C) public comments received on the EA; (D) public hearing transcript; and (E) agency comment letters.

Alternatives Analysis Summary

Two alternatives were analyzed in the EA – a No Build Alternative and a Build Alternative.

The **No Build Alternative** would leave the highway segment as is without coordinated plans for improvement. Required maintenance projects would occur and other improvements to this segment of ORE 18 would be planned as individual projects. At this time, two projects identified in the *Statewide Transportation Improvement Program* are scheduled for 2006. These are the realignment of the Fort Hill intersection and the addition of an eastbound passing lane between Fort Hill and Wallace Bridge. An access road between Fort Hill and Wallace Bridge is also planned. These projects would be developed under the No Build scenario without coordination with future potential projects in the area.

The **Build Alternative** presented in the EA is similar to the Preferred Alternative described in the next section of this REA with one notable exception: at Fort Hill Road, the Build Alternative presented in the EA proposed an at-grade intersection. The EA states:

“The Build Alternative includes the following proposed projects: widen the highway to four lanes, including three bridges over the south Yamhill River; install non-traversable medians; construct interchanges at Grand Ronde and the Casino/Valley Junction area; *realign the Fort Hill intersection*; consolidate and close private accesses; and construct access roads.”

This intersection relocation would have moved the ORE 18/Fort Hill Road/South Yamhill River Road intersection east of the service station and Fort Hill Restaurant. A northside access road also would have been constructed from Fort Hill eastward approximately 2.8 miles, crossing over ORE 18 and connecting to South Yamhill River Road. This road would have eliminated all highway approach roads, other than the weigh stations, east of the new Fort Hill Road intersection. Fort Hill Road would have connected to the ORE 18/ORE 22 Wallace Bridge Interchange via South Yamhill River Road.

As the EA was being readied for publication and distribution, ODOT designers proposed an alternate solution to the Fort Hill Road/ORE 18/ORE 22 connection. Rather than a realigned, at-grade intersection, designers proposed an interchange that could be constructed at either a comparable cost or for less than the original proposed solution. The separated grade interchange would greatly reduce conflicts for the critical-path left-hand turn movement at the ORE 18/ORE 22 and Fort Hill Road intersection. The interchange also has the potential to impact fewer wetland acreage and may avoid many impacts to existing commercial businesses.

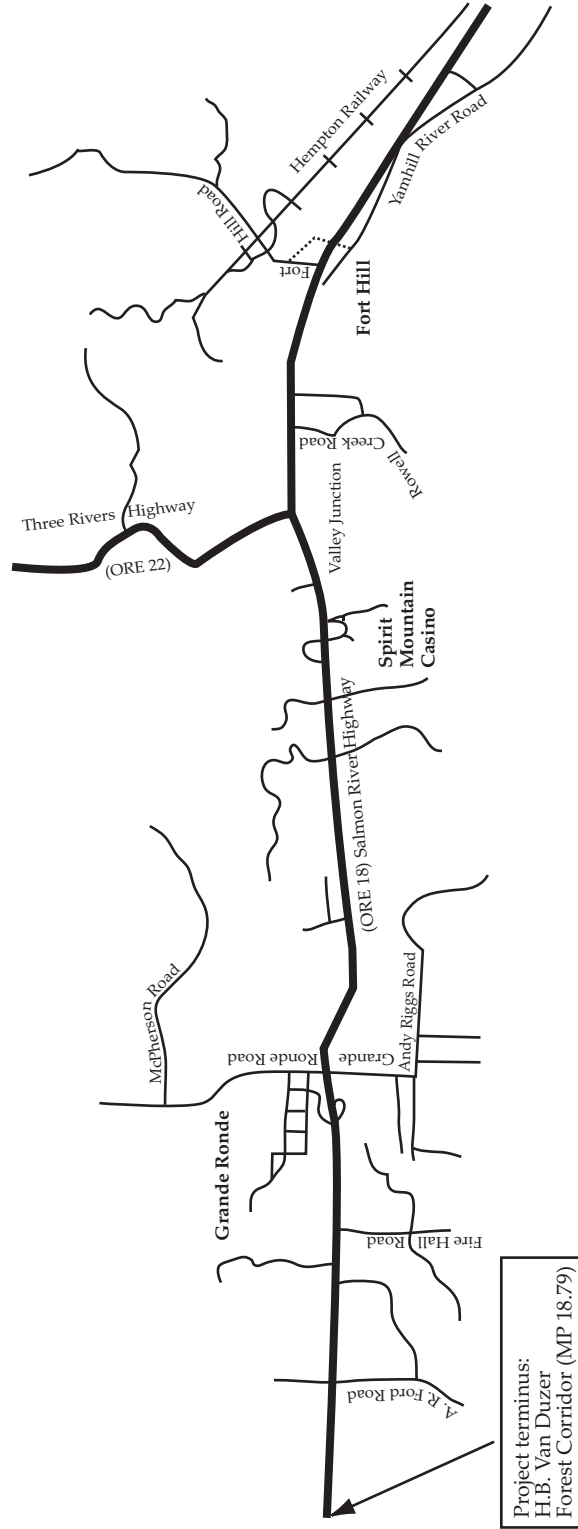
At the November 7, 2002, public hearing for the EA, ODOT presented information about the project and included the proposal for an interchange east of Fort Hill Road instead of

realigning the current intersection at Fort Hill Road. Residents attending the hearing showed strong support for the interchange option. This interchange is recommended by ODOT and included as part of the Preferred Alternative in this REA. It results in improved safety and convenience and provides the opportunity to reduce impacts to wetlands in the area by designing the connecting access road to serve the residents, rather than to carry all the truck traffic between the Fort Hill Lumber Company mill at Fort Hill and the ORE 18/ORE 22 Wallace Bridge interchange near Willamina. See the subsection titled Conceptual Design Changes in the Additions and Changes to the EA section of this REA for more information.

Figures 1 and 2 show the project location from the west and east, respectively.

Location and Project Map

H.B. Van Duzer Forest Corridor to Steel Bridge Road — West



Project terminus:
H.B. Van Duzer
Forest Corridor (MP 18.79)

OREGON DEPARTMENT OF TRANSPORTATION

TRANSPORTATION PLANNING ANALYSIS UNIT

H.B. Van Duzer to Steel Bridge Road Environmental Assessment
Project Location

FILE: 18ProjBigPPT

Prepared By: Harlan Nole, P.E.

DATE: 5/26/99

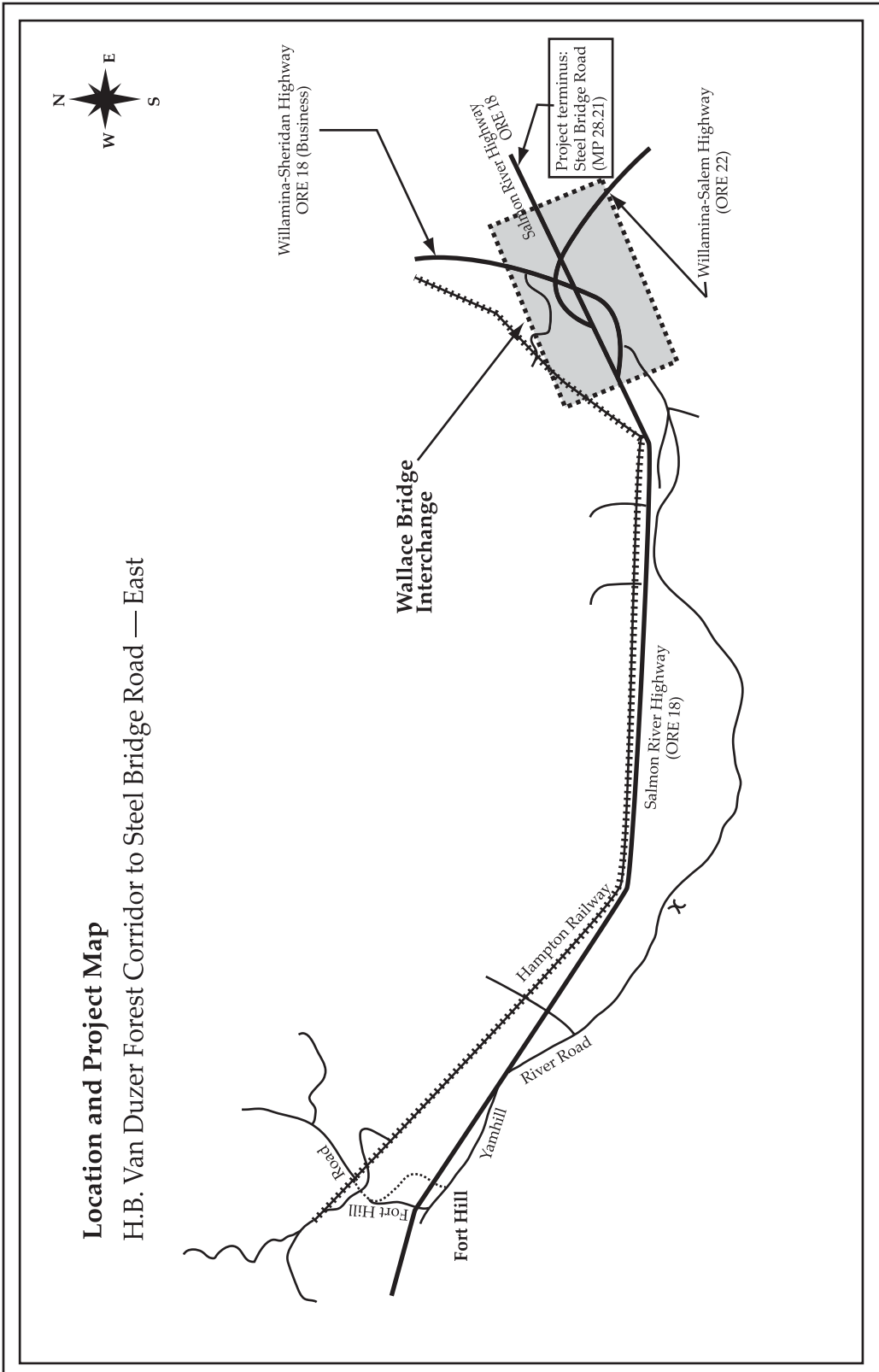
Reviewed By: Roxann Rivord, P.E.

FIGURE 1

Figure 1: Location and Project Map (West)

Location and Project Map

H.B. Van Duzer Forest Corridor to Steel Bridge Road — East



TRANSPORTATION PLANNING ANALYSIS UNIT

OREGON DEPARTMENT OF TRANSPORTATION

Prepared By: Harlan Nole, P.E.
Reviewed By: Roxann Rivord, P.E.

FILE: 18ProjBigPPT
DATE: 5/26/09

H.B. Van Duzer to Steel Bridge Road Environmental Assessment
Project Location

FIGURE 2

Figure 2: Location and Project Map (East)

Description of the Preferred Alternative

ODOT selected the Preferred Alternative (the Build Alternative proposed and analyzed in the EA, with modifications) for implementation. The Preferred Alternative is similar to the Build Alternative analyzed in the EA. The difference between the Build Alternative and the Preferred Alternative described here is the construction of a grade-separated interchange at Fort Hill Road. This design change is described in detail in the Additions and Changes to the EA section, under Conceptual Design Changes.

Background

The EA for the H.B. Van Duzer Forest Corridor—Steel Bridge Road project disclosed locations for general roadway improvements so that right-of-way could be identified and acquired and communities could plan for the future with knowledge of the long-range transportation plans. The EA published for the project contains descriptions and analyses of the general locations and estimated impacts of various construction phases of the project, which would improve approximately 9 miles of ORE 18 and ORE 22 between the H.B. Van Duzer Forest Corridor (milepoint [MP] 18.79) and Steel Bridge Road (MP 28.21). The individual construction phases (identified on the following page) make up the Preferred Alternative described in this REA.

The Preferred Alternative (also referred to in this REA as ‘the project’) was developed through the planning process required by the Oregon Transportation Planning Rule (TPR). The requirements for the Transportation System Plans and Corridor Plans are at a level of detail that prompted ODOT to enter into the National Environmental Policy Act (NEPA) process concurrently with the Refinement Planning process to produce a “location” environmental assessment. According to the “NEPA-Refinement Planning Process,” a paper produced by ODOT (June 1, 2000), *“The location decision will be made in the Refinement/NEPA document and the design decisions will be made later during project development.”*

Project Location

Three rural communities are located within the project area: Grand Ronde, Valley Junction, and Fort Hill. This segment of ORE 18/ORE 22 serves local, commuter, commercial, and recreational traffic between the metropolitan areas of Portland and Salem and the central Oregon coast. In addition, the Spirit Mountain Casino and Resort, a major tourist destination, is located on ORE 18 near Grand Ronde, within the highway corridor. ORE 18/ORE 22 is designated a statewide highway and rural expressway. The project is needed to decrease congestion and improve safety.

Project Elements (Individual Construction Phases)

Following are the individual construction phases of the project that were proposed and have been selected for implementation:

Phase 1: Construct projects between Fort Hill and Wallace Bridge

- Construct the Fort Hill interchange east of the present location of the intersection (Statewide Transportation Improvement Program [STIP] project, funded and scheduled for construction in 2005 or 2006).
- Add an eastbound passing lane east of Fort Hill to Wallace Bridge and construct a non-traversable median (STIP project, funded and scheduled for construction in 2005 or 2006).
- Construct a new Fort Hill Road east of the Fort Hill Lumber Company mill as other funding becomes available.
- Construct an access road east of Fort Hill Road, north of and parallel to ORE 18/ORE 22, that would connect to the Fort Hill interchange.

Phase 2: Construct projects between Spirit Mountain Casino and Fort Hill Road

- Widen ORE 18/ORE 22 to four lanes with a non-traversable median.
- Construct the Casino/Valley Junction (Three Rivers Highway) interchange.
- Replace or widen two bridges.
- Consolidate accesses and private property road approaches to ORE 18.
- Construct access roads south and north of ORE 18 at Rowell Creek.

Phase 3: Extend the four-lane, non-traversable median roadway from Spirit Mountain Casino west past Grand Ronde Road

- Construct the Grand Ronde interchange.
- Relocate the Jahn Road intersection with a left-turn median break across from the Seventh Day Adventist Church and School.
- Extend Jahn Road to the east toward Valley Junction as an access road, using the roadbed of the former Willamina and Grande Ronde Railroad as much as possible.

Phase 4: Widen the Wallace Bridge-Willamina Interchange Area

- Widen the highway to four lanes with a non-traversable median between the Wallace Bridge and the Steel Bridge Road, including adjustment of the eastbound ramps. This phase may need to be accelerated if the results of earlier phases place too much demand on this area.

Phase 5: Complete highway widening from Grand Ronde to H.B. Van Duzer Forest Corridor

The four-lane section would transition from a non-traversable median to a painted median to a two-lane segment to meet the two-lane segment at the Forest Corridor boundary. Work would include the following:

- Complete an access road along South Street extending beyond A.R. Ford Road north of Oregon 18 as local development occurs and as other funding becomes available.
- Complete access roads south of ORE 18 connecting Fire Hall Road to Andy Riggs Road.

- Close and consolidate private property road approaches to the highway.

Phase 6: Realign curves and widen the shoulders of Oregon 22

- Improve ORE 22 between Valley Junction and Grand Ronde Agency. Complete this work earlier if safety problems begin to increase on ORE 22 owing to construction of sections of ORE 18.

Phase 7: Complete access road connections south of Oregon 18

- Construct access roads between A.R. Ford and Fire Hall Roads as development occurs and as other funding becomes available.

Figures 3A and 3B provide an overview of the Preferred Alternative.

Additional Environmental Analysis

Individual construction phases of the project may require additional environmental study once preliminary project design details for each phase are known.

Biological Studies

ODOT initiated formal consultation with the U.S. Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration (NOAA) Fisheries Service while the EA was being developed. In 2000, ODOT prepared a Biological Assessment (BA) to study the potential impacts of the proposed action on two Evolutionarily Significant Units (ESUs) of steelhead trout (*Oncorhynchus mykiss*) and chinook salmon (*O. tshawytscha*) that are listed as threatened under the Endangered Species Act (ESA). The finding of effect in the BA for Upper Willamette spring-run salmon and Upper Willamette steelhead was that the project may affect and is likely to adversely affect both ESUs. Because individual construction phases included in the REA had not been designed, NOAA Fisheries advised that ODOT coordinate with them throughout the design stages of each construction phase, as warranted. NOAA Fisheries would provide technical assistance to avoid, minimize, or mitigate impacts to ocean-going fish species in the project area for each construction phase.

In 1999, ODOT prepared two BAs analyzing potential impacts of the project on plant and animal species, respectively. Federally Listed and Proposed species analyzed included Nelson's checker-mallow (*Sidalcea nelsoniana*), Willamette Valley daisy (*Erigeron decumbens decumbens*), Kincaid's lupine (*Lupinus sulphureus kincaidii*), Fender's blue butterfly (*Icaria icarioides*), marbled murrelet (*Brachyramphus marmoratus*), bald eagle (*Haliaeetus leucocephalus*), and northern spotted owl (*Strix occidentalis caurina*).

The finding of the BA on plant species concluded that the project may affect and is likely to adversely affect Nelson's checker-mallow, and will have no effect on other listed species. The findings from the Biological Opinion (BO) provided by USFWS concluded that the project is not likely to jeopardize the continued existence of Nelson's checker-mallow or Willamette Valley daisy, and provided terms and conditions for threatened, endangered, and sensitive plant species.

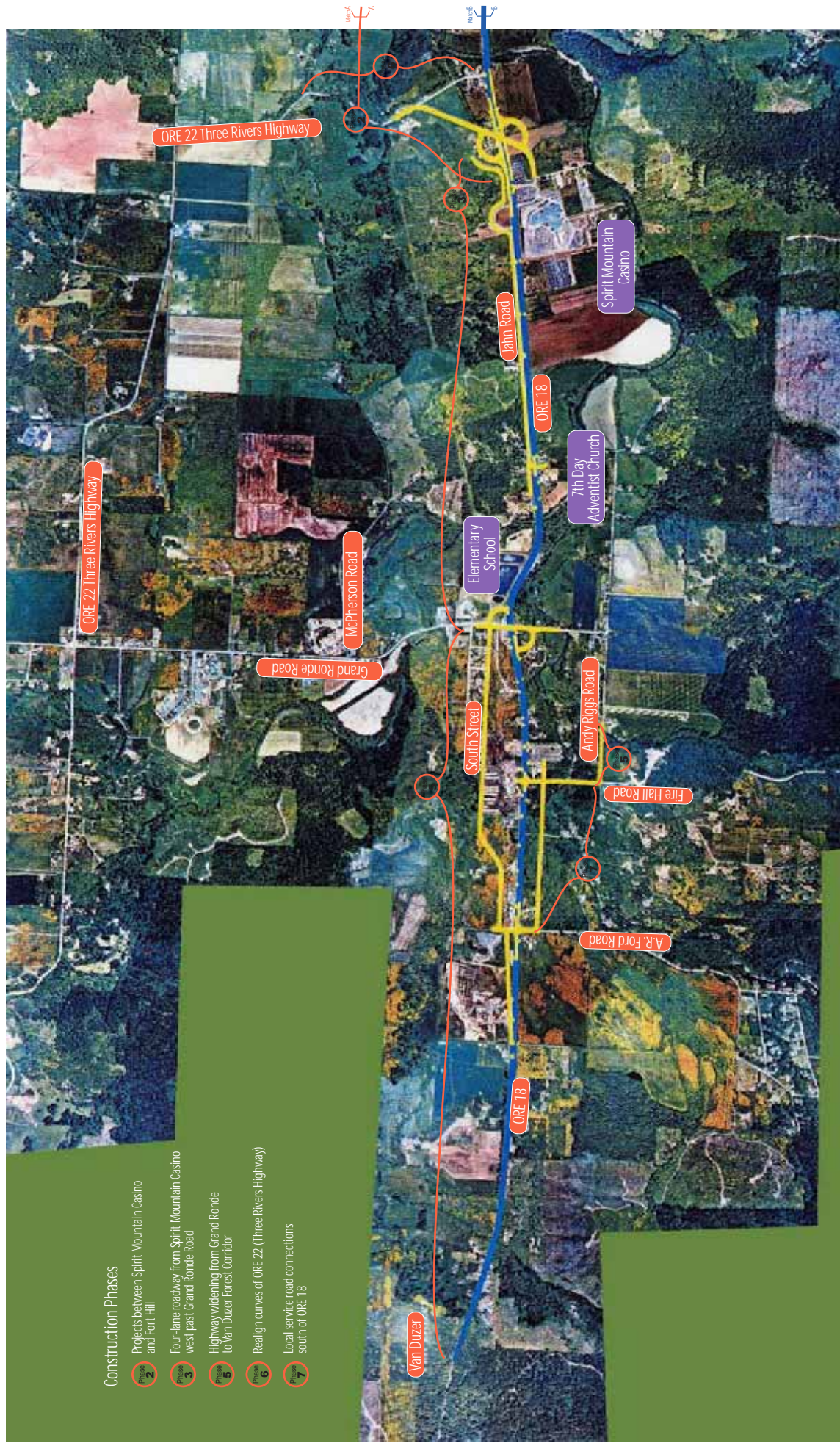


FIGURE 3A
Overview of the Preferred Alternative (West)

H.B. VAN DUZER FOREST CORRIDOR — STEEL BRIDGE ROAD

NOTE: This figure replaces 3-1 in the EA.

Construction Phases

- Phase 1** Projects between Fort Hill and Wallace Bridge
- Phase 2** Projects between Spirit Mountain Casino and Fort Hill
- Phase 4** Widen Wallace Bridge-Willamina Interchange Area

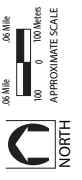
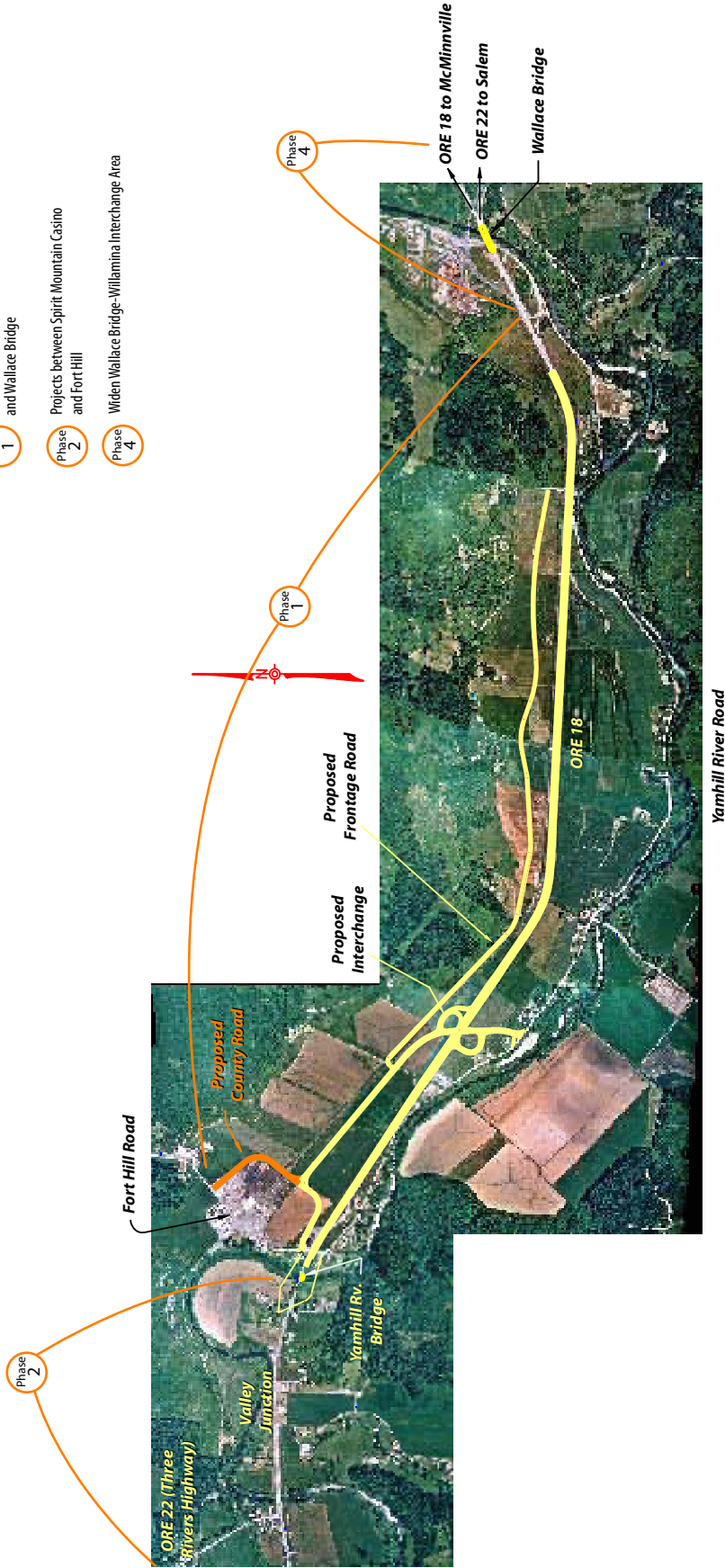


FIGURE 3B
Overview of the Preferred Alternative (East)
 H.B. VAN DUZER FOREST CORRIDOR — STEEL BRIDGE ROAD

NOTE: This figure replaces 3-2 in the EA.

The BA on animal species concluded that the proposed action would have no effect on the northern spotted owl, marbled murrelet, or bald eagle. ODOT will continue to work cooperatively with the USFWS throughout the design stages of the individual construction phases. USFWS would provide technical assistance to avoid, minimize, or mitigate impacts to plant and animal species in the project area. ODOT will prepare BAs for the construction phases of the project and initiate consultation with USFWS before final design, as warranted through coordination with USFWS during the design stage.

Rationale for Selecting the Preferred Alternative

Range of Alternatives Considered

Of the five separate alternatives considered, with over thirty variations or options, the Preferred Alternative was most effective at reducing congestion and improving vehicle, pedestrian, and bicycle traffic flow and safety from the H.B. Van Duzer Forest Corridor to Steel Bridge Road. A main consideration, along with safety and traffic flow in the corridor, was minimizing community and environmental impacts. Included in the consideration of impacts to the communities are impacts on residents, businesses, forest and farming operations, utilities and facilities, and cultural resources. Included in the consideration of impacts to the environment are impacts to threatened chinook salmon and steelhead, threatened plants, wetlands, and water quality.

Evaluation Criteria

ODOT used the following criteria to evaluate the alternatives, determining that the alternative should:

- Meet the project goals of reducing traffic congestion and crashes
- Evaluate the input of citizens
- Maintain reasonable project costs
- Minimize impacts to the local communities
- Minimize impacts to the environment

Reasons for Selecting the Preferred Alternative

Following are the reasons the Preferred Alternative was selected for implementation.

The Preferred Alternative:

- Can be constructed easily in phases, upon need, and as funding becomes available.
- Uses the existing roadway and infrastructure to the greatest extent possible, avoiding the need for new highway alignments.
- Provides controlled access and therefore improves safety throughout the corridor.
- Combines two major access points (Valley Junction and Spirit Mountain Casino) into one grade-separated interchange for safer and more efficient access.
- Avoids affecting the historically significant H.B. Van Duzer Forest Corridor.
- Provides a grade-separated interchange for the Grand Ronde community to improve safety for all users of the road system, and to improve efficiency of movement at that intersection.

- Provides safer access for individual properties with a local access road system.
- Provides protection to the travelling public from cross-over accidents (installation of non-traversable medians).
- Reduces long-term impacts to fish species, hydrology, and water quality in the South Yamhill River by replacing old bridges with new single-span structures.

Probable Permit Needs and Planning Actions

Each construction phase of the project is expected to require different types of permits and/or planning actions. Although specific information is not available until these construction phases advance into the design stage, the following paragraphs provide a general list of the types of permits and/or planning actions that may be required.

Permits Received for the Project

- United States Department of the Interior, Fish and Wildlife Service. 2001. Formal Consultation on the Willamina-Grand Ronde Corridor Project-Highway 18. Biological Opinion on Plant Species, February 22, 2001. The Biological Opinion concluded that the project is not likely to jeopardize the continued existence of Nelson's checker-mallow or Willamette Valley daisy, and provided conservation recommendations for threatened, endangered, and sensitive plant species.

Probable Permit Needs and Planning Actions for the Project

The following are the probable permits needed and agencies to consult for this project:

- OHP Spacing Deviations. The 1999 OHP spacing requirements between approach roads and interchanges would not be met in some cases, and would most likely require deviations for the Grand Ronde, Casino/Valley Junction, and Fort Hill interchanges and other interchanges and access points. ODOT would apply for the deviations.
- ODOT is directed by statute (ORS 824.202)

"To achieve uniform and coordinated regulation of railroad-highway crossings and to eliminate crossings at grade wherever possible [and] to control and regulate the construction, alteration, and protection of railroad-highway crossings."

The project contains two proposals that would necessitate crossing the railroad owned and operated by Hampton Lumber Company (see the Land Use Findings section for more detail). ODOT or the authority building the road would apply for an order from the Rail Division to cross the railroad. See OAR 741-200-0010 to 741-200-0090 for the application process.

- Clean Water Act (1972, 1977, 1987). This act covers the protection of waters of the United States to include wetlands. It establishes various programs such as the National Pollution Discharge Elimination System governing pollution point sources, an indirect source control program, and the 404 Process and permits controlling pollution and filling in wetlands and deep water habitat. ODOT will apply for a Section 404/Removal Fill Permit from the U.S. Army Corps of Engineers if needed as the individual construction phases move into the design stage.
- A state fill removal permit from the Division of State Lands will be applied for if needed.

- Federal Endangered Species Act (1973). This act requires the protection of federally designated threatened and endangered animal and plant species. Avoidance of taking individuals or jeopardy to populations is required. Agencies are required under Section 7 of the act to consult with appropriate federal resource agencies before taking any action. ODOT initiated formal consultation with the U.S. Fish and Wildlife Service and NOAA Fisheries while the EA was being developed. Because the construction phases of the project have not been advanced to the design stage, the resource agencies advised that ODOT coordinate with them throughout project development for each construction phase, as warranted. Resource agencies would provide technical assistance to avoid, minimize, or mitigate impacts to plant and animal species in the project area. ODOT will prepare biological assessments for the construction phases of the project and initiate consultation with USFWS before final design for each project phase, as warranted.
- Chapter 119 of Polk County Ordinances addresses Conditional Uses. The Fort Hill to Wallace Bridge phase of the project includes moving weigh stations, which will require a conditional use permit. In addition, Polk County requires a conditional use permit for transportation improvements requiring additional right-of-way within the Exclusive Farm Use (EFU) and Farm Forest (FF) zones. The conditional use permit findings will address Chapter 119, Conditional Uses, as well as Chapter 138 (Farm Forest Zone), Chapter 178 (Floodplain Overlay Zone), and Chapter 182 (Significant Resource Areas Overlay Zone). The conditional use permit findings will also address consistency with specific elements of the Comprehensive Plan, including Policy 1.3 Unincorporated Communities; Policies 1.4 and 1.5 Agriculture; and Policy 2.2 Highways.

Additions and Changes to the EA

This section identifies additions and changes to the Environmental Assessment. The discussion in this section is divided into three areas—conceptual design changes, minor revisions cited by page number, and an updated land use and zoning section. One additional main section of the REA, titled Land Use Findings of Consistency with Local Plans, follows this section. The section titled Summary of Mitigation and Conservation Measures is included to replace in its entirety the same section in the EA.

Conceptual Design Changes

This section replaces the section titled “Intersection at Fort Hill (Option FH-A)” on page 20 of the EA.

The Build Alternative in the EA presented improvements to the existing at-grade intersection at Fort Hill Road (Figure 4-6 of the EA). The design of the Preferred Alternative has been modified to include a grade-separated interchange at this location (see Figure 3B of this REA). ODOT recommends the interchange because of its improved safety and convenience and the opportunity to reduce impacts to wetlands in the area. The public access road east of Fort Hill Road would be designed with the minimum requirements needed to serve local residents as opposed to truck traffic between the Fort Hill Lumber Company mill at Fort Hill and the ORE 18/ORE 22 Wallace Bridge interchange. This minimized roadway design would reduce the roadway footprint and thus minimize wetland impacts in the area. An interchange spacing deviation would be needed for this construction phase.

The interchange will be constructed about 0.81 mile (4,300 feet) east of the current intersection. Interchange ramps will be located in the northeast and southwest quadrants with the main structure of the interchange (the overpass) crossing ORE 18. The overpass would connect on the north side to an access road linking the interchange to Fort Hill Road. Polk County’s Fort Hill Road can be rerouted to intersect with this road east of the Fort Hill Lumber Company mill site, as was suggested by the mill manager. A local access road will be built south from the interchange to intersect with South Yamhill River Road.

About 950 feet west of the interchange ramp on the north side of ORE 18, an access road will be built to intersect with the new local access road extending to Fort Hill Road. This road will cross the former Willamina and Grande Ronde railroad and extend eastward to provide property access to land north of the highway. An eastern connection to ORE 18 will be provided for emergency vehicle use only. All direct property access to ORE 18 will be removed.

This new interchange will improve vehicle safety and mobility for vehicles turning onto ORE 18. In addition, the residents living along South Yamhill River Road should find it safer and easier to gain access to the existing businesses in the area across the highway.

Development could result along the roads connecting between the interchange and Fort Hill Road, and between the interchange and South Yamhill River Road. However, any commercial or industrial development would require changing the existing Exclusive Farm Use (EFU) zoning to a zoning district that would allow such uses. A statewide planning goal exception process would also be required from Polk County to provide these uses. Additionally, Interchange Access Management Plans will be developed to describe how interchange operations will be protected for each new interchange. There may be insufficient distance between the interchange ramps and South Yamhill River Road to provide for property access. The closest private approach road north of the highway would be located opposite the access road intersection or farther from the interchange. The local access road's exact location and design will be established during final design.

ODOT is exploring an option where the eastern end of the local access road would be shifted towards the railroad, which would reduce impacts to farm properties. Actual impacts are uncertain at this time and will be assessed in more detail during the design of this construction phase. If this design option is pursued, a minimum clear storage distance of 100 feet from the railroad tracks would be required.

Minor Revisions by Page

Minor revisions to the EA are noted below. Text with ~~strikeout~~ (i.e., ~~project~~) means the text has been deleted, and italicized text (i.e., *project*) is the revised or additional new text.

Page 19, Four-Lane Highway with Non-Traversable Median: Add a footnote to the end of the second sentence that reads:

The required right-of-way for the Build Alternative is based on preliminary location design and is subject to change.

Page 19, Four-Lane Highway with Non-Traversable Median: Add the following language to the end of the first paragraph:

Amenities for pedestrian and bicycle travel are included in the Build Alternative by incorporating wider shoulders, sidewalks, bikeways, and crossing safety improvements. For example, the grade-separated interchange at Grand Ronde Road will improve bicycle and pedestrian access between residential areas south of ORE 18 and the Grand Ronde Historic District north of the highway.

Page 113, Right-of-Way Impacts: Replace the last sentence of the first paragraph with the following:

Final design detail will dictate right-of-way needs. Owners of properties required for the project will be contacted and offered just compensation for the required rights-of-way.

Page 125, Impacts of the Build Alternative, Social Effects, Residential Impacts: Add a paragraph following the first paragraph that reads:

When funding for any particular construction phase is approved, ODOT will identify the precise land areas needed for the project and will compensate landowners accordingly. Dislocated residences and businesses would be acquired according to current state and federal laws, acts, and policies. An ODOT Right-of-Way Agent would work closely with the impacted residents and businesses to

explain eligible relocation benefits. Sufficient vacant parcels zoned residential or commercial are available in the study area so that relocation of residents and businesses within the area is not perceived to be a problem. For indirect impacts, ODOT would have the responsibility to compensate a landowner for impacts, providing the landowner can demonstrate that property value has been adversely impacted by the construction phase.

Page 125, Impacts of the Build Alternative, Social Effects, Residential Impacts: Add the following language following the first sentence of the second paragraph:

This could entail some out-of-direction travel for residents located along these service roads, though this travel is expected to be minimal. Access consolidation is expected to greatly improve safety. Creation of local service roads is not expected to impact residential property values.

Page 125, Impacts of the Build Alternative, Social Effects, Residential Impacts: Add the following paragraph to the end of this section:

Adoption of the H.B. Van Duzer Forest Corridor to Steel Bridge Road Corridor Refinement Plan will improve agency and individual understanding of long-range plans for the highway. This will assist Polk County and residents and business owners located in Grand Ronde, Valley Junction, and Fort Hill in focusing on growth and development in the region.

Page 126, Impacts of the Build Alternative, Social Effects, Changes in Community or Neighborhood Cohesion: Add the following between bullets two and three:

- *A better understanding of long-range plans for the highway through adoption of the H.B. Van Duzer Forest Corridor to Steel Bridge Road Corridor Refinement Plan could provide an opportunity to the communities of Grand Ronde, Valley Junction, and Fort Hill to focus future growth and development in a manner that improves community or neighborhood cohesion.*

Page 128, Impacts of the Build Alternative, Economic Effects, Through Traffic, Direct Impacts: Add the following language to the end of the first paragraph in this section:

Alternatively, some businesses located between interchanges, median breaks, and right-in right-out accesses could experience less business from customers no longer making left-hand turns at their business driveway. Existence of this impact would depend on the location of individual businesses and the type of business. More detail will be available once the individual construction phases move into design.

Page 129, Employment Effects, Direct Impacts: Modify the first sentence of the second paragraph to state:

Implementation of the Build Alternative would result in purchase ~~for~~ of right-of-way ~~of~~ for businesses and facilities such as...

Page 129, Impacts of the Build Alternative, Economic Effects, Employment Effects, Direct Impacts: Add the following language to the end of the second paragraph in this section:

Sufficient parcels are located in the vicinity to provide additional commercial, residential, and industrial land uses as called for by Polk County. Undeveloped and underdeveloped land within these areas can provide area that would replace the uses acquired by the project. Relocation benefits for businesses include moving costs, reestablishment costs, and other benefits as applicable. A Right-of-Way Agent works closely with the business to explain what benefits are available. The agent also provides advisory services to the business to help assure a smooth transition. Because of the

speculative nature of business damages, Oregon state law does not allow for the payment of business damages.

Adoption of the H.B. Van Duzer Forest Corridor to Steel Bridge Road Corridor Refinement Plan will improve business owners' understanding of the long-range plans for the highway. This could provide an opportunity to the communities of Grand Ronde, Valley Junction, and Fort Hill to focus future retail and service commercial growth and development in a manner that strengthens or creates one or more community business areas.

Page 130, Effects on Existing Highway-Related Businesses and Business Areas: Modify the first sentence of this paragraph to state:

Implementing the Build Alternative would impact ~~two~~ *three* existing business areas, Fort Hill, ~~and~~ Grand Ronde, *and Valley Junction.*

Page 133, Measures to Minimize and Reduce Socioeconomic Effects, Social, Residential: Modify the second bullet to read:

Provide *displaced* owner occupants or renters relocation planning, advisory assistance, *and payment reimbursement* of qualifying moving and related expenses and relocation benefits if displaced.

Page 133, Measures to Minimize and Reduce Socioeconomic Effects, Economic, Highway Related Businesses and Business Areas: Modify the second bullet as follows:

- *Work with ODOT Travel Information Council to potentially* provide *tourist oriented directional* signage to alert traffic to upcoming services and businesses.

Page 220, Hazardous Materials, Impacts of the Build Alternative, Site 23, Property Description: Amend the sentence in this section as follows:

~~Abandoned structure with parking area~~ *Retail business for antiques*

Page 220, Site 23, Property Acquisition: Modify the sentence to read:

This property ~~would~~ *may* be wholly acquired.

Page 220, Hazardous Materials, Impacts of the Build Alternative, Site 24, Property Description: Amend the sentence in this section as follows:

~~Old structure (abandoned), automotive, fabrication, motorcycles~~ *Warehouse structure for antique motors, vehicles*

Page 226, Air Quality: Add the following information:

The study area is located within Polk County, which is designated as "in attainment" for all State and National Ambient Air Quality Standards (NAAQS). The area is also designated as Prevention of Significant Deterioration Class II (PSD II). PSD II areas are allowed moderate degradation of existing air quality. DEQ is the governing air pollution control agency for Polk County.

The Oregon State Implementation Plan for air quality does not specify that transportation control measures are needed to attain or maintain air quality standards in the study area. Therefore, state and federal air quality rules regarding conformity of transportation actions with the Implementation Plan are not applicable to this project.

Sections with Major Revisions

Land Use and Zoning

This section replaces the Land Use and Zoning sections (Pages 135-149) of the EA. Added text is *italicized* and deleted text is marked with ~~strikethrough~~.

Note: All land use and zoning information in this section of the EA is based on preliminary location designs and is subject to change. As the project is refined, some right-of-way requirements that may affect land use and zoning may be deleted and others added. The land use and zoning information is presented to provide a general idea of the project's impacts.

Existing Conditions

The ~~proposed project~~ *Preferred Alternative* is located within unincorporated portions of Polk County. Three unincorporated communities, lands held in tribal trust, and lands with various uses and zoning are located along ORE 18 in the project area between the H.B. Van Duzer Forest Corridor and Steel Bridge Road. The communities are, from west to east: Grand Ronde, Valley Junction, and Fort Hill. The lands held in tribal trust for the Confederated Tribes of the Grand Ronde lie near the unincorporated community of Grand Ronde and the Grand Ronde Agency area and include the site of the Spirit Mountain Casino and Resort and tribal offices west of Grand Ronde.

The main land uses and zoning in the area, designated by the *Polk County Comprehensive Plan*, are: resource (farm and forest); industrial (mostly used for mills and wood products industries); commercial (gas stations, restaurants, other businesses or facilities); and rural residential. See Figures 4A and 4B for current *plan and zoning designations (Polk County Ordinance 01-2, May 2001)*. *For purposes of planning, zoning and tribal lands have been assigned land use designations, including zoning, by Polk County.* The analysis in this section is based on current zoning.

Proposed Land Use and Zoning Changes

The Regional Problem Solving (RPS) committee, a *regional group consisting of Tribal representatives, area citizens, water district representatives and the City of Willamina, citizen group,* began meeting in 1997 to study the area and plan for the growth associated with the development of the Spirit Mountain Casino and Resort. This committee recommended several zoning changes. Most of the proposed changes would align zoning with existing use, readjust rural community boundaries, rezone several areas for different types of residential use for anticipated population growth, and *establish community boundaries so they include certain* ~~remove zoning designations from~~ *tribal trust properties being planned and developed by the Confederated Tribes of the Grand Ronde for economic and housing purposes.* Figures 5 and 6 show *the proposed* zoning for the Grand Ronde, Valley Junction, and Fort Hill areas *that was adopted by Polk County in 2001. Other land use changes proposed by the committee were not adopted by Polk County. Although all or some of the proposed changes may be adopted by Polk County in the future.*

Rural Transportation Improvements and County Zoning

The improvements specified in this Revised Environmental Assessment are in the following zoning districts: Exclusive Farm Use (EFU, Section 136.050(R); Timber Conservation (TC, Section 177.040(V)), and Farm/Forest and Farm/Forest Overlay (Section 138.060, including the uses listed in the EFU and TC zones). These zoning districts include uses permitted conditionally as provided for in Oregon Administrative Rule OAR 660-012-065(3), including replacement of an intersection with an interchange, new access roads, and other transportation facilities and improvements to serve local travel needs. For these uses, Polk County has to determine that the requirements of Oregon Law ORS 215.296 have been met. The county also must:

- a) identify reasonable build design alternatives, such as alternatives that are safe and can be constructed at a reasonable cost, not considering raw land cost, with available technology;*
- b) assess the effects of the identified alternatives on farm and forest practices, considering impacts to farm and forest lands, structures and facilities, considering the effects on traffic on the movement of farm and forest vehicles and equipment, and considering the effects of access to parcels created on farm and forest lands; and*
- c) select from the identified alternatives the one, or combination of identified alternatives that has the least impact on lands in the immediate vicinity devoted to farm or forest use.*

These provisions will protect the planned transportation improvements from subsequent development. All phases of the project can be allowed on rural lands without a statewide planning goal exception because they are authorized in OAR 660-012-065. Conditional use permits will be obtained before any phase of the project is constructed based upon information available with the project final design.

Compliance with these criteria can be accomplished for the transportation uses or improvements that are consistent with the provisions of OAR660-012-065(3) for the entire project by adopting it as an amendment to the county transportation system plan. Project compliance also can be determined using the conditional use permit process on a construction unit basis. Polk County's land use regulations also call for minimizing accessibility to rural lands from the proposed transportation uses, and to support continued rural use of the surrounding lands (Section 119.150(G)). The conditional use permit process is the process most likely to be used for the project components funded in the 2004-2007 State Transportation Improvement Program (Replacing the Fort Hill/South Yamhill River Road intersection with an interchange; constructing an additional passing or travel lane east of Fort Hill, and constructing an access road on the north side of ORE 18).

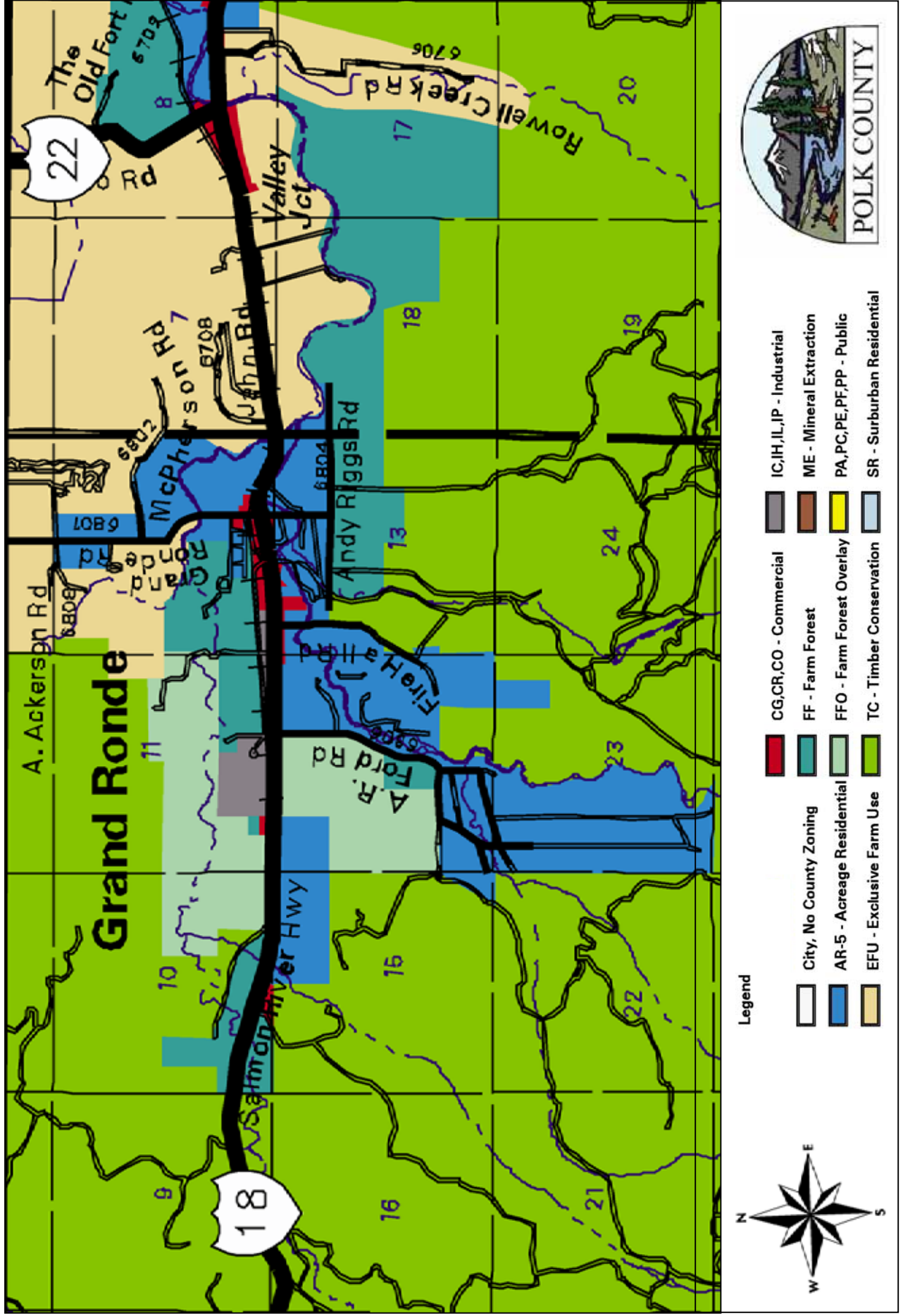
Other land use designations exist in the project area. Where these zones are not intended to protect agricultural lands or forestlands, the transportation improvements included in this project are provided for through conditional use permits. However, the criteria listed above are not applicable.

Impacts of the Build Alternative

NOTE: Estimated impacts reported in the EA were provided both in metric units (hectares) as well as English units (acres). ODOT has since stopped reporting metric units. All references to hectares in this section have been removed.

The proposed Build Alternative would impact land use and zoning. These impacts are shown in Table 13 and described below by highway section. The milepoints, ~~hectares~~, and acres are approximate. The impacts are described as direct, indirect, and cumulative. Direct

Figure 4A
Current Polk County Zoning (West)
H.B. Van Duzer Forest Corridor — Steel Bridge Road



NOTE: This figure replaces 22-1 in the EA.

Figure 4B
Current Polk County Zoning (East)
H.B. Van Duzer Forest Corridor — Steel Bridge Road

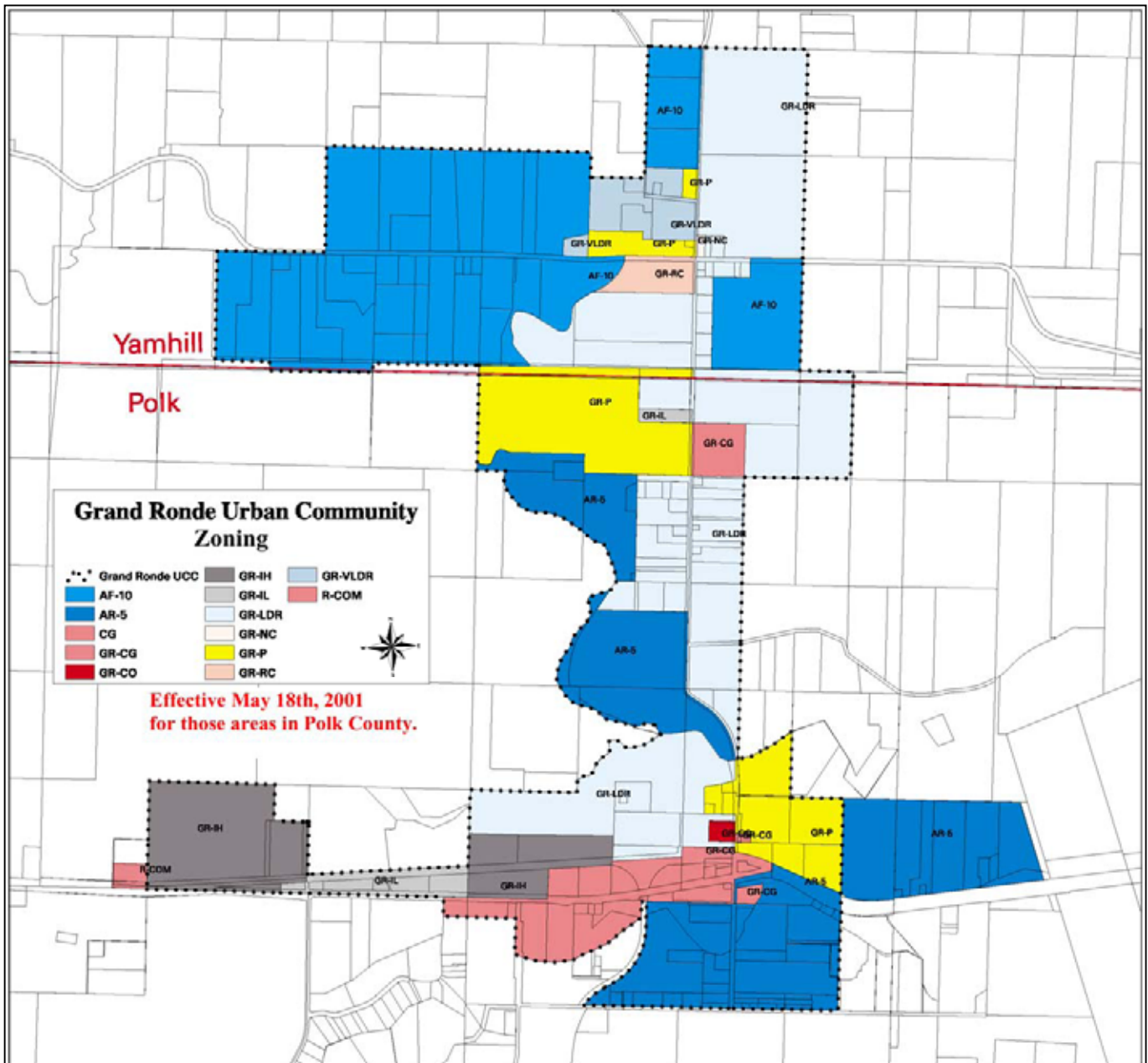


- Legend**
- CG,CR,CO - Commercial
 - City, No County Zoning
 - AR-5 - Acreage Residential
 - EFU - Exclusive Farm Use
 - IC,IH,IL,IP - Industrial
 - ME - Mineral Extraction
 - FFO - Farm Forest Overlay
 - TC - Timber Conservation
 - SR - Suburban Residential



NOTE: This figure replaces 22-2 in the EA.

Figure 5
Grand Ronde Current Zoning
H.B. Van Duzer Forest Corridor — Steel Bridge Road

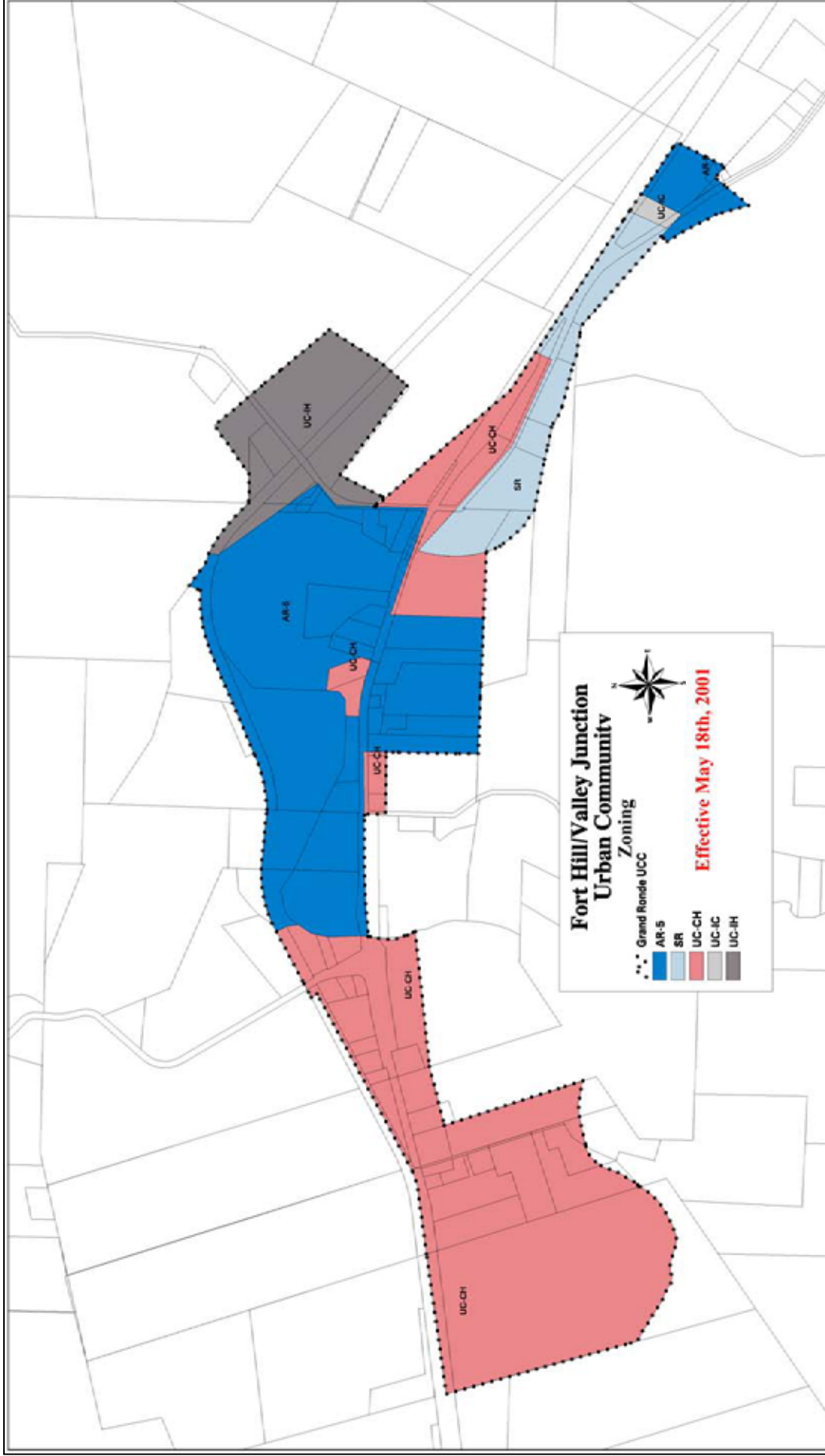


Key to Zoning Designations:	GR-IL: Grand Ronde Light Industrial	R-COM: Rural Commercial
AF-10: Agriculture and Forest 10-Acre	GR-LDR: Grand Ronde Low Density Residential	
AR-5: Acreage Residential 5-Acre	GR-NC: Grand Ronde Neighborhood Commercial	
CG: General Commercial	GR-P: Grand Ronde Public	
GR-CG: Grand Ronde General Commercial	GR-RC: Grand Ronde Rural Commercial	
GR-CO: Grand Ronde Office Commercial	GR-VLDR: Grand Ronde Very-Low Density Residential	
GR-IH: Grand Ronde Heavy Industrial		

NOTE: This figure replaces 23-1 in the EA.

Source: Polk County GIS, 2003. <http://www.co.polk.or.us/ComDev/Documents/Planning/grandzone.pdf>

Figure 6
Fort Hill/Valley Junction Current Zoning
H.B. Van Duzer Forest Corridor — Steel Bridge Road



Zoning Designations: * AR-5 = Acreage Residential 5-Acre
 * SR = Suburban Residential
 * UC-CH = Unincorporated Community-Commercial Highway
 * UC-IC = Unincorporated Community-Industrial Commercial
 * UC-IH = Unincorporated Community-Industrial Heavy Industrial

NOTE: This figure replaces 23-2 in the EA.

Source: Polk County GIS 2003. <http://www.co.polk.or.us/ComDev/Documents/Planning/fhvjzone.pdf>

TABLE 13 (FIGURE 13 IN THE EA)
Build Alternative—Land to be Acquired for Right-of-Way by Zone in Hectares/Acres*

Highway Segment	AR-5	CG	FF/FFO	EFU	Tribal	IH	Total
H.B. Van Duzer Forest Corridor to Grand Ronde Road							
Access road, A.R. Ford—Fire Hall Road	1.4/3.5						1.4/3.5
Access road, Fire hall to Andy Riggs Road	0.59/1.5						0.6/1.5
Access road, South Street extended west			2.3/5.8			0.3/0.6	2.6/6.4
Grand Ronde interchange		2.7/6.7					2.7/6.7
Highway widening	0.2/0.5	1.0/2.5	2.0/4.9			0.8/2.0	4.0/4.9.9
Totals	2.2/5.5	3.7/9.2	4.3/10.7			1.1/2.6	8.7/21.528
Grand Ronde to Valley Junction							
Jahn Road realigned intersection				0.2/0.5			0.2/0.5
ORE 22 (Three Rivers Highway) realignment		0.3/0.8		1.7/4.1	0.2/0.5		2.2/5.4
Casino/Valley Junction interchange		1.8/4.3		1.8/4.3			3.6/8.6
Highway widening	0.6/1.4	0.8/2.0		3.3/8.2	0.8/2.0		5.5/13.6
Totals	0.6/1.4	2.9/7.2		6.9/17.1	1.0/2.6		11.4/28.228.1
Valley Junction to Fort Hill							
Access roads at Rowell Creek	0.4/1.0	0.4/1.0					0.8/2.0
Highway widening	1.0/2.6	0.8/1.9		0.8/1.9			2.6/6.4
Fort Hill realigned intersection		0.5/1.1	0.5/1.1				0.9/2.2
Fort Hill Road realigned east of the mill		0.1/0.3	0.8/2.0			0.4/1.0	1.4/3.5
Totals	1.4/3.6	1.8/4.2	1.3/3.2	0.8/1.9		0.4/1.0	5.7/14.98.4
Fort Hill to Wallace Bridge							
Fort Hill Interchange	6.5		8.3	6.8			21.6
Access road			8.8/19.9				8.8/19.9**
Eastbound and westbound scale sites			0.2/0.5				0.4/1.0
Highway widening			21.2				21.2
Totals	6.5		9.0/22.228.7	0.2/0.528.5			9.2/22.763.7
Wallace Bridge to Steel Bridge Road							
Highway widening	0.8/2.0			1.0/2.5		0.2/0.5	2.0/4.9.5.0
Grand Totals	5.0/12.419	8.4/20.719.2	44.6/36.139.4	8.9/21.950	1.0/2.62.5	4.7/14.23.1	39.6/97.9133.2

CG=Commercial General; FF=Farm Forest; FFO=Farm Forest Overlay; IH=Industrial; Heavy; IL=Industrial Light; AR-5=5 Acres Residential EFU=Exclusive Farm Use; T=Tribal lands.

* All acreages are approximate and subject to change during the design stage of each individual project phase.

** New design information currently under evaluation may include additional land conversion.

impacts occur from conversion of lands to right-of-way for the highway. Indirect impacts are those reasonably foreseeable land use impacts caused, but not immediately induced, by the ~~proposed~~ project, mainly related to changed highway access. Cumulative impacts are those that arise when the ~~proposed~~ project, in conjunction with other highway or non-highway projects, could result in additional land use impacts.

Of the estimated ~~39.6 hectares (130.797.9 acres)~~

- ~~5 hectares (192.4 acres)~~ would be AR-5 (five acre residential)
- ~~8.4 hectares (19.20.7 acres)~~ would be CG (commercial lands)
- ~~14.6 hectares (39.436.1 acres)~~ would be FF and FFO (farm/forest and farm/forest overlay)
- ~~8.9 hectares (5021.9 acres)~~ would be EFU (exclusive farm use)
- ~~1.7 hectares (3.14.2 acres)~~ would be IH (heavy industrial)

Acquisition of farm/forest, farm/forest overlay, and exclusive farm use land will be for highway widening, replacement of intersections with interchanges, and *access roads* to replace direct highway access removed by the project or allow local trips without using the highway. All of these actions are consistent with statewide planning goals 3, 4, 11, and 14 according to OAR 660-012-0065(3), *and consistent with that was recently adopted into Polk County's zoning code provisions. The county's provisions authorize these improvements through conditional use permit ordinance (Polk County Ordinance 01-10, November 14, 2001).*

Polk County's land use regulations also include policy and requirements calling for right-of-way dedication and for reservations of future right-of-ways for transportation improvements that are included in the county transportation system plan. Dedication or reservation of right-of-way for road improvements is required at the time a partition, subdivision or other development activity is proposed on a particular property. County provisions also require structure setbacks from future road rights-of-way identified in the county transportation system plan.

H.B. Van Duzer Forest Corridor to Grand Ronde Road, Milepoint 18.79 to 21.18. Construction includes widening the highway from the H.B. Van Duzer Forest Corridor to Grand Ronde, constructing the Grand Ronde interchange, and constructing access roads south and north of ORE 18.

Direct Impacts. Between the H.B. Van Duzer Forest Corridor and Grand Ronde, approximately ~~8.7 hectares (27.921.5 acres)~~ of land zoned AR-5, CG, FF, and IH would become road right-of-way for ORE 18 and the access roads. This includes:

- ~~2.2 hectares (5.5 acres)~~ AR-5
- ~~3.7 hectares (9.1 acres)~~ CG
- ~~4.3 hectares (10.7 acres)~~ FF and FFO
- ~~hectares (2.6 acres)~~ IH

The construction of an interchange at Grand Ronde Road would modify or displace approximately 3 to 4 residences, approximately 3 businesses, and 3 to 4 community facilities in the immediate vicinity. These most likely are:

- Grand Ronde Shopping Center and Barclay's Fast Cast—business wholly displaced
- Ken's Gems—business and residence wholly displaced

- Bonanza Building (Antique Shop) – business wholly displaced
- Post Office – community facility wholly displaced
- Fire District Substation – community facility wholly displaced
- Grand Ronde Sanitary District – community facility wholly displaced
- Sprint – community facility possibly displaced

Secondary Impacts. Several private property approach roads to the highway will be changed to right-in, right-out only access. The access roads would provide routes to and from Grand Ronde that would allow nonhighway travel.

Cumulative Impacts. Currently, no major transportation activities independent of this Preferred Alternative are proposed within the study area. It is assumed that ongoing commercial and/or industrial developments as sanctioned under Polk County’s Comprehensive Plan will occur over the lifetime of this action. The majority of land in the area of the projects is zoned for agricultural or timber uses and is not likely to be developed.

Improved access combined with tribal expansion and development could increase the possibility of future development in the Grand Ronde Road area. With this exception, no cumulative impacts are expected and the direct and secondary impacts described above address the likely full extent of land use impacts associated with the projects.

Grand Ronde Road to Valley Junction, Milepoint 21.18 to 23.04

Direct Impacts. Between Grand Ronde Road and Valley Junction, approximately ~~11.4 hectares~~ (28.3 acres) of land zoned AR-5, CG, *and* EFU ~~and Tribal~~ would be acquired by ODOT for right-of-way for ORE 18 and the access roads. This includes:

- ~~0.6 hectares~~ (1.4 acres) AR-5
- ~~2.9 hectares~~ (7.2 acres) CG
- ~~6.9 hectares~~ (17.1 acres) EFU
- ~~1.0 hectares~~ (2.6 acres) Tribal

The ~~hectares~~ *acreages* described above would be used to:

- Widen ORE 18
- Realign ORE 22
- Replace the existing Valley Junction intersection (ORE 18 and ORE 22) with the Casino/Valley Junction interchange, and
- Construct access roads to provide local access when direct highway access is removed

All of these actions are consistent with goals 3, 4, 11, and 14 according to OAR 660-012-0065(3) and can be authorized *through conditional use permits by* ~~as land uses through~~ Polk County’s ~~land use procedures~~.

The construction of the Casino/Valley Junction interchange would displace approximately four residences, the Grand Ronde Water District facility, and a billboard. See Figures 2 to 6.

Indirect Impacts. Existing commercial and residential properties located on the north side of the highway at the closed Valley Junction intersection would lose direct access to and from ORE 18. These properties would gain access to ORE 18 by the Casino/Valley Junction

interchange connection to the realigned ORE 22 (Three Rivers Highway). Extension of Jahn Road as an access road would afford easier access to the land it passes through and could cause pressure to change land use in that area.

South of the highway nearly ~~5 hectares (12 acres)~~ currently designated for agriculture (EFU) would be isolated from the remainder of farm use properties located farther to the south due to construction of the southeast loop of the interchange. This property would have no access to the highway. *If the property cannot be safely accessed via the cross-road, ODOT may have to acquire the property.* See Figure 4-5 in the EA. ~~As stated above, replacement of the existing Valley Junction intersection with an interchange is consistent with goals 3, 4, 11, and 14.~~

Cumulative Impacts. Currently, no major transportation activities independent of the Preferred Alternative are proposed within the study area. It is assumed that ongoing commercial and/or industrial developments as sanctioned under Polk County's Comprehensive Plan will occur over the lifetime of this action. The majority of land in the area of the projects is zoned for agricultural or timber uses and is not likely to be developed.

The Casino/Valley Junction interchange, combined with Casino expansion, could result in increased pressure for development in this area. With this exception, no cumulative impacts are expected and the direct and secondary impacts described above address the likely full extent of land use impacts associated with the projects.

Valley Junction to Fort Hill, Milepoint 23.04 to 23.85

Direct Impacts. Approximately ~~8.4~~~~14.1~~ acres of land zoned AR-5, CG, ~~FF~~, and EFU ~~and IH~~ are expected to be acquired by ODOT between Valley Junction and Fort Hill for right-of-way for ORE 18 and the access roads. This includes:

- ~~1.4 hectares (3.6 acres)~~ AR-5
- ~~1.8 hectares (2.94.4 acres)~~ CG
- ~~1.3 hectares (3.2 acres)~~ FF
- ~~0.8 hectares (1.9 acres)~~ EFU
- ~~0.4 hectares (1.0 acres)~~ IH

The ~~hectares~~ *acres* described above would be used for road right-of-way for ORE 18. This would include land needed for widening the highway, widening or replacing two bridges over the South Yamhill River, ~~realigning replacing the Fort Hill intersection with an interchange, realigning Fort Hill Road east of the mill,~~ and constructing the access roads south and north of ORE 18 at Rowell Creek intersection to allow removal of direct local access to the state highway. *See Figures 4-5 and 4-6.* All of these actions are consistent with *statewide planning* goals 3, 4, 11, and 14 according to OAR 660-012-0065(3) and can be authorized *through conditional use permits as by* ~~land uses through~~ Polk County's *land use procedures*.

Indirect Impacts

~~The commercial and industrial properties located at the Fort Hill Road intersection would lose direct access to OR 18 and Fort Hill Road. A; access to the businesses and the wood processing mill both roads would be provided by the proposed local wrap around service access road via the new interchange. Fort Hill Road would no longer bisect the mill, although the mill would still have access to Fort Hill Road at its new alignment.~~

The Fort Hill Road relocation would separate a 4.8 hectare (12 acre) farm field located between the gas station and the mill from the adjacent farmland to the east. The property currently is zoned Exclusive Farm Use. According to the recommendations made in the Regional Problem Solving Report, property surrounded by commercial and industrial activities may be converted to non-resource use if other land zoned for rural development but currently being farmed is rezoned to Exclusive Farm Use. If the recommendation is approved, approximately 3.2 to 3.6 hectares (8 to 9 acres) of easily accessible and desirable property could be available for development. Development of these lands could increase traffic volumes at the Fort Hill/South Yamhill River Road interchange. However, the resulting number of vehicle trips would be too few to affect interchange operations adversely, negating improvements made as part of this project. To address this issue, Polk County has implemented a trip cap overlay zone in the area of the Fort Hill intersection similar to the overlay zone recently implemented to the west. The existing overlay is applied to the development zones located along ORE 18 at Grand Ronde and Valley Junction/Fort Hill. The overlay is to “limit the development of uses that create traffic at levels above...a) in residential zones, ten (10) average vehicle daily trips as per the Institute of Transportation Engineers Trip Generation, 6th Edition, 1997, and b) in commercial and industrial zones, ten (10) trips per acre per day with a maximum of 100 trips per day.” The overlay zone is to be in place until the local access road is completed, allowing an alternative to the Fort Hill intersection for eastbound vehicles.

Cumulative Impacts. Currently, no major transportation activities independent of this action are proposed within the study area. It is assumed that ongoing commercial and/or industrial developments as sanctioned under Polk County’s Comprehensive Plan will occur over the lifetime of this action. The majority of land in the area of the Preferred Alternative is zoned for agricultural or timber uses and is not likely to be developed.

All of the land zoned commercial and industrial in this segment of the project is within the Fort Hill Service Center boundary. Land zoned acreage residential and suburban residential also is within the service center boundary.

The Oregon State Parks Department ~~has purchased~~ *owns* the historic Fort Yamhill site between Valley Junction and Fort Hill. *Use of the site as a day-use state park is expected to begin in 2005. The adjoining property to the north, owned by the Confederated Tribes, is to be developed compatibly with the state park, and will provide the access road to the park. It plans to develop an interpretive site and to purchase more land in the immediate area for support facilities.* This will likely change land use in the area. With this exception, no cumulative impacts are expected and the direct ~~and secondary impacts~~ described above address the likely full extent of land use impacts associated with the projects.

Fort Hill to Wallace Bridge, Milepoint 23.85 to 26.86

Direct Impacts. Approximately ~~22.73~~ *63.7* acres of land ~~zoned FF/FFO and EFU~~ between Fort Hill and Wallace Bridge are expected to be acquired for road right-of-way. This includes:

- *6.5 acres AR-5*
- *28.5 acres EFU*
- *28.7 acres FF/FFO*
- ~~9 hectares (22.23 acres) FF/FFO~~

• ~~0.20 hectares (0.49 acres) EFU~~

The ~~hectares estimated acreages~~ described above would be acquired by ODOT for road right-of-way for ORE 18 including highway widening, *replacing the Fort Hill intersection with an interchange, realigning Fort Hill Road east of the Fort Hill Lumber Company*, the relocation of the eastbound and westbound scale sites, and construction of a local ~~access service~~ road *east of between Fort Hill and Wallace Bridge*. See Figures 4-6 to 4-9. These actions are consistent with *statewide planning* goals 3, 4, 11, and 14 according to OAR 660-012-0065(3) and can be authorized ~~through conditional use permits by as land uses through~~ Polk County's ~~land use procedures~~. ~~A conditional use permit would be required from Polk County for relocation of the scaling sites~~. Substandard parcels would not be created in the farm-forest areas, *either because not enough land would be taken to reduce parcels to below minimum sizes, or the parcels are already substandard. State law (ORS 92.010(7)) establishes that new parcels are not created when land is sold or granted for road right-of-way, so no new parcels would be created.*

Indirect Impacts. *The commercial and industrial properties located at Fort Hill would lose direct access to ORE 18. Access to the businesses and the wood processing mill would be provided by the proposed access road via the new interchange.*

There are no reasonably foreseeable induced land use changes resulting from highway widening and relocation of the weigh station. Properties adjoining this section of the project are agricultural or farm-forest and would remain so for the near future since direct highway access would be replaced by access to an access road.

The construction of the access road could increase pressure to convert land to non-forest or non-farm uses for an area of approximately 600 to 800 acres lying between the proposed road and foothills. However, such conversion would require several land use decisions by Polk County that would be inconsistent with the intent of the current land use designations.

Cumulative Impacts. At this time, there are no known active plans or proposals for development in this area with the exception of a proposal to develop a gas station in the commercially zoned area.

Currently, no major transportation activities independent of this action are proposed within the study area. It is assumed that ongoing commercial and/or industrial developments as sanctioned under Polk County's Comprehensive Plan will occur over the lifetime of this action. The majority of land in the area of the Preferred Alternative is zoned for agricultural or timber uses and is not likely to be developed.

No cumulative impacts are expected and the direct and secondary impacts described above address the likely full extent of land use impacts associated with the projects.

Wallace Bridge to Steel Bridge Road, Milepoint 26.86 to 28.21

Direct Impacts. Estimates are that between Wallace Bridge and Steel Bridge Road ~~2 hectares (4.49 5.0 acres)~~ of land zoned AR-5, EFU, and IH would be acquired by ODOT for road right-of-way for ORE 18. This includes:

- ~~0.8 hectares (2.0 acres) AR-5~~
- ~~1 hectare (2.5 acres) EFU~~
- ~~0.2 hectares (0.5 acres) IH~~

The highway in the Wallace Bridge area would be widened to four lanes and extended to Steel Bridge Road to match the four-lane section there. See Figures 4-9 and 4-10 in the EA. These actions are consistent with goals 3, 4, 11, and 14 according to OAR 660-012-0065(3) and can be authorized through Polk County's land use procedures.

Indirect Impacts. There are no reasonably foreseeable induced land use changes; most properties adjoining this segment of the project are agricultural resource or industrial and would remain so for the *near* future. The project would not change the desirability for this use and limiting access should limit the property's desirability for other uses.

Cumulative Impacts. Currently, no major transportation activities independent of this action are proposed within the study area. It is assumed that ongoing commercial and/or industrial developments as sanctioned under Polk County's Comprehensive Plan will occur over the lifetime of this action. The majority of land in the area of the Preferred Alternative is zoned for agricultural or timber uses and is not likely to be developed.

No cumulative impacts are expected and the direct and secondary impacts described above address the likely full extent of land use impacts associated with the projects.

ORE 22 (Three Rivers Highway) Improvements

Direct Impacts. No land would be needed for improvements to ORE 22. These improvements would include widening shoulders and realigning several curves.

Indirect Impacts. No land would be acquired for right-of-way.

Cumulative Impacts. Current zoning would not result in business locations along the section of ORE 22 to be improved, but commercially zoned property exists at the intersection of ORE 22 and ORE 18 that could be developed.

Currently, no major transportation activities independent of this action are proposed within the study area. It is assumed that ongoing commercial and/or industrial developments as sanctioned under Polk County's Comprehensive Plan will occur over the lifetime of this action. The majority of land in the area of the Preferred Alternative is zoned for agricultural or timber uses and is not likely to be developed.

No cumulative impacts are expected and the direct and secondary impacts described above address the likely full extent of land use impacts associated with the projects.

Impacts of the No Build Alternative

Direct Impacts. No land would be needed for the No Build Alternative.

Indirect Impacts. No land would be acquired for right-of-way. Land use would not change due to highway-related projects.

Cumulative Impacts. Land use may change in the area unrelated to highway plans. Polk County may adopt the Regional Problem Solving Committee's zoning proposals wholly or partially, and thereby change land use zoning. See Figures 5 and 6 for Regional Problem Solving Committee's proposed zoning.

Land Use Findings of Consistency with State and Local Plans

The State Agency Coordination Agreement (OAR 731-015-0075) requires ODOT to analyze the Preferred Alternative in relation to its compliance and consistency with statewide goals and policies, and adopt findings of consistency with the acknowledged comprehensive plans of affected cities and counties. Findings of consistency were prepared for this H.B. Van Duzer Forest Corridor—Steel Bridge Road Project REA. These findings of consistency have been reviewed by Polk County, which has indicated its agreement with the findings.

These findings of consistency provide factual information supporting the consistency of the project with the Oregon Highway Plan (1999), the Oregon Transportation Plan (1992), and the Transportation Planning Rule (1991, updated 1999), as implemented by the Polk County Transportation Systems Plan (1998), Polk County Comprehensive Plan, and Polk County Planning Ordinance. In the few cases where the Preferred Alternative does not comply with specific policies, the general process that ODOT will follow to request a deviation is described in this section. This section also describes how the Preferred Alternative aligns with state and local plans that have no regulatory role with the project, such as the H.B. Van Duzer Forest Corridor—Steel Bridge Road Refinement Plan (May 2004).

ODOT coordinated with Polk County, the steering committee, and others throughout the planning and NEPA phases of the EA and this REA to ensure that the project is consistent with local plans.

Regulatory Plans and Policies

Oregon Highway Plan

The 1999 Oregon Highway Plan (OHP) is a modal element of the 1992 Oregon Transportation Plan (OTP) that defines the long-term policies and investment strategies for Oregon's state highway system. The OHP emphasizes efficient management of the highway network, increased partnerships with regional and local governments, access management, modal balance, and a linked land use and transportation planning process that reduces effects on environmental and scenic resources.

The following subsections discuss policies from the OHP which are relevant to the Preferred Alternative.

Goal 1: System Definition

Policy 1A: State Highway Classification System

Policy 1A provides a classification system for Oregon highways, including the type of highway and the mobility objectives associated with each classification. The classifications provided in Policy 1A are used throughout the OHP.

Action 1A1 classifies all highways in Oregon for planning, management, and investment decisions. ORE 18 is categorized as a Statewide Highway. The OHP lists the primary purpose of Statewide Highways as providing interurban and interregional mobility and connections to larger urban areas, ports, and major recreation areas not directly served by Interstate Highways. The secondary purpose of Statewide Highways is to provide connections for intraurban and intraregional trips.

The management objective for Statewide Highways is to provide safe and efficient, high-speed, continuous-flow operation along the corridor, with minimal interruptions to flow in constrained or urban areas.

Findings: ORE 18 is a Statewide Highway, a Designated Freight Route, an Expressway, and a Safety Corridor. Heavy freight and farm operation vehicles have been and remain prominent highway users. In addition, ORE 18 is a principal route between the Willamette Valley and the Oregon Coast, and higher-speed recreation travelers compete with slower-moving freight and farm operation vehicles.

The Spirit Mountain Casino, located along ORE 18 between ORE 22 and Grand Ronde Road, opened in 1995 and attracts trips from around and beyond the region. The casino has dramatically increased both the amount of traffic and the variety of vehicle classifications using the corridor within the project area. The casino has also marked a resurgence of commercial services to the area.

Many private driveways and local roads with direct access onto ORE 18 are located through the project section. This large number of direct, uncontrolled accesses is not consistent with the objective for Statewide Freight Route Highways and Expressways to provide safe, high-speed, continuous flow operation. The purpose of the set of projects composing the Preferred Alternative is to improve the highway so that traffic can move safely, efficiently, at high speed, and with continuous flow. The proposed set of improvements will make this section of highway more consistent with the characteristics and objectives of a Statewide Freight Route Highway and Expressway than the existing facility. The proposed improvements include expanding the capacity of the existing corridor to a four-lane highway, providing a non-traversable median with periodic breaks for approach roads, introducing three grade-separated interchanges (at Fort Hill Road, Valley Junction, and Grand Ronde Road), and consolidating the approach roads. Each of these project elements will help to provide a safer facility and achieve the objective of an efficient, high-speed continuous flow operation.

Action 1A2 defines and classifies Expressways as a subset of Statewide, Regional, and District Highways. The function of expressways is to provide safe and efficient high-speed and high-volume traffic movements with minimal interruptions, for interurban travel and connections to ports and major recreation areas. Action 1A2 characterizes expressways as roads where private access is discouraged, connections to public roads are highly controlled, traffic signals (rural areas only) are discouraged, and non-traversable medians are encouraged.

Findings: The definition of Expressways includes objectives similar to the definitions of Action 1A1 above. As stated previously, the existing highway does not meet those objectives for the reasons discussed above.

As stated on page 9 of the EA, the purpose of the Preferred Alternative is to bring this section of ORE 18 up to the standards of the 1999 OHP, by improving the highway so that traffic can move safely, efficiently, at high speed, and with continuous flow. The elements of the Preferred Alternative (approach road consolidation, grade-separated interchanges, non-traversable medians with periodic breaks for approach roads) would achieve the objective of Action 1A2.

Policy 1F: Highway Mobility Standards

Policy 1F defines highway mobility standards by volume to capacity (V/C) ratios. V/C is a measure of roadway congestion calculated by dividing the number of vehicles passing through a section of highway during the peak hour by the capacity of the section.

Action 1F1 designates highway mobility standards based on maximum V/C ratios by roadway classification. The OHP's maximum allowable V/C ratio for this roadway classification is 0.70.

Findings: ORE 18 is a Statewide Highway and designated freight route outside an Urban Growth Boundary. The corridor experiences heavy seasonal traffic during the summer months both within and outside of the project area. Drivers travel this route from Portland and the Willamette Valley to the coast for recreational purposes. Summer weekend traffic flows are especially high. Westbound traffic often operates at capacity for an hour or two on Saturdays, but the delay is minimal. Eastbound traffic often operates at capacity for longer periods of time Sundays during the summer months, resulting in considerable traveler delays. The high through traffic volume often prevents local drivers from turning left onto the highway.

V/C ratios calculated in 1998 at key intersections and segments along ORE 18 in the project area showed that several segments and key intersections along the corridor were operating at V/C ratios that are worse than the OHP standard. The four segments included ORE 18 east of Grand Ronde Road; ORE 18 west of ORE 22 at Valley Junction; ORE 18 east of ORE 22 at Valley Junction; and ORE 18 east of Fort Hill Road. The congestion results in slow speeds, a potentially unsafe speed differential, long queues, extended peak periods, and few acceptable gaps for vehicles making left turns onto the highway.

The three intersections operating at a V/C worse than 0.70 were ORE 18 and Grand Ronde Road (southbound to eastbound movement); ORE 18 and ORE 22 at Valley Junction (southbound to eastbound movement); and ORE 18 and Fort Hill Road (southbound to eastbound movement).

Forecasted future traffic analysis for the No Build Scenario for the year 2008 showed through traffic at all key locations on ORE 18 in the study area exceeding 1.0 (volumes greater than capacity), and V/C ratios for key intersections deteriorating to a maximum V/C of 10.62 at ORE 18/Grand Ronde Road (north to east movement).

The proposed improvements included in the Preferred Alternative provide a maximum V/C ratio of 0.65 in 2018, which is better than the OHP standard of 0.70. The project therefore would provide mobility that is consistent with the management objectives of OHP Policy 1F.

Policy 1G: Major Improvements

Policy 1G directs ODOT and local jurisdictions to protect and improve the efficiency of the highway system before adding new highway facilities.

Action 1G1 lists the four ordered priorities for developing highway improvements. These are:

1. Protect the existing system
2. Improve efficiency and capacity of existing highway facilities
3. Add capacity to the existing system
4. Add new facilities to the system

Findings: The Preferred Alternative for the Van Duzer Corridor does not add new facilities to the system but rather proposes a mixture of major and minor improvements, that fall under Priority 1, Priority 2, or Priority 3.

Priority 1: Protect the Existing System. Improvements considered to be part of Priority 1 include access management, traffic operations improvements, Transportation Demand Management (TDM), and alternative modes of transportation. A ‘limited build’ alternative was considered as part of the Refinement Plan. The limited build alternative considered small, low-cost improvements such as driveway consolidation, installation of traffic signals and lighting at major intersections, adding right-turn lanes at the north and south approaches from Grand Ronde Road, widening shoulders between the Spirit Mountain Casino and Grand Ronde Road, adding bicycle and pedestrian improvements, and improving local roads off ORE 18. Analysis conducted on these improvements showed them to be inadequate by themselves at meeting the safety and mobility needs of the corridor. In addition, signals were shown to increase crash potential due to the high speeds posted along the corridor.

One element of Priority 1 – TDM – is already practiced by the Spirit Mountain Casino and Resort, the largest employer in the project area. The Casino currently employs shuttle services from the Salem, Portland and Vancouver areas seven days a week. Casino employee shift changes are staggered to prevent a sudden infusion of vehicles onto ORE 18. A paved park-and-ride lot is located at the Wallace Bridge interchange. Area residents commuting to work use the lot, accessible from the Willamina-Sheridan Highway.

The ‘limited build’ alternative was found to be inadequate in addressing traffic problems in the corridor and in making this section of highway consistent with pertinent elements of the OHP. TDM measures in place along the corridor do not by themselves substantially reduce traffic volumes on the facility. Therefore, by itself, protection of the existing system would not adequately address safety and mobility problems within this section of ORE 18.

Priority 2: Improve efficiency and capacity of existing highway facilities. Improvements considered to fall under Priority 2 include widening highway shoulders or adding auxiliary lanes, extending or connecting local streets, and making other off-system improvements. Minor improvements such as shoulder widening were considered in the ‘limited build’ alternative but rejected as the only highway improvements by the Corridor Refinement Plan Steering Committee.

As discussed under Policy 1F, several segments and key intersections along the ORE 18 corridor currently operate at V/C ratios worse than those established by the OHP for a Statewide Highway and Rural Expressway. The TDM/TSM methods of Priorities 1 and 2 alone do not eliminate the need for making major improvements that add capacity to the system. Elements of Priority 2, specifically shoulder widening for bicycle and pedestrian traffic, have been added to the Preferred Alternative, but do not fully resolve the transportation problems in the corridor.

Priority 3: Add Capacity to the Existing System. The major improvements of two general purpose lanes and three grade-separated interchanges, along with widened shoulders and approach road consolidation along the project corridor is needed to resolve current operational and safety deficiencies. The Preferred Alternative would reduce V/C ratios to within the accepted OHP threshold, and provide adequate safety improvements.

The Preferred Alternative includes Priority One and Priority Two elements. Private approach road consolidation and elimination is a large part of the Preferred Alternative, as well as construction of local access roads to serve local traffic and provide fewer access points to ORE 18.

Goal 2: System Management

Policy 2D: Public Involvement

The objective of Policy 2D is to ensure effective public participation from residents, business owners, regional, state, and local governments, and tribal governments. The policy requires that transportation projects create opportunities for citizens, business owners, state and local governments, and tribal governments to comment on proposed projects.

Findings: The public involvement process for the H.B. Van Duzer Forest Corridor – Steel Bridge Road EA included three public open houses prior to the release of the EA, three focus group meetings with local area residents, and a public hearing to discuss the EA. The three open houses were held during different phases of project development.

The draft Refinement Plan was produced in July 2000. Information produced for the Refinement Plan was used in the EA. Public involvement for the Refinement Plan included the formation of a Steering Committee and a Technical Advisory Committee. Steering Committee meetings were open to the public and often attended by members of the community. A total of 15 Steering Committee meetings were held. At the same time the Regional Problem Solving Committee, a group of citizens with technical support, considered land use changes in response to the establishment of the Spirit Mountain Casino and Resort. The Regional Problem Solving Committee received briefings on and provided input to the EA and the Refinement Plan.

Policy 2F: Traffic Safety

This policy directs agencies to improve safety for all users of the highway system through engineering, education, enforcement, and emergency medical solutions.

Findings: Within the section, a comparatively high number of crashes occur at the intersections of ORE 18/Fort Hill, ORE 18/Valley Junction and ORE 18/Grand Ronde. Until 1998, the ORE 18/Fort Hill Road intersection was included within the top 10 percent of the

State Priority Index System (SPIS), a listing of accident data.² The Grand Ronde intersection was listed in SPIS in 1992, 1993, and 1994. Crashes also occur along the highway between major intersections.

ODOT crash statistics show that between January 1, 1998 and December 31, 1999, 61 crashes were reported on ORE 18 in the study area. As a result of these crashes, 82 people were injured and 10 were killed. The crash history between January 1991 and January 2001 was reviewed following the EA public hearing. The project section had more crashes per mile than the section of ORE 18 to the west, or the section of ORE 18 east of the project, for the following crash types: total crashes, fatalities, rear-ends, turning movements, head-on collisions, sideswipes, and crashes involving trucks.

Widening the highway and constructing non-traversable medians would improve both through and local traffic flows. This is expected to reduce fatalities from head-on collisions. The non-traversable median also would increase safety by reducing the number of turning conflict points along the highway. Widening the highway would provide passing opportunities for vehicles using the highway at different speeds.

The Preferred Alternative would control access along the highway with interchanges at Grand Ronde and Valley Junction, a realigned intersection at Fort Hill, and by consolidating private approach roads and constructing local access roads with limited connections to ORE 18. Limiting the number of approach roads to and from ORE 18 would improve safety by reducing the number of conflict points along the highway. Most local traffic could access ORE 18 at the proposed interchanges and at intersections using local access roads without having to travel long distances out-of-direction. Some local approach roads to ORE 18 would be right-in and right-out only.

Goal 3: Access Management

Policy 3A: Classification and Spacing Standards

Policy 3A requires the management of intersections and approach roads to state highways to ensure safe and efficient operation consistent with highway classification. Specifically, state highways are required to maintain spacing standards of 2 miles between interchanges, 1 mile between auxiliary lanes leading to interchanges, and ¼-mile between interchange ramps and local roads.

Findings: ORE 18 is classified as a Statewide Highway and a Rural Expressway outside an Urban Growth Boundary. Improvements to Rural Expressways require that private access be discouraged, public road connections be highly controlled, traffic signals be discouraged, non-traversable medians be constructed, and parking be prohibited.

The existing facility does not meet the objectives set out in Policy 3A. There are many private approach roads directly onto ORE 18 in the study area.

The Preferred Alternative would consolidate, modify, or eliminate approximately 100 approach roads to ORE 18 (farm fields, residences, and businesses). Some parcels would be served by local access roads while others would be modified to allow right-in and right-out movement only.

² SPIS used a new formulation after 1998, so the comparison to earlier listings is not exact.

Local access roads would be constructed to provide controlled access from residences, businesses, and farm properties to ORE 18. Service roads would be constructed between A.R. Ford Road and Fire Hall Road south of ORE 18; an extension of Andy Riggs Road to Fire Hall Road south of ORE 18; an extension of Jahn Road toward Valley Junction; at Rowell Creek Road south and north of ORE 18; and from Fort Hill Road to the east with an overpass connecting to the South Yamhill River Road and the Willamina interchange.

The distance between the proposed Grand Ronde Road interchange and the Casino/ORE 22/Valley Junction interchange would not meet the 1999 *Oregon Highway Plan* standards for spacing between interchanges. ODOT would apply for a deviation from this standard.

The proposed project would therefore make ORE 18 more consistent with Policy 3A spacing standards by consolidating more than 100 accesses by building local access roads, and modifying several remaining accesses to right-in, right-out movement only.

Policy 3B: Medians

This policy calls for the State of Oregon to plan for and manage the placement of medians and location of median openings on state highways to enhance the efficiency and safety of highways and to influence and support land use development plans that are consistent with approved Transportation System Plans. Action 3B2 calls for design and construction of non-traversable medians for modernization of all rural, multi-lane Expressways. Action 3B4 directs agencies to provide full and directional median openings only where they conform with ODOT spacing standards. According to ODOT Spacing Standards for Statewide Highways, such access needs to be spaced one mile apart.

ORE 18 is a rural, multi-lane Expressway. The Preferred Alternative includes widening the highway to four lanes with a non-traversable median along the entire length of the corridor within the project area. Full openings in the non-traversable median are planned at the following locations: A.R. Ford, Fire Hall, Jahn, and Rowell Creek Roads. The proposed median openings at A.R. Ford Road and Fire Hall Road would not meet the 1-mile spacing standards and will require a deviation. The spacing between the other three locations would be greater than one mile.

Continuing the existing condition of median control and direct property access on ORE 18 when modernizing the highway is not consistent with Policy 3B. The current conditions include no medians and many direct property approach roads. The Preferred Alternative would make ORE 18 more consistent with Policy 3B by providing consolidated accesses, non-traversable medians, and meeting spacing standards with two locations requiring deviations.

Policy 3C: Interchange Access Management Areas

Policy 3C calls for planning and managing grade-separated interchange areas to ensure safe and efficient operation between connecting roadways. Action 3C1 requires agencies to develop Interchange Area Management Plans to protect the function of interchanges over the long-term. The intention of an Interchange Area Management Plan is to minimize the need for major interchange improvements in the future.

Findings: Interchange Area Management Plans will be developed for each of the three interchanges when these projects begin the Preliminary Design stage. It is the intention that these Interchange Area Management Plans would ensure compliance with Policy 3C.

Oregon Transportation Plan

The Oregon Transportation Plan (OTP) provides the long-range policies to guide the development of a safe, convenient, and efficient statewide transportation system that promotes economic prosperity and livability for all Oregonians. Goals and policies deal with an array of subjects including modal balance, accessibility, environmental responsibility, connectivity, safety, livability, land use, and economic development. Some specific actions that apply to the Preferred Alternative are as follows.

Goal 1: Characteristics of the System

Policy 1G: Safety

Action 1G.4 calls for resources to be targeted to dangerous routes and locations in cooperation with local and state agencies. Within the section, a comparatively high number of crashes occur along the ORE 18 corridor within the study area, and at the intersections of ORE 18/Fort Hill, ORE 18/Valley Junction, and ORE 18/Grand Ronde. This section of ORE 18 had more crashes per mile than the section of ORE 18 to the west, or the section of ORE 18 east of the project, for the following crash types: total crashes, fatalities, rear-ends, turning movements, head-ons, sideswipes, and crashes involving trucks.

Widening the highway and constructing non-traversable medians would improve both through and local traffic flows. This is expected to reduce fatalities from head-on collisions. The non-traversable median also would increase safety by reducing the number of turning conflict points along the highway. Widening the highway would provide passing opportunities for vehicles using the highway at different speeds.

The individual construction phases that constitute the Preferred Alternative were developed as part of the H.B. Van Duzer Forest Corridor to Steel Bridge Road Corridor Refinement Plan. This is a collaborative effort among ODOT, Polk County, Yamhill County, the Confederated Tribes of Grand Ronde, the Department of Land Conservation and Development, the Mid-Willamette Valley Council of Government, and community leaders.

Goal 4: Implementation

Policy 4G: Management Practices

Action 4G.1 states that priority should be given to preserving, maintaining, and improving transportation infrastructure and services that are of statewide significance. The Preferred Alternative recommends enhancements to ORE 18 that would improve the safety and mobility of the existing highway, while minimizing impacts on the surrounding human and natural environment.

Action 4G.2 stipulates that access control should be a part of transportation system projects to achieve reasonable levels of service. Access control is a significant element of the Preferred Alternative, through consolidating or modifying approach roads and driveways, and constructing local service roads with limited connections to ORE 18. For these reasons, the projects contained in the Preferred Alternative would be consistent with the goals and policies of the OTP.

Transportation Planning Rule

The Oregon Transportation Planning Rule (TPR), OAR 660-012, implements Statewide Planning Goal 12, Transportation. Two provisions of the TPR relate directly to this project. The first provision, OAR 660-012-0015 calls for the state to develop a TSP for Oregon adequate to meet state needs. This provision also requires each county within the state to prepare and amend a regional Transportation System Plan (TSP) that meets identified regional transportation needs and is consistent with adopted elements of the state TSP. The Polk County TSP calls for the county to support ODOT's corridor refinement planning along ORE 18.

The second provision, OAR 660-012-065, identifies transportation uses that can be authorized on rural lands. Transportation uses allowed or conditionally allowed by Oregon law, as well as the transportation uses provided for in Forest Lands through OAR 660-06. This administrative rule also provides for other transportation uses, including adding travel lanes, improvements to highway related facilities, road realignments, replacing intersections with interchanges, and new access roads to reduce local access to a state highway. No statewide planning goal exception is required for these uses.

The improvements in the Preferred Alternative fall under the provisions of Polk County Zoning Code Section 119.150(G) which implements OAR660-012-065 and ORS 215.296. Compliance with these provisions are addressed for each improvement in the following sections.

Findings: Where the Preferred Alternative requires the acquisition of right-of-way in lands zoned as Exclusive Farm Use (EFU, Polk County Zoning Ordinance Section 136.050(R)); Timber Conservation (TC, Polk County Zoning Ordinance Section 177.040(V)); and Farm/Forest and Farm/Forest Overlay (FF and FFO, Polk County Zoning Ordinance Section 138.060), the transportation improvements called for by the project require conditional use permit review and approval. These zoning districts include uses permitted conditionally as provided for in OAR 660-012-065(3), including replacement of an intersection with an interchange, new local access roads, and other transportation facilities and improvements to serve local travel needs. For these uses, the county has to determine that the requirements of Oregon Law ORS 215.296 have been met. The County also must:

- Identify reasonable build design alternatives, such as alternatives that are safe and can be constructed at a reasonable cost, not considering raw land cost, with available technology;
- Assess the effects of the identified alternatives on farm and forest practices, considering impacts to farm and forest lands, structures and facilities, considering the effects on traffic on the movement of farm and forest vehicles and equipment, and considering the effects of access to parcels created on farm and forest lands; and
- Select from the identified alternatives the one, or combination of identified alternatives that has the least impact on lands in the immediate vicinity devoted to farm or forest use.

Project compliance will be determined using the conditional use permit process on a construction unit basis. Projects will be in compliance with these criteria once conditional

use permits are obtained by Polk County. Polk County's land use regulations also call for minimizing accessibility to rural lands from the proposed transportation uses, and to support continued rural use of the surrounding lands (Section 119.150(G)). The conditional use permit process is the process most likely to be used for the project components funded in the 2004-2007 State Transportation Improvement Program. These are replacing the Fort Hill/South Yamhill River Road intersection with an interchange; constructing an additional passing or travel lane east of Fort Hill, and constructing a local access road on the north side of ORE 18.

Those portions of the Preferred Alternative requiring a conditional use permit are described below. ODOT will prepare the findings for the required conditional use permits once more design detail on each of these projects is complete.

ORS 215.283 (2)(p), OAR 660-06-025 (4)(u), and the Polk County Zoning Ordinance:

In the EFU, FF, and TC zones, construction of additional passing lanes and climbing lanes, requiring the acquisition of new right-of-way, but not resulting in the creation of new land parcels requires a conditional use permit

Findings: The Preferred Alternative includes widening the approximately 9.4 mile segment of ORE 18 from a largely two-lane facility to four lanes with a non-traversable median. The highway widening element of the Preferred Alternative is expected to require approximately 35 acres of land, including roughly 4.9 acres of Farm Forest and 12.5 acres of Exclusive Farm Use.

ORS 215.283 (2)(q), OAR 660-06-025 (4)(u), and the Polk County Zoning Ordinance

In the EFU, FF, and TC zones, improvement of public road and highway related facilities such as maintenance yards, weigh stations, and rest areas, where additional property or right-of-way is required, but not resulting in the creation of new land parcels requires a conditional use permit

Findings: The ODOT weigh station east of Fort Hill Road would be relocated. It is anticipated that the relocation of the weigh station would impact roughly 0.5 acres of Exclusive Farm Use land.

There are no reasonably foreseeable induced land use changes resulting from highway widening and relocation of the weigh station. Properties adjoining this section of the project are agricultural or farm-forest and would remain so for the foreseeable future since direct highway access would be removed by the project.

ORS 215.283(3) and OAR 660-12-065(3)(e) and (5)

In the EFU, FF, and TC zones, replacement of an intersection with an interchange requires a conditional use permit

Findings: The three interchanges contained in the Preferred Alternative require the acquisition of roughly 18 acres of land. The construction of the Valley Junction interchange impacts roughly 4.3 acres of Exclusive Farm Use. The Fort Hill Road interchange impacts approximately 3.1 acres of Farm Forest land.

Valley Junction Interchange

The proposed interchange at Valley Junction and associated ORE 22 realignment would replace the current intersection of ORE 18 and ORE 22. The replacement of an intersection with an interchange and realignment of an existing road are allowed on rural lands subject

to compliance with standards in OAR 660-012-065(5) and ORS 215.296. The paragraphs below address the requirements implemented by Polk County and how they are broadly addressed by the Preferred Alternative.

Section 119.150(G)(1)—Consider Reasonable Build Alternatives. Several alternatives were considered, including by-pass proposals, the addition of traffic signals to the existing intersection, and several interchange design options. These alternatives and design options that were considered but not advanced are described in the EA, page 55. The by-pass alternatives were not found to be reasonable because they could not be built in phases and the feasibility of procuring funding to build the entire project at one time is low. Signalizing the existing intersection was not reasonable because it would not meet the standards in the *1999 Oregon Highway Plan* for a rural highway of statewide importance, and would not adequately address existing safety concerns. Of the interchange options, non besides the Preferred Alternative were considered reasonable due either to their inability to meet design standards or due to substantially higher cost.

Section 119.150(G)(2)—Assess Effects on Farm and Forest Practices. Approximately 4.3 acres of land zoned for exclusive farm use would be used as road right-of-way in this section of the Preferred Alternative. Two properties would be divided creating four farm fields. No farm structures would be displaced other than fencing. The new interchange will provide a means for farm and forest vehicles and equipment to cross ORE 18 without conflicts with through traffic. It will also provide a better connection between ORE 22 and ORE 18 that will improve access for farm and forest vehicles to and from processing facilities. ODOT management standards prohibit property approach roads within ¼ mile of the interchange ramp ends. Therefore, access to these properties will not be permissible from the realigned segment of ORE 22. Access to these properties through other routes will be identified when the interchange is further developed for construction.

Section 119.150(G)(3)—Select Alternative with Least Impacts on Farm and Forest Lands. The Preferred Alternative was found to be the only alternative to adequately address identified safety concerns. Impacts to environmental resources were part of the evaluation criteria for selection of alternatives. As this construction phase moves into the design stage, opportunities will be identified to minimize impacts on farm and forest lands.

Section 136.060—Standards for Approval of Certain Uses in Exclusive Farm Use Zones. (1)(a)—The use will not force a significant change in accepted farm or forest practices on surrounding lands: Changes in farming practices on the surrounding lands will be limited to changes in the patterns used by farm equipment to work farm fields. The proposed use will have no affect on forest practices.

(1)(b)—The use will not significantly increase the cost of accepted farm or forest practices on surrounding lands: The need to move farm equipment between farm fields may result in a small increase in costs. Those costs may be offset by the improved access to ORE 18 that will result from construction of the interchange.

Fort Hill Road/South Yamhill River Road Interchange

The proposed interchange connecting to Fort Hill Road and South Yamhill River Road would replace the current intersection of ORE 18/Fort Hill Road/South Yamhill River Road.

Fort Hill Road would be realigned to the east and connect to ORE 18 at a new interchange east of the service station and restaurant. The existing ORE 18/Fort Hill Road intersection would be closed. Fort Hill Road would extend across ORE 18 at the interchange and intersect with South Yamhill River Road. A new local access road would be built north of the service station and restaurant. Realignment of a road is allowed on rural lands (Polk County Zoning Section 136.050(R)(3) subject to the provisions of Section 119.150(G). The new access road is needed to provide access to the restaurant, service station and lumber mill north of ORE 18, and to the residential and commercial/industrial uses south of the highway because all other highway accesses would be removed by the project. The replacement of an intersection with an interchange and realignment of an existing road are allowed on rural lands subject to compliance with standards in Section 065(5) and ORS 215.296. A new access road is permitted on rural lands when the purpose of the road is to reduce local access to or local traffic on a state highway (Section 136.050(R)(6), subject to the provisions of 119.050(G)). This provision applies because the intention of the proposed access road is to consolidate local access from residential properties and the highway.

The paragraphs below address the requirements implemented by Polk County and how they are broadly addressed by the Preferred Alternative.

Section 119.150(G)(1)—Consider Reasonable Build Alternatives. Alternatives considered for the relocation of Fort Hill Road included keeping the existing alignment and realigning Fort Hill Road west of the Fort Hill Lumber Company mill. Alternatives for the new access road included keeping the existing restaurant and service station highway access and not building the new road, shifting the road south onto commercially zoned land, and moving the road further north. These alternatives and design options that were considered but not advanced are described in the EA, page 55. Maintaining the two existing business highway approach roads do not meet access spacing standard for expressways in the *1999 Oregon Highway Plan*. Shifting the access road south onto commercial property would require moving its intersection with the realigned Fort Hill Road to close to the new intersection with ORE 18 to allow enough room for vehicles waiting to turn onto the highway. The Preferred Alternative runs along the southern edge of an agricultural field, leaving a small parcel in the southeast corner. Shifting the alignment to the north would have divided the agricultural parcel into three new farm fields. Maximizing remaining resource-zoned parcel size was considered a high priority. The Preferred Alternative was the only alternative that adequately addressed safety concerns and maximized remaining resource-zoned parcel size.

Section 119.150(G)(2)—Assess Effects on Farm and Forest Practices. The realignment of Fort Hill Road and the associated access road would use approximately 3.1 acres of land zoned Farm/Forest for road right-of-way. The realigned Fort Hill Road would run along the boundary of two agricultural fields that appear to be on the same parcel. The new access road would run along the southern boundary of an agricultural field. A portion of the parcel at the southwest corner of the intersection of the new local access road and the realigned Fort Hill Road would probably be too small for agricultural use. The new local access road or the realignment of Fort Hill Road would affect no structures or facilities. Fort Hill Road has relatively low traffic volumes and its relocation would not hinder the movement of farm vehicles or equipment. Access to the agricultural field east of the new alignment would be provided just south of the rail line. Access to the western field would be provided near the western end of the new local access road.

Section 119.150(G)(3)—Select Alternative with Least Impacts on Farm and Forest Lands. As stated above, the Preferred Alternative was the only alternative that adequately addressed safety concerns and maximized remaining resource-zoned parcel size. Impacts to environmental resources was part of the evaluation criteria for selection of alternatives. As this construction phase moves into the design stage, opportunities for minimizing impacts on farm and forest lands will be identified.

Section 136.060—Standards for Approval of Certain Uses in Exclusive Farm Use Zones. (1)(a)—The use will not force a significant change in accepted farm or forest practices on surrounding lands: Realigning Fort Hill Road and constructing the new local access road would create three farm fields. Two are currently being farmed separately. The project would require only minor changes in current agricultural practices. The third would be too small to be suitable for agricultural use.

(1) (B)—The use will not significantly increase the cost of accepted farm or forest practices on surrounding lands: The need to move farm equipment between farm fields may result in a small increase in costs.

ORS 215.283(3) and OAR 660-12-065(3)(g)

In the EFU, FF, and TC zones, new access roads and collectors where the function of the road is to reduce local access to or local traffic on a state highway requires a conditional use permit. These roads shall be limited to two travel lanes. Private access and intersections shall be limited to rural needs or to provide adequate emergency access

Findings: The Preferred Alternative recommends the construction of several new or extended access roads, including the extension of South Street, Andy Riggs Road, and Jahn Road, and new access roads east and west of Rowell Creek Road and east of Fort Hill Road. Two of the access roads—South Street extension and the service road east of Fort Hill Road—would impact resource lands. The extension of South Street west of A.R. Ford Road requires the acquisition of 5.8 acres of Farm Forest land. The new access road east of Fort Hill Road would require the acquisition of 19.9 acres of Farm Forest land and would divide several parcels, creating parcel remainders between the new access road and ORE 18.

South Street Extension Local Access Road

South Street in Grand Ronde would be improved and extended west past A.R. Ford Road as a two-lane local access road. The South Street extension would reduce local trips on ORE 18 by providing an east-west alternative, and provide access to emergency vehicles. A portion of the new road would cross lands zoned for Farm/Forest use. A local access road is allowed on rural lands when the purpose of the road is to reduce access to or local traffic on a state highway.

Section 119.150(G)(1)—Consider Reasonable Build Alternatives. Local access road options were considered as part of the Section 4(f) evaluation included in the EA. The two build options include the North Street Option and the Abandoned Railroad Grade Option, located between South Street and ORE 18. The North Street Option was determined to be unreasonable because it would cross tribal lands and would possibly impact lands of traditional cultural significance to the Confederated Tribes of Grand Ronde. The Abandoned Railroad Grade option was not considered reasonable because the road would

intersect with Grand Ronde Road between the ORE 18 interchange ramps, and overcoming differences in road grade would be likely to impact historic resources.

Section 119.150(G)(2)—Assess Effects on Farm and Forest Practices. The South Street Extension would use about 5.8 acres of land zoned Farm/Forest as road right-of-way. The extension would not displace any structures or facilities. Access to property would be from the new access road. Farm vehicles would have to cross the new road to travel between farm fields. However, traffic on the new road would not be a substantial hindrance to movement.

Section 119.150(G)(3)—Select Alternative with Least Impacts on Farm and Forest Lands. The Preferred Alternative was the only alternative that adequately addressed safety, congestion, and access management issues. Consideration has been given in minimizing direct impacts and in avoiding severance to parcels designated as farm and forest lands. As this construction phase moves into the design stage, opportunities for minimizing impacts on farm and forest lands will be identified.

Section 136.060—Standards for Approval of Certain Uses in Exclusive Farm Use Zones. (1)(a)—The use will not force a significant change in accepted farm or forest practices on surrounding lands: Changes in farming practices on the surrounding lands will be limited to changes in the patterns used by farm equipment to work the farm fields and travel between the farm fields.

(1)(b)—The use will not significantly increase the cost of accepted farm or forest practices on surrounding lands: The need to move farm equipment between farm fields may result in a small increase in costs.

Access Road Eastward from Fort Hill Road

A two-lane local access road would be constructed north of the highway from approximately the Fort Hill Road interchange eastward to provide access to properties north of the highway when the existing highway approach roads are removed. The local access road would eliminate several private railroad crossings, improving safety conditions for railroad operations. It would also provide access to emergency vehicles. A new access road is allowed on rural lands when the purpose of the road is to reduce local access to or local traffic on a state highway (Polk County Zoning Code Section 136.050(R)(6) subject to the provisions of Section 119.150(G). This provision applies because the intention of the proposed access road is to consolidate local access from residential properties and the highway.

Section 119.150(G)(1)—Consider Reasonable Build Alternatives. These alternatives and design options that were considered but not advanced are described in the EA, page 55. Properties affected by the local access road that are in farm use are farming the wetland areas near their southern property boundaries. Alternatives considered included locating the access road next to the railroad and farther up the hillside to the north. The proposed access road location was selected to avoid, to the extent practicable, the wetlands in the area to the south. Section 404 of the Clean Water Act requires avoidance of wetlands if possible. Shifting the alignment south into the wetlands would result in impacts to agricultural lands similar to those of the proposed alignment because these areas are being farmed. Shifting the alignment to the north would move it closer to several residences and, because the steeper slopes would necessitate more cut and fill work to create the road, would remove

more land from farm use. Neither of these alternatives was considered reasonable, though ODOT is exploring an option where the eastern end of the access road would be shifted to the railroad, which would reduce impacts to farm properties while avoiding or minimizing additional impacts to wetlands. Actual impacts are uncertain at this time. When dividing parcels, it is deemed desirable to maximize the size of the remaining parcel(s).

Section 119.150(G)(2)—Assess Effects on Farm and Forest Practices. Approximately 19.9 acres of land zoned Farm/Forest would be converted to right-of-way for the local access road. Some existing agricultural fields would be divided while other farm fields would be reduced along the farm field edge. No structures or facilities would be removed other than fencing and the existing highway approach roads. The local access road would have low traffic volumes that would have little, if any, effect on the movement of farm vehicles and equipment. Access to the farm properties would be provided from the new local access road.

Section 119.150(G)(3)—Select Alternative With Least Impacts on Farm and Forest Lands. The Preferred Alternative was the only alternative to adequately address safety, congestion, and access management issues. Impacts to environmental resources was part of the evaluation criteria for selection of alternatives. With regard to the local access road, eliminating private approach roads to ORE 18 requires development of a replacement road to provide property access. Because these properties have no other public road access, consolidating these approach roads into one road that connects these properties to the existing public road network is the only reasonable alternative. The road design, to the extent practicable, minimizes direct property impacts and avoids dividing farm fields on lands designated as farm and forest lands. As this construction phase moves into the design stage, opportunities for minimizing impacts on farm and forest lands will be identified.

Section 136.060—Standards for Approval of Certain Uses in Exclusive Farm Use Zones. (1)(a)—The use will not force a significant change in accepted farm or forest practices on surrounding lands: Changes in farming practices, if any, on the surrounding lands would be limited to changes in the patterns used by farm equipment to work the farm fields affected by the local access road. The proposed use will have no affect on forest practices.

(1)(b)—The use will not significantly increase the cost of accepted farm or forest practices on surrounding lands: The need to move farm equipment from a farm field on one side of the local access road to a farm field on the other side may result in a minor increase in costs, depending upon whether the landowner fences and gates access to the farm fields, and whether the farm equipment can cross any roadside ditch. If no farm field fencing and gating is installed, then farm equipment could move between farm fields wherever the roadside ditch slopes and depth would permit.

Polk County Comprehensive Plan

In 1973, the Oregon Legislature adopted Senate Bill 100 – the Oregon Land Use Act. Senate Bill 100 required that all state and local agencies that impact land use prepare comprehensive and coordinated land use plans which are reviewed by the public, adopted by locally elected governing bodies, and acknowledged by the newly-formed Land Conservation and Development Commission (LCDC). The first Polk County Comprehensive Plan was acknowledged by LCDC in 1978.

The Comprehensive Plan for Polk County guides decisions on future growth and development within the County, with the intention of providing coordinated development of the County. County-developed goals and policies align with relevant Statewide Planning Goals. Once adopted, the Comprehensive Plan becomes law. All related ordinances and regulations, and all planning-related decisions, must be in conformance with it under Oregon law. The Plan, however, allows for flexibility in decision making, as future circumstances are bound to change. As new information comes to light, objectives and priorities are altered, and goals and policies are modified, the Comprehensive Plan will change.

The comprehensive plan contains two policies that apply to this section of ORE 18. These are:

- **Transportation, Policy 2.2:** Discourage direct access from adjacent properties onto those highways designated as arterials whenever alternative access can be made available. The proposed projects of the Preferred Alternative implement this policy.
- **Forest Lands, Policy 1.9:** Discourage the construction of new roads within areas designated as forestlands, with the exception of secondary roads necessary for harvesting purposes. Construction of the new local access roads would require acquisition of land zoned farm/forest and farm/forest/overlay. This action is consistent with goals 3, 4, 11, and 14 according to OAR 660-012-0065(3) and can be authorized through Polk County's land use procedures.

The element of the Polk County Comprehensive Plan most relevant to the H.B. Van Duzer Forest Corridor – Steel Bridge Road Preferred Alternative is the transportation element and transportation systems plan (TSP). This is discussed above under the TPR. Through its development and implementation, the TSP provides consistency of the transportation system, which includes this section of ORE 18, with planned land uses and zoning within the Polk County Comprehensive Plan.

Polk County Transportation System Plan

The Polk County TSP addresses OAR Chapter 660-012, which implements Statewide Planning Goal 12. The above discussion under the Transportation Planning Rule provides a detailed summary of how the Preferred Alternative addresses 660-012. The TSP is a multimodal transportation plan to identify and recommend a series of transportation projects to address current and future transportation needs within the County. Specific elements that are relevant to the Preferred Alternative include:

- Existing shared shoulder bikeway on ORE 18, the full length of the refinement area, and beyond;
- Proposed future shared bicycle roadways on South Yamhill River Road and Grand Ronde Road;
- Desired reduction in the high number of accidents on ORE 18;
- Proposed realignment of Fort Hill and South Yamhill River Roads.

Other policies relating to this project area include:

- Participation in and support of state and regional transportation planning efforts;
- Recognition that the functions of ORE 18 and 22 are critically important to a wide range of statewide, regional and local users and that these highways serve as the primary route linking the mid-Willamette Valley to the Oregon Coast, with links to Lincoln City and Tillamook.

The Preferred Alternative supports these elements of the Polk County TSP. Although the Polk County TSP includes a project to realign Fort Hill and South Yamhill River Roads, it includes no guidance as to project design. Rather the plan identifies a general need and solution.

Polk County Planning Ordinance

Chapter 119 of Polk County Ordinances addresses Conditional Uses. The two projects currently funded for construction, the Salmon River Highway at Fort Hill Road, and the Fort Hill–Wallace Bridge section of the Salmon River Highway including weigh stations, will require conditional use permits. Because both projects would be constructed within a similar period, it is expected that both projects would be submitted within the same conditional use permit.

The Preferred Alternative is located within unincorporated portions of Polk County. The main land uses in the area include resource (farm and forest); industrial (mostly used for mills and wood products industries); commercial (gas stations, restaurants, other businesses or facilities); rural residential and tribal lands, including a Casino and related commercial uses, a governance center and a medical clinic. Most land use designations within the Polk County Zoning Ordinance (PCZO) permit transportation improvements outright. However, within the Exclusive Farm Use (EFU) and Farm Forest (FF) zones, a conditional use permit is required from the County for transportation improvements where acquisition of additional right-of-way is required, as is the case for both of these projects.

ODOT will prepare a conditional use permit for both of these projects. The conditional use permit process will address Chapter 119, Conditional Uses, as well as:

- Farm Forest Zone (Chapter 138)
- Floodplain Overlay Zone (Chapter 178)
- Significant Resource areas Overlay Zone (Chapter 182)

The conditional use permit process will also address consistency with specific elements of the Comprehensive Plan, including:

- Policy 1.3 Unincorporated Communities
- Policies 1.4 and 1.5 Agriculture
- Policy 2.2 Highways

All other Comprehensive Plan elements were reviewed and found to be not applicable to the findings for the conditional use permit.

The preceding discussion under the Transportation Planning Rule broadly describes how the Preferred Alternative addresses conditional use permit criteria. Not enough design detail has been conducted to complete land use findings for the conditional use permit at this stage. Findings for the conditional use permit will be completed once specific project phases of the Preferred Alternative move into the design stage.

State Agency Coordination Agreement

ODOT's State Agency Coordination Program (OAR 731-015) ensures that the procedures used in developing highway improvement projects and other ODOT actions affecting land use comply with Oregon's Statewide Planning Goals and are consistent with applicable acknowledged comprehensive plans, as required by ORS 197.180. This administrative rule provides coordination procedures to be used when developing Environmental Assessments (OAR-731-015-0075). During development and analysis of all the studied alternatives, ODOT involved affected cities, counties, state agencies, special districts, and other interested parties in the development of the plans for these projects. Elected and appointed officials of Willamina, Polk, and Yamhill Counties; the Department of Land Conservation and Development; and the Confederated Tribes of the Grand Ronde participated on steering and technical committees.

This assessment addresses consistency with the comprehensive plans of Polk and Yamhill Counties.

Findings of project compatibility with the applicable acknowledged comprehensive plans are adopted as part of this REA. All interested parties will be mailed a notice of decision. Before elements of the Preferred Alternative are constructed, ODOT will obtain any required land use approvals and planning permits

ODOT also will obtain any ministerial planning permits required from local governments.

Nonregulatory Plans and Policies

H.B. Van Duzer Forest Corridor to Steel Bridge Road Corridor Refinement Plan (June 2001, Amended and Edited through May 2004)

The H.B. Van Duzer Forest Corridor to Steel Bridge Road Corridor Refinement Plan (Refinement Plan) documents a process recently undertaken to evaluate the need for safety and mobility improvements along the corridor. The Refinement Plan culminated in a recommended set of improvements to be constructed over a 20-year planning horizon. The H.B. Van Duzer Forest Corridor - Steel Bridge Road EA and REA are based largely on the recommendations of the Refinement Plan.

Goals and actions listed in the Refinement Plan were originally developed for the *Portland to Lincoln City Corridor Interim Strategy*, adopted in 1997. Those actions which directly relate to the Preferred Alternative are discussed below. These goals and actions are advisory only.

Action J1: Improve operations at highway-to-highway junctions and major intersections. If necessary, provide grade-separated interchanges in response to operation and safety needs.

Findings: There are three major highway-to-highway or highway-to-major arterial intersections in the study corridor that showed traffic and safety deficiencies. The success of the Spirit Mountain Casino and Resort, located south of ORE 18 between Valley Junction and Grand Ronde Road, and the continued desire to travel to the Oregon Coast means that the study area is expected to see growth in development and traffic that would exacerbate current traffic and safety problems. The three major highway junctions are discussed generally below. The discussion earlier in this section under Policy 1F and 2F of the OHP provides more detail on the results of the traffic operations and safety analysis.

The discussion of safety deficiencies is provided in responses to Action L1.

ORE 18/Grand Ronde

Left turns from Grand Ronde Road onto ORE 18 exceeded capacity (V/C ratio = 2.81) in 1998. Without improvements, it is expected that drivers will continue to have unacceptable delays while accessing ORE 18 during peak travel times. By the 2008 design year, the V/C ratio under the No Build Scenario for this north to east movement is expected to increase to 10.62.

An overpass at Grand Ronde Road would allow local residents to travel by vehicle, bicycle or on foot through the community on Grand Ronde Road without having to directly intersect with ORE 18. The heavy traffic flow coming from the north side of ORE 18 in the community of Grand Ronde would turn right from Grand Ronde Road to a loop ramp connecting to eastbound ORE 18. The heavy traffic flow from the east on ORE 18 would turn right from the westbound on/off ramps to travel north on Grand Ronde Road.

ORE 18/ORE 22 Valley Junction

The 1998 traffic analysis identified the two-lane portion of ORE 18 immediately east and west of Valley Junction as operating at V/C ratios of 0.91 and 1.00, substantially worse than the standard set by the OHP for a Statewide Highway. The highest traffic flow volumes in the study area were observed in the eastbound direction between Valley Junction and Wallace Bridge. An automatic traffic recorder located 0.7 miles east of Valley Junction on ORE 18 found that traffic flows on ORE 18 increased 104 percent between the years 1983 and 1997, an average increase of 7.4 percent a year. At the ORE 18/ORE 22 Valley Junction intersection, the critical movement was observed to be north to east at a V/C ratio (1998 observed) of 2.98.

The proposed interchange would be located approximately halfway between the Spirit Mountain Casino interchange and the existing ORE 18/ORE 22 intersection at Valley Junction. ORE 22 would cross over ORE 18 and connect the Casino property to the interchange. The Casino's existing interchange approach roads to ORE 18 would be closed, but the underpass would remain open to access tribal property on the north side of ORE 18. The existing ORE 18/ORE 22 intersection at Valley Junction would be closed. The proposed interchange would handle both Casino and ORE 22 traffic flows adequately. Casino traffic would be able to access ORE 18 safely and efficiently. Constructing this new interchange would slightly improve the interchange spacing between the ORE 18/Grand Ronde Road Interchange and the ORE 18/Spirit Mountain Casino Interchange. It would slightly worsen

the spacing condition between the Casino Interchange and the interchange proposed at ORE 18/Fort Hill Road/South Yamhill River Road.

ORE 18/Fort Hill Road/South Yamhill River Road

Traffic analysis conducted in 1998 found that the segment of ORE 18 west of Fort Hill Road (eastbound and westbound movement) and east of Fort Hill Road (the eastbound movement) was operating at or near capacity. At the intersection of Fort Hill Road and ORE 18, V/C for the north to east movement (1998 observed) was greater than capacity (V/C = 1.45).

According to 1998 statistics, approximately 32 vehicles/hour traveling southbound on Fort Hill Road turned east on ORE 18 during the 30th highest hour. The V/C ratio for this movement is 1.45 because sufficient gaps in the ORE 18 traffic do not exist to allow the turning movements. These drivers experience unacceptable delays while waiting for acceptable gaps on ORE 18. In the year 2018 approximately 41 vehicles/hour or 540 vehicles/day would travel southbound on Fort Hill Road and turn east onto ORE 18.

Development at the Fort Hill Road intersection is expected to be commercial. Without any improvements to the intersection, V/C is expected to increase by 2008 to 4.50 for the critical movement (north to east), while the south to west movement is expected to see volumes greater than capacity as well (V/C = 1.24).

The proposed interchange at Fort Hill Road/South Yamhill River Road is expected to improve vehicle mobility for vehicles turning onto ORE 18, bringing the intersection into compliance with the OHP mobility standard.

Action J9: Evaluate ORE 18 between McMinnville and the Van Duzer Corridor State Park to determine needs for passing lanes, capacity improvements, intersection improvements, grade-separated interchanges at ORE 22 (Valley Junction) and access management applications.

Findings: The length of the Preferred Alternative spans from the Van Duzer Forest Corridor to the west to Steel Bridge Road to the east. The multi-year planning effort conducted by the Corridor Refinement Plan Steering Committee and Technical Advisory Committee, in conjunction with the public, analyzed traffic operations and accident data for the corridor. The results of these analyses are discussed under Policy 1F and 2F of the OHP.

The traffic flows on ORE 18 increased 104 percent between the years 1983 and 1997 and are projected to continue increasing. The traffic flows have increased approximately 44 percent in the last three years. The 20-year growth factor for the automatic traffic recorder is 1.50 percent. The year 2018 projected average daily traffic for the automatic traffic recorder site is 27,500 vehicles per day. In addition to an increase of through traffic, future development located within the project area will add to the volume of traffic on ORE 18.

Several alternatives were considered as part of the Refinement Plan. These included a no build alternative, a limited-build alternative, two bypass alternatives, a five-lane highway with a center turn lane, a four-lane divided highway with a closed median, and a four-lane divided highway with a variety of intersection improvement options. Access management and local access roads were considered as a separate element of all the build alternatives. Travel Demand Management (TDM) techniques are used by the Spirit Mountain Casino and

Resort, the largest employer in the project area. The Casino currently employs shuttle services from the Salem, Portland and Vancouver areas 7 days a week.

Analysis conducted on the alternatives to the Preferred Alternative showed them to be inadequate or inefficient at meeting the safety and mobility needs of the corridor. The Preferred Alternative widens ORE 18 to a four-lane divided highway with a non-traversable median and three grade-separated interchanges, along with widened shoulders and approach road consolidation.

Action K6: Develop ORE 18 as a fully access controlled facility between the Van Duzer Corridor and ORE 99W at McDougal Center.

Findings: The discussion earlier in this section under Goal 3 of the OHP provides more detail on approach roads along the existing facility and the access control elements of the Preferred Alternative. Below is a general synopsis of this previous discussion.

The Preferred Alternative includes widening the highway to four lanes with a non-traversable median along the entire length of the corridor within the project area. Full breaks in the non-traversable median are planned at the following locations: A.R. Ford, Fire Hall Road, Jahn Road, and Rowell Creek Road. The proposed medians at A.R. Ford Road and Fire Hall Road will not meet the 1-mile spacing standards and will require a deviation. The spacing between the other three locations is greater than 1 mile apiece.

The Preferred Alternative would consolidate or modify approximately 100 approach roads to ORE 18. Some parcels would be served by local access roads while others would be modified to allow right-in and right-out movement only. Service roads would be constructed between A.R. Ford Road and Fire Hall Road south of ORE 18; an extension of Andy Riggs Road to Fire Hall Road south of ORE 18; an extension of Jahn Road toward Valley Junction; at Rowell Creek Road south and north of ORE 18; and from Fort Hill Road to the east with an overpass connecting to the South Yamhill River Road and the Willamina interchange.

Action L1: Target safety improvements to sections of the corridor with the highest accident rates. Analyze the accident types at all SPIS accident index sites and develop solutions that reduce accident rates.

Findings: ODOT crash statistics show that between January 1, 1998 and December 31, 1999, 61 crashes were reported on ORE 18 in the study area. As a result of these crashes, 82 people were injured and 10 were killed. The crash history between January 1991 and January 2001 was reviewed following the EA public hearing. The project section had more crashes per mile than the section of ORE 18 to the west, or the section of ORE 18 east of the project, for the following categories: total crashes, fatalities, rear-ends, turning movements, head-on collisions, sideswipes, and crashes involving trucks.

Within the section, a comparatively high number of crashes occur at the intersections of ORE 18/Fort Hill, ORE 18/Valley Junction and ORE 18/Grand Ronde. Anecdotal information exists about near misses and the observations and experiences of local residents and through travelers lead to the perception that these intersections are congested and dangerous. Until 1998, the ORE 18/Fort Hill Road intersection was included within the top

10 percent of the State Priority Index System (SPIS), a listing of accident data.³ The Grand Ronde intersection was listed in SPIS in 1992, 1993, and 1994. Crashes also occur along the highway between major intersections.

Widening the highway and constructing non-traversable medians would improve both through and local traffic flows. This is expected to reduce fatalities from head-on collisions. The non-traversable median would increase safety by reducing the number of conflict points along the highway. Widening the highway would provide passing opportunities for an ever-increasing number of vehicles using the highway at different speeds.

In addition, limiting the number of accesses to and from ORE 18 would improve safety by reducing the number of conflict points along the highway. Most local traffic could access ORE 18 at the proposed interchanges and at several intersections using local access roads without having to travel long distances out-of-direction. Some local approach roads to ORE 18 would be designed as right-in and right-out only.

Sketch Transportation Analysis, Grand Ronde Tribal Master Plan

The Sketch Transportation Analysis is an adjunct to the Tribal Master Plan. It calls for several transportation upgrades throughout the area. One of these is widening Grand Ronde Road to accommodate bike and pedestrian traffic. Other improvements to Grand Ronde Road and connecting roads are also included in the analysis. The Analysis notes that in previous years ODOT has identified a need for a four-lane segment from Grand Ronde to Fort Hill and a fourth lane from Fort Hill to Wallace Bridge. These needs were identified prior to consideration of a casino development.

The Preferred Alternative includes a grade-separated crossing of ORE 18 at Grand Ronde, which accommodates bicycle and pedestrian traffic, and a widening of ORE 18/ORE 22 between Grand Ronde and Wallace Bridge. As such, it addresses these concerns and so complies with the *Sketch Transportation Analysis*.

Rail and Highway Compatibility

ODOT is directed by statute (ORS 824.202) “to achieve uniform and coordinated regulation of railroad-highway crossings and to eliminate crossings at grade wherever possible [and] to control and regulate the construction, alteration, and protection of railroad-highway crossings.” The first action item of the rail and highway compatibility policy is to eliminate crossings at grade wherever possible and to consider the needs of local pedestrian, bicycle, or vehicle circulation.

The Preferred Alternative contains two proposals that would necessitate crossing the railroad owned and operated by Hampton Lumber Company. The realignment of Fort Hill Road east of the Fort Hill Lumber Company mill would require an at-grade crossing where the tracks leave the mill. Construction of a grade-separated crossing at this location would have impacted a larger farming parcel than currently expected with the proposed at-grade crossing, thereby increasing impacts to farmland. In addition, a grade-separated crossing at this location was deemed to be cost prohibitive. The second at-grade crossing of the Hampton Lumber Company railroad tracks is along the Fort Hill service road. This new

³ SPIS used a new formulation after 1998, so the comparison to earlier listings is not exact.

crossing consolidates several old crossings. A grade-separated crossing at this location was not deemed to be cost effective due to assumed high costs for access to only six properties.

ODOT or the authority building the road would apply for an order from the Rail Division to cross the railroad. See OAR 741-200-0010 to 741-200-0090 for the application process.

Oregon Bicycle and Pedestrian Plan

The Oregon Bicycle and Pedestrian Plan is a statewide plan that provides direction and guidance to bikeway and pedestrian programs in Oregon. Goals of the plan include:

- Provide safe, accessible and convenient bicycling and walking facilities;
- Support and encourage increased levels of bicycling and walking.

The Preferred Alternative projects all comply with the Oregon Bicycle and Pedestrian Plan.

Oregon Rail Freight Plan

The *Oregon Rail Freight Plan* describes the existing rail system in Oregon and analyzes possible rehabilitation improvements to the system. This plan is used to help qualify improvement projects for federal funding. Policies address economic development, retention of local rail service, protection of abandoned rights-of-way, and integration into state and local land use planning processes. Within this section of the corridor, there are no proposed upgrades to the rail system contained in the Preferred Alternative.

Willamette Valley Transportation Strategy

This document addresses the problems and opportunities of “transportation interdependence” among the Willamette Valley communities. The project area lies within the scope of the *Strategy*. Three goals were identified for the valley: mobility, industrial growth, and livability. None of the individual strategy elements is specific to the Van Duzer to Steel Bridge Road area. However, the overall intent of the Willamette Valley Strategies was considered as the project was developed.

Oregon Forest Practices Act

The *Oregon Forest Practices Act*, ORS 527.755 designates ORE 18 and 22 as scenic highways. The purpose of scenic highways is to maintain roadside trees for the enjoyment of the motoring public while traveling through forestland. The act also applies to project activities outside the 150-foot buffer along each side of the highways created by the scenic designation. ODOT will work with the Oregon Department of Forestry to assure compliance during development of individual projects.

Summary of Mitigation and Conservation Measures

The following mitigation and conservation measures address impacts associated with the project. This section replaces the Summary of Mitigation, Impact Minimization, and Conservation Measures section of the EA (pages 255 to 269).

Right-of-Way

Acquisition and relocation assistance procedures are governed by the Uniform Relocation Assistance and Real Property Acquisition Act of 1970 as amended, Federal Law 91.646, the Code of Federal Regulations (49 C.F.R. Part 24), and ORS 281.045 to 281.105). ODOT policy requires that displaced persons receive fair and humane treatment and not suffer unnecessarily as a result of a highway project.

Owners of properties that are needed to provide right-of-way in order to implement the Preferred Alternative will be entitled to just compensation for land and improvements. Just compensation includes the estimated value of all land and improvements within the area needed for the project. If only a portion of the property is acquired, just compensation will include any legally compensable, measurable, loss in value to the remaining property due to the partial acquisition. In addition, an offer will be made to purchase any remaining property determined to have no remaining economic value to the owner.

Just compensation is based on valuation of the needed property by an experienced and qualified employee of ODOT or by an independent fee appraiser under contract with ODOT. Valuation is determined by comparison of similar properties that have recently sold, by knowledge and consideration of costs and depreciation for any improvements to be acquired, and when applicable, by the properties income potential. Any increase or decrease in the value of needed property brought about by public knowledge of the upcoming highway project is disregarded in the valuation process.

Businesses, Communities, Facilities, Neighborhoods, and Residences

Social

Residential

- Provide compensation to property owners for eligible relocation costs, loss of land, buildings, and improvements at fair market value.
- Provide owner occupants or renters relocation planning, advisory assistance, reimbursement of qualifying moving and related expenses.
- During construction, provide alternate routes and appropriate signs for traffic. Evaluate means to phase and time construction activities at periods least disruptive to local residents.

Effects on General Social Groups

Encourage relocation or establishment of a grocery and convenience store in the Grand Ronde center to enable those groups who cannot or do not drive (low-income, elderly, or disabled) to shop in their community for convenience items, some groceries and other necessities.

Community Cohesion

ODOT will assist in relocating facilities such as the Grand Ronde Post Office, Grand Ronde Substation of the Willamina Fire District, Grand Ronde Sanitary District, Grand Ronde Community Water Association office, and possibly the Sprint telephone switching office to a location central to the Grand Ronde Community. Community cohesiveness and identity will be further advanced if a convenience market and grocery were in the same area.

Community Facilities

In addition to assisting community facilities to relocate to a central community area, ODOT will coordinate with utility companies to assure the lines (water, sewer, electric, telephone, fiber optic, natural gas) are avoided or moved correctly and without damage.

Environmental Justice

Impacts to Native Americans and other minorities will be analyzed for each individual construction phase as it is advanced.

Economic

Highway Related Businesses and Business Areas

- Provide compensation to property owners for eligible relocation costs, loss of land, buildings, and improvements at fair market value.
- Work with ODOT Travel Information Council to potentially provide tourist oriented directional signage to alert traffic to upcoming services and businesses.
- Work with individual businesses to redesign accesses as right-in and right-out.
- Work with Polk County to focus future development for businesses dependent on through traffic at major intersections or on access roads serving interchanges.

Wetlands

Both the Oregon Division of State Lands (ODSL) and the U.S. Army Corps of Engineers (USACE) will regulate most, if not all, of these wetlands. ODOT has consulted informally with ODSL. ODOT will avoid or minimize impacts to wetlands through project design, calculate wetlands impacts, and develop a conceptual wetland mitigation plan. ODOT will coordinate with ODSL and the USACE when projects reach design stage.

The USACE and ODSL will require compensatory mitigation for unavoidable wetland impacts. Replacement of lost wetland functions and values will require the development of wetlands within the project corridor with functional values similar to those wetlands that are impacted. Potential mitigation options include wetland restoration within drained agricultural wetlands and filled lands adjacent to log mill sites primarily located at the

eastern end of the project corridor. Wetland creation opportunities are also present at an old log mill site located in the western half of the project corridor.

In the agricultural lands, restoration of lowered wetland hydrology could be conducted by severing ditch connections or removing drainage tiles. Culverts may be raised to increase the amount of wetland hydrology in a particular area. On the old mill sites, fill material could be removed to pre-fill elevations. This would restore effectively filled areas by intercepting natural occurring high water table levels. Native plant communities will be installed to reestablish historic Oregon ash bottomland, emergent marshes and wet meadows. New wetlands can be created from uplands by lowering surface elevations to expand preexisting wetlands. By developing suitable hydrology sources (such as ditch diversion), new wetlands could also be created. Hydrophytic plants in the pre-existing wetland areas could colonize into the new, created wetlands.

ODOT will complete a detailed compensatory mitigation plan for each project phase at the final plans stage of that project. ODOT will coordinate mitigation concepts with federal, state, and local resource agencies. Prior to commencing with the project, a Section 404/Removal-Fill permit will be obtained from the USACE and ODSL. ODOT will develop compensatory mitigation plans to adequately replace impacted wetlands functions and values, and to ensure that no loss of the wetlands functions and values, or area, will occur as the result of this highway corridor project.

The compensatory mitigation plan will include an annual monitoring program by ODOT for a period of 5 years to document the development of wetland conditions and success of performance standards. The monitoring plan will involve the establishment of sampling plots to track hydrologic development and plant survival, composition and density over time. Photographic monitoring will be conducted to provide a visual record of the mitigation effort. Established photograph points will document plant community type development and coverage. Annual reports detailing monitoring results will be submitted to ODSL and USACE by December of each of the required five-year period. The monitoring report will identify any gains and deficiencies in the progress of the mitigation sites.

As part of the annual monitoring reports, contingency measures will be included to discuss potential corrective actions, if performance goals are not being met. Contingency measures may include corrective grading work to improve hydrologic conditions or replacement plantings to increase low plant survivorship. Modifications to the planting plan may also be made if the monitoring reveals that high plant mortality is due to an inappropriate hydrologic regime.

Wetland mitigation opportunities and concepts have been investigated with appropriate resource and regulatory agencies. Wetland mitigation will be designed after wetlands have been delineated for each construction project within the corridor.

Water Quality

Erosion and sediment control plans and pollution control plans will be developed for the individual construction phases of the project before construction, and will be implemented during construction. This is in accordance with the conditions of the National Pollutant Discharge Elimination System (NPDES) 1200-CA permit and ODOT policy.

The South Yamhill River is included on the Oregon State Department of Environmental Quality 303(d) list for 1998 and 2000 as water quality limited, which requires a total minimum daily load (TMDL) for phosphorus. Because of this listing, treatment of highway runoff for phosphorus removal will be required for the project. Treatment of highway runoff will be incorporated into the design of the project. The primary target of treatment will be phosphorus, but it will also remove other pollutants, including sediment and metals. It will also ensure no net increase in pollutant load. The target removal rate for phosphorus will be based on management plans for the South Yamhill River. Mitigation measures likely to achieve these ends on individual projects could consist of roadside filter strips and/or bioswales designed to treat runoff from 140 percent of the new impervious surface area.

With well-designed, implemented and maintained treatment facilities, the project should have little adverse impact on water quality. Stormwater treatment should be able to prevent any increase in overall pollutant increases as a result of the project. During the design stage of each of the individual construction phases, the designers will work with environmental staff to incorporate avoidance and minimization of impacts to wetlands and riparian areas as much as possible. Unavoidable impacts will result in compensatory mitigation focused on replacing lost functions. Mitigation of wetland and riparian impacts will take time to become fully effective, so there might be some short-term loss of water quality.

Wildlife Habitat

All in-water work will be conducted during agency-prescribed work periods and localized in space and time, thereby reducing the potential for detrimental effects to aquatic species. ODOT has consulted informally with the Department of State Lands and will coordinate with ODSL and USACE when projects reach design stage.

Impacts to riparian habitats will require mitigation consultation with NOAA Fisheries. ODOT initiated formal consultation with USFWS and NOAA Fisheries Service while the EA was being developed.

USFWS provided a BO containing terms and conditions for threatened, endangered, and sensitive plant species. ODOT will continue to work with USFWS as projects are designed to avoid, minimize, or mitigate impacts to freshwater fish and terrestrial wildlife.

In 2000, ODOT prepared a BA assessing the potential impacts of the proposed action on two ESUs of steelhead trout (*Oncorhynchus mykiss*) and chinook salmon (*O. tshawytscha*) that are listed as threatened under the ESA. The finding of effect in the BA for Upper Willamette spring-run salmon and Upper Willamette steelhead was the proposed action may affect, and is likely to adversely affect both ESUs. Because individual construction phases included in the REA have not been designed, NOAA Fisheries advised that ODOT coordinate with them throughout the design stages of the individual construction phases. NOAA Fisheries would provide technical assistance to avoid, minimize, or mitigate impacts to ocean-going fish species in the project area.

In 1999, ODOT prepared a BA analyzing potential impacts of the project on animal species. The report concluded that the proposed action would have no effect on the northern spotted owl, marbled murrelet or the bald eagle. ODOT will continue to work with USFWS as

projects are designed to avoid, minimize, or mitigate impacts to freshwater fish and terrestrial wildlife.

ODOT will follow Best Management Practices (BMPs) during construction to avoid causing impacts to wildlife habitat. BMPs are techniques, procedures, schedules of activities, prohibitions of practices, and other management tools aimed at reducing impacts and protecting and preserving resources.

To minimize impacts on wildlife attempting to cross the highway, ODOT will consider the following actions for incorporation into the final construction plan for each segment of the project to facilitate wildlife movement across or under the highway and to reduce the number of animals killed on the highway:

- When replacing culverts, insure that the culvert is not perched to allow for more effective fish and amphibian access. A large diameter culvert should also be considered to allow for small mammal use.
- Consider building ramps to existing perched culverts to improve access for amphibians. This action will be particularly effective when wetlands or forested areas are present on both sides of the highway.
- Construct a bridge to improve fish passage for Jackass Creek. Consider bridges or other options to improve fish passage for other fish bearing streams where less effective structures currently exist.
- Reduce impacts to raptors by minimizing impacts to existing riparian areas and reestablishing trees outside the project clear zone.

Proposed, Threatened and Endangered Species

Subsequent deviations from the conservation measures will require the approval of the Endangered Species Office of the USFWS.

Mitigation for Proposed, Threatened, and Endangered Fish Species

ODOT has initiated formal consultation with NOAA Fisheries while the EA was being developed. ODOT prepared a BA with a determination that the Build Alternative “May Affect and is Likely to Adversely Affect” steelhead and chinook. Because individual construction phases included in the REA have not been designed, NOAA Fisheries advised that ODOT coordinate with them throughout the design stages of the various construction phases that potentially impact listed anadromous fish species (see Appendix C of the EA, titled Natural Resources Consultations). NOAA Fisheries would provide technical assistance to avoid, minimize, or mitigate impacts to ocean-going fish species in the project area.

Bridge Structure Repair or Replacement

The following avoidance, minimization, and mitigation measures will be applied to all activities involving bridge repair or replacement:

- Institute BMPs. BMPs are techniques, procedures, schedules of activities, prohibitions of practices, and other management tools aimed at reducing impacts and protecting and preserving resources. Examples of these types of BMPs are included in ODOT's Routine Road Maintenance Water Quality and Habitat Guide, Best Management Practices, July 1999.
- Eliminate where feasible the intentional release of untreated drainage to waterways.
- Pursue mitigation at a 1.5:1 ratio for degraded or removed functional riparian vegetation within the affected watershed.
- Maintain channel area and length.
- Minimize rip-rap where appropriate.

Culvert Extension, Replacement, Installation, or Enhancement

- The following avoidance, minimization, and mitigation measures will be applied to all activities involving culvert extension, replacement, installation, or enhancement:
- Maintain fish passage.
- Institute all BMPs.
- Meet the requirements of ORS 509.585 and 509.645 as implemented by OAR 635.412 that "No person shall construct or maintain any artificial obstruction across any waters of this state that are inhabited or were historically inhabited by native migratory fish without providing passage for native migratory fish."
- Incorporate high-flow discharge designs.
- Restore passage where possible.
- Review culverts that are barriers to fish passage and consider solutions.
- Pursue mitigation at a 1.5:1 ratio for degraded or removed functional riparian vegetation within the affected watershed to benefit aquatic systems.
- Maintain channel area and length.

Minor Alignment Changes Within or Adjacent to a Riparian Corridor

The following avoidance, minimization, and mitigation measures will be applied to all activities involving minor alignment changes within or adjacent to a riparian corridor:

- Institute all BMPs.
- Pursue mitigation at a 1.5:1 ratio for degraded or removed functional riparian vegetation within the affected watershed to benefit aquatic systems.

Road Repair or Improvement

The following avoidance, minimization, and mitigation measures will be applied to all activities involving road repair or improvement:

- Institute all BMPs.
- Use all applicable in-water work conservation measures.
- Pursue mitigation at a 1.5:1 ratio for degraded or removed functional riparian vegetation within the affected watershed to benefit aquatic systems.

General Minimization/Avoidance Measures (BMPs)

The following minimization and avoidance measures, or BMPs will be used for the project activities described above as they apply to each specific situation:

- In-Water and Bank Work
 - Ensure passage of fish as per ORS 498.268 and ORS 509.605.
 - Complete all work within the active channel of all anadromous fish-bearing systems within Oregon Department of Fish and Wildlife’s (ODFW) in-water work period for the Yamhill River basin, July 1 to October 15. Any extensions will first be approved in writing by and coordinated with ODFW and NOAA Fisheries (and ODSL if a Removal/Fill permit is required).
 - Remove mud from equipment prior to operation in the stream. Do not permit equipment with fluid leaks to operate in or near streams.
 - Minimize the impacts of riprap placement and the amount of riprap used. Use bioengineering in conjunction with riprap.
 - Use larger riprap preferentially in areas with riprap installation within the two-year floodplain where this riprap would come into contact with actively flowing water and where it would not substantially constrict the channel, nor require substantially larger impacts to bank areas. Plant riprap areas with native willow stakes (and other riparian shrubs and trees) to increase shading and cover within the ten-year floodplain, where appropriate.
 - Minimize alteration or disturbance of stream banks and existing riparian vegetation.

Erosion Control

ODOT will prepare an Erosion, Sediment, and Pollution Control Plan (ESPCP) for all construction projects with the potential to contribute sediment to aquatic resources. The ESPCP contains the elements outlined in Sections 280.00 and 290.30 of ODOT’s *Standard Specifications for Highway Construction* (2002), and meets requirements of all applicable laws and regulations. The ESPCP will outline how and to what specifications various erosion control devices will be installed and maintained to meet water quality standards, and will provide a specific inspection protocol and time response. The contractor may revise the ESPCP with the approval of the ODOT engineer, providing that the revised ESPCP offers the same or superior protection. For precise specifications, see Specification 280 (ODOT 2002). See also *Biological Assessment, Effects on the upper Willamette River Steelhead and Chinook Salmon ESUs* prepared by Beak Consultants Incorporated (July 2000).

Hazardous Materials (HazMat)

- The contractor (as ODOT's agent) will meet or exceed DEQ requirements for the National Pollution Discharge Elimination System (NPDES) 1200-CA permit.
- The contractor will develop an adequate, site-specific Spill Prevention and Countermeasure or Erosion, Sediment, and Pollution Control Plan (ESPCP) and is responsible for containment and removal of any toxicants released. The ESPCP will specify restrictions on chemical storage, refueling areas and other activities that have the potential to release pollutants.
- No toxicant (including petroleum products) will be stored within 164 feet of any stream.
- Hazardous material booms will be installed in all streams where certain conditions apply or where they could be useful.
- Mobile construction will not be allowed to operate within the five-year floodplain of any anadromous system if the vehicles show signs that they may contribute toxic materials into the waterway.
- No surface application of nitrogen fertilizer will be used within 50 feet of any stream.
- No treated timbers will be used in waterways.

Riparian Impacts

- Boundaries of the clearing limits will be flagged (ODOT project inspector, assisted by an ODOT biologist). Ground beyond the flagged boundary will not be disturbed.
- Minimize alteration of native vegetation. No protection will be made for invasive exotic species (e.g., Himalayan blackberry).
- ODOT will require a contract grow period for all riparian mitigation plantings.

Water Quality Impacts

- Highway runoff will be treated for phosphorus. As management plans are developed for the South Yamhill River, mitigation goals will be better defined. The actual type of treatment will depend on site specific factors as well as pollutant removal goals.
- Remove other pollutants (while not the primary target of treatment).

Mitigation for Proposed, Threatened, and Endangered Wildlife Species

ODOT has initiated formal consultation with USFWS (see Appendix C of the EA, titled Natural Resources Consultations). Specific mitigation measures will be developed as appropriate as individual construction phases included in the REA move into the design stage.

Red-Legged Frogs

Federal Status – Species of Concern

State Status – Sensitive, Undetermined

BMPs will be in place to control erosion, protect aquatic habitats, and maintain water quality in areas impacted by construction. Nevertheless, short-term impacts to red-legged frogs may occur.

Western Pond Turtle

Federal Status – Species of Concern

State Status – Sensitive, Critical

BMPs described above will be in place to control erosion, protect aquatic habitats and maintain water quality. Opportunities exist to incorporate habitat features beneficial to pond turtles.

Fender's Blue Butterfly

Federal Status – Endangered

No occurrences of Fender's blue butterfly or Kincaid's lupine are documented within the project area. Therefore, the project is not expected to impact this butterfly population or habitat and no mitigation measures are proposed.

Mitigation for Proposed, Threatened, and Endangered Plant Species

ODOT has initiated formal consultation with the USFWS (see Appendix C of the EA, titled Natural Resources Consultations). The USFWS provided a biological opinion containing conservation recommendations such as special management areas (SMAs) for sensitive plants.

Nelson's Checker-Mallow

Federal Status – Threatened

State Status – Threatened

Conservation measures to ensure that inadvertent loss of plants or their habitats are avoided will be part of design criteria or contract provisions. Measures include: minimization of impacts by spatial or temporal means; in-situ preservation of the existing populations by vegetative buffers; habitat enhancement by controlling competing non-native species; fencing; monitoring; posting signs to alert maintenance staff; and following Best Management Practices. All conservation measures and BMPs are an integral part of the BA prepared as part of the environmental review process and will prevent additional impacts to Nelson's checker-mallow. Because these measures have influenced the conclusions drawn in this analysis, and because these conclusions are subject to subsequent review by the Endangered Species Office of the USFWS to determine compliance with the Endangered Species Act (ESA), any substantial deviations from the conservation measures contained in the biological assessment will require the approval of that office.

Bradshaw's Lomatium

Federal Status – Endangered

State Status – Endangered

Additional surveys will be conducted along the railroad tracks as projects near implementation. Project specific mitigation measures will be developed if surveys determine that *Bradshaw's Lomatium* is present.

Howellia

Federal Status – Threatened

Another survey will be conducted before project construction begins. Project specific mitigation measures will be developed if surveys determine that *Howellia* is present.

Willamette Valley Daisy

Federal Status – Endangered

State Status – Endangered

The species will be introduced into an enhancement area, perhaps near the historical site of a population near Grand Ronde.

Kincaid's Lupine

Federal Status – Threatened

State Status – Threatened

Another survey will be conducted before project construction begins. Project specific mitigation measures will be developed if surveys determine that Kincaid's Lupine is present.

Archaeological Resources

Additional investigations will be needed to document the physical archaeological remains of the former tribal camps associated with the initial settlement of the reservation near Grand Ronde. Further efforts to document the history and importance of these tribal communities by document research, the collection or oral histories, or other means may be warranted. These investigations would take place during the design stage of each individual project phase.

If archaeological resources are discovered during the construction of the project, appropriate mitigation measures will be followed to ensure their identification, evaluation, and disposition. Section 00170.50 of the Standard Specifications for Highway Construction (ODOT 1991) requires the contractor to cease work immediately at the site of a discovery and to avoid further damages to the resources at the site. ODOT, the Federal Highway Administration (if federal funding is involved), the State Historic Preservation Office, and the Oregon State Museum of Anthropology will work together within a framework of an established procedure to determine what steps to take to recover the data.

Visual Resources

To offset unavoidable substantial visual impacts associated with project construction, designers will consider using the following methods, to the extent feasible, to reduce form, texture, and color contrast in cut and fill slopes:

- Stock and reapply topsoil from fill and cut slopes to reduce color contrast and promote revegetation of native plants.
- Round slopes and plant pockets of varied vegetation to help produce revegetated cut and fill slopes that have visual variety.
- Revegetate slopes with mixtures of native grasses, trees, and plants, considering the size and placement limitations of the clear zone and sight triangle.
- Plant medians with native grasses, trees, and plants (this will necessitate maintenance agreements with local jurisdictions).

Additionally, visual impacts associated with the building of interchange abutments, retaining walls and other structures, could be mitigated, to the extent feasible, by the following:

- Texture or pattern surfaces to incorporate local culture and history in coordination with local cultural leaders.
- Pigment, stain, or paint surfaces to blend with native coloration.
- Use designs that present visually rounded surfaces.
- Plant native vegetation outside the clear zone to add vertical dimension apart from the structures to lessen their dominance in the landscape.

During final design, to the extent feasible, consider the following methods to mitigate the visual impacts associated with building new access roads:

- Combine native vegetative plantings, earth mounding, or fences outside the clear zone, that screen impacts of headlights to residential areas.
- Establish a forest corridor similar in nature to H.B. Van Duzer Forest Corridor along the proposed section between Fire Hall Road and A.R. Ford Road.
- Create wayside pull-off areas to interpret scenic, cultural, and historic resources impacted by the project.
- Use minimum width standards for nonhighway sections to preserve cultural, historic, or scenic view opportunities.
- Sign and make minor operational improvements on South Yamhill River Road so it may serve as a scenic route for travelers seeking river-viewing opportunities.

Removal of vegetation should be limited to the area needed to perform work, with compensation in the form of vegetation buffer plantings to screen residents that lose

vegetation due to the project or are impacted by the proximity of the project to their residence or business.

Work operations impacting the South Yamhill River or its tributaries will consider, to the extent feasible considering safety, lessening impacts by using native riparian plantings.

Historic Resources

If the final design of the Preferred Alternative necessitates the removal of the Grand Ronde Store, the Ronde Diner, the Grand Theater, or the Tipton-Talbot House, these structures will be documented with 4" x 5" archival photographs as a permanent record of their design.

The improvement and extension of South Street as an access road can be constructed without impacting any buildings in the Grand Ronde Historic District. When plans for this phase of the project move into the design stage, the areas will be reexamined and mitigation measures will be designed. Mitigation opportunities could include providing a playground area for children who currently use South Street as an informal play area. During the design stage, ODOT will prepare a determination of eligibility (DOE) and a Finding of Effect (FOE) report and will prepare the appropriate Section 106 documentation in coordination with the Oregon State Historic Preservation Office (SHPO).

Hazardous Materials

Based on the identified hazardous materials sites and the extent of the proposed right-of-way, six of the sites would require additional work. This includes the following:

- Fort Hill Lumber Company – Conduct testing to determine if lumber mill activities have contaminated the soil.
- Littlejohn Logging – Conduct a visual inspection of the property, including structures, to determine if additional investigation of the property is necessary.
- Former Chevron Station at Grand Ronde – Conduct testing to determine if there is residual soil and groundwater contamination from the former gas station.
- Dom's Repair – Conduct a visual inspection of the property, including structures to determine if additional investigation of the property is necessary.
- H. R. Jones Veneer – Conduct testing to determine if lumber mill activities have contaminated the soil.
- Erickson Hardwood Company – Conduct testing to determine if there is soil or groundwater contamination beneath the property to be acquired.

Mitigation for Hazardous Materials Discovered During Project Construction

Owners of properties within the proposed project right-of-way will need to have any substantial hazardous contamination contained or removed according to DEQ regulations before the state acquires the properties. However, materials contaminated with hazardous substances may be encountered during project construction. Both a health and safety plan

and a contingency plan for emergency response and cleanup of hazardous materials are recommended for inclusion in the construction contract. Discovery of improper handling or disposal of hazardous substances will warrant the services of a qualified consultant to perform a site assessment. If hazardous materials are thought to be present, the contractor should stop work and immediately contact the construction project manager.

In addition, hazardous materials may be found during demolition or relocation of other structures in the project. Materials of concern and disposal measures are as follows:

PCBs (polychlorinated biphenyls)

- *Fluorescent light fixtures in old commercial buildings.* Some old commercial buildings may have old fluorescent light fixtures that use ballast containing polychlorinated biphenyl (PCB). Before any renovation or destruction of these structures, the contractor must be informed there is a possibility of encountering PCBs in the light ballast. The removal and disposal of any ballast with PCBs must be according to DEQ regulations (OAR 340-110 and ORS 466).
- *Transformers on utility poles.* A transformer removed from a power pole must be tested for PCBs. If the unit contains 50 ppm or more PCB, it can be placed in a temporary storage that has been designated for disposal. Within one year it must be transferred to a disposal facility. DEQ has specific requirements for the testing, storage, transport and disposal of transformers (40 C.F.R. 761). EPA also has rules for used transformers with 50 ppm or more of PCB. The transformer is designated a PCB contaminated unit (50-499 ppm) or a PCB transformer (500 ppm or more) and must comply with storage and disposal regulations. The rules state that a transformer must be disposed of within one year of disconnection if it is not intended for reuse.

Asbestos

The construction of the project will require the removal of existing buildings within the project area. DEQ should be notified of any facility in the project to be renovated, relocated or demolished, even those buildings not containing asbestos. Prior to the removal of any building in the proposed right-of-way, the structures must be inspected by a DEQ approved person, such as an agency employee trained by DEQ or a consultant in asbestos identification. If asbestos is detected in buildings to be demolished or removed, the contractor and method of removing, handling, and disposing the materials must be approved by DEQ (ORS 468, OAR 340-25 and 340-33, 40 C.F.R. 61.145).

Leaded Paint

Congress passed The Residential Lead-Based Paint Hazard Reduction Act of 1992, also known as Title X, to protect families from exposure to lead paint, dust and soil. According to Title X, it is not necessary to conduct a lead paint survey in structures that would be demolished. This is true as long as the life expectancy of those structures is short, less than three years and no children under six or pregnant women will occupy the dwelling before demolition. Following OSHA guidelines, workers doing the demolition might be required to wear proper dermal and respiratory protection. The demolition contractor should take safety precautions to limit human exposure to lead during demolition activities. Dust should be reduced as much as possible. This could be accomplished by keeping the debris

wet to reduce airborne particulate. In addition, dust masks, gloves, and coveralls should limit exposure to dust.

If a structure such as a house built before 1978 is not demolished but sold to a third party, then a lead paint survey conducted by a state certified inspector is required. Structures that will be remodeled because of the project should also have a lead paint survey done. All leaded paint removed should be collected and properly disposed of per EPA/DEQ requirements.

Materials and Sources

Materials and sources will be proposed, evaluated, and disclosed as designs are completed for each project phase. The appropriate permitting agencies will be consulted.

Borrow and Waste Disposal

Biological and archaeological investigations will be conducted prior to removal (borrow) and disposal (waste) at the future construction sites. Disposal sites will be negotiated closer to the time of construction, during the design stage of the individual construction phases that comprise the Preferred Alternative.

Traffic Noise

Local coordination can help mitigate traffic noise impacts by restricting the issuance of building permits for land use that will be incompatible with traffic noise, requiring developers to consider noise mitigation as part of their development plan. Planning agencies could promote development that is compatible with traffic noise. Copies of the *Noise Study Report* will be sent to Polk County and The Confederated Tribes of the Grand Ronde so those agencies can make use of the information and plan accordingly.

ODOT will conduct additional noise studies and propose appropriate mitigation measures as the projects approach the design stage.

Construction and Staging

Impacts will be further assessed and mitigating measures will be included in the design stages of the various individual construction phases. During construction and construction staging dust control measures, such as watering, will be used as needed. The following mitigation measures will be followed for minimizing construction noise:

- No construction shall be performed within 984 feet of an occupied dwelling unit on Sundays, legal holidays and between the hours of 10:00 p.m. and 6:00 a.m. on other days without the approval of the project manager.
- All equipment used shall have sound control devices no less effective than those provided on the original equipment. No equipment shall have unmuffled exhaust.

- All equipment shall comply with pertinent equipment noise standards of the U. S. Environmental Protection Agency.
- No pile driving or blasting operations shall be performed within 2,952 of an occupied dwelling unit on Sundays, legal holidays and between the hours of 8:00 p.m. and 8:00 a.m. on other days, without the approval of the project manager.
- The noise from rock crushing or screening operations performed within 2,952 feet of an occupied dwelling shall be mitigated by strategic placement of material stockpiles between the operation and the affected dwelling or by other means approved by the project manager.

Should a specific noise impact complaint occur during the construction of the project, the contractor at his or her expense may be required to implement one or more of the following noise reduction measures as directed by the project manager:

- Locate stationary construction equipment as far from nearby noise sensitive properties as possible.
- Shut off idling equipment.
- Reschedule construction operations to avoid periods of noise annoyance identified in the complaint.
- Notify nearby residences whenever extremely noisy work will be occurring.
- Install temporary or portable acoustic barriers around stationary construction noise sources.
- Operate electric-powered equipment using line voltage power.

Noxious Weeds and Non-Native Species

To further meet the requirements of Executive Order (EO) 13112, ODOT will require the following activities prior to construction:

- A botanist will conduct a survey of the right-of-way to identify plants listed in the Oregon Noxious Weed Policy and Classification System maintained by the Oregon Department of Agriculture (ODA). Based on the survey, the botanist will prepare a report identifying the species, location, approximate areal distribution, and approximate density of ODA listed weeds.
- Based on the results of the survey, ODOT will write construction contracts requiring the contractor to control identified weeds and to prevent the establishment of other ODA listed weeds. Measures to prevent the introduction of invasive species could include using “seed free” straw or the equivalent for erosion control and replanting disturbed areas with native species.
- A botanist will inspect the right-of-way following construction to assure ODA listed weeds identified during the initial survey have been effectively controlled and that no

new ODA listed weeds have appeared in the areas affected by construction. If necessary, the contractor will be required to take additional steps to control ODA listed weeds.

- Herbicides will be used only when other methods will not be effective. Only herbicides certified for use near water will be used adjacent to wetlands and water. A botanist will survey areas that may contain sensitive species and will identify “no spray” areas before application of herbicides. Applicators will generally use spot application and will avoid applying herbicides on windy days. To the extent possible, applicators will apply herbicides when a weed is most vulnerable.

In conjunction with conservation measures to mitigate the impacts to Nelson’s checker-mallow, ODOT recommends selective removal of individual Scotch broom plants where they are competing with Nelson’s checker-mallow.

Public and Agency Coordination

The identification and subsequent selection of the Build Alternative as the Preferred Alternative occurred after a public hearing was held on the Environmental Assessment and comments received during the public comment period were considered by ODOT.

A Steering Committee and a Technical Advisory Committee were formed to develop the *Draft Willamina-Grand Ronde Corridor Refinement Plan* in 1998 (now called the *H.B. Van Duzer – Steel Bridge Road Corridor Refinement Plan*). The Steering Committee meetings were open to the public and often attended by members of the community. Members of the Steering Committee and the Technical Advisory Committee are listed below.

Steering Committee

- Polk County Planning Department
- Oregon Department of Transportation
- Willamina City Council
- Yamhill County Public Works
- Department of Land Conservation and Development
- The Confederated Tribes of the Grand Ronde
- City of McMinnville Commissioner
- Regional Problem Solving Committee
- Polk County Planning Commission
- Mid Willamette Valley Council of Governments
- Area business owners

Technical Advisory Committee

- Polk County Planning Department
- ODOT, Preliminary Design
- ODOT, Transportation Operations
- ODOT, Planning
- Yamhill County Public Works
- Department of Land Conservation and Development
- Confederated Tribes of the Grand Ronde
- ODOT, Environmental
- ODOT, Transportation Analysis Unit
- Mid Willamette Valley Council of Governments

Public Hearing

ODOT held a public hearing on November 7, 2002, at the Confederated Tribes of the Grand Ronde Governance Center. The purpose of the public hearing was to present the project

Build and No Build alternatives, as well as the updated design at the ORE 18/Fort Hill Road intersection, answer questions from the public, and provide project information to those requesting it. Persons attending the public hearing were invited to provide written comments and/or oral testimony.

The public hearing was advertised through the local media and invitations were sent to property owners in the area. Approximately 100 people attended the hearing to discuss the project and provide oral and/or written testimony.

Public Comments on the Environmental Assessment

The public comment period occurred between October 19 and November 18, 2002. Approximately 100 people attended the public hearing to discuss the project and provide oral or written testimony, or both. A total of 12 comments were submitted to a court reporter as oral testimony at the hearing, the transcript of which is included as Appendix D to this REA. In addition, 14 comments were submitted in writing at the hearing, with another 35 comments submitted in writing at some point during the comment period. Of these 35 comments, 31 were from members of the public and four were from resource agencies. Summarized responses to comments are provided as Appendix B to this REA. Comments from the public are included as Appendix C, and comments from resource agencies are included as Appendix E.

Public comments, including testimony provided by the court reporter, written comments submitted at the public meeting, and written comments submitted to ODOT during the comment period, were compiled and reviewed by the Steering Committee. Appendix B contains summarized responses by the Steering Committee to comments.

Project Conclusion Statement

Based on this evaluation of the project impacts, the Federal Highway Administration has concluded that this project will not significantly affect the environment; therefore, an environmental impact statement is not required.

A Finding of No Significant Impact (FONSI) is attached to this REA for the H.B. Van Duzer Corridor—Steel Bridge Road project as no significant impacts were found through this analysis.

Draft Section 4(f) Evaluation Update

The proposed H.B. Van Duzer Forest Corridor – Steel Bridge Road project may affect a group of properties considered potentially eligible for the National Register of Historic Places (NRHP). This group of buildings and property is referred to in this section as the Grand Ronde Historic District.

Highway projects that impact historic properties must fulfill the requirements of section 4(f) of the DOT Act of 1966, which sets the requirement for consideration of park and recreational lands, wildlife and waterfowl refuges, and historic sites in transportation project development. The law, now codified in Title 23 U.S.C. 138, “Preservation of Parklands,” states that special effort should be made to preserve the natural beauty of the countryside and public park and recreation lands, wildlife and waterfowl refuges, and historical sites. Any program or project shall not be approved if it requires the use of any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance as determined by the federal, state, or local jurisdiction, or any land from a national, state, or locally significant historic site unless there is no feasible and prudent alternative to the use of such park, recreational area, wildlife and waterfowl refuge, or historical site resulting from such use, and all planning to minimize impacts has been undertaken.

Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic properties and afford the Council a reasonable opportunity to comment on such undertakings. The Section 106 process seeks to accommodate historic preservation concerns with the needs of federal undertakings through consultation among the agency official and other parties with an interest in the effects of the undertaking on historic properties, commencing at the early stages of project planning.

A Draft Section 4(f) Evaluation for the Grand Ronde Historic District was included in the H.B. Van Duzer Forest Corridor – Steel Bridge Road EA. The Grand Ronde Historic District comprises several related properties located at Grand Ronde near the junction of ORE 18 and Grand Ronde Road. Construction phase 5 of the Preferred Alternative includes a project to improve South Street as an access road and extend it to the west. Although this project is not expected to have a direct or a constructive use 4(f) impact to the district, application of the criteria of adverse effect established in article 800.5 of Section 106 (36 C.F.R. 800 “Protection of Historic Places”) indicates that the proposed project would have an effect, possibly adverse, on the potential historic district. Improvements to South Street may increase traffic through the residential area and change the character of the district’s setting by adding visual, atmospheric, and audible elements that have the potential to diminish the integrity of the district.

ODOT has not conducted a Determination of Eligibility (DOE) for any properties in the Grand Ronde Historic District. It is expected that the improvement and extension of South Street would be constructed in approximately 2015. Not enough information is available about the specific construction phase to determine if a DOE needs to be done. ODOT, in concurrence with Christine Curran, Preservation Specialist with the Oregon SHPO, has

determined that it is too early to prepare a DOE and a Finding of Effect report. ODOT will prepare the appropriate Section 106 documentation when this individual construction phase is more fully developed.

APPENDIX A

Summary of Public Involvement and Agency Coordination

Public Involvement and Agency Coordination

Open Houses

Three open houses, advertised in the *Sheridan Sun* and *Smoke Signals* local newspapers, and in newsletters mailed to area residents and business owners, were held as follows:

Date	Place
May 18, 1998	Confederated Tribes of the Grand Ronde Community Center
November 9, 1998	Grand Ronde Elementary School
April 7, 1999	Grand Ronde Elementary School

The following pages describe the topics discussed and issues raised at each of the three open houses.

May 18, 1998, Open House

Confederated Tribes of the Grand Ronde Community Center

Thirty-three citizens attended the open house and 43 citizens mailed, phoned, or e-mailed comments.

ISSUES. Issues raised by the attending citizens included: dangerous turns at intersections of ORE 18 with Grand Ronde Road, ORE 22 at Valley Junction, Fort Hill Road, Willamina, and ORE 22 at Grand Ronde Agency; unsafe conditions east of Fort Hill; and worn road conditions and curves on ORE 22 between Valley Junction and Grand Ronde Agency. There were questions about bridge widening in the H.B. Van Duzer Forest Corridor and about how steering committees are formed. There were comments about the difficulties of building a frontage road behind the Grand Ronde store and information about a potential wetland and floodplain area northeast of the Valley Junction bridge.

The following issues were collected from the comment forms. Commenters responded to the question, "What are the biggest problems along the corridor?"

- Driver related issues included speeding, tailgating, drunk driving, and unsafe passing.
- Traffic volume issues included too much traffic congestion, especially on summer weekends, difficulty making left turns from connecting roads, and slow travel.
- Roadway issues included not enough lanes and lanes decreasing from 3 to 2 between Fort Hill and Wallace Bridge, causing a bottleneck and conditions for unsafe passing.
- Access issues included difficulty getting on or off ORE 18 from side roads.
- Traffic signal issues included the need to slow traffic at Grand Ronde, Valley Junction, and Fort Hill; signals may be needed.

- Enforcement issues included the lack of police presence and high speeds when enforcement is not around; on the other hand, a show of force occurs with the speed box and police visibility.
- Accident issues included too many accidents and deaths, worse since the Casino was built; the difficulty getting onto ORE 18 from ORE 22, and a notation of accidents at MP 17.5.

Responding to the question, “What are the most dangerous or congested areas?” commenters replied, in order of number of comments: Valley Junction, Fort Hill, Grand Ronde Road, Fort Hill to Wallace Bridge, and in general, locations from McMinnville to Lincoln City.

Issues raised by the Steering Committee included unpermitted new accesses, standing water and flooding on the highway, and rest stops.

Proposed Solutions. Citizens at the open house proposed the following solutions:

- Traffic signals at Grand Ronde and Fort Hill;
- Frontage roads using abandoned railroads as an access road or as part of a couplet or using access roads in combination with a signal at A.R. Ford Road.
- Additional lanes extended from Fort Hill beyond A.R. Ford Road or four lanes for the whole segment of highway and the addition of turn lanes between Fort Hill and the H.B. Van Duzer Forest Corridor.

Other general suggestions included: adding median barriers west of Fort Hill; repainting the striping; adding grooves to alert drivers approaching intersections; adding signals or slow zone at Grand Ronde and ORE 18; using rail and reducing chip trucks on the highway; and improving local accesses to connect the north and south without having to use ORE 18.

Solutions suggested from commenters using the comment form were:

- Signs – need one for the Casino turn-off
- Signals – need one at Grand Ronde or at all three intersections; signals will back up traffic; time signals to work together
- General – need more patrolling, encourage rail use, limit speed to 45 mph from Grand Ronde to Thole’s; drive with lights on

The Steering Committee suggested a light is needed at the McMinnville turn-off at the overpass. The Committee also suggested studying rail options, including an excursion train to the Casino.

November 9, 1998, Open House
Grand Ronde Elementary School

Nearly 100 people attended this open house. They viewed and commented on various options that the Steering and Technical Advisory Committees had developed. They commented on the positive and negative aspects of proposals for options at Andy Riggs Road, A.R. Ford Road, a by-pass of ORE 18, the Casino area, Grand Ronde Road, Fort Hill

Road, Jahn Road, Valley Junction, Wallace Bridge area, and miscellaneous subjects, as follows:

- Andy Riggs Road—commenters felt an extension and new bridge are not necessary, would impact the environment, and would cater to a certain group.
- A.R. Ford Road—residents in the areas were against an interchange at that location.
- By-pass—some commenters supported the idea of a by-pass south of the South Yamhill River that would avoid ORE 18 at Grand Ronde and between the Casino and Wallace Bridge.
- Casino area—residents were concerned about accesses, frontage roads, and out-of-direction travel.
- Grand Ronde Road—commenters expressed a variety of opinions about options. They were not in favor of a road parallel to Grand Ronde Road; wanted sidewalks and provisions for bicycles; liked the relocated 4-lane option and the couplet option and wanted to keep the interchange as far as possible from the school, churches, and library.
- Fort Hill Road—citizens preferred an overpass option and promoted access to the commercial area.
- Jahn Road—residents mentioned there are only 10 residences on the road, not high volume traffic.
- Valley Junction—commenters favored an overpass (ORE 22 over ORE 18) and thought a signal would bring traffic to a standstill.
- Wallace Bridge area—some suggested reducing the speed of the traffic coming from Salem and others said leave the area alone.
- General—Suggestions were made for painting new fog lines and the potential for carpooling. Some commenters thought the open house was helpful, others disagreed. Some felt the meetings should be held at neutral community sites and not in the tribal facilities.

The Steering and Technical Advisory Committee members gathered the public comments and addressed them as they worked on adding, subtracting, and refining various proposals and options.

April 7, 1999, Open House Grand Ronde Elementary School

This was a joint open house with the Regional Problem Solving Committee. Seventy-two citizens attended and 24 completed a survey about land use and the three possible interchange proposals for Grand Ronde, Valley Junction and Fort Hill. Attendees reviewed the proposals developed by the Steering and Technical Advisory Committees. These proposals reflected citizen's comments from the previous open houses and other communications.

An item of major interest was the proposal for an access road between Fort Hill and the Wallace Bridge area. Residents expressed support for such a road.

Attendees expressed concern about loss of private approach roads to ORE 18.

Public Hearing

ODOT held a public hearing on November 7, 2002 at the Confederated Tribes of the Grand Ronde Governance Center. The purpose of the public hearing was to present the project Build and No Build alternatives, as well as the interchange proposal to replace the ORE 18/Fort Hill Road intersection, answer questions from the public, and provide project information to those requesting it. Persons attending the public hearing were invited to provide written comments and/or oral testimony. Approximately 100 people attended the hearing to discuss the project and provide oral and/or written testimony.

Focus Group Meetings

September 16, 1998

Arts Guild, Methodist Church

Approximately 12 people attended this informal meeting. Attendees suggested new alternatives and expressed concern about loss of business property at the Grand Ronde intersection.

September 20, 1998

Arts Guild, Methodist Church; evening meeting at Thole's Business

Ten citizens attended the afternoon meeting at the Methodist Church. They were concerned about alternatives that might increase traffic along Grand Ronde Road and might adversely impact businesses or historic sites or sites that might be eligible for the National Register of Historic Places.

The evening meeting was held at George and Kathy Thole's business. Attendees expressed dissatisfaction with any alternative that removed direct private approach roads to ORE 18 that would cause removal of structures. They made suggestions for right-turn lanes on Grand Ronde Road that may help improve the local situation.

May 22, 2000

Coyote Joe's Café, Willamina

Approximately 20 citizens who live within the project area, especially neighbors near or on Fort Hill and South Yamhill River Roads, invited two ODOT staff to meet with them to explain the status of the project and discuss the proposals for the Fort Hill intersection and other items. The citizens expressed their opposition to the project unless an interchange with an overpass connecting Fort Hill Road to South Yamhill River Road was part of the plan. They also wanted the access road between Fort Hill and Wallace Bridge to be built before or at the same time as the Fort Hill intersection project. Safety was a main issue. Crossing ORE 18 was considered dangerous. Along with safety, time was an issue for those with elderly or disabled family members who could need emergency medical attention.

For more information about public involvement, including meeting notes, letters and recorded comments, see the *H.B. Van Duzer Forest Corridor to Steel Bridge Road Corridor Refinement Plan, Appendix B*.

Steering Committee Meetings

The Steering Committee met 15 times between May 1999 and October 2000.

The Steering Committee meetings focused on developing, reviewing and refining solutions and options. Citizens often attended the Steering Committee meetings and participated in the discussions. The committee members reviewed information presented to them by the Technical Advisory Committee and others who provided them with information such as traffic volume statistics and projections and highway standards. At the fifth Steering Committee meeting the members reviewed a summary of the local resident's and the Technical Advisory Committee meetings. They updated and discussed new options and alternatives, based on citizen and technical input. By the sixth meeting some options were dismissed from further consideration. At the eighth meeting members discussed the advantages and disadvantages of a by-pass.

At further meetings Steering Committee members discussed phasing of the projects comprising the individual construction phases, reviewed a draft of the *H.B. Van Duzer Forest Corridor to Steel Bridge Road Corridor Refinement Plan*, looked at a new Valley Junction interchange option, and discussed re-routing Fort Hill Road east of the Fort Hill Lumber Company mill. They discussed the alignment of the access road between Fort Hill and Wallace Bridge. The alignment is aimed at reducing environmental impacts to wetlands. They also reviewed the impacts of access management rules for ORE 18 once it became an expressway. Expressways call for specific access standards for distances between interchanges and other access points that may not be met for some of the projects and would likely require major deviations.

At the fourteenth meeting the members agreed upon an at-grade realignment of the Fort Hill intersection and encouraged building the access road between Fort Hill and Wallace Bridge concurrent with the intersection work and the addition of another east bound lane east of Fort Hill. The Casino/Valley Junction interchange was agreed upon based on its technical and engineering benefits, although property access was a concern. An access road that extends South Street in Bunnsville toward the west was agreed to. During the fifteenth meeting the members reviewed the draft for the *H.B. Van Duzer Forest Corridor – Steel Bridge Road Corridor Refinement Plan*.

Public Information

Two newsletters were developed for the project. In addition, a project Web site hosted by ODOT was developed. Below is a summary of each.

Newsletter No. 1

The first project newsletter was published in August 2002. It described the Build and No Build alternatives, provided advance notice of the upcoming publication of the EA, defined the status of the Refinement Plan, and provided a project schedule.

Newsletter No. 2

The second project newsletter was published in October 2002. It provided an update on project status, notified the public of the November 2002 public hearing to discuss the EA, and provided direction on requesting a copy of the EA.

Project Web Site

ODOT developed and hosted a Web site providing information and schedule on the project. The EA and Refinement Plan were made available for downloading by the public from the Web site.

Agency Coordination

The following agencies were consulted during the development of this project:

The Confederated Tribes of the Grand Ronde (CTGR)

Federal

- NOAA Fisheries
- U. S. Army Corps of Engineers (USACE)
- U. S. Fish and Wildlife Service (USFWS)

State

- Oregon Department of Land Conservation and Development (DLCD)
- Oregon Department of Fish and Wildlife (ODFW)
- Oregon Department of Parks and Recreation (ODPR)
- Oregon Department of State Lands (DSL)
- Oregon Natural Heritage Program (ONHP)
- State Historic Preservation Office (Oregon SHPO)

County

- Polk County
- Yamhill County

Other Agencies and Businesses

- Grand Ronde Community Water Association
- Grand Ronde Sanitary District
- Sprint
- Qwest Communications International, Inc.

APPENDIX B
**Responses to Public and Agency
Comments (Summarized)**

APPENDIX B

Responses to Public and Agency Comments (Summarized)

A total of 61 comments from the public and agencies (not including ODOT and FHWA) were received on the Environmental Assessment (EA), in the form of oral testimony at the public hearing (12 comments), comment forms submitted at the public hearing (14 comments), and written comments submitted during the public comment period (35 comments, of which 31 were from members of the public and four were from resource agencies). Appendix C contains all comments received from the public on the EA. The public hearing transcript is included as Appendix D. Appendix E contains all comments received from public and/or resource agencies on the EA.

ODOT staff reviewed all comments received and grouped them according to topic. These topics are listed below.

- Socioeconomics
- Access
- Proposed Solutions
- Grand Ronde community
- Citizen Participation
- Land Use and Zoning
- Fort Hill community
- Traffic and Safety
- Natural Resources
- Historic Resources
- Valley Junction community
- Inaccuracies
- Expressway Designation
- More Study Needed
- Aesthetics
- Flooding
- Noise
- Hazardous Materials

Under each category heading in this section are summaries or excerpts of comments pertaining to that category. They are identified by code number – for example VII, G, or 12.

ODOT responses to comments (as summarized in this appendix) are linked to the individual public or agency comments to which they respond. The following key explains the link:

Category 1: Oral Testimony

- I. David Franzen
- II. Dennis Werth

- III. Don Yates
- IV. Alan Floyd
- V. Wes Shenk
- VI. Tim Thorp
- VII. Bruce Harrington
- VIII. James Gordon
- IX. Lucie Lindberg
- X. Ernest Hollmann
- XI. Paul Boehler
- XII. Don Yates

Category 2: Written Comments Submitted at Public Hearing

- A. Walt and Ellen Brewster
- B. Jack Getzler
- C. Jerry and Shelia Hargett
- D. Katie Cox
- E. Nancy Adams
- F. Kristina Dizick
- G. Randy and Jenny Brown, c/o Patricia Brodies
- H. Brett and Gayle Hembree
- I. Martie Coblentz
- J. Elmer M. Werth
- K. Duane Hussey
- L. Peter Cotting
- M. Linda Fink
- N. Erin E. Getzler Lamers

Category 3: Written Comments Submitted During Public Comment Period

- 1. *
- 2. Dennis R. Werth
- 3. Shirley Ewert
- 4. Weltha Turner
- 5. Tim Wright
- 6. Laura Wright
- 7. Oscar Frederic
- 8. Mrs. Betty L. Frederic
- 9. Phyllis I. Theodorson
- 10. Alice Flory
- 11. Laura Watson
- 12. Jairus H. Watson
- 13. Lucie Lindberg
- 14. John William Green II
- 15. Doug R. White, Department of Land Conservation and Development
- 16. George and Kathy Thole
- 17. David and Pam Franzen
- 18. Chaplains Ann and Bert Miller
- 19. Bryan Orton

20. Pearl Lockwood
21. Wesley V. Shenk
22. Nolan and Tenette Ferguson
23. Greg Thole
24. *
25. Eric F. Scott, The Confederated Tribes of the Grand Ronde Community of Oregon
26. Paul Boehler
27. Susan Randolph
28. Jody Ring
29. Kelly Gordon, Friends of Polk County
30. Sara Floyd
31. Alan Floyd
32. Lori Baldoni
33. Kim W. Grant
34. Linda A. Smith
35. In-Cha and Kap-Su Lee
36. *
37. Kemper M. McMaster, U.S. Fish and Wildlife Service
38. *
39. Willie Taylor, U.S. Department of the Interior

* NOTE: Some internal and/or advisory comments were received during the public comment period (comments 1, 24, 36, and 38). Being internal and/or advisory, these comments are not listed here nor counted as public comments received. These internal and/or advisory comments were considered and incorporated into the REA as warranted.

Summaries of Comments and ODOT's Responses

Socioeconomics

Several comments related to Socioeconomics were received on the EA. The following section summarizes and provides a response to these comments. See Appendix C for complete comments received from the public on the EA.

COMMENT: *Local business use of highway should not be sacrificed for the convenience of urban population, gamblers, and tourists.*

ODOT Response: The highway designation specified in the 1999 OHP guides ODOT in the development and design of highway projects. ORE 18 is designated as a Rural Expressway, which places a high emphasis on mobility. The highway will be designed to consider the various users of the highway, including local resident and business traffic, destination and recreational traffic, farming and logging traffic, and bicycle traffic.

This response addresses or partially addresses comment 29.

COMMENT: *Local access to the highway is the problem now – not accidents. Accidents will increase if local access is not improved.*

ODOT Response: Access between individual properties and Rural Expressways is typically provided via frontage and local access roads and local street networks with minimal if any direct connections to the highway. This provides a safer highway facility with sufficient capacity to meet mobility standards. The introduction of local access roads and expanded capacity along ORE 18 will require the acquisition of some current businesses as well as residences. Modernizing the highway as a Rural Expressway will greatly improve safety in the corridor because existing conflict points (i.e., current private driveways and public roads intersecting with the highway) will be eliminated and/or reduced in number, and traffic flows and capacity will be increased and improved. This will reduce the number and severity of accidents in the project area.

This response addresses or partially addresses comment M.

COMMENT: *What is the process for ODOT relocation of businesses and residences?*

ODOT Response: Impacted residences and businesses would be acquired according to current state and federal laws, acts, and policies. This ensures that the acquisitions are conducted in a fair, consistent, and humane manner with owners and occupants. Appraisals are completed on the properties (portion or entire) to be acquired. These appraisals reflect the value of the land acquired and any compensable damages. Any property severed by the project would be appraised to consider whether the severance damaged the remainder property. If this is determined to be the case, those damages would be quantified and this compensation would be included in the offer ODOT makes to the landowner. Because of the speculative nature of business damages, Oregon state law does not allow for the payment of business damages. If a business is displaced, ODOT offers relocation benefits.

Relocation benefits for businesses include moving costs, reestablishment costs, and other benefits as applicable. A Right-of-Way Agent works closely with the business to explain what benefits are available. The agent also provides advisory services to the business to help assure a smooth transition. It is up to the business where and how they choose to relocate. The effect on county tax rolls is based on the decision made by each individual business. Sufficient commercial-zoned parcels appear to be available for businesses to relocate to in the immediate community. Zoning is not an ODOT function but rather a county function.

Residential occupants are provided with a variety of benefits including housing or rent supplements. A Right-of-Way Agent works closely with those displaced to ensure that decent, safe, and sanitary housing is available, within the means of the displaced.

This response addresses or partially addresses comments III, VII, F, 16, 19, 21, 22, 29, and 35.

COMMENT: *The project cost estimates are understated if ODOT has to condemn and buy land at Valley Junction.*

ODOT Response: Corridor cost estimates are performed using current land values and estimates of improvements and damages. Also added are personnel, administrative, and condemnation costs based on historical data. The estimates provided in this document were done following standard estimating procedures.

This response addresses or partially addresses comment 2.

COMMENT: *Concerned that the project will make my place a very unpleasant place to live. Understanding that there will be a four-lane freeway on one side and an access road off my back porch.*

ODOT Response: Traffic volume on ORE 18 will require four travel lanes in order to avoid extended periods of high traffic congestion. The location of the future access road has not been determined in detail. The location can be modified to minimize impacts and to accommodate existing and proposed property development.

This response addresses or partially addresses comment B.

COMMENT: *Can we afford to take Grand Ronde private business properties off the tax rolls?*

COMMENT: *The tribe's Casino is getting all the benefits and doesn't pay taxes.*

ODOT Response: This project is financed with gas tax proceeds, which are held in a separate trust and are not tied to property taxes.

This response addresses or partially addresses comments I, 2, and 16.

COMMENT: *Consider the growth and changes that will take place during the 20-year phases of the project, land values, and uses, and mitigation for hardships. The proposed build alternative would have impact on the communities of Grand Ronde, Valley Junction, and Fort Hill and the rural way of life.*

ODOT Response: The project would be constructed over a 20-year period, during which time the commercial character of the community may change. The location of community centers may shift as the interchanges are constructed. The communities are expected to remain largely rural in character and are under the jurisdiction of Polk County.

Connections between communities north and south of ORE 18 would see improved safety because traffic will be using the interchange structures and ramps to enter and exit the highway rather than trying to cross the highway at grade. Travelers and potential customers would have safe and therefore more convenient access to all the communities and businesses in the area from the highway. Commerce as well as livability should improve over the next 20 years with the increased safety of the public road system in the project area for all the communities in the corridor.

This response addresses or partially addresses comments B, H, I, M, N, 6, 11, 14, 16, 19, 21, 22, and 29.

COMMENT: *Concern over impacts to the historic community at the intersection of Grand Ronde and Highway 18.*

ODOT Response: ODOT studied all potentially historic buildings in the project area. The Grand Ronde Historic District includes a three-block residential neighborhood now called Bunnsville, the Bank of Grand Ronde (now a library), the Willamina and Grand Ronde Railroad Depot, the Grand Ronde Hotel, and the United Methodist Church. The project has been designed to avoid impacting any of these buildings. The Bonanza building was evaluated, along with several other buildings outside the Grand Ronde Historic District. These buildings were found to be of local historic interest because of their association with the community's early development, but they have been substantially altered from their historic designs and are not considered eligible for the National Register of Historic Places.

One or more of these buildings of local historic interest may be impacted to provide the right-of-way needed to build the project.

This response addresses or partially addresses comments 11, 14, 18, and 19.

COMMENT: *Business owners need the limited use overlay lifted.*

ODOT Response: The Limited Use Overlay is a Polk County zoning ordinance policy. County zoning ordinance policies are not analyzed as part of the EA or REA. (A more detailed response to this comment is provided under the *Land Use and Zoning* category of this appendix.)

This response addresses or partially addresses comments I, XI, 6, and 26.

COMMENT: *Spend highway money elsewhere where more accidents occur.*

ODOT Response: Traffic safety is a significant issue for the entire length of ORE 18. An analysis of the number of crashes per mile showed that the study area witnessed more crashes per mile than the other studied segments. (A more detailed response to this comment is provided under the *Traffic Safety* category of this appendix.)

This response addresses or partially addresses comments III, 22, and 23.

COMMENT: *Property values would be decreased due to access road through property.*

ODOT Response: Property values are expected to be maintained or enhanced by the safer access afforded by the interchanges.

This response addresses or partially addresses comment 29.

Access Issues

Comments related to access are summarized below. See Appendix C for complete comments received on the EA.

COMMENT: *Desire to construct a frontage road east and west of the Casino at Valley Junction on the south side of the Oregon Highway 18, and build the frontage roads at the same time as the highway is widened and the median installed.*

ODOT Response: The plan provides for a local access road north of the highway as an extension of Jahn Road to approximately the existing access to the Spirit Mountain Casino. Left turns to and from the highway will be provided at Jahn Road. Farm fields south of the highway will continue to be accessed from the highway west of the casino; east of the casino, property access will be developed via the public road system that then will connect to the future ORE 18/ORE 22 Interchange. Access management strategy for this area calls for private property accesses to be consolidated and limited to right-in and right-out accesses. There is also a local access road on the north and south side of ORE 18 at Rowell Creek Road. There will be combined accesses and frontage roads throughout as needed.

This response addresses or partially addresses comments II, 2, and 25.

COMMENT: *Oregon 22 coming from Tillamook crosses 18 and rejoins 18 at Valley Junction. From then on it's a local service road, or it should be, and it crosses two properties prior to getting to the property. Why doesn't it service those two properties?*

ODOT Response: Access to private property will be provided, or just compensation will be paid to affected property owners. For traffic safety and operations reasons, the Oregon Highway Plan and Oregon Administrative Rule establish an intersection spacing standard of 1,320 feet between an interchange ramp terminal and the next public or private road intersection. Murphy Road, an existing north-south public road west of the proposed interchange, is approximately this distance from the interchange ramp terminal. As the project develops, individual accesses will be further evaluated to determine the best way to access those properties. In addition, an interchange area management plan will be developed for the proposed interchange.

As the project develops, an access management subteam will be formed to look into individual accesses to determine the best way to access those properties. In addition, an interchange area management plan will be developed where there are proposed interchanges, such as the Valley Junction interchange.

This response addresses or partially addresses comments II and 2.

COMMENT: *At least one driveway in existence is not found on project plans.*

ODOT Response: Not all the details are shown. The access management sub-team will address access management issues on the project for each construction phase as it advances.

This response addresses or partially addresses comment III.

COMMENT: *The proposed road will make considerable problems for the people living on the side roads, getting on and off the highway is a major problem for people on AR Ford Road as well as King Rd.*

ODOT Response: The additional travel lanes on ORE 18 are needed to accommodate projected traffic volumes. An at-grade intersection is called for at AR Ford Road that will provide for all turning movements to and from the highway. This design provides for safe vehicle movements at the intersection until additional development occurs between AR Ford Road and the other local roads east of it. As the development called for in the Polk County Comprehensive Plan occurs in this area, additional road system would connect AR Ford Road to Fire Hall Road, and Fire Hall Road to Grand Ronde Road via Andy Riggs Road. This local road system would provide a road network south of ORE 18 that allows residents to circulate safely throughout the Grand Ronde community, and to safely enter and exit ORE 18.

This response addresses or partially addresses comment 10.

COMMENT: *Why should properties be bisected by proposed frontage roads over impacting wetlands?*

ODOT Response: Federal and state wetland regulations require that wetland impacts must first be avoided or minimized before compensation occurs. Alternative sites for the frontage road along the highway were considered to meet the federal and state avoidance/minimization regulation. Alternatives for other elements of the project (e.g., addition of travel lanes) were not considered because they occur along an existing transportation facility. Impact to personal property resulting from construction of such

elements directly connected to the existing highway would be minimal when compared to building a new route on lands located north and south of the existing state highway.

This response addresses or partially addresses comments VI and 21.

COMMENT: *Concerns with consolidated driveways and right-in, right-out movement. Concern that project will not give adequate access, or will require significant out-of-direction travel*

ODOT Response: This project is intended to address the safety needs of this corridor. One of the best ways to improve safety is to control access and conflict points. The inclusion of interchanges at specific locations will accommodate turning movements. Some amount of out-of-direction travel will result because driveways will be combined and turning movements are restricted as part of the project.

As part of the access control aspect of this project, ODOT will attempt where possible to combine access and any written agreement with adjacent property owner will be worked out with ODOT's right-of-way agents. Easement rights of access from private property to the highway will be further evaluated when funding becomes available for each construction phase of the project. The maximum out-of-direction travel for any one property is 2.5 miles.

This response addresses or partially addresses comments VIII, F, J, N, and 16, and 33.

COMMENT: *Concern about losing specific paved mailbox turnout, which is currently used by police.*

ODOT Response: The widening of ORE 18 will eliminate the paved mailbox turnout. A new mailbox turnout and approach will be built at a different location. The proposed project would widen ORE 18 to provide additional travel lanes and paved, eight-foot wide shoulders. At mailbox locations, the shoulder will be further widened for a turnout and an approach will be built at a different location.

This response addresses or partially addresses comment VIII.

COMMENT: *I question how the access for on and off Jahn Rd. and other frontage roads will work for people?*

ODOT Response: The idea is to reduce turning conflicts. Access to Jahn Road will be via a full access.

This response addresses or partially addresses comment I.

COMMENT: *What is going to happen to businesses if there is a divided highway preventing (not allowing) turn lanes to access businesses?*

ODOT Response: Right-in/right-out access will be provided to businesses via frontage roads. Left-turn access is allowed at certain intersections.

This response addresses or partially addresses comment I.

COMMENT: *Local access to the highway is the problem now --- not accidents. Accidents will increase if local access is not improved. We in the area should not have to give up our daily convenience for the convenience of urban populations.*

ODOT Response: The highway is used by both local and nonlocal traffic. Safety, efficiency, capacity, and links between destinations are the functions of highways. One of the purposes of this project is to improve safety in the corridor. The elimination of conflict points through access control will improve safety for all travelers in the project area.

This response addresses or partially addresses comment M.

COMMENT: *The proposed road will make considerable problems for the people living on the side roads, getting on and off the highway is a major problem for people on AR Ford Road as well as King Rd.*

ODOT Response: Additional travel lanes on ORE 18 are needed to accommodate projected traffic volumes. An at-grade intersection is called for at AR Ford Road that will provide for all turning movements to and from the highway. This design provides for safe vehicle movements at the intersection until additional development occurs between AR Ford Road and the other local roads east of it. As the development called for in the Polk County Comprehensive Plan occurs in this area, an additional road system would connect AR Ford Road to Fire Hall Road, and Fire Hall Road to Grand Ronde Road via Andy Riggs Road. This local road system will provide a road network south of ORE 18 that allows residents to circulate safely throughout the Grand Ronde community, and to safely enter and exit ORE 18.

This response addresses or partially addresses comment 10.

COMMENT: *I would not like Andy Riggs Road used as a frontage road. There isn't much traffic now on the west end of it and that would change, I'm sure. Would the road be widened? If so what side? Just when would this plan come about?*

ODOT Response: While identified in the project as Phase 7, it is expected that this section of Andy Riggs Road will be constructed as a part of development on the adjacent property. When funding becomes available to construct this phase, further evaluation will be necessary to determine how the road would be widened to accommodate local travel needs. It falls under Phase 5, (out of 7 phases) in the corridor refinement plan. Phase 5 completes the following: ORE 18 widening from the Grand Ronde area to the Van Duzer Forest Corridor, local service roads north of ORE 18, and local service roads south of ORE 18 (connecting Fire Hall Road to Andy Riggs Road). Phasing is to occur over a 20-year period.

This response addresses or partially addresses comment 20.

COMMENT: *I do not care for non-traversable medians idea at all. I feel that if you would put a 4 lane road with a center turning lane would be sufficient except at Valley Junction, Grand Ronde and Fort Hill, where I feel you need overpasses. If you are going for a deviation at Grand Ronde, Valley Junction, well then go for one at Fort Hill too.*

ODOT Response: The Fort Hill Interchange proposal will allow the local access road extending further east to be constructed only for local traffic. The road will have less impact than it would have had as a truck route between Fort Hill and the ORE 18/ORE 22 Interchange. ORE 18 is designated as a rural expressway and, as such, private access is discouraged and non-traversable medians are encouraged.

This response addresses or partially addresses comment 21.

COMMENT: *This Environmental Assessment covers solely the factors pertaining to Highway 18. This assessment does not examine the impact of frontage roads upon the residences of Highway 18 and how this will affect their land values and private property rights. It also does not study the effect of removing local owned private commercial businesses from their customer base of Highway 18. How will that affect this area. Will these businesses be able to relocate? How will relocating or perishing affect this area and the residents living here?*

ODOT Response: The purpose of an Environmental Assessment is to evaluate whether significant environmental impacts would result from construction of the road project. While impacts to individuals will result from the project, the cumulative impacts of the project have not been determined to be significant. The analysis for the project assumed that the land areas designated for commercial and industrial use in the Polk County Comprehensive Plan would be developed in that manner in the future. Area population is projected to increase, creating a larger local market than exists today.

Consistent with the requirements of federal and state law, displaced businesses and persons are compensated for damage to their business or property. In such a circumstance, the individual may then decide whether it is in his or her own interest to re-establish a business in the area.

This response addresses or partially addresses comment 29.

COMMENT: *Does this document consider how access roads will influence farm operations?*

ODOT Response: The document presents analysis of the project's impact to farm operations as part of the Land Use Findings section of this REA. Additional analysis will be conducted as part of the Polk County Conditional Use Permit process. This process will be conducted as per Polk County Zoning Ordinance Chapter 119, following an Administrative Review process outlined in Polk County Zoning Ordinance Chapter 111, section 240. Specific direction as to the type of administrative review will be determined by the County at the beginning of the application process.

This response addresses or partially addresses comment 29.

Proposed Solutions

Comments related to proposed solutions are summarized below. See Appendix C for complete comments received on the EA.

COMMENT: *Before constructing large infrastructure projects, try smaller improvements. Pursue low-cost solutions, such as installing signals and electronic reader boards.*

ODOT Response: A limited build alternative was considered but dismissed for the study corridor. The limited build alternative considered small, low-cost improvements such as driveway consolidation, installation of traffic signals and lighting at major intersections, adding right-turn lanes at the north and south approaches from Grand Ronde Road, widening shoulders between the Spirit Mountain Casino and Grand Ronde Road, adding bicycle and pedestrian improvements, and improving local roads off ORE 18. Analysis showed that installing traffic signals alone would worsen traffic congestion through the project. Adding traffic signals and travel lanes would not result in the highway capacity

needed through the planning horizon. In addition, signals were shown to increase crash potential due to the high speeds posted along the corridor.

The stated purpose and need for the project is to increase safety and decrease congestion through the project section (EA, p4). Reader boards would notify the driver of traffic conditions, but they would not result in additional highway capacity needed in the project section. Traffic analysis accomplished for the project shows that additional highway capacity (travel lanes) is needed if the project section is going to avoid high congestion problems and operate as called for in the 1999 OHP.

This response addresses or partially addresses comments III, I, M, 5, 7, 8, and 29.

COMMENT: *Instead of frontage road, widen highway shoulder to allow right-in, right-out movement.*

ODOT Response: The stated Purpose and Need for the project is to increase safety and decrease congestion through the project section (EA, p. 4). One of the strategies to improve safety is to consolidate access to the highway. Retaining unconsolidated direct access to the highway would not comply with ODOT Access Management Standards as outlined in the 1999 OHP.

This response addresses or partially addresses comment 25.

COMMENT: *Consider a five-lane roadway with a center turning lane. Call the area "special travel and business area road."*

ODOT Response: The purpose is to reduce the turning conflicts and improve the safety of the corridor. This section is classified as an Expressway. Adding a center turn lane in a rural area is not acceptable as it will increase conflict points and have the potential to increase traffic crashes.

This response addresses or partially addresses comment 35.

COMMENT: *Straighten ORE 18 as it comes into Grand Ronde from the east and install the same jug handles as your preferred alternative. This would avoid impacts to the historic district.*

ODOT Response: Other interchange options were explored at Grande Ronde Road. The interchange configuration requested would put jughandles in the northeast and southwest quadrants of the interchange. This would require three additional crossings of Rock Creek. This and other alternatives were rejected to avoid and/or minimize impacts to residential property not previously impacted and environmentally sensitive resources/lands.

This response addresses or partially addresses comments I and 17.

COMMENT: *Educate the public to take leisurely drives through beautiful scenic areas such as the ORE 18 corridor*

ODOT Response: ORE 18 is designated as a Rural Expressway and a Statewide Freight Route. The 1999 Oregon Highway Plan describes Expressways as roads where private access is discouraged, connections to public roads are highly controlled, traffic signals (rural areas only) are discouraged, and non-traversable medians are encouraged. Mobility is a special concern along freight routes. The Project Steering Committee is attempting and will

continue to attempt to minimize the environmental impacts associated with the selected alternative while balancing the needs and uses of the corridor.

This response addresses or partially addresses comment 13.

Grand Ronde Community

Several residents and business owners commented that work should be done to reduce impacts on the community and businesses at Grand Ronde. Comments related to the Grand Ronde community are summarized below. See Appendix C for complete comments received on the EA.

COMMENT: *There are other locations more important for improvement than the Grand Ronde intersection. The Grand Ronde intersection is not responsible for traffic safety and congestion problems.*

ODOT Response: Crashes at the Grand Ronde intersection, especially from vehicles turning left from Grand Ronde onto ORE 18, have been a cause of concern. As traffic increases on ORE 18 it is harder for vehicles to find reasonable gaps to turn left from Grand Ronde Road safely.

This response addresses or partially addresses comments I, 18, and 34.

COMMENT: *The community needs the grocery store at the intersection of Grand Ronde and ORE 18. This store is likely to be removed as part of the Preferred Alternative.*

ODOT Response: The location and footprint of the roadway widening have not been fully designed, and specific impacts have not been fully identified (including the need for additional right-of-way). It is probable that properties would need to be acquired to accommodate the new highway footprint. Through right-of-way negotiations, ODOT would consider relocation of affected businesses to other locations in the project area.

This response addresses or partially addresses comment H.

COMMENT: *Consider an option at AR Ford Road to improve the connection with ORE 18/ORE 22 and reduce impacts upon existing business and community along Grand Ronde Road.*

ODOT Response: An alternative was considered but not advanced which involved an extended south bypass and a partial south bypass. Both the EA (page 56) and the H.B. Van Duzer Forest Corridor to Steel Bridge Road Corridor Refinement Plan (page 5-3) outline reasons that the bypass alternatives were not advanced.

This response addresses or partially addresses comment K.

COMMENT: *I have had a booth at the Bonanza Antique mall for three years now and find it would be very hard to find another place with such a large volume of potential customers.*

ODOT Response: An interchange is proposed at the intersection of Grand Ronde Road and ORE 18. Due to the grade separation, the footprint of the interchange will have impacts to the surrounding area. The specific impacts will need to be identified as additional information is obtained as the project goes through the design process for each construction phase. ODOT will work with businesses and residences displaced by the project to identify

relocation opportunities within the study area. ODOT will provide relocation planning, advisory assistance, and payment for qualifying moving and related expenses.

This response addresses or partially addresses comment 3.

COMMENT: *Reduce impacts to Grand Ronde, avoid removing the Bonanza Antique Mall, and implement smaller improvements such as traffic signals, not a grade-separated interchange.*

ODOT Response: The project would be constructed over a twenty-year time period, during which time the commercial character of the Grand Ronde area is likely to evolve. Although some businesses at Grand Ronde may be displaced by the project, relocation services would be provided within the area. ODOT would minimize direct and indirect impacts to residents and businesses. The interchange at Grand Ronde would improve safety and connectivity between the residential area and the historic center at Grand Ronde, for all traffic but especially for pedestrians and bicyclists.

At the Grand Ronde/ORE 18 intersection, a signal was considered in place of a grade-separated interchange. The signal was found to be insufficient at addressing the congestion and accident issues at this intersection. Furthermore, analysis showed that installing traffic signals alone would worsen traffic congestion through the project. Adding traffic signals and travel lanes would not result in the highway capacity needed through the planning horizon.

This response addresses or partially addresses comments N, 3, 4, 5, 9, 10, 11, 12, 17, 28, 32, and 34.

Citizen Participation

Comments related to citizen participation are summarized below. See Appendix C for complete comments received on the EA.

COMMENT: *The public has not been included in the decisionmaking process.*

ODOT Response: ODOT held three open houses, one public hearing, and three focus group meetings to solicit feedback and ideas from the public about what issues and concerns to take into consideration for this project. Public input has helped shape the selected Preferred Alternative. As each construction phase of the project moves forward, additional opportunities will be provided for the public to be involved in the project development process.

This response addresses or partially addresses comments III, VIII, G, 16, 25, and 31.

COMMENT: *Meetings should not be held on tribal property.*

ODOT Response: ODOT and stakeholders involved in the project development process chose the location for the public meetings. Of the three public open houses, two were held at the Grand Ronde Elementary School and one was held at the Confederated Tribes of the Grand Ronde Community Center. The three focus group meetings were held at various businesses around the community. The Public Hearing was held at the Confederated Tribes of the Grand Ronde Community Center. Meeting locations are typically chosen to minimize travel for the public and to be in a location central to the project area.

This response addresses or partially addresses comments XI, 4, and 13.

COMMENT: *I particularly dislike the fact that the whole idea was formulated and planned without a vote.*

ODOT Response: Capital improvement highway projects are not typically voted on, unless they require an additional tax or other funding source. Funding for the projects that make up the Preferred Alternative, though not finalized, are planned to come from traditional state and federal funding sources.

This response addresses or partially addresses comments 6, 17, and 34.

Land Use and Zoning

Comments related to land use and zoning are summarized below. See Appendix C for complete comments received on the EA.

COMMENT: *ODOT and Polk County have applied a Limited Use Overlay (LUO) to the entire corridor. The LUO does not allow more than ten cars in or out of any new businesses until long-term improvements to the highway are completed. This severely limits commercial opportunities along the corridor.*

ODOT Response: County zoning ordinance policies are not analyzed as part of the EA or REA. The LUO is a Polk County zoning ordinance policy. It is a trip cap policy applied by the county to control new growth in the area by limiting the number of trips in and out of a property per day. This policy protects the corridor until the ODOT project to improve mobility and safety is approved or Polk County adopts the *Corridor Refinement Plan* for the area of ORE 18/ORE 22 between the H.B. Van Duzer Corridor to the west and Steel Bridge Road to the east. This restriction and resulting consideration of highway capacity is consistent with the Oregon Administrative Rule 660-022-0030(7) and 660-012-0060(1). If Polk County adopts the *H.B. Van Duzer Forest Corridor to Steel Bridge Road Corridor Refinement Plan*, which is discussed in the EA and REA, the LUO could be lifted and existing and new commercial, industrial and residential properties can develop within the framework of future adopted plans for the corridor.

This response addresses or partially addresses comments I, XI, 6, and 26.

COMMENT: *Not enough attention was paid to impacts on agricultural and forest land.*

ODOT Response: ODOT evaluated several alternatives before analyzing the Build Alternative in the EA, with the objective of identifying an alternative that minimized impacts to agricultural and forest lands as well as wetlands. Some of the alternatives considered but not advanced for analysis had greater impacts on agricultural and forest lands and were considered unacceptable for that reason (see the Alternatives Considered but not Advanced section, pages 55-56 of the EA). The *H.B. Van Duzer Forest Corridor – Steel Bridge Road EA* is a location assessment, looking at the broad, general plan for the corridor. The final design is not yet determined and specific impacts to individual properties are not known at this time. A Conditional Use Permit is required from Polk County for portions of the project that directly impact resource-zoned lands, such as Exclusive Farm Use and Farm Forest.

Polk County protects rural land by requiring conditional use permits. Before constructing the project, ODOT would enter into the process to secure these permits, thereby adhering to Polk County's protection measures. This permit would be acquired during the design stage, and before each project phase could be constructed.

ODOT will ensure access to farm fields from the public road system (for this project, the local access road) to ensure that existing farming practices can continue. If this is not possible, ODOT would acquire the property.

This response addresses or partially addresses comments II, III, 2, and 29.

COMMENT: *Consider the Hampton Lumber Company railroad right-of-way as a location for the frontage road east of Fort Hill Road. This would minimize impacts to farm and forest properties.*

ODOT Response: The idea of using the Hampton Lumber Company railroad right-of-way was discussed at several different planning and design meetings. Both ODOT and Polk County see industrial rail as a mode of transportation to be maintained rather than removed. In addition, the railroad bed is not wide enough to support the local access road and placing a road here could impact more wetlands. The local access road will be designed to minimize impacts to wetlands, including a federally funded wetland. As the project moves to final design, ODOT will explore options to design the local access road to minimize impacts to farm and forest land. The grade-separated interchange design at Fort Hill would take log truck traffic off the local access road, allowing for greater design flexibility.

This response addresses or partially addresses comments V, VI, and M.

COMMENT: *Our property has been zoned 'Commercial General,' although Polk County rezoned it to 'Rural Commercial.' We are concerned that the rezoning will affect our future livelihood.*

ODOT Response: Zoning is a county issue, not related to this environmental assessment.

This response addresses or partially addresses comment 16.

COMMENT: *Will the State access road from Fort Hill to Wallace Bridge legally create two parcels that were bifurcated by this road? If so, will this allow more dwellings and more traffic along this road? How will this interact with the parcels and residences already present? Will this affect property values? Is there sufficient infrastructure to accommodate further development in this area? Will high speed traffic along this access road lower property values?*

ODOT Response: The provisions of state law govern the process whereby parcels are legally created (ORS 92). The access road does not create parcels of land. The Fort Hill Road Interchange alternative eliminates the through traffic function for the access road east of Fort Hill Road and will only provide local property access. The extent of property impact is described in the Environmental Assessment. The proposed interchange locations and designs minimize impact to local land use, but impact cannot be completely avoided. Access roads provide access to adjacent property, making them available for development consistent with the provisions of the Polk County Comprehensive Plan. The net effect is likely an increase in property value through the planning horizon considered for this project, but such an increase in value will also be associated with an increase in demand resulting from increases in area population.

This response addresses portions of comment 29.

COMMENT: *The acreages reported in the land use section of the EA to be directly impacted by the Preferred Alternative would have significant impacts. The 12 acres zoned residential would affect these communities with the added impact of increased traffic and fragmentation of their neighborhoods. The 20 to 22 acres zoned commercial includes most of the commercial zoned land along this corridor. Access controls would detriment remaining commercial land. The 35 to 38 acres zoned farm/forest and farm/forest overlay makes up the most level land that exists in these parcels. This would indirectly affect the remaining parcels of this area there by limiting their usefulness. The 22 acres zoned exclusive farm use consists of large portions of high value farmland. Cutting up farmland with the interchanges and frontage roads will make it that much harder to compete, by making access to fields very difficult, and change drainage patterns. The 5 acres zoned industrial land would bisect several of the very few industrial parcels in these communities. This would complicate development for industrial businesses to compete.*

ODOT Response: The project will not result in significant impacts to farmland or other lands or make it more difficult to farm these lands. Some loss of agricultural land will be unavoidable in order to accomplish the purpose and need for the project (to reduce congestion and improve safety throughout this segment of ORE 18/ORE 22). Information will be further evaluated during project design to provide reasonable access.

The environmental assessment is a location assessment, looking at the broad, general plan for the corridor. The final design is not yet determined and specific impacts to individual properties are not known at this time. The conditional use permit required before the applicable construction phases can be constructed would be obtained by ODOT from Polk County. ODOT right-of-way agents would contact individual property owners as the project proceeds. Through the process of applying for the conditional use permit, ODOT and the property owner coordinate on farming practices.

Some of the alternatives considered but not advanced for analysis had greater impacts on agricultural and forest lands and were considered unacceptable for that reason. See EA, pages 55-66. In addition, Polk County protects rural land by requiring conditional use permits. Before constructing the project, ODOT will enter into the process to secure these permits, thereby adhering to the county protection measures. ODOT will ensure access to farm fields from the public road system to ensure that existing farming practices can continue. If this is not possible, ODOT would acquire the property.

This response addresses portions of comment 29.

COMMENT: *The Regional Problem Solving zoning process that is described in this proposal is now under legal proceedings to appeal its findings and is likely to be drastically revised if not completely removed. Without a revised zoning comprehensive plan, this document is not based on pertinent information as it now exists.*

ODOT Response: The land use section provided in the EA has been revised to show the land use designations adopted by Polk County. The RPS effort proposed several land use changes that were not adopted by Polk County.

This response addresses portions of comment 29.

Fort Hill Interchange

Comments related to the Fort Hill Interchange are summarized below. See Appendix C for complete comments received on the EA.

COMMENT: *There should be an overpass (grade-separated interchange) at Fort Hill. An interchange would increase the safety of moving vehicles within the interchange area and provides for the efficient movement of vehicular traffic. A surface grade intersection would not increase safety, or recognize the importance of maintaining efficient through movement of goods. The interchange should be located close to the restaurant and gas station.*

ODOT Response: An interchange is the preferred solution selected by ODOT to solve the existing safety problems in the Fort Hill area. The interchange will include an overcrossing of ORE 18. The interchange will be located as close as possible to the restaurant and gas station consistent with design geometry and ODOT access control standards.

This response addresses or partially addresses comments I, IV, 30, 31, and 32.

COMMENT: *The Tribe would support a land swap of EFU zoning for commercial zoning through RPS or other similar mechanisms.*

ODOT Response: Discussions are ongoing with citizen groups involving the possibility of an exchange of EFU land closer to the Valley Junction interchange to commercial, if there were an equal exchange of property in the area to be rezoned EFU. The County would be responsible for all decisions involving rezoning property.

This response addresses or partially addresses comment 25.

COMMENT: *An interchange at Fort Hill is an extreme option that would impact the existing buildings and businesses that are independently owned/operated.*

ODOT Response: The interchange selected by ODOT will be located east of the existing Fort Hill intersection. Businesses located at the existing intersection would not be directly impacted by the new interchange. The project design team considered future traffic levels and the requirement to implement the Oregon Highway Plan adopted by the Oregon Transportation Commission. The team studied many design alternatives and it considered the interchange the safest and most cost effective solution, with the least impacts to the natural and human environment.

This response addresses or partially addresses comments B, 4 and 21.

COMMENT: *Access should be provided to the businesses at Fort Hill Road.*

ODOT Response: The interchange will provide reasonable access to properties on each side of ORE 18. Safe left turns from or onto ORE 18 without an interchange would become increasingly more difficult. The state Department of Justice (DOJ) has determined that the proposed design has met the state's legal obligation to provide reasonable access to the gas station and restaurant.

This response addresses or partially addresses comments H and 33.

COMMENT: *The weigh station would be better off moved to where there is better clearance for the trucks.*

ODOT Response: The location of the weigh station will be restudied in the design phase and relocated if necessary to ensure public safety.

This response addresses or partially addresses comment 4.

COMMENT: *Closing off access from Yamhill River Road to Fort Hill Road would turn this area into a dead end, causing potential concerns over vandalism.*

ODOT Response: As the project develops, an access management sub-team will be formed to look into access issues, in coordination with property owners. Concerns like this will be discussed and potential solutions will be evaluated at the design stage of each construction project as it advances.

This response addresses or partially addresses comment C.

COMMENT: *Concerned about high speed traffic using the access road.*

ODOT Response: The volume of traffic along the access road is expected to be low, as it serves only local residences. Speed on the access road would be controlled by Polk County.

This response addresses or partially addresses comment 29.

COMMENT: *Concern that the access road from Fort Hill to Wallace Bridge would bisect parcels, allowing more dwellings and traffic along the road. Further concern about how additional dwellings and traffic would interact with existing parcels and residences.*

ODOT Response: Polk County will be responsible for addressing zoning, parcel size, and development codes for parcels along the access road. Property rights are not impacted by the proposed action. The County has the authority to restrict development in the public interest. ODOT expects to request Polk Co. to restrict further development in the area around the interchange. Polk County has indicated a willingness to do so. Therefore there is no anticipated impact on existing residences by further development. Property values are expected to be maintained or enhanced by the safer access afforded by the interchange.

This response addresses or partially addresses comment 29.

Traffic Safety

Comments related to traffic safety are summarized below. See Appendix C for complete comments received on the EA.

COMMENT: *All crash types for which statistics are reported to ODOT occur more frequently east of the project area than within it.*

ODOT Response: ODOT's Safety Improvement Program (SIP) analyzes highway safety by categorizing segments of all state highways for the number of fatalities and severity of injuries. Highway sections in a SIP Category One have the best history of such crashes, while a highway section in a SIP Category Five has the worst history. The ORE 18/Fort Hill Road Intersection project and the ORE 18 passing lane project are identified in the "Evaluation of the 2002-2005 STIP-SIP Program" as projects in SIP Category 5 highway sections.

Traffic safety is a significant issue for the entire length of ORE 18. There are several ways to analyze crash information. The presentation made at the public hearing compared the number of crashes by roadway section irrespective of the length of that section. The following table evaluates the number of crashes per mile in each area. Other approaches could evaluate crashes based upon the volume of traffic through each section; the number of intersections, or other factors.

CRASHES PER MILE, ORE 18, JANUARY 1, 1991-DECEMBER 31, 2001

	Area A (Project Area) 9.42 miles	Area B (West of Project) 18.42 miles	Area C (East of Project) 23.16 miles
Total Crashes/Mile	31	23.4	25.04
Fatalities/Mile	1.91	1.19	1.81
Rear-End Crashes/Mile	8.92	6.13	7.17
Turning Crashes/Mile	4.99	2.28	4.4
Truck Crashes/Mile	2.34	1.47	1.6
Angle Crashes/Mile	0.53	0.11	3.84
Head-on Crashes/Mile	1.27	1	0.82
Sideswipe Crashes/Mile	1.59	1.41	1.3
Intersection Crashes/Mile	4.03	1.57	10.1

As shown in this table, Area A, the project area, has more crashes per mile than the other studied segments for the following categories: total crashes, fatalities, rear-ends, turning, trucks, head-on, and sideswipes. Area C, ORE 18 east of the project section, has more crashes per mile for angle crashes and intersection crashes. Area B, west of the Van Duzer to Steel Bridge Road Area, does not have more crashes than Area A for any crash category.

This response addresses or partially addresses comments III, 22, and 23.

COMMENT: *A rural expressway will exacerbate the traffic safety problems that already exist elsewhere on ORE 18.*

ODOT Response: The Oregon Transportation Commission designated the highway as an expressway in 2001. This designation did not change traffic safety conditions on ORE 18. The designation established design standards for the highway that, as funding becomes available, will improve traffic safety on the entire length of ORE 18. Traffic safety conditions are improved through several processes. Improving the highway is one of these, but driver education, enforcement, and improvements in vehicle technology are important variables as well.

This response addresses or partially addresses comment III.

COMMENT: *The no-build alternative is the only reasonable alternative;*

ODOT Response: The No Build Alternative would result in a highway section similar to the existing conditions. The existing highway operates at or near capacity during the design hour, exceeding the 1999 Oregon Highway Plan mobility standard for Statewide Highways. The existing condition would not provide sufficient capacity to meet the highway mobility standard through the planning horizon (20 years).

COMMENT: *There are low-cost solutions available, such as:*

a) *change the eastbound exit to the Casino to a merge lane controlled with a traffic signal during peak traffic periods, similar to freeway entrances in Portland;*

ODOT Response: While this could regulate the number of vehicles entering ORE 18 eastbound, it does not add capacity to the highway needed through the 20-year planning horizon.

This response addresses or partially addresses comments III and 36.

b) *Add electronic reader boards west and east of the Casino to warn of traffic slowing ahead;*

ODOT Response: The stated purpose and need for the project is to increase safety and decrease congestion through the project section (Environmental Assessment, p4). Reader boards would notify the driver of traffic conditions, but they would not result in additional highway capacity needed in the project section. Traffic analysis accomplished for the project shows that additional highway capacity (travel lanes) is needed if the project section is going to avoid high congestion problems and operate as called for in the 1999 Oregon Highway Plan.

This response addresses or partially addresses comment III.

c) *Install a traffic signal at the ORE 18/ORE 22 intersection that is a flashing yellow and uses sensors on ORE 22 to trigger the traffic signal only when traffic on ORE 22 warrants it.*

ODOT Response: Installing traffic signals was analyzed during preparation of the Environmental Assessment, but rejected as a suitable alternative by the Steering Committee, the Technical Advisory Committee, and the project development team. Reasons for this decision are provided on page 56 of the Environmental Assessment. Analysis showed that installing traffic signals alone would worsen traffic congestion through the project. Adding traffic signals and travel lanes would not result in the highway capacity needed through the planning horizon.

This response addresses or partially addresses comments III, VIII, and 36.

COMMENT: *The Casino has brought higher traffic to the area, and increase safety concerns because of drivers unfamiliar with the area attempting to navigate from the highway to the Casino.*

ODOT Response: Part of the selected alternative for the project includes a new interchange located between the casino and ORE 22 to replace the existing interchange at the casino.

This response addresses or partially addresses comment VIII.

COMMENT: *What is planned for the A.R. Ford intersection?*

ODOT Response: A.R. Ford will be an at-grade intersection.

This response addresses or partially addresses comment 16.

COMMENT: *On the west end of the project there is no provision for people who need to turn around.*

ODOT Response: The far-west end is the transition (taper from five-lane to two-lane) section that is about 1,969 feet in length and there are no plans to build a U-turn in this section at this time. Details for where vehicles can turn around will be decided during the design phase.

This response addresses or partially addresses comments VIII and X.

COMMENT: *The problem would be eliminated if the “interchange” occurred at the casino, where the back-ups are started. Have the casino pay for their addition to traffic on this Hwy.*

ODOT Response: The proposed Valley Junction interchange connects ORE 22 (Three Rivers Highway) and all access to the casino location at one interchange to ORE 18. The design for ORE 18 includes four travel lanes east of A.R. Ford Road, including this location. The Confederated Tribes of the Grand Ronde have a formal agreement with the state of Oregon to provide funding for this construction. However, additional travel lanes west of the casino will be needed to alleviate traffic congestion that results from travel between the Oregon coast and the Willamette Valley.

This response addresses or partially addresses comment 2.

COMMENT: *How much longer would it take for emergency vehicles to reach homes along the inner portions of access roads?*

ODOT Response: Service roads could add to the distance that emergency vehicles need to travel, but by improving the operations of the facility emergency providers should be able to travel through the corridor more easily. In the Fort Hill area, an eastern connection to ORE 18 will be provided for emergency vehicles to access the area. Through project design stages for each construction phase, emergency vehicle access will be evaluated in more detail once the access management subteam has been formed.

This response addresses or partially addresses comment L.

COMMENT: *It appears that the project is being built for people living outside the area so they can reach destinations such as the Casino and the Coast more quickly, and the cost of this approach is the small communities through which this project is traversing.*

ODOT Response: Making improvements in this section of the highway will reduce the existing turning conflicts. It is not expected that speed will increase over current levels. Interchanges will help with traffic flow, allowing all travelers to get where they want in a safer and more efficient manner.

This response addresses or partially addresses comment 29.

COMMENT: *Other locations along the corridor have much higher traffic and safety concerns. The intersection at Grand Ronde is a breeze in comparison as there are lanes and room for lane changes.*

ODOT Response: Traffic safety in the project area, and in particular at the intersection with Grand Ronde, is a growing problem. There have been significant crashes in the Grand Ronde/ORE 18 intersection area, including at least one fatality.

This response addresses or partially addresses comment 18.

COMMENT: *Real traffic problems are west of the Casino and east of Fort Hill.*

ODOT Response: The area west of the Casino has been experiencing both crash and operational problems. There is significant crash history at the Grand Ronde/ORE 18 intersection and operationally, a signal at this location will not address the traffic issues.

This response addresses or partially addresses comment 22.

Natural Resources

Comments related to natural resources are summarized below. See Appendix C for complete comments received on the EA.

COMMENT: *The frontage roads should not avoid wetlands to the extent that it cuts through peoples' homes instead.*

ODOT Response: Federal and state wetland regulations require that wetland impacts must first be avoided and/or minimized before compensated. Alternative sites for the local access road along the highway were considered to meet the federal and state avoidance/minimization regulations for wetlands. Alternatives for other elements of the project (e.g., addition of travel lanes) were not considered since they occur along an existing transportation facility. Impact to personal property resulting from construction of such elements directly connected to the existing highway would be minimal when compared to building a new route on lands located north and south of the existing state highway.

The Fort Hill Interchange will allow the access road extending further east to be constructed only for local traffic. The road will have less impact than it would have had as a truck route between Fort Hill and the ORE 18/ORE 22 interchange.

This response addresses or partially addresses comments VI and 21.

COMMENT: *No thought has been given to the wildlife in this area at all. The deer are being killed on the highways when they try to cross over ORE 18 for water.*

ODOT Response: Opportunities to remove existing fish and wildlife crossing blockages will be investigated during the design stage of individual project phases.

This response addresses or partially addresses comment IX.

COMMENT: *Bald eagles are not uncommon in this project area. In past years, I've seen several in the Wallace Bridge area near the east end of the project area. They have also been seen from my residence at Valley Junction several times. This year, I saw one in May and another in July, both in/near Valley Junction south of ORE 18. I've seen no evidence of nesting, in the area and doubt that they would be adversely impacted by this project.*

ODOT Response: ODOT will be in coordination with USFWS as each individual construction phase moves into the design stage, to avoid, minimize, or mitigate impacts to plant and animal species in the project area, including bald eagles. Biological assessments and consultation with USFWS may be warranted for one or more of the construction project phases. This will be known as each construction phase advances to the design stage when more details about exact road footprints are known.

This response addresses or partially addresses comment 2.

COMMENT: *To decrease congestion and improve safety may be a favorable aspect of the plan but it will be at the expense of the local businesses, farmland and our natural resources (deer, elk habitat and their migration patterns), wetlands, plant life and water quality and clear air in this community.*

ODOT Response: ODOT will avoid and minimize impacts to streams, riparian zones, floodplains, wildlife/rare plant species, wildlife habitat, and wetlands by project elements including interchanges, highway widening, and local access roads. The project footprints will be minimized to be consistent with the Purpose and Need of the project in addition to meeting applicable design and safety standards. Project elements will be located to avoid sensitive or irreplaceable habitats to the extent practicable, and as is feasible from a roadway design standpoint.

This response addresses or partially addresses comment 13.

COMMENT: *Water Quality issues were not addressed in the EA.*

ODOT Response: ODOT will develop a Stormwater Management Plan once preliminary design is begun on each individual construction phase of the project. Engineered stormwater treatment facilities have maintenance and operation recommendations and requirements developed following project Approved Design, after the EA/REA has been completed. These include the type of maintenance needed and normal schedules. Nonengineered facilities can, if appropriate, be designated as special management areas with associated maintenance guidance. Nonengineered facilities typically require only some vegetation maintenance.

To the extent allowed by project design and local conditions, treatment for stormwater will be provided by filtration through vegetation, either in vegetated swales or filter strips. Where that form of treatment is not possible, detention facilities may be used. Vegetated swales, whether engineered or not, depend primarily on trapping of contaminated sediments by vegetation, with a smaller percentage of the water subject to infiltration into the soil, with subsequent filtration and chemical bonding of pollutants. Detention facilities function primarily by allowing the deposition of sediments. By using permeable beds, some infiltration also occurs. Detention facilities can incorporate vegetation, but they are subject to periodic disruption by maintenance activities necessary to maintain the effectiveness of the facility.

This response addresses or partially addresses comment IV.

Historic Resources

Comments related to historic resources are summarized below. See Appendix C for complete comments received on the EA.

COMMENT: *Several individuals commenting on the EA were concerned about the impact of the Build Alternative on the cultural and historic resources in the vicinity of Grand Ronde.*

ODOT Response: A professional Cultural Resources Specialist visited the project area and identified all buildings and historic resources that are 50 years old or older. Relevant state, regional, and local inventories of historic buildings and resources, as well as maps, photographs, and other archival materials, were reviewed, in accordance with the National Historic Preservation Act of 1966 (16 U.S.C. 470f), Section 106. The cultural resources specialist reviewed the project under the criteria and procedures outlined in 36 C.F.R. 800 and prepared a Cultural Resources Report in October of 1999. The report was reviewed and approved by a cultural resources specialist at ODOT and the environmental coordinator at FHWA and sent to the Oregon SHPO for review.

Based on both field visits and subsequent archival records review, none of the identified resources within the project area of potential effect appears to meet the criteria for eligibility to the National Register of Historic Places (36 C.F.R. 60.4; see also the National Register Bulletin 16). Two resources have been included in the Polk County Inventory and of these, only the H.B. Van Duzer Forest Corridor was considered significant.

The four commercial buildings located at the intersection of Grand Ronde Road and ORE 18 are of local historic interest through their association to the community's early development. However, each of these sites has been significantly altered from its historic design and none retains sufficient integrity to relate its original role in the development of the community. Other structures located outside the project area of potential effect, including the Grand Ronde Bank, the Grand Ronde Depot, and the Grand Ronde Hotel, retain both strong association with the development of "New Grand Ronde" and a high degree of integrity with their original design. These structures will not be directly impacted by the project.

This response addresses or partially addresses comments I, 5, 11, 14, 18, 19, 26, and 27.

Valley Junction Interchange

Comments related to the Valley Junction interchange are summarized below. See Appendix C for complete comments received on the EA.

COMMENT: *At Valley Junction, instead of keeping eastbound ORE 22 traffic heading east onto ORE 18, it would be sent west into Casino cross traffic.*

ODOT Response: The current conceptual design of the interchange to be built at ORE 18 and ORE 22 is a standard jughandle style interchange that will accommodate all movements to and from ORE 22 to ORE 18.

This response addresses or partially addresses comment I.

COMMENT: *At Valley Junction, why is ORE 22 from the ramp where it rejoins ORE 18 to the dead end at the Casino front door, why is that considered part of ORE 22? It seems to me that's an access road. ORE 22 coming from Tillamook crosses ORE 18 and rejoins ORE 18 at Valley Junction. From then on it's an access road, or it should be, and it crosses two properties prior to getting to the property. Why doesn't it service those two properties as well as a third property that we've arrived at?*

ODOT Response: Currently ORE 22 ends at a “T” intersection with ORE 18. There is also the existing casino interchange that will be removed. The current interchange concept will be located between the existing casino interchange and ORE 22. There were other interchange concepts studied for this location. From a traffic standpoint, it made sense to remove the existing casino interchange and locate a new one between the existing casino interchange and ORE 22. The issue of approaches to properties will need to be addressed in the interchange area management plan to determine the best locations for approaches.

This response addresses or partially addresses comment II.

COMMENT: *Why does the Build Alternative make no effort to permit the safe use of slow moving agriculture and forest machinery?*

ODOT Response: The shoulder will be 8 feet wide with two lanes in each direction. This design width was chosen because it is adequate for slow-moving vehicles and agricultural machinery.

This response addresses or partially addresses comment 2.

COMMENT: *The preferred option calls for a new ORE 18/ORE 22 interchange approximately 820 feet west of Valley Junction. We believe that the majority of the eastbound ORE 22 traffic will continue east on ORE 18 rather than doubling back to the Casino. It is essential that this eastbound movement from ORE 22 to ORE 18 should be free flowing. Ideally, traffic from westbound ORE 18 to the Casino would also be free flowing.*

ODOT Response: The purpose of the interchange to be built at ORE 22 and ORE 18 is to handle the traffic to and from these two highways. The interchange also would handle the traffic that currently is served by the existing casino interchange. The existing casino interchange is being removed as part of the project. The configuration of the new interchange is intended to address the projected traffic movement while minimizing the impacts to the surrounding area. The configuration of the interchange ramps is based on traffic needs.

This response addresses or partially addresses comment 25.

COMMENT: *Consideration should be given to locating the south side jughandle on the west side of the overcrossing thereby eliminating the left hand turning movement for east bound traffic from ORE 22 to ORE 18.*

ODOT Response: The interchange configuration and location of ramps take into account the demand for specific turning movements. With right-hand turns being an easier movement than left-hand turns, the interchange ramps have been conceptually designed to make the large turning movements right-hand turns. In addition, limiting impacts to the area was considered, and will continue to be evaluated as the construction phase moves into final design.

This response addresses or partially addresses comment 25.

COMMENT: *The overcrossing as shown touches down on a side street east of the casino, requiring patrons to the casino to make two additional turning movements before entering the casino’s road network.*

ODOT Response: Details related to the exact touch-down point of the interchange ramps will be decided when this construction phase goes through more development in design.

This response addresses or partially addresses comment 25.

COMMENT: *We are concerned that westbound ORE 18 patrons having inadvertently missed the turnoff at Valley Junction will create a conflict at the Grand Ronde Road interchange as they attempt to double back, only to find that they have to again pass the casino heading east before they are directed to the casino via the South East ramp at Valley Junction. Worse yet, they may try to cross the highway median in a frustrated attempt to get into the casino.*

ODOT Response: Travelers will not be able to cross the median, which will include a concrete barrier. As for missing the exit, details such as signing would need to be determined during the design stage.

This response addresses or partially addresses comment 25.

COMMENT: *I dislike the design of the Valley Junction interchange. Vehicular traffic transferring/traveling from ORE 18 to 22 or ORE 22 to 18 should be the primary concern.*

ODOT Response: The purpose of the interchange at ORE 22 and ORE 18 is to handle the traffic to and from these two highways, and also to handle the traffic that is currently served at the existing casino interchange. The existing casino interchange is being removed as part of the project. The configuration of the new interchange in that area is intended to address the projected traffic movement of all vehicles while minimizing the impacts to the surrounding area. The configuration of the interchange ramps is based on the traffic needs.

This response addresses or partially addresses comment 31.

COMMENT: *We need a safe interchange at Valley Junction. Almost all traffic bottlenecks east of the Casino.*

ODOT Response: The interchange at Valley Junction is part of the proposed solution for the area. It is intended to address safety and operational issues for the entire corridor.

This response addresses or partially addresses comments 9, 14, 27, and 28.

Inaccuracies

The following section summarizes and provides a response to comments received related to perceived or actual inaccuracies in the EA. See Appendix C for complete comments received on the EA.

COMMENT: *There is no "Large Gambrel Roof Barn" at MP 23.20 ORE 18, though one is listed on page 205 of the EA.*

ODOT Response: An ODOT historian visited the site of MP 23.20 of ORE 18 in June 2004 and verified the presence of the Large Gambrel Roof Barn. Further evaluations will be completed for all potentially impacted properties as each construction phase reaches the final design stage.

This response addresses or partially addresses comment 2.

COMMENT: *The property description for Site 23 is listed as an 'Abandoned Structure with Parking Area.' Property 24 is also described as an 'Abandoned structure.' These properties are absolutely not abandoned!*

ODOT Response: This comment has been noted and the EA has been corrected.

This response addresses or partially addresses comment 26.

Expressway Designation

Comments related to the Expressway designation of ORE 18 are summarized below. See Appendix C for complete comments received on the EA.

COMMENT: *A rural expressway will exacerbate the traffic safety problems that already exist elsewhere on ORE 18.*

ODOT Response: The Oregon Transportation Commission designated the highway as an Expressway in 2001. This designation did not change traffic safety conditions on ORE 18. The designation established design standards for the highway that, as funding becomes available, will improve traffic safety on the entire length of ORE 18. Traffic safety conditions are improved through several processes. Improving the highway is one of these, but driver education, enforcement, and improvements in vehicle technology are important variables as well.

This response addresses or partially addresses comments I, III, 16, and 17.

More Study Needed

Comments related to the need for more study are summarized below. See Appendix C for complete comments received on the EA.

COMMENT: *Concern that all the possible impacts may not have been fully considered. Look at all angles—no matter how small because this will impact the region for decades.*

ODOT Response: The purpose of this locational EA is to broadly identify long-term transportation improvements along the study corridor. Once individual construction phases of the project are in the design stage, ODOT will work with the affected communities to reduce impacts.

This response addresses or partially addresses comments IV and 19.

COMMENT: *I feel like the whole project needs more study.*

ODOT Response: The project would be constructed in phases over a 20-year period as funding becomes available. During that time, businesses will most likely change and development will most likely occur. Although some businesses at Grand Ronde, Valley Junction, and Fort Hill may be displaced by the project, they may relocate in the vicinity. Other businesses may be established. The tax revenues may increase, decrease, or remain close to what they are currently. The location of community centers may shift as the interchanges are constructed. The connections between the north and south parts of the communities would be safer because people could use the overpass of the interchanges rather than trying to cross Oregon 18/22. The communities could remain largely rural in character, depending on land use changes, which are under the jurisdiction of Polk County.

This response addresses or partially addresses comments IV, 21, and 32.

COMMENT: *The four-lane limited access ORE 18 which is proposed will be extremely adverse to the surrounding residents. This proposal will affect them in many ways that this study did not examine. Why does ODOT believe that this Environmental Assessment is thorough enough to weigh the impacts when it does not consider many aspects of this proposal's impacts? This Environmental Assessment of this proposal has been very superficial and shortsighted and has not completed the assignment of assesses the impacts of this proposal. A thorough Environmental Impact Statement needs to be prepared and presented.*

ODOT Response: The purpose of this locational EA is to broadly identify long-term transportation improvements along the study corridor. Once individual projects are in the design stage, further environmental analysis will be conducted and ODOT will continue to work with the affected communities to minimize impacts from the project.

This response addresses or partially addresses comment 29.

Aesthetics

Comments related to aesthetics are summarized below. See Appendix C for complete comments received on the EA.

COMMENT: *By designating this highway as an expressway it is actually destroying the beauty of Oregon by creating these roads and express highways that just moves them rapidly down through the highway. So people want to see and enjoy Oregon, but yet at the same time they are destroying Oregon in order to see and enjoy it.*

ODOT Response: The Oregon Forest Practices Act (ORS 527.755) designates ORE 18 and ORE 22 as Scenic Highways. The purpose of the Scenic Highway designation is to maintain roadside trees for the enjoyment of the motoring public while traveling through forestland. The act also applies to project activities outside the 150-foot buffer along each side of the highways created by the scenic designation (EA, page 161). ODOT will work with the Oregon Department of Forestry to ensure compliance during development of individual construction phases of the project. Also see EA, pages 204-205 and pages 262-263, and this REA, Land Use Findings of Consistency with State and Local Plans section, for measures to offset visual impacts resulting from the project.

This response addresses or partially addresses comments IX and 13.

Flooding

Comments related to flooding are summarized below. See Appendix C for complete comments received on the EA.

COMMENT: *At least one proposed frontage road goes across a natural high water relief channel. Suggestion to widen the shoulder and allow direct access from driveway to highway with right-in, right-out movement.*

ODOT Response: Flood-prone areas exist along the South Yamhill and Little Rogue Rivers, and Rock, Rowell, Gold, and Cosper Creeks (Figure 25, page 173 of the EA, and page 215 of the EA). Impacts to these areas pertaining to flooding potential will be assessed and

addressed as the construction projects are designed, and the appropriate agencies will be consulted about mitigation and/or design measures.

This response addresses or partially addresses comment X.

COMMENT: *Highway water runs off onto certain properties every year, causing flooding which is not acceptable. How would this project impact, address this issue?*

ODOT Response: ODOT realizes that water quality is a concern in the project area. ODOT will develop a Stormwater Management Plan once preliminary design is begun for each construction phase of the project which will address stormwater treatment. Erosion and sediment control plans will also be developed which will meet the requirements of the NPDES 1200-CA permit.

This response addresses or partially addresses comment G.

Noise

Comments related to noise are summarized below. See Appendix C for complete comments received on the EA.

COMMENT: *A sound barrier will be needed near the intersection of ORE 18 with Fort Hill Road.*

ODOT Response: Noise measurements were taken on July 21, 1999. The measured noise levels in this area indicate that the residence in this area may be noise impacted. ODOT will evaluate the cost effectiveness of recommending noise mitigation for the residence in this area. Typically, noise mitigation for one residence is seldom cost-effective. It is unlikely that cost-effective noise mitigation can be provided for one residence.

This response addresses or partially addresses comment A.

Hazardous Materials

Comments related to hazardous materials are summarized below. See Appendix C for complete comments received on the EA.

COMMENT: *The Chevron Station listed was closed in 1969. DEQ has no listing on this property because the USTs (underground storage tanks) were decommissioned before DEQ came into existence. The USTs were decommissioned properly within all applicable laws of the land in place at the time. The permits were issued in 1974 by Polk County and the work inspected and approved by Polk County and State Fire Marshall, which was to the proper letter of the law at the time! This issue was revisited by Oregon State Courts in 1997 during Bankruptcy Proceeding involving past owner Charlie Cherry and found not polluted by the courts, prior to my purchase of the property.*

ODOT Response: The EA states that the DEQ has no information regarding this property, but that property records show that a Chevron gasoline service station was formerly located at this property. The EA stated a concern for residual soil and groundwater contamination from the former gasoline service station. Based on the absence of information, this concern remains valid.

The USTs were reportedly decommissioned in 1974. It is not known if 'decommissioning' means that the tanks were physically removed from the subsurface or if the tanks were opened and filled with an inert substance. Decommissioning USTs in 1974 did not require

the collection of any soil or groundwater samples. Therefore, it is unlikely that any soil or groundwater samples were collected at that time to document the presence or absence of petroleum hydrocarbons in the subsurface.

Further investigations are needed for all identified hazardous materials sites in the project area to determine the extent of any soil or groundwater contamination. Also, see Hazardous Materials under Summary of Mitigation and Conservation Measures in this REA.

This response addresses or partially addresses comment I.

Response to Agency Comments and Comments from Tribal Governments

Appendix E includes letters received from Resource Agencies on the EA. Summarized responses to these comments are as follows:

Department of Land Conservation and Development (Comment 15)

Land Use Zoning

COMMENT: *How does Polk County intend to implement their acknowledged plan and zoning provisions adopted pursuant to the Transportation Planning Rule?*

ODOT Response: Oregon law allows counties to permit certain transportation uses listed in Oregon law and in Oregon Administrative Rule 660-012-065 through a conditional use permit procedure. Polk County has amended its land use regulations to provide for these uses. All of the improvements called for in the Preferred Alternative can be permitted through this procedure. However, ODOT has been informed that Polk County also intends to amend its Transportation System Plan and Comprehensive Plan to include ODOT's Preferred Alternative (i.e., this project).

COMMENT: *Provide more detailed zoning for the Fort Hill to Steel Bridge section given that further stage of development.*

ODOT Response: The Land Use Zoning section of the EA has been updated and included in the REA. This section provides zoning information for the project area. In addition, the Land Use Findings section of the REA addresses project impacts to resource zones.

United States Fish and Wildlife Service (Comment 37)

United States Department of the Interior (Comment 39)

General Comments

COMMENT: *The EA may be mixing elements of a location refinement pre-State Transportation Improvement Plan (STIP) phase of project planning with proposed alternatives that are more commensurate with a construction post-STIP EA or EIS.*

ODOT Response: The intent of the location EA is to broadly identify and estimate the potential environmental impacts in relation to a set of future projects based on conceptual-level design. Preliminary design is typically not included in a location EA, and was not included in this EA. The individual construction phases of the project comprising the Preferred Alternative will follow different timelines for project development depending on project need and available construction funding. Potential environmental impacts resulting from these specific projects will be identified and addressed as each specific project is advanced through the process of development and design.

COMMENT: *The Build Alternative appears to add infrastructure beyond that needed to accomplish the desired safety standards and velocity/capacity ratios.*

ODOT Response: The proposed infrastructure improvements included in the Build Alternative were developed based on traffic analysis of existing and forecasted future traffic conditions. Results of this traffic analysis were described in two sections of the EA. The project Purpose and Need section provides an overview of volume-to-capacity (v/c) ratios at key locations along ORE 18 (see Table 1 on pg. 9 of the EA) and the Transportation Analysis section provides current and forecasted v/c ratios within the project area (see pages 103-112 of the EA). Several intersections and sections of ORE 18 currently exceed maximum acceptable volume-to-capacity ratio standards as defined in the Oregon Highway Plan, and additional exceedances are expected by the 2008 forecast year.

Coordination with Other Agencies

COMMENT: *Recommend that ODOT prepare a general plan outlining how the agency will comply with the Migratory Bird Treaty Act, and determine opportunities to remove potential fish passage barriers, enhance wetlands, enhance riparian stream habitat, install wildlife crossings, and prepare compensatory mitigation alternatives.*

ODOT Response: ODOT will coordinate with appropriate local, state, and federal agencies during the design of each construction phase of the project to identify and incorporate elements that avoid, minimize, and/or mitigate the direct and indirect effects, as required for compliance with applicable local, state and federal regulations. ODOT will incorporate the following general measures, as appropriate and to the extent practicable, for each construction phase of the project:

- ODOT will avoid and minimize impacts to streams, riparian zones, floodplains, wildlife/rare plant species, wildlife habitat, and wetlands by project elements including interchanges, highway widening and frontage roads. The project footprints will be minimized to be consistent with the Purpose and Need of the location-level EA/REA in addition to meeting applicable design and safety standards. Project elements will be located to avoid sensitive or irreplaceable habitats to the extent practicable, and as is feasible from a roadway design standpoint.
- To the extent practicable, bridge crossings over streams will fully bridge the bankfull width of their respective channel. Bridge/culvert replacements will be designed to the extent feasible to allow for wildlife passage. Opportunities to remove existing fish and wildlife crossing blockages will be investigated.
- ODOT will develop erosion and sediment control plans that meet the requirements of the NPDES 1200-CA permit for discharge of stormwater from construction. Stormwater treatment will be provided where topography and other constraints allow. To the extent allowed by project design and local conditions, treatment will be provided by filtration through vegetation. As a condition of this permit, sediment from disturbed areas or tracked by vehicles onto pavement would not be permitted to leave the sites or enter waters of the State.
- ODOT will design construction and post-construction stormwater treatments to meet pre-project water quality, hydrology, and seasonality, with a preference for upland stormwater treatment sites.

- Mitigation for project-related impacts will be commensurate with the area and severity of the impact. Mitigation for habitat impacts will be measured by the ecological value lost as a result of the project impact.
- Compensatory wetland mitigation actions will be implemented in advance of or within the same year of project-related construction activities. Mitigation actions may include but are not necessarily limited to restoring, creating, or enhancing wetlands. Opportunities for establishment of a wetland mitigation bank, or use of an existing wetland bank, will be investigated.

Water Quality

COMMENT: *The water quality discussion does not adequately consider stormwater and floodplain issues.*

ODOT Response: ODOT will develop a Stormwater Management Plan once preliminary design is begun on each individual construction project. Engineered stormwater treatment facilities have maintenance and operation recommendations and requirements developed following project Approved Design. These include the type of maintenance needed and normal schedules. Non-engineered facilities can, if appropriate, be designated as special management areas with associated maintenance guidance. Non-engineered facilities typically require only some vegetation maintenance.

Erosion and sediment control plans will be developed after the preliminary design of each individual project is completed. These plans will meet the requirements of the NPDES 1200-CA permit for discharge of stormwater from construction sites. The actual techniques used to prevent erosion and control sediment are site specific and depend on the local topography, soils, proximity to water bodies, and right of way available. Typical techniques include, but are not limited to, diverting runoff from entering disturbed areas and use of temporary ground cover (mulch or erosion control fabric) on disturbed ground, maintaining vegetated buffers, silt fencing, and temporary settling ponds. As noted in the Draft EA, the erosion and sediment control plans are completed prior to the beginning of construction. The NPDES 1200-CA permit requires periodic inspection of erosion and sediment control facilities during construction to ensure that they are maintained and functioning as intended. Because on-the-ground conditions may vary from what was anticipated during erosion and sediment control plan development, alterations to the plans would be made at the direction of or with the concurrence of the project engineer.

Water quality treatment facilities are described in the Water Quality Design Concept Report for the location-level Build Alternative in July 2000 and will be further described/developed in each construction project's plans and for that project phase. Following design of water quality treatment facilities, a Water Quality Design Report will be prepared.

Treatment of stormwater for water quality is usually provided by one or more techniques. To the extent allowed by project design and local conditions, treatment will be provided by filtration through vegetation, either in vegetated swales or filter strips. Where that form of treatment is not possible, detention facilities may be used. Vegetated swales, whether engineered or not, depend primarily on trapping of contaminated sediments by vegetation, with a smaller percentage of the water subject to infiltration into the soil, with subsequent filtration and chemical bonding of pollutants. Detention facilities function primarily by

allowing the deposition of sediments. By using permeable beds, some infiltration also occurs. Detention facilities can incorporate vegetation, but they are subject to periodic disruption by maintenance activities necessary to maintain the effectiveness of the facility.

Detention facilities can be designed to maintain peak flows at pre-project conditions for up to a given storm size, though doing so increases the footprint of the basin. Storm flow detention facilities can do the same thing, but again their footprint may be large. Depending on the location and local land cover, these facilities may actually do more harm than good. Additional mitigation for hydrologic impacts may be a secondary benefit of actions such as wetland mitigation.

As described in the EA, stormwater treatment will prevent an increase in net pollutant loading to the receiving waters. Because phosphorus is a TMDL pollutant for the project corridor's main receiving water, treatment options will address that specifically. This would meet any water quality requirements. It is expected that stormwater treatment facilities will be designed to treat 140% the area of new impervious surface. Due to a variety of constraints, such as topography and other sensitive resources (T&E species, archaeological sites, historic properties, high quality wetlands), it may not be possible to provide treatment at all locations along a project, but "over-compensation" at other locations is then used at other sites to achieve the overall project goal.

The placement of water quality treatment facilities and storm flow detention facilities is entirely dependent on topography and the location of other constraints, such as regulated resources. Frequently these facilities are placed adjacent to the roadway, especially filter strips and vegetated swales, but at other locations they may need to be placed away from the highway. As mentioned above, some places may not be at all suitable for treatment. At other sites, the need for treatment may exceed the desire to not disturbed undegraded uplands, though degraded uplands would be preferable if suitably situated. In most situations, the presence of wetlands or other waters would preclude the placement of a stormwater treatment facility. If impacts are absolutely necessary, they would be permitted as part of the total impact for the project, and mitigation provided as required. There is no regulatory or statutory requirement to provide mitigation for impacts to uplands that do not involve impacts to other regulated resources.

ODOT will encourage the use of recyclable or degradable on-site erosion control materials. Hazardous material spill containment and notification plans will be included in the Pollution Control Plan. This will be developed by the contractor prior to construction.

Wetlands

COMMENT: *Explore opportunities to enhance wetlands.*

ODOT Response: Limited opportunity for wetland creation or enhancement exists within the project corridor since the majority of the ground surrounding the project area is currently being used for agriculture.

ODOT is currently working with the Confederated Tribes of Grand Ronde to develop a joint rare plant and wetlands mitigation site near the project area. Other current compensatory mitigation opportunities may include ODOT acquiring a private parcel at the east end of the

project area. This site will be analyzed to determine its suitability as a wetland mitigation site.

Wetland mitigation opportunities and concepts have been investigated with appropriate resource and regulatory agencies. Wetland mitigation will be designed after wetlands have been delineated for each construction phases of the project.

Other Alternatives Considered

COMMENT: *Too few alternatives were reviewed under the level of analysis required to make a decision on a preferred alternative. Other alternatives requiring less construction should be given equal analysis.*

ODOT Response: ODOT, in coordination with project stakeholders, considered several alternatives prior to the publication of the EA, including a limited build alternative, a bypasses alternative, a five-lane highway with a center turn lane, a four-lane divided highway with a non-traversable median, and interchange design options at A.R. Ford Road, Grande Ronde, and Valley Junction. These alternatives, after undergoing an evaluation screening process analysis, public involvement, and much consideration, were not advanced for further study in the EA. The EA includes a description of these alternatives as well as the rationale used for dismissing them (see page 55 of the EA). In addition, ODOT worked with Yamhill and Polk Counties, the City of Willamina, the Confederated Tribes of Grande Ronde, and the public on the development of the Refinement Plan. The Refinement Plan analyzed several possible alternatives for ORE 18 and ORE 22 corridors, and recommends the coordinated set of improvements analyzed in the EA.

The Confederated Tribes of the Grand Ronde Community (Comment 25)

Access Issues

COMMENT: *We do not believe adequate consideration has been given to a frontage road system on the south side of ORE 18 both east and west of the casino. Consideration should also be given to a limited right-in/out to provide local access to those properties on the west side of the Casino.*

ODOT Response: The plan provides for an access road north of the highway as an extension of Jahn Road to approximately the existing casino access. Left turns to and from the highway will be provided for at Jahn Road. Farm properties south of the highway will continue to be accessed from the highway west of the casino. East of the casino, property access will be developed via the public road system that will connect to the future interchange at Valley Junction. The access management strategy for this area calls for private property accesses to be consolidated and/or limited to right-in/right-out movement. An access road is planned for the north and south side of ORE 18 at Rowell Creek Road. ODOT will work with property owners concerning access south of Valley Junction.

COMMENT: *The planned frontage road on the north side of the highway would provide for a return route back to the Casino and an alternate route to Hwy 18 for local traffic using the north side frontage road if connected to the existing undercrossing. This would be further improved if the limited right-in/right-out at Jahn Road were to be located further east.*

ODOT Response: As the project goes into the design stage for each construction phase, additional study may be required for specific access management issues. The project would allow left and right turns at the proposed Jahn Road location. Relocating this intersection would also impact the church located opposite the proposed ORE 18/Jahn Road intersection. Additional study will occur when funding becomes available to complete this phase of the project.

APPENDIX C

Public Comments Received on the Environmental Assessment



H.B. Van Duzer Forest Corridor
Steel Bridge Road

RECEIVED
NOV 13 2002
O.D.O.T. REGION

#2

FORMAL WRITTEN COMMENT SHEET

Name:

Dennis R Werth

Address:

8990 Hebe Rd
Grand Ronde, OR 97347

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List)

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I do not support the Build Alternative.

- See Attached -

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

DENNIS R WERTH
8990 HEBE RD
GRAND RONDE, OR

H. B Van Duzer Forest Corridor-Steel Bridge Road, ORE 18ORE 22
Environmental Assessment Questions
Nov. 7, 2002

Comment: 2 maps on pages 137 & 141, Figures 22 & 23-2

Map 2 shows SRM Casino is currently bordering VJ boundary, within proposed VJ boundary, separated by about 1 mile of ECU land from GR, yet in EA it is depicted as bordering VJ boundary as near Grand Ronde. Location language is not consistent and misleading.

Example: (page 4, top) For instance, an interchange is planned for the intersection of ORE 18 and ORE 22 between the Spirit Mountain Casino and Valley Junction.

... there is no "Interchange" ... Where are the 3 ODOT signs on ORE 18 & 22 identifying the location of Valley Junction so there would be no confusion?

Question:

Why doesn't the EA consider the Rural Community Center of Valley Junction a "Business Area"?

(page 130: Implementing the Build Alternative would impact two existing business areas, Fort Hill and Grand Ronde.

Question:

Why is there little to no impact analysis in the EA on agricultural-great lands?

EA recognizes the rural environment (page 124). The area is generally rural.

(page 131: It is assumed that ongoing commercial and/or industrial developments are sanctioned under Polk County's Comprehensive Plan will occur over the lifetime of the proposed action. The majority of land in the area of the proposed project is zoned for agricultural or timber uses and is not likely to be developed.

Therefore, no cumulative impacts are expected and the direct and secondary impacts described above address the likely full extent of economic impacts associated with the projects.

Secondary impacts (page 130) states some temporary right of way access.

COMPLIANCE WITH STATE REGULATIONS: (page 157). In reference to ORS 215.206, the EA states: The user will not force a significant change in accepted farm or forest practices on surrounding lands. Changes in farming practices on the surrounding lands will be limited to changes in the manner used by farm equipment to work the farm fields. The proposed use will have no effect on forest practices.

Who will the expert on farming practices and what does this statement mean?

Question:

Why are there no local service roads on the south side of ORE 18 at Valley Junction for properties east and west of Spirit Mountain Casino?

(Minutes of the March 13, 2000 meeting of the Steering Committee of the Willamina Grand Hotels Corridor Realignment Study, page 5) They (Steering Committee members) also agreed to eliminate the southside local service road if access issues are addressed through design changes and/or negotiations with the Tribe.
Access issues have not been addressed by design changes and/or negotiations with the Tribe.

Question:

ORE 22 crosses and joins ORE 18 at Valley Junction in ODOT's Build Alternative. Why does ODOT extend a direct "local service road" to the Casino and call it ORE 22? Why doesn't that local service road service two properties it crosses to get to the Casino?

Some other comments:

(page 105, 107) *Build alternatives are not addressed in the environmental assessment because there are no known occurrences in the vicinity of the project.*

Build outlines are not uncommon in this project area. In just years, two signs appear in the Willamina Ridge area near the east end of the project area. They have also been seen from my residence at Valley Junction several times. The year I saw one in May and another in July, both signs near Valley Junction south of ORE 18. I've seen no evidence of meaning in the area and doubt that they would be adversely impacted by the project.

(pages 206, 207)

There is conclusion for me about descriptions/locations on two of the 15 historic properties:

- # 2. There is no Longa Gerdw/Rock Barn on my property at Valley Junction. Perhaps what is intended is east of Valley Junction and the South Yamhill River.
- # 6. The only Burigalow and Farm 1 can be associated with on Salmon River. They is at 27255 and is west of Properties 7 and 8. However, Location 6 in the right placement for 8 in Figure 20, page 207.

These properties are not impacted by the Build Alternative and their description/location is not relevant.

(page 3, 114)

Project cost estimates are understated for ODOT's Build Alternative design. ODOT's design decision to deny access to two properties east of the Casino in Valley Junction suggests construction intentions for at least 20 more acres than are stated. ODOT's design decision to deny local service road access west of the Casino severely impacts three more properties (building more than 100 more acres). These five properties are worth millions to the Casino for expansion.

MINUTES WGR 04/14/00 Reformed study

benefits of the preferred option. It drops up his property and eliminates access. Dennis strongly suggested that the interchange be constructed further east (at Valley Junction) to lessen the impact to his property. ODOT representatives will research access to Dennis's property further. ODOT options include consideration of a farm access, negotiations with the Tribe to allow construction of a north-south road to access the property, or purchasing the inaccessible property.

Steering Committee members expressed concern about access issues for the preferred option, but agreed to choose this option based on its technical and engineering benefits, with the understanding that ODOT would research access concerns. Dutch La-Roue - the new Tribal representative - offered to have the tribal engineer contact Dennis Werth to discuss access concerns through tribal lands.

Local service roads west of casino to Grand Ronde
Jim Buettner showed maps of two proposed local service roads, one north and one south of the highway, from just west of the casino to Grand Ronde. There will be left turning pockets (i.e. five lanes in left turn areas) so that vehicles can be out of the traffic while they wait to turn left. The north fringe road alignment is close to the railroad right of way, and John Road alignment. It enters Tribal land, just north of the casino interchange. Area residents commented that if Tribal land can be used for this part of the project, then it should be feasible to provide property access across Tribal land in other areas if needed.

Although the maps show local service roads also on the south side of the highway, John deTar explained that the local service road was developed as a way to provide access to properties. ODOT has learned that they can provide right-in, right-out gated farm access off the highway, so the south local service road may not be needed. Dennis Werth and other area residents expressed the opinion that gated farm access would not be a safe, workable or acceptable solution. They stated that a local service road is necessary - if not from the west, then from the east, by the casino road. Jim Gordon pointed out that Mr. John's property would not have highway access. ODOT representatives will work with residents to address access concerns. Residents expressed strong opinions that they want to be involved in resolving access and right of way issues. John deTar explained that funds are not yet available for any part of the project, but that there is plenty of time to research and resolve access concerns for this part of the project.

Steering Committee members approved the north local service road alignment as proposed. They also agreed to eliminate the southside local service road if access issues are addressed through design changes and/or negotiations with the Tribe.

Local service road along South Street, from Grand Ronde west to AR Ford Road
Jim Buettner showed maps of two proposed local service roads, north and south of the highway, from the proposed Grand Ronde interchange, heading west to AR Ford Road. The roads include some access from left turning west on Highway 18 and some right-in, right-out areas. Kathy Thole expressed her preference for an access road. Although the south local service road provides the RV park and other properties with access to the highway, Kathy Thole pointed out that the proposed local service roads do not provide access for Seaway. She expressed strong

8990 Hebo Rd
Grand Ronde, OR 97347
March 17, 2000

Wayne L. Rickett Jr
Mid-Willamette Valley Council of Governments
105 High St., SE
Salem, OR 97301-3667

Re: Willamette-Grand Ronde Corridor Refinement Plan/Valley
Junction area frontage road(s)

Dear Wayne,

I had an idea since the Steering Committee meeting on Monday about the frontage road design in the Valley Junction area. If you think there is any merit to it, perhaps you could pass it on for Jim and Erlo and the ODOR design team to take a look into it. I shared features of the ODOR proposal with my family, as well as this idea, so I have their support in speaking up.

It appears the frontage road design on the north side of Highway 18 fits people's access needs reasonably well. The fact that the footprint "overlay" crossed Tribal land as well as other lands on either side suggests to me that ODOR has some confidence in making that happen. If ODOR has that confidence, could it extend to this idea?

Can ODOR access the closed, "oxbow"/old Casino exit from the northside frontage road for passage south under the roadbed of Highway 18? If ODOR can do this, the existing south-side Tribal roadway paralleling Highway 18 lends itself very conveniently for a short, westerly extension to the eastern edge of my property line. I can grant an easement next to Highway 18 for access to my father's property on beyond west of me. That would provide access for southside properties up to the John place west of us. The Tribal roadway needing dedication would appear to have little utility for the Tribe after the present highway exit is closed. Linking the northside frontage road to the oxbow would also provide the Tribe direct access between the Casino and their property north of Highway 18.

This idea would seem to have even more merit when coupled with an eastern extension of the northside frontage road across Werth property to link with Highway 22. Users of this

frontage road during peak traffic conditions could then access Highway 18 at the Valley Junction overpass rather than at the at-grade/non-signalized intersection near the Adventist Church. This extension, coupled with the ox-bow link, permits Werth Farms and all other slow moving vehicle operators to access all lands between Valley Junction and Grand Ronde without travelling upon Highway 18 (excepting that access-deprived area just south of Valley Junction and the overpass - a separate issue).

If the ODOR design team is agreeable to this idea, and if the Werth family and the Tribe are willing participants, this might be a superior plan than having farm machinery moving on this section of Highway 18.

Respectfully,

Dennis R. Werth
Dennis R. Werth

With your understanding, I will share the correspondence with the Federal Highway Administration as well as Park County officials.

Respectfully,



Dennis R. Worth

Enc.

cc: John Garthwaite, FHM
Mika Propp, Park County Commissioner

H.B. Van Duzer Forest Corridor

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NOV 18 2002

O.D.O.T. REGION



FORMAL WRITTEN COMMENT SHEET

Name:

Stewart (business owner)
Shirley Stewart

Address:

PO Box 6902
Salem, OR 97304

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List) Bonanza Antique Mall

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I feel it would be a shame to lose the buildings at this interstion, I grew up stopping at the Bonanza Restaurant on our way to the coast. I had a bath at the Bonanza. Antique Mall for 3 years now and find it would be very hard to find another place with such a large volume of potential customers.

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

I would distroy the existing buildings and businesses that are independantly owned/operated and allow Indian trade only at this spot

DO YOU HAVE ANY ADDITIONAL COMMENTS?

I believe that if the "interchangig" occurred at the casino, where the back-ups are started the problem would be eliminated there. 4 lanes @ the entrance to the casino, and have the casino pay for their addition to traffic on this Hwy.

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395



FORMAL WRITTEN COMMENT SHEET

Name:

Melitta Jansen

RECEIVED

Address:

51750 SW. 44th Road
Steel Bridge, OR 97147

NOV 19 2002
O.D.O.T. REGION

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List)

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

It needs to be a good plan except for the distribution of the frame of Steel Bridge. It does seem to make sense for the frame but the rest of the structure seems to be a compromise we have, but please do the engineering work, the design and the construction. We will be glad to see it as soon as possible. We will be glad to see it as soon as possible. We will be glad to see it as soon as possible.

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

It has good views of the mountains at Fort Hill. The only objection would be that it is more of a barrier than a road. It would be better if it was a road.

RECEIVED

NOV 19 2002

O.D.O.T. REGION

DO YOU HAVE ANY ADDITIONAL COMMENTS?

Why do we have a barrier? It would be better if it was a road. It would be better if it was a road. It would be better if it was a road. It would be better if it was a road.

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H.B. Van Duzer Forest Corridor
Steel Bridge Road

#5
RECEIVED
NOV 14 2002
O.D.O.T. REGION

FORMAL WRITTEN COMMENT SHEET

Name:

Tim Wright

Address:

15940 SE Arista drive
Bathland, OR, 97267

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List) Neighbor

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I don't like interfering with the shops people have worked hard to build up. Also to take out a building like the Bonanza would be bad because its been there for so long - its a landmark. I think the only thing needed at that point (SandRade Road) is a stop light. I've owned property in GrandRade for #Decades and I see that as the only problem, Not to start a major clover leaf or Scam.

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

I think the interchange would be better at Valley Junction for eastbound traffic. A traffic light would be the only thing Fort Hill would need.

DO YOU HAVE ANY ADDITIONAL COMMENTS?

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

H.B. Van Duzer Forest Corridor

Steel Bridge Road



FORMAL WRITTEN COMMENT SHEET

ODOT REGION

NOV 14 2002

RECEIVED

Name:

A Susan Whitney

Address:

*54900 Nicks Ford
Hood River Oregon*

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter *and newsletter*

Other (Please List) *Neighbors*

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I particularly dislike the fact that this whole idea was formulated and planned WITHOUT a vote of the people AND WITHOUT proper verification of the facts. The statements set forth are full of INACCURACIES and FALSEHOODS meant to mislead the people in the area who are affected. All citizens of said area should be duly notified BEFORE this sham goes any further. We should be allowed a vote on this ENTIRE PLAN as befits the AMERICAN WAY!

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

DO YOU HAVE ANY ADDITIONAL COMMENTS?

I hesitate to issue much comment on this COMPLETELY INACCURATE plan other than to say the interchange (if done at all) should be at Valley Junction, routing traffic to the east.

The LUO is completely unjust and all wrong and should be lifted!

Your plan, as it stands, would eliminate the livelihood of many people, along with hard-earned businesses and the taxes currently paid by those businesses.

This plan could mean the destruction of our home, Grand Ronde.

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395



FORMAL WRITTEN COMMENT SHEET

RECEIVED
NOV 1 2002
ODOT REGION #1

Name:

OSCAR FREDERIC PO BOX 180 SCIRO Hebo, OR

Address:

Grand Road OR 97347

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

- Newspaper
- Project Newsletter
- Other (Please List) _____

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

[Faint handwritten text, mostly illegible]

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building 8, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

We need to ~~abolish~~ improve the TRAFIC between SALINE and LINCOLN CITY. NO MATTER HOW IT IS DONE. ~~ALL~~ IMPROVEMENT IN THE BEST OF HIS FIELD.

Do your best. And The Lord is Christian God of The bible bless you

DO YOU HAVE ANY ADDITIONAL COMMENTS?

I Am Retired From Public Country Rd Dept OR
I have owned and lived on Hwy 22 for
Thirty Two years. Hwy 22 needs more
larger TURN OUTS FOR CARS OR TRUCKS.
ITS TWENTY FIVE miles of winding
Twisting CURVES FROM Grand Road
To Hebo. There ARE many Tail Gate
conduers in a hurry. ON RAINY wet days.
lets have less accidents and more TURN
OUTS. Parking Rest Areas and Missing houses and shops

OSCAR FREDERIC PO BOX 180 SCIRO Hebo, OR
Grand Road OR 97347 THANK YOU.
503 879 5912



FORMAL WRITTEN COMMENT SHEET

O.D.O.T. REGION



FORMAL WRITTEN COMMENT SHEET

O.D.O.T. REGION



O.D.O.T. REGION

Name: Phyllis D. Waldron

Address:

1889 Cant St NE
Salem OR 97302

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper Project Newsletter

Other (Please List) My antique business is in the Bergstrom

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I dislike losing my business site as the Bergstrom
after they own the land here. I favor the No
Build alternative in Grange Park. we do favor road
a side interchange at Valley Junction. We don't want
land here in Washburn (to give road) and desire
to grade lands frequently. Almost all traffic in the
needs one east of the town to Salem. Please return
this one!

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395



FORMAL WRITTEN COMMENT SHEET

O.D.O.T. REGION



FORMAL WRITTEN COMMENT SHEET

O.D.O.T. REGION



O.D.O.T. REGION

Name: Phyllis D. Waldron

Address:

1889 Cant St NE
Salem OR 97302

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper Project Newsletter

Other (Please List) My antique business is in the Bergstrom

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I dislike losing my business site as the Bergstrom
after they own the land here. I favor the No
Build alternative in Grange Park. we do favor road
a side interchange at Valley Junction. We don't want
land here in Washburn (to give road) and desire
to grade lands frequently. Almost all traffic in the
needs one east of the town to Salem. Please return
this one!

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

Name: Phyllis D. Waldron

Address:

36150 Nells Rd SW Grand Ronde Ave 97137
P.O. Box 180

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper Project Newsletter

Other (Please List) _____

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

Dear Sirs!
I'd think instead of billions of years of
study & building overpasses, stand out
with stop signs & turnouts left
turn lanes. I don't continue to do
the thing you will!
I thank you! Head Blevins & keep
you & yours! Best Frederick
573-879-5912

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

H.B. Van Duzer Forest Corridor

10



Steel Bridge Road

RECEIVED

NOV 15 2002

FORMAL WRITTEN COMMENT SHEET REGION

Name:

Steve Flapp

Address:

7100 Howard Hwy
Grand Rapids OR 97347

Would you like to receive the Revised Environmental Assessment?

Yes

No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List)

David Shargen

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

The proposed street will ~~not~~ create considerable problems for the people living on the side roads, getting on and off the highway is a major problem for people on N. Ford road, as well as King Rd. We've not ever disturbing the small town of Grand Rapids is essential to overcome the road conditions, surely, there are other choices that can be done to ease a town, Oregon cannot meet another great town.

Please turn over to record comments on the Fort Hill Interchange



Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

I think an bypass at Fort Hill would be a considerable.

DO YOU HAVE ANY ADDITIONAL COMMENTS?

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395



#11
RECEIVED
NOV 1 2002
O.D.O.T. REGION

FORMAL WRITTEN COMMENT SHEET

Name:

Laura Whitson

Address:

500 West Hill View NW
Salem OR 97301

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List)

friend

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I dislike the plan to destroy the historic community at the intersection of Grand Ronde + Highway 18. there are many families livelihoods at stake - there must be a Better way to improve the Road.

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

H.B. Van Duzer Forest Corridor

Steel Bridge Road

NOV 13 2002
O.D.O.T. REGION



FORMAL WRITTEN COMMENT SHEET

#112

Name:

TARUS H. WATSON
ARCHITECT AMBITUS

Address:

500 WEST HILLS WAY NW
SALEM OR 97304

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper Project Newsletter

Other (Please List) WORD OF MOUTH

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I DO NOT BELIEVE ELIMINATING HISTORIC BUSINESSES AT HIGHWAY 18 & GRAND RONDE ROAD WILL DO MUCH TO SPEED TRAFFIC ALONG HIGHWAY 18 IMPROVING HIGHWAYS 18 & 22 FROM THE CASINO TO THE 18/22 INTERCHANGE WOULD BE MORE BENEFICIAL TO THE GENERAL PUBLIC. THIS IS THE AREA WHERE TWO HIGHWAYS SHARE THE SAME ROADWAY

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

DISLIKE THE CONGESTION CREATED WITH THE CASINO CROSS TRAFFIC.

DO YOU HAVE ANY ADDITIONAL COMMENTS?

THERE USED TO BE A RESTAURANT AND GAS STATION AT THE WEST INTERSECTION OF HIGHWAY 22 WITH 18 (WE CALLED IT WHELY JUNCTION) AND IT WAS A GREAT PLACE TO STOP FOR PIE AND COFFEE IN THE FIFTYS AND SIXTYS. THE HIGHWAY IMPROVEMENT AT THAT INTERSECTION DISAPPEARED THAT SERVICE!! I DON'T WANT TO SEE THAT HAPPEN TO THE COMMERCIAL AT GRAND RONDE ROAD, TOO.

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

H.B. Van Duzer Forest Corridor RECEIVED

Steel Bridge Road

NOV 13 2002

O.D.O.T. REGION

FORMAL WRITTEN COMMENT SHEET

#13

Name:

Lucie Lindberg

Address:

8045 Rowell Cr. Rd. Willamette, OR 97396

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting? Newspaper Project Newsletter

Other (Please List)

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

To decrease congestion and improve safety may be a favorable aspect of the plan but it will be at the expense of the local business, farmland and our natural resources (deer, elk habitat and their migration patterns) wetlands, plantlife and water quality and also will in this community.

Little by little Oregon is reducing the quantity and quality of its natural resources, its beautiful environment. It is this pristine environment that attracts people to Oregon and it's this pristine environment that we are destroying in order to speedily transport tourists to recreational destinations and our once beautiful Oregon beaches. Educate the public to have leisurely drives through these beautiful scenic areas and to enjoy the wilderness of the country. A high speed expressway affects its own purpose by destroying the very beauty of Oregon.

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

It destroys the local business.

DO YOU HAVE ANY ADDITIONAL COMMENTS?

Meetings should be held in a public facility.

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395



FORMAL WRITTEN COMMENT SHEET

Name:

John William Green II

Address:

4192 Kweck Rd N 97803

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List) Grand Ron Business

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

My dislike about it is the useless design to ruin the historical town of Grand Ron. the Bonanza mall which has its own history. Back many years the road split junction should be dealt with at Valley Junction.

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

DO YOU HAVE ANY ADDITIONAL COMMENTS?

Don't split Mountain creek up enough from this area. taking the money from the natural and the couple be gamble. Can't we take care of the traffic problem at these front lots? or at Valley Junction? May we have are history just the small store, historical signs, protecting Oregon yet growing hand in hand with progress.

John W Green II

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

RECEIVED

NOV 18 2002

November 18, 2002
O.D.O.T. REGION

Susan Whitney, Environmental Project Manager
Region 2
Oregon Department of Transportation
455 Airport Rd. SE, Bldg B
Salmon, Oregon 97301-5095
Re: COMMENT ON P.A.V. 7-2.0 / REV. 02.01.00012
PROJECT FOR NO. 200211 AT TRAVELER
Near Susan
First, we want to say, that you have been very pleasant
regarding information on the Polk County Duroy/Steel
Bridge Road Highway Plan. We appreciate that.

However, we take serious issue with the Plan itself.
It was prepared by CH2MHILL, as was the the April, 1996,
"Portland to Ilwaco City Corridor Development..." which
included the report of the November, 1995, Grand Road
Open House, which had 45 people signed in, and listed
issues of concern on flip charts, from the people.
We thought that our input was valued. We expect CH2MHILL
as paid by ODOT. Nowhere in that document did it suggest
that the objective was to destroy our community, nor our
livelihoods, nor our civil rights. *Cong. attacked.*
All of our comments were intended to facilitate and further
OUR success, our businesses, our community including school.

Now, we and our businessmen are to be summarily disposed of.
You ODOT people think you are GOOD people, and you are
trying to put us people who will suffer irreparable harm
in a position of loss while being fully aware that you
are exclusively trying to make our loss their gain. They
are our friends and neighbors, and government must stop
using Indians to start a second civil war. You guys can't
give anything to tribes that you don't take from all of us.
You are taxers. Indians are capable. They don't need to
be reduced to tears again. They are 15/16 white like us.

2 of 8

Of course, we know, that the Federal Government is
ordering the Indian-first agenda, and your job depend
on your implementation of that agenda. But, do you ever
ask yourselves "to what avail?" Do you write to your
Legislators and say them "why"...why this generation of
1/16th blood Indians...when the 1/32 generation of Indians
will have to live as white men? Tribes are not lowering
the blood quantum necessary to be tribal members. Would
it be right to supposedly settle the problems of the past
by condemning the Indian children of the future? As well
as the children of the white future? Do you ever think
about what you are doing here with this Corridor agenda?
George and I belong to Citizens Equal Rights Alliance, CERA,
of which organization the head is Indian. She speaks quite
eloquently of the wrongs of Federal Indian Policy
hurting all of us. She is awesome, and we'd love
to be able to bring her from Yreka to speak to you. She
is also the chair of "GRANDMUM". We want YOU to think about
whether your involvement in treason is worth it. Do you
have skills that would enable you to get a job outside of
treason? Your pleasantness will go a long way.

Now, necessarily, we must comment on our own situation.
According to Figure 3-1, our property has 1/40 "right in/
right out" designations. Then Figure 4-2 appears to cut
off our main business/home access, plus the Eastern access
that we must keep open for the neighbor to the North, says
the Deed from ODOT in May of 1984. When I commented to
Mike Propper, a few months ago, that both accesses should be
kept open so the people using the service road could exit
from the Eastern access, he said I was right....so now,
apparently, and according to John DeWitt (a week ago or so)
they are both cut off.

This business, that Propes assured us "you can keep doing what you are doing..." on 4/11/01 would be taken away in a minute, if your plans to dead-end a service road at the edge of our property. Our property is zoned "Commercial General"...through some unknown trick, Polk County rezoned it to "Rural Commercial", but it's purpose is still Commercial and it's use has been Commercial since we bought it from Bizarre in 1983. So our investment has become our livelihood, not to be taken away now or in the future. The Real Market Value of our property is in jeopardy through all this, probably. If you don't change the "Traffic plan for this corridor, we won't get the vendors to rent from us, nor the tourists to enter some unknown service road. What do you have planned for the A.R. Road intersection? Signs? Overpass? Just a very dangerous intersection?

You know, this five acres, plus the one-half acre we bought from ODOT, are political hot spots. We don't know why... Except that in 1983 prior to the auction at which we bought this five acres, Propes had apparently secured a promise from our Three Cities Community Development Corporation, of a \$5,000.00 loan (all we had)(I believe) to the Grand Ronde Tribe, who just got "restoration" (for federal vandalism over them) on Nov. 22, 1983. But Propes reported at that late November/early December, 1983 meeting that the tribe thanked us for being willing to loan our \$5,000.00 to them to purchase (put down on) this five acres, but they didn't know when they'd get the rest of their money. All that was required was a downpayment was \$5,000.00 (and I believe all Three Cities Community Development Corporation had)

This history is important now, because of the troubling future you apparently have laid out for this property.

So, then, at the auction of this property in December, 1983, ODOT presented a letter. They would have for sale or for rent the 50' x 400' plus strip of land laying across the whole front of the five acres, to the buyer of the five acres. Then they reneged, until ODOT Director ordered "right of way" to "SELL THIS LAND TO THIS LADY". They did, for \$4600.00, with possession that day in May, 1984. Then, P.O.s. sends us a notice that we had to sign that we bought it for only \$4,000.00. We didn't sign that. And we had to sign that we bought it at auction for that price. We didn't sign. (They said it had to go to public auction, because it was valued at more than \$5000.00). Well, why didn't they represent THAT at the auction of the five acres? The value the country had on it was \$125,000, when we bought it for \$65000. on auction. Why, all of a sudden, did the front ODOT land, the 1/2 acre get valued at more? They said they would get in trouble if they said it to us. Thanks to Director Larry Rulain, and, in spite of our "possession", (it wasn't until three years ago, or so, that we found out that) that same day in May, 1984, ODOT gave NW Natural Gas a 40' assessment across our 50' strip, and that was never put onto our Deed from ODOT. Because of that, apparently, we lost \$300.00/month business from renting to Strawberry Patch. NW Natural Gas paid \$100.00 to ODOT for a n assessment that was on OUR PROPERTY, illegally. ODOT explained three years ago, or so, that they filed the Gas assessment before our Deed was filed. Well, that's not our fault, and no excuse. I had asked Propes for help in getting ODOT to follow through on what ODOT had represented at the auction (Propes was the Realtor), and Propes said to me that he would nothelp. That we just bought it to reveal to the Indians and make some money.

We still have all the original auction bill along with OCO's representation, our purchase receipt, paper that OCO sent that we were to sign, etc. And it still hurts. OCO had said they would be used if they sold that 1/2A to us. Who would sue OCO? Did they?

Further about this property being a polluted hot spot. This had been the Elroy Restaurant since 1982, I believe. The water bill had been normal...\$20 or \$30 or so/month. All of a sudden, in July/August of 1983, the bill jumped from that to \$100.00 or more. They were told they could only sell \$100.00/day on paper plate because of such high usage of water (only only has 750' of drain field on record; witnesses have told me that there is 3000', and they helped put it in. Kathy wants to have the water put in whole name; and Nicole Hollett, secretary, organizer of the Grand Forks Community Water Association, told me that we SHOULD CHECK THE PUMP UNDER THE HOUSE or our bill would be over \$100. THE GUY IN VEGAS? THE ELROY RESTAURANT HAD USED THE WATER. There is a recent meter between the house and the Elroy, but Macgruder said the Water Assn. refused to read that. So, George crawled under the house, the water was spraying from a split in the pipe. He replaced that part of the water pipe, and our bill was the regular 38.50/month. That reboiled that water bill started in July, 1983. From a split in the pipe. And it was known that it was under the house. And Macgruders lost the property...Ron Blawie sold it through Willmore as Auctioneer/Mountain Springs Realty (Propers)

So then, after a mysterious fire at the adjacent Erickson Hardwood mill, *Terribel Vega. Told the neighbor*

the wife would like to have Erickson Hardwood (HQA.), our 5 1/2A, NW 1/4 95A, and 20 or so% of the adjacent farm, for a shopping center and a golf course. If we would correctly.

There is such a long list of usurpations, attempted usurpations of our status, our rights, that it would take a few more pages. Problems with OCO's from 1980 never tended to... at a minimum, that \$100.00 OCO's got from NW Gas should have been ours...we know nothing about any gas assessment sold the same day as there was none. "you got to talk to..." "he's not in..." The Gas Assessment was filed before the deed to you was filed... The Gas Assessment is not on our deed from OCO. The gas assessment that runs kitty-corner across the tip of our five acres and was on our deed for the five A is only 30 feet wide...this illegal assessment that was not on our deed is 40' wide. The neighbor was told that we acquired the 1/2A illegally, by the Assessor's office, again, a disclaimer like "if we remember correctly"... The 1/2A was returned to Farm Forest, when our business depended on it being Commercial (Propers helped verify that). The Assessor's office changed the designation and map of our five acres to about 3A farm forest and only 2A commercial. Propers helped verify that, while Assessor's office personnel kept declaring to Propers "I told Kathy...I told Kathy...I told Kathy...". I like I was some kind of nitwit that just couldn't understand anything. Propers kept saying "How do you change the map?". He knew the Auction Bill represented the 5A as half farm/forest and half Commercial.

Such more. After OCO's insists on destroying Port Hill apparently it becomes important to destroy all the rest of our businesses, accorann, homon, along this part of the corridor.

What has ODOT paid CHEWILL regarding this project?

What has ODOT paid Council of Governments re this project?

What has ODOT Planning Dept. got paid re this project?

What have all you high mucky-mucks got paid for the time you've spent on this project?

Where are you getting all the money? From us taxpayers.

So now you investigate for a new gas-use tax for this kind of nonsense, because you're not getting enough gas tax from the cars that save gas by being fuel efficient.

Where will you get the money to pay the tribe for building near their reservation of 5,554 Gaitin land; and their

50A Governance Center where you like to hold your meetings? Where will you get the money to pay tribes when they claim archeological remains from when the Yalipoulin and Uppun and Rogue River, Molalla, Ellet settled in this area, and you have to close the whole highway through Grand Ronde for them? Oh, we know...from the Federal Gov.... our taxes.

What will you do when your conscience catches up to you? We forgive you now for what you are doing to us and our livelihood, because Jesus said from the cross, "Father, forgive them for they know not what they do." and we must do the same. But we don't like it.

There will be nothing left for anyone in a few years, if you keep the treason-wheel destroying our roads, our economy, our social, etc. existence in disarray.

Will our questions ever be answered? Will our comments ever be listened to? Will you please adopt the NO BUILD ALTERNATIVE, sincerely hoping that you will have read this whole letter.

These comments, these concerns for all posterity..... as we come full circle with the problems with ODOT, CHEWILL, Polk County, with the tribes being the butt-end, the pawn in this fraud on our country, we are reserving the right of legal action to prevent this Draft Plan from becoming implemented against us all.

George Thole
George Thole

Kathy Thole
Kathy Thole

20795 Salmon River Highway (13)
Grand Ronde, Oregon, 97147
(Orbers, and taxpayers of the
Lots 600 and 1700, T.6, R.8)

4 pp. returned
COPIES:
Polk County
OTOR
COB
CIR 2 m. Hill
Neighbors/Orberbers
City of Williamson
*(Hand delivered)
on 11/14/02*

P. 5. City of Williamson and many of us
stake holders brought written objections (to
ODOT Carolyn Gassaway, without regard to
opposing OTC plan to call Hwy 18 an
Expressway. We never got a response. So Hwy 18
is not an Expressway because to destroy us.

NOV 15 2002 8 1 AM RECEIVED
Portland-Lincoln City
(Highway 99W-18)

Corridor Overview
Existing and Future Conditions, Issues, and
Interim Strategy

APRIL 1998

Prepared by:
Oregon Department of Transportation
CHIM HILL
Agneta Lawson Associates

WATERMARK
4/19/98

Grande Ronde

On November 15, an open house was held in conjunction with the Polk County Community Development Department. 45 people signed in at the open house and listed the following issues on flip charts:

- Concerns with Highway 22 from 18 through Greater Grande Ronde area in Yamhill County. Lots of residents with more and more traffic going to coast on 22.
- Impossible to cross 18 with farm equipment (3 lane segment west of Willametta).
- Residential access to Highway 22 and 18 is impossible and very unsafe. (Two people commented)
- Need local road network to move farm equipment and local traffic from Valley Junction to Grande Ronde.
- Vehicles passing farm equipment. Shoulders are non-existent on sections through Grande Ronde-Fort Hill area.
- Left turn lane needed at Rowell Creek Road and at Fort Hill Road (ROW at Rowell Creek Road is wider due to purchase for South Yamhill Bridge (should be a left-turn to the corridor).
- Highways 18 and 22 need bus stop signs for students. Current pickup and drop off areas are very unsafe for all.
- Need signalization or signs so we may depart from driveways.
- Consider a bus pullout for school buses and mail delivery.
- Congestion in area results in local residents choosing to walk to local destinations. (?)
- Better enforcement of speed zones.
- Enforce no parking on the outside curb in front of Fort Hill gas station and restaurant -- safety issue.
- 40 mile speed limit from Fort Hill through Grande Ronde past Thole's commercial property. The 55 MPH zone is 4 mile before church/school, residences and John Road entrance.
- More travel lanes.

- If building more highway lanes, also implement bike lanes too. Bike safety - lanes stop at bridges on highway.
- Billboards! Must there be so many Fort Hill? -- Billboards hide the natural beauty of Grande Ronde. They must go.
- Different traffic pattern needed at Fort Hill intersection - study alternatives.
- In the Fort Hill area, commercial land development needs to be timed so that the road network has been improved to accommodate the traffic before the development occurs.
- Better access needed to Williamson from Highway 18. (three people commented)
- ✓ Extend center turn-lane at the west end of Grande Ronde, further west.
- Install a signal at Fort Hill.
- Provide bus service from the Fort Hill area to Portland.
- Re-align (straighten) Fort Hill intersection.
- ✓ Increase Highway 18 to four lanes.
- More crosswalks in Grande Ronde - a lot of children/community.
- Grande Ronde should be a dry community (no booze).
- Have casino-goers park outside of Grande Ronde and commute in by bus to reduce traffic impacts.
- Increase law enforcement.
- People are driving over medians near the strawberry patch/casino area.
- Need a traffic light at Grande Ronde and Highway 22 Valley and Fort Hill Road. (two people commented)
- Need passing lane (east and west bound) between Sheridan and McMinville.
- People turn around on private property to enter the casino (front property west of casino). (Two people commented)
- Casino needs better signage signs with arrows. There is currently no sign marking the

Steel Bridge Road

NOV 18 2002
O.D.O.T. REGION



FORMAL WRITTEN COMMENT SHEET

Name:

DAVID FRANZEN

11-14-02

Paul Hanged Train Franzen

Address:

28405 SALTWATER RIVER HIGHWAY
P.O. BOX 86
GRAND ROUTE OR. 97347

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List) NEIGHBORS

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE? I NO NOT LIKE THE
BUILD ALTERNATIVE TAKING OUT LANDMARK BUILDINGS AND BUSINESSES!
TOWN HISTORY ON BOTH THE SOUTH AND NORTH SIDE OF #18 & G.R.R.D.
I BELIEVE IF THE HISTORY IS STRAIGHTENED OUT AS IT COMES INTO
GRAND ROUTE FROM THE EAST AND CHANGES ROCK CREEK TWICE
AT BEND AND INSTALL THE SAME OLD HANDLES AT YOUR PREFERRED
ALTERNATIVE WE WOULD BE ABLE TO SAVE THE ENTIRE HISTORIC
DISTRICT AS PICTURED IN YOUR DRAFT. COMING FROM THE EAST
THE ONE HANDLE WOULD COME OUT EXACTLY AT THE PRESENT
INTERSECTION OF 18 & G.R.D. SAVING ALL THE BUILDINGS WITHIN OF
HAWAY INCLUDING GR. STORE, FIREHALL, FOUR OFFICE, TELEPHONE, STEER
BOWAZA, MOVIE THEATRE AND MORE. MY WIFE AND I WOULD STILL BE
LOSING OUR 2 ACRES CORNER LOT (PTO G.R.D.) BUT THE COMPANY WILL NEED TO
HISTORICALLY LANDMARK BUILDINGS. COMING FROM THE WEST THE ONE HANDLE
WOULD BE AT THE CORNER OF S.W. BURNETT STREET AND THE ONE HANDLE
PREFERRED ALTERNATIVE.

Please turn over to record comments on the Fort Hill Interchange

NEAT PAGE

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

THE FT. HILL INTERCHANGE SHOULD HAVE AN
OVERPASS AND BE LOCATED CLOSE TO THE RESTAURANT
AND GAS STATION, FROM THE CASINO EAST THERE
SHOULD BE NO MEDIAN AND HAVE SLANES
WITH THE FIFTH LANE BEING A CENTER TURN
LANE. NO NEW FLOWING ROAD WOULD BE NECESSARY.
FT. HILL ROAD AND YAMHILL RIVER ROAD COULD BE
UPGRADED FOR ADDITIONAL LOCAL TRAFFIC. NO
ROADS WOULD HAVE TO CLOSE R.R. TRACKS THIS OPTION.
ELIMINATING THE EXPRESSWAY DESIGNATION WOULD ALLOW
SLANES (General rule line) AND SOLVE THE "HOW TO GET ENERGY
VEHICLES IN AND OUT OF FANS RESIDENT BUSINESSES"
- MAY BE A PAID VOTE ON ELECTRON DAY!

DO YOU HAVE ANY ADDITIONAL COMMENTS? BY INSTALL A GOOD INTERCHANGE
EAST OF CASINO THAT PERMITS EAST BOUND #22 NOW STOP FLOW
TO EAST BOUND #18 WITH ACCELERATION + DECELERATION IN-TOWN OF FLOWING
AND SLANES EAST TO SALTWATER INTERCHANGE. THIS OPTION
COULD MAKE GRAND ROUTE ROAD INTERCHANGE UNNECESSARY.
ELIMINATING LEFT TURNS FROM GRAND ROUTE ROAD TO EAST #18.
EAST BOUND TRAFFIC WOULD HAVE TO USE #22 TO VALLEY STATION.
SOUTH STREET COULD STILL BE EXTENDED TO RR. FORD WITH
OVERPASS THERE FOR LOCAL ACCESS TO RIVER LEGS -
GIVING RIGHT IN, RIGHT OUT TURNS ONLY AT GRAND ROUTE ROAD.
THIS TYPE OF OPTION SAVED OLD BUILDINGS AND BUSINESSES
AND MORE IMPORTANTLY AVOID DISTURB TRX BASE AS
MUCH AS YOUR PREFERRED ALTERNATIVE

Paul Franzen

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

#18



H.B. Van Duzer Forest Corridor **RECEIVED**
Steel Bridge Road
NOV 1 2002
O.D.O.T. REGION

FORMAL WRITTEN COMMENT SHEET

Name:

*Deborah Lane Miller
4740 SW Fort Hill*

Address:

*19750 S 25th Avenue SE
The Meadows, Oregon 97142
503-472-1092*

Would you like to receive the Revised Environmental Assessment? Yes NO
How did you hear about this meeting? *yes*

Newspaper Project Newsletter

Other (Please List) *documented Assembly for use and (available) include their own concerns about access and quality.*

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE? *there should be no road!*

As frequent users of Highway 18, we feel that there are many places far more important for improvement, than the area at the intersection by the Sonoma Boutique Mall, where we have never observed the road problems in this area, between Mc Minnville and the Coast. As St. Helens near our 90+ winding two spaced Sonoma - the many stress, there, the income from sales supplements our 8. income!

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGER?

There are no problems there, compared to many other areas' operations who Sonoma Boutique Mall - is Fort Hill to the future - a road bridge a dangerous. The destruction of Sonoma will bring an improvement! As there are lower a norm for some changes.

DO YOU HAVE ANY ADDITIONAL COMMENTS?

Should Sonoma's driveway be removed to work than adjacent part that this building property is built in an environmentally sensitive area.

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

H.B. Van Duzer Forest Corridor

#20



Steel Bridge Road

RECEIVED

NOV 15 2002

FORMAL WRITTEN COMMENT SHEET

O.D.O.T. REGION

Name:

Paul Stekwood

Address:

(A555 Andy Pines Rd) P.O. Box 22
Grand Rapids, OR 97347

PER RL, LOOKWOOD
P.O. BOX 22
GRAND RAPIDS, OR, 97347

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

- Newspaper Project Newsletter

Other (Please List)

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I like that there would be a major entry from
Shaw's Road, road to Highway 18.
I would not like Lady Raggi road used as a junction
road. Please just make traffic flow on the west side of
road that would change, in some.
Would the road be widened? If so what side?
Just when would this plan come about?

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

H.B. Van Duzer Forest Corridor

#21



Steel Bridge Road

RECEIVED

NOV 15 2002

FORMAL WRITTEN COMMENT SHEET

O.D.O.T. REGION

Name:

Wesley V. Steak

Address:

9075 East Hill Rd
Williamson, OR 97396 Ph 503-226-6652

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

- Newspaper Project Newsletter

Other (Please List)

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I feel like the whole project needs more study as that
it has not put the business along the project out of
business, more consideration of the business would be appreciated
I do not care for non treatment's making use at all.
I feel that if you would put a 4 lane road and street
a center turning lane would be sufficient except at valley junction,
around Road and Fort Hill, where I feel you need overpass. If you
are going for a divider at Grand Road, Valley Junction, would this
go for on at Fort Hill to.

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE

I do not like the Fort Hill interchange at all. You will get the business of Fort Hill out of business with this plan. Because this is an expensive ~~the~~ Fort Hill is to close to valley junction. For a savings on interchange as stated in the Environmental Assessment book, I would suggest that ~~that~~ DOT apply for a major Revision from the ~~state~~ as they said they would from valley junction and Grand. Road and not the interchange when it would not put that Hill into and Restaurant out of business. I would also say forget about doing that Hill to connect the summit. If you think you need a junction road from that Hill to ~~connect~~ connect Grand Road, put it where you are not going thru the middle of Purple Project. I know this is unethical, but we think can make studies for

DO YOU HAVE ANY ADDITIONAL COMMENTS?

The one you would like to do. I really think DOT should widen the bridge first before starting any other construction except if they think they need the 47th law between that Hill and where bridge is connect take road at all to put the other law going ~~west~~ east as they did when they put the one law going west.

Wednesday 1. thank

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

#22

Oregon Department of Transportation **H.B. Van Duzer Forest Corridor**
Steel Bridge Road
RECEIVED
NOV 18 2002
ODOT REGION
FORMAL WRITTEN COMMENT SHEET

Name: Nolan & Tenette Ferguson

Address: 4326 Area Loop NE
Salem, Oregon 97305

Would you like to receive the Revised Environmental Assessment? Yes No

Newspaper Project Newsletter

Other (Please List) Friends

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILT ALTERNATIVE

- (1) We do not believe the real traffic problems are west of the casino but are east of Fort Hill. We go to the east about 30 times a year and stop at stores/shops at Grand Road. Getting on and off the main highway has not been a real problem.
- (2) Removing businesses and farms/houses that is proposed in the plan is totally unnecessary - There are certainly better solutions.
- (3) The highway from Everett's cafe to Lincoln City is far more dangerous than the Grand Road area.

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

Susan Whitely
OOCOT Environmental Project Manager

Project Van Duzer
23

Telephone Log

Date: 11-18-02

Who? Greg ~~Good~~ ^{Tholt}, Sheridan

What? Comment on EA

Sheridan + Mc Minville is a much
more serious hazard. ^{reg Sheridan to coast.} ^{can this warning}
that he withheld. Log truck + car.
Has been driving highway for 20 years.

Follow Up?

add to comments



H.B. Van Duzer Forest Corridor
Steel Bridge Road
RECEIVED
NOV 1 ~ 2002
O.D.O.T. REGION

19

FORMAL WRITTEN COMMENT SHEET

Name:

Bryan Orton

Address:

1072 23rd St. NE
Salem, OR 97301

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List)

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

See attachment

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

Bryan Orton
1072 23rd Street NE
Salem, OR, 97301

Susan Whitney
Oregon Department of Transportation
455 Airport Road SE, Building B
Salem, Oregon 97301-5395

Dear Susan Whitney:

I am writing you in regards to the proposed changes on Highways 18 and 22. Specifically, I am concerned about the H.B. Van Duzer Forest Corridor to Steel Bridge Road plan and possible new highway designs to have traffic routed through the Spirit Mountain Casino when I travel back and forth from the coast.

I appreciate your attempt to help ease traffic congestion on Highways 18 and 22. My family enjoys traveling to the coast. Like anyone else, I want the journey to be smooth and relaxing. However, I am concerned with changes to these highways because all the possible impacts may not have been fully considered. Many times we do not travel directly to the coast. We enjoy stopping at places such as the casino for a meal or an antique shop for gifts. I would hate to see some of these smaller businesses along the highway be negatively impacted by any permanent highway construction changes. I fully understand that the casino is the biggest business in the area, but shouldn't the Oregon Department of Transportation be concerned about all businesses and historic buildings in the area? I have a college degree in history. Saving historic buildings and sites is something that is important to me.

I certainly am not opposed to highway improvement plans. This would greatly benefit me personally. On the other hand, we must take into account safety, history, and small businesses. Any proposed highway plan that omits any of these three components, in my opinion, is a failure. Please look at all angles--no matter how small they may appear to ODOT--because this will impact the region for decades.

Thank you for taking the time to read my concerns. I trust you and the Oregon Department of Transportation will do the right thing.

Best Wishes,

Bryan Orton
Bryan Orton

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NOV 19 2002

FORMAL WRITTEN COMMENT SHEET

ODOT REGION

#26



Name:

Paul Beckler

PO Box 477 Willamina, Or 97149

Address:

Ret 28410 Salmon R. Hwy
Grand Route Or 97347

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List)

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitlony, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

RE: ODOTS - HB VanDuzer To Steel Bridge Rd, DART, DETOR
- THESE STATEMENTS - MISREPRESENTATION OF PROPERTIES -

I am the current owner of the old movie theatre bldg. AT 28410 Salmon R. Hwy, Grand Route, Or. This property is located approx. 200 FT WEST OF Grand Route Rd and adjacent to the Old Bonanza Restaurant property. My parents took us kids to the movies here in 1948 and thru the 60's, so myself and many other people see this property as having some significant "Historic" value!!

IT'S A PATHETIC LAUGH TO READ THE PROPERTY DISCREPITIONS IN THIS DRAFT. MY NEIGHBOORS HAVE A THRIVING ANTIQUE BUSSINESS FOR THE PAST 2 years and their property is described as an "Abandoned structure with parking area".

My property is also described as an "Abandoned Structure", This property is absolutely NOT Abandoned!! Since my purchase in June 2000 it's being used as a "warehouse" to store an EXTENSIVE personal collection of antique "Ford Flathead V-8 Motors" (Probably the largest individual collector in the state of Ore) as well as several antique and classic vehicles.

When I purchased this "Commercial" zoned property it was with the intent of

OPERATING SOME FORM OF INCOME
PRODUCING BUSINESS VENTURE.

THANKS TO THE "LIMITED USE OVERLAY" THIS
HAS BECOME IMPOSSIBLE — SO YES, THIS
PROPERTY CAN APPEAR TO BE VACANT OR
ABANDONED WHICH THAT IS NOT THE CASE AT ALL.

Polk Co. and EDDOT HAVE "HOGTIED" ME ON A
PIECE OF COMMERCIAL PROPERTY THAT HAS EXISTED
FOR 62 YEARS.

IT'S DAMN FUNNY THAT YOU CAN TELL ME THAT
I CAN'T OPERATE A BUSINESS ON MY PROPERTY,
YET I AM NOT OFFERED ANY KIND OF A TAX
BREAK FROM POLK COUNTY — OR MAYBE I MISS-
CALLED "POLK" COUNTY.

PAUL BOEHLER
PO Box 477
WILLAMINA OR 97396
503-560-0026

27



Steel Bridge Road

RECEIVED

NOV 19 2002

FORMAL WRITTEN COMMENT SHEET O.T. REGION

Name:

Susan Vandolph

Address:

P.O. Box 682
Meyers City Oregon 97135

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List)

Bureau of Field Port Features

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I have enjoyed the Abundant Road over
for the past 40 years traveling back
and forth to Meyers City. It would be
such a loss of history to have the express-
way bypass them. I also feel there
could be a safe interchange at Millery
quarter.

Sincerely,
Susan Vandolph

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B.

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O.D.O.T. REGION

FORMAL WRITTEN COMMENT SHEET

Name:

John King

Address:

1615 N.W. Masonville Rd.
Merrillville, Or 97128

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List)

By word of mouth

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I have had a space in the Exchange Mall for a couple of years, as do over 50 other dealers. The Steel Bridge Road area has been a stopping place for me and my family for many years, and I would hate to see that area lose its character. I would like to see the area developed, but please don't destroy the Valley Junction, but please don't destroy the Steel Bridge Road area.

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to:
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

This is testimony referring to:

H.B. Van Duzer Forest Corridor---Steel Bridge Road Environmental Assessment

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O.D.O.T. REGION

Sir,

"The proposed project would improve safety and decrease congestion on approximately 9 miles of Highway ORE 18."

Oregon Department of Transportation declares that only two options are to be considered, Build or No-Build option. Either the whole extravaganza will be constructed or nothing will be done beyond the two projects that are already funded. Does Oregon Department of Transportation want us to think that there are no other options available that would increase safety and decrease congestion?

This proposal seems to have no cost factor attached. The build option is by far the most expensive of any mentioned options and the no build option will of course not happen. Why are only these two options proposed?

(To increase safety and reduce congestion at a low cost? Reduce the highway speed, add a middle median strip, add traffic signals at proposed interchange spots, curbside access from residences where possible, creation of several obvious speed traps and permanently assign troopers to enforce the law.)

The build alternative includes four lanes with no transference, right through the middle of three small communities. This would kill the commercial districts of these three communities that now receive almost all of their business off of Highway 18? Oregon Department of Transportation contends that by tearing up these humble communities, gamblers could get to the casino's 5 minutes faster and all the tourists could drive by at 60 miles an hour. ODOT also appears to think that slabbing these small communities in multiple pieces would help them grow.

The interchanges that are being planned for these three small communities will increase traffic through much of what is now sleepy rural areas. Will this procedure of access roads and frontage roads impact property values or does ODOT care? Many of these connecting roads are now dead end streets or gravelled lanes. How will this impact the residents of this area? Is there any evidence that this assessment even peeked at these factors?

Is the benefit of the safety of the Gamblers and Tourists of Highway 18 being offset by safety of these small communities and of their children? What is the accident rate in these small areas and what will be the accident rate after traffic begins to traverse these new high speed roads? How could this be a comfortable place to live with heavy traffic coursing down these new roads? How could this proposal be beneficial to the people of these small communities when the traffic speeds are trilled right through the middle of these areas? How could these interchanges do anything but splinter these quiet communities and their commercial enterprises?

This proposal will displace most of the commercial enterprises that now hug Highway 18. The only clear winner of this proposal is the gambler, the casino, and the tourist that is heading to the beach.

This proposal will displace residents who will be deprived of operating a business or being employed at a local business. The four lane highway which will cut through their communities would bleed off their commercial, industrial, and natural resources and many of their young people. Any time a 2 lane highway is built into a 4 lane limited access highway, *these communities wither and die.*

If congestion is a major item that needs to be addressed, then please explain the City of Dundee and their limited amount of congestion to me.

ODOT maintains that changing access to business owners now positioned along Highway 18 will result in less traffic and fewer customers. However most businesses would benefit from improved safety and reduced congestion. How will decreased congestion and corresponding higher speeds of traveling tourists help businesses? How will the destruction of most commercial businesses along Highway 18 help these businesses? How will these businesses, which will have been bulldozed, benefit from improved safety and reduced congestion? How will these businesses survive when all their customers now go whizzing by on this new 4 lane limited access Highway 18?

When does the safety of gamblers and tourists supersede local residents, local commercial businesses, local communities and local neighborhoods of these three small communities?

In the Executive Summary, the impacts which are identified are:

1) Displacement of 7 to 8 residences

What does the displacement of a residence do to the surrounding neighborhood? Fragmentation and severing the cohesion of the neighborhood infrastructure.

2) Displacement of 1 to 4 businesses

The displacement of three or four businesses and the removal of Highway 18 access will dislocate most of the commercial businesses in these small communities. Most of the commercial businesses depend on impulsive behavior of people traveling Highway 18. Without direct access to Highway 18, these businesses will fail.

3) Displacement of 4 to 5 community facilities

4) Displacement of portions of 8 utilities

5) 99 acres of land needed for right of ways

The 12 acres zoned residential lost to this proposal will terrifically affect these communities with the added impact of increased traffic and fragmentation of their neighborhoods.

The 20 to 22 acres zoned commercial lost to this proposal includes of most of the commercial zoned land along this corridor. Much of the commercially zoned land that is left would be without access to their previous flow of customers directly off of Highway 18.

The 35 to 38 acres zoned farm/forest and farm/forest overlay which this proposal would take out of production makes up the most level land that exists in

these parcels. This would indirectly effect the remaining parcels of this area there by limiting their usefulness.

The 22 acres zoned exclusive farm use consists of large portions of high value farm land which will be paved over and ruined for further production. Cutting up farm land with the interchanges and frontage roads will make it that much harder to compete. Farming is hard enough now without this.

The 5 acres zoned industrial land would bisect several of the very few industrial parcels in these communities. This would complicate development for industrial businesses to compete.

As a whole package, this proposal would destroy the communities which Highway 18 passes through:

- 1) by cutting up the residential land with the frontage roads and interchange roads,
- 2) by destroying the commercial businesses that now line Highway 18 that employ local residents which would reduce the employment possibilities of the local residents,
- 3) by bisecting industrial parcels which will preclude any development of any size,
- 4) by further fragmenting the natural resource lands in these communities and driving the last of the natural resource users out of business.

The Regional Problem Solving (RPS) zoning process that is described in this proposal is now under legal proceedings to appeal. It's findings and is likely to be drastically revised if not completely removed. Without a revised zoning comprehensive plan, this document is not based on pertinent information as it now exists.

The population study (done by Portland State University) of this area mentions only Williamson. Williamson is not even a part in this proposal and this municipality and its surrounding area is the only part mentioned.

Another big loser of this proposal is the farming community. This four lane, limited access road will kill the farming community by making access to their fields very difficult, and change drainage patterns. Will the elimination of high value farmland help farmers survive? Will the fragmentation of the farmers fields lower the cost of doing businesses? Will further defundations getting to their fields that were once connected and will be cut or here pieces help the farmers conduct their businesses? Will smaller fields lower the cost of conducting business and make farming practices easier?

It is readily apparent upon reading this document that this organization's only goal is to build this project. Real impacts to the surrounding area and residents of these small communities are brushed aside as of no consequence.

The four lane limited access highway 18 which is proposed will be extremely adverse to the surrounding residents. This proposal will affect them in many ways that this study did not examine.

This Environmental Assessment covers solely the factors pertaining to Highway 18. This assessment does not examine the impact of frontage roads upon the residences of Highway 18 and how this will effect their land values and private property rights. It also does not study the effect of removing local owned private commercial businesses from their customer base of Highway 18. How will that effect this area. Will these businesses perish? Will these businesses be able to relocate? How will relocating or perishing affect this area and the residents living here?

None of these items were even considered. Does this document consider how access roads will influence farm operations?

Will the State access road from Fort Hill to Wallace Bridge legally create two parcels that were bifurcated by this road? If so, will this allow more dwellings and more traffic along this road? How will this interact with the parcels and residences already present? How will this impact on the owners private property rights and privacy of their locations? Will this affect property values? Is there sufficient infrastructure to accommodate further development in this area? Will high speed traffic along this access road lower property values? Was there any attention given to this point? Will the interchanges and their on ramps and off ramps negatively effect the surrounding area and it's residents? Will these access roads, frontage roads, and ramps directly or indirectly dissolve the communities? How will fragmentation effect neighborhoods as access roads cut through residential areas? Will this reduce the property values of these districts? Name of this was adequately addressed in this environmental assessment.

Why does ODOT believe that this Environmental Assessment is thorough enough to weigh the impacts when it does not consider many aspects of this proposal's impacts?

This Environmental Assessment of this proposal has been very superficial and short sighted and has not completed the assignment of assesses the impacts of this proposal.

A thorough Environmental Impact Statement needs to be prepared and presented.

If this proposal is to be done, then it needs to be done well

It has not been done well.

Thank you,

Kelly Gordon
6891 Ohms Road
Monmouth, Oregon 97361
vice-chair Friends of Polk County

#30



H.B. Van Duzer Forest Corridor
Steel Bridge Road

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NOV 17 2002

FORMAL WRITTEN COMMENT SHEET P.D.O.T. REGION

Name: Sara Elvigt

Address: 128 NW Willamona Dr
Willamona, OR 97306

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting? Newspaper Project Newsletter

Other (Please List)

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

I am in full support of your new proposal to build an overpass at Fort Hill. I feel this is the only way to keep traffic moving safely along this portion of the highway. A surface grade intersection is not an acceptable solution to traffic concerns in this section of the highway!

DO YOU HAVE ANY ADDITIONAL COMMENTS?

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395



FORMAL WRITTEN COMMENT SHEET

NOV 19 2002 O.D.O.T. REGION

31

Name:

ALAN FLOYD

Address:

128 NW WILSON DR
WILSON OR 97156

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List) Door Posters / Handwritten Address

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I like the new interchange (EIS - compare) part of the current (interim) project for Fort Hill Rd.
I like the good look and interchange design.
I dislike the width of the valley between the roadway. The amount of the valley can seem as the existing road, not the at road design. Vehicle crash frequency/spacing from May 19 or 22 at any 22 or it could be the primary cause, not the cause.

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

I like the newer proposal (design) proposed on November 7th and being in place upon the new interchange. Spending I like the proposed overall design of Fort Hill. I would like to have a better job surface grade before construction. A better job surface would help with the dust. A "paved" for the corridor; 1) improve safety 2) the benefits of the importance of maintaining efficient road network of roads. Therefore I like the newer road proposal on Nov 7, 2002. The design involving safety of many vehicles with the interchanges then road grade and the efficient manner of vehicle travel. Run the overall interchange at Fort Hill.

DO YOU HAVE ANY ADDITIONAL COMMENTS?

Please provide the place for the primary road. Community center, and some opportunity to have some/revenue will give door to achieve more benefit. Additionally, along the road community improvement within the area. The "cost" will be what they want, and matter what the current/proposed limits, some for a revenue project, making the current project.

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

#32



Steel Bridge Road

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FORMAL WRITTEN COMMENT SHEET P.O.T. REGION

Name:

Lori Beldoni

Address:

9874 Golf Club Rd #66
Stayton, OR 97383

Would you like to receive the Revised Environmental Assessment?

Yes

No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List)

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

Go ahead and put 4 lanes in from ~~the~~ Salem and McMinnville to the casino. Need an overpass ~~at~~ Fort Hill, and a good interchange at Valley Junction letting East and westbound traffic flow more easily. Leave roads from Grand Ronde to Lincoln City alone in its historic originality. Don't take out any businesses. Leave historic buildings and business owners alone. Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

DO YOU HAVE ANY ADDITIONAL COMMENTS?

Plan, plan, plan - ask for feedback and then Plan, plan, plan some more. Need a big or long timelines for planning. Thanks Lori Beldoni

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395



H.B. Van Duzer Forest Corridor
Steel Bridge Road

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NOV 19 2002

O.D.O.T. REGION

FORMAL WRITTEN COMMENT SHEET

Name:

Kim McCraft

Address:

Property Address 25740 Yamhill River Rd

Would you like to receive the Revised Environmental Assessment?

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List)

Yes

No

Already have

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

Please turn over to record comments on the Fort Hill Interchange



Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

Don't want to lose direct access to highway for my customers quite concerned about impact on my business. Most board customers have easy access currently. Need to know how you propose to compensate

DO YOU HAVE ANY ADDITIONAL COMMENTS?

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

34



Steel Bridge Road

RECEIVED

NOV 19 2002

FORMAL WRITTEN COMMENT SHEET P.D.O.T. REGION

Name:

Randy A. Smith

Address:

32355 Salmon River Hwy
Williamson, Oregon 97396

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List)

the Grand Ronde community

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I Don't like any thing
about it.

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

Don't like it, but
if it has to be done
do it their

DO YOU HAVE ANY ADDITIONAL COMMENTS?

I have lived here all
my life. I love Grand
Ronde. Don't Destory it.

Grand Ronde is not the cause
of Sunday back up. alot of it is
the gas. I think we the
people could have been able to vote
on it.

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

H.B. Van Duzer Forest Corridor
Steel Bridge Road

FORMAL WRITTEN COMMENT SHEET

RECEIVED
NOV 9 2002
O.D.O.T. REGION



Name:

IN-CHA LEE & KAP-SU LEE
(SEAWAY MARKET)

Address:

3800 SALMON RIVER HWY
PO Box 215
GRAND RONDE, OREGON, 97347

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper Project Newsletter

Other (Please list) PUBLIC OPEN HOUSE HEARING 11-07-02

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

DEAR SUSAN WHITNEY

I AM THE OWNER OF SEAWAY MARKET LOCATED
NOT FAR FROM SPIRIT MOUNTAIN CASINO.

I DID NOT GIVE ANY CONSENT TO H.B VAN DUZER
FOREST CORRIDOR/ODOT BY CLASHING OUR BUSINESS
TO DISPLAY ANY BARRIAGE ON HIGHWAY 18.

IF SO, H.B. VAN DUZER CORRIDOR TO STEEL BRIDGE
RD & ODOT AT ITS DISCRETION ENGAGE SUBCONTRACTORS
TO PERFECTLY WORK HEREUNDER, PROVIDED SHALL
FULLY PAY THE LOSS OF OUR BUSINESS AND IN ALL

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

→ INSTANCES REMAIN RESPONSIBLE FOR
THE PROPER COMPLETION OF THIS CONSTRUCTION.

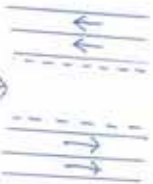
THANK YOU.

11-15-02

IN-CHA LEE, KAP-SU LEE,

DO YOU HAVE ANY ADDITIONAL COMMENTS?

X How do you think about this both Tuning Line



THAT BOTH TUNING LINE MAY BE NO MORE PROBLEM,
(ANYBODY, ANYTIME, ANYPLACE, ANY BUSINESS.)

WHY?

THAT AREA HAVE A LOT OF OLD KIND BUSINESS.
(CASINO, GRAND PAVIL HISTORY, TENDING CO, PUMP,)
ANYTIME, GAS STATION, ELECTRIC, ETC.

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

FINAL
I'D LIKE CALL THE AREA BUSINESS AREA NO.
(SPECIAL TRAVEL)



Oregon Department of Transportation
H.B. Van Duzer Forest Corridor
Steel Bridge Road

FORMAL WRITTEN COMMENT SHEET

Name: Walt & Elin Prosser

Address: 25250 Stahlhill River Rd.
Williamette, OR 97146

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting? Newspaper Project Newsletter

Other (Please List) _____

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

We will need some kind of sound barrier so we can enjoy so fast from the road highway on the bridge. Grand might have to be on the main.

*Thank you
 Walt & Elin Prosser*

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

H.B. Van Duzer Forest Corridor

Steel Bridge Road



FORMAL WRITTEN COMMENT SHEET

Name:

Andie Leister

Address:

*29320 Salmon River Hwy
Grand Ronde OR 97114*

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List) _____

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I think the build alternative will destroy the community of Grand Ronde, Willamette and Fort Hill. The small town feel will give way to the feeling of living on the side of I-5. The benefit to the coast will increase the access for business will become more difficult. The area residents will have much harder time getting around. I also am not happy about having a Four lane freeway on our side (the front of my place) and a access road off my back porch. It will make my place a very unpleasant place to live.

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

I do think something needs to be done with the Fort Hill area, but do we need something like a bridge?

DO YOU HAVE ANY ADDITIONAL COMMENTS?

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

H.B. Van Duzer Forest Corridor

Steel Bridge Road



FORMAL WRITTEN COMMENT SHEET

Name:

DEE J SHELL HARLEY

Address:

2570 Yamhill Ruice Rd
Williamette OR 971396

Would you like to receive the Revised Environmental Assessment?

Yes

No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List)

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

Handwritten notes, mostly illegible due to blurriness.

Please turn over to record comments on the Fort Hill Interchange

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WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

By closing off access from Yamhill Ruice Rd to Fort Hill Rd, this will create our property to turn into a dead end. Call-DS-SHE, I already have problems with trespassers with Lemis Garbages, walk these dogs, pretty like I clean up my front yard (enough to be coming in dead end, I have animals and have had problems w/ tenants dogs chasing them and destroying them

DO YOU HAVE ANY ADDITIONAL COMMENTS?

Proposed ones. Problems county turn around prior to reaching my property lots with signs starting from end -- no turn around -- Reluctant Property.

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

H.B. Van Duzer Forest Corridor

Steel Bridge Road



FORMAL WRITTEN COMMENT SHEET

Name:

Nancy Adams

Address:

2077 Al Star 9910
MADISON OR 97128

Would you like to receive the Revised Environmental Assessment? Yes No
How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List)

PLEASE PUT ME ON YOUR MAILING LIST

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

OR EMAIL ME AT:
Nancy@vialink.com

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

D

H.B. Van Duzer Forest Corridor

Steel Bridge Road



FORMAL WRITTEN COMMENT SHEET

Name:

Kate Cox

Address:

2077 Al Star 9910
MADISON OR 97128

Would you like to receive the Revised Environmental Assessment? Yes No
How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List)

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

Please put me on the mailing list
Thanks..

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

E



FORMAL WRITTEN COMMENT SHEET

F

Name:

Kristian Duzick

Address:

28100 Salmon River Hwy
Grand Ronde, OR 97347

Would you like to receive the Revised Environmental Assessment? Yes No
How did you hear about this meeting? Newspaper Project Newsletter

Other (Please List) deal with mitigation from a community friend.
WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I don't like any of it. Money could be well spent elsewhere. Not to mention your plan goes right in front of possibly right there my new home. It doesn't get that it, it doesn't show me any access. No body would give me any access. I want to know how long it will take to know how long it will have my home. I worked really hard to be able to buy my home by myself at the age of 35. Now you want to take everything I ever worked for away. I have some of my dreams. Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

The Reason why people live in small communities is because we don't want big cities. The only thing this would do is destroy our small community's way of living, and in the end our lives.

DO YOU HAVE ANY ADDITIONAL COMMENTS?

How would you feel if I put an X over your ~~name~~ your home in your community?

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

H.B. Van Duzer Forest Corridor

Steel Bridge Road

11/7/02



FORMAL WRITTEN COMMENT SHEET

Name:

Randy & Jenny Brown
do Patrick Brooks

Address:

25930 Salmon River Hwy
Cullamena OR 97396

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List) notified by post card.

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

NO ACCESS to Hwy Expressways
Did Not address Any Issue to
our yrs of comments over the
Hwy → Flooding on our property
that we have to deal with
Every year. NO mention to that
Issue & NO BUILD.

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

conf -
Too much concern is given
only to the Casino and
Not Residents or Business

NO BUILD.

DO YOU HAVE ANY ADDITIONAL COMMENTS?

This property 25930 Salmon River Hwy
sustain's all of the Hwy water
thru this property as in a
River that runs thru is
not acceptable and was
not addressed at all.

Thank you
Randy & Jenny Brown

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

11/7/02



FORMAL WRITTEN COMMENT SHEET

H

Name:

Brett & Gail Henderson
104 Grand Ridge Shopping Center

Address:

8580 Grand Ridge Rd
P.O. Box 369
Grand Ridge, OR 97347 (503) 879-2811

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List) Marketing List

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

We are in favor of the no-build alternative. We have a grocery store that would be eliminated in this process. The community needs a store, one that isn't just owned by the Tri-Val as they are building a store at the valley junction intersection.

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

Dislike - I buy my gas at the station - I ~~would~~ would not purchase the need to get gas for the convenience that is involved.

DO YOU HAVE ANY ADDITIONAL COMMENTS?

my husband & I were both raised here & then moved away. Have since moved back & wanted to invest in the community, & raise our family here.

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

H.B. Van Duzer Forest Corridor
Steel Bridge Road



FORMAL WRITTEN COMMENT SHEET

I

Name:

Martin Colburn

Address:

27285 John Rd
Willamette OR 97146

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List)

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

- 1) I question how the access for on off John Rd & other frontage Rd. will work for people.
 - 2) What is going to happen to businesses such as Bony Co & Ft Hill & Grand Rands. area if there is a divided highway preventing (not allowing) turn lanes to access these businesses. Without that access these businesses & communities (including Ft Hill & Grand Rands) they will no longer exist.
 - 3) Use Grade Paved, Paving etc @ Interchange. Paving on East of Study area.
- Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

Some type of interchange at Willamette Bridge & Ft Hill ok - just don't build off ~~the~~ or divide the Highway. I have the rest of my ideas - focus on East of Study Area

DO YOU HAVE ANY ADDITIONAL COMMENTS?

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

H.B. Van Duzer Forest Corridor

Steel Bridge Road



FORMAL WRITTEN COMMENT SHEET

Name:

Elmer W Werth

Address:

9030 Heba Rd
Grand Rapids OR 97347

Would you like to receive the Revised Environmental Assessment? Yes No
How did you hear about this meeting?

- Newspaper
- Project Newsletter
- Other (Please List) _____

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I had my son
I own property East and also west of
the Casino on the South side of the
highway. you show me access to either
property. This involves a total of near
700 acres you seem intent on giving to
the Casino. Who is being paid for this
design?

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

H.B. Van Duzer Forest Corridor

Steel Bridge Road



FORMAL WRITTEN COMMENT SHEET

Name:

Dave Shuey

Address:

4100 Sengstacke Drive
Atlanta GA 30330 Grand Rapids Oregon 97347

Would you like to receive the Revised Environmental Assessment? Yes No
How did you hear about this meeting?

- Newspaper
- Project Newsletter
- Other (Please List) _____

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I believe the increase in traffic is inevitable, perhaps not
as was once thought because of the change of ^{road access} ~~road access~~
Sellers of their shares of General Motors. Hudson/Aviation/US has
The increase due to local improvements will add to
traffic problems.
I would see to review an option offered at Astoria Zoo.
To improve the connection of I-5 to reduce impacts
upon existing businesses especially along Grand Blvd. Last but not
least, allow water to be restored with faster land survey, impact hour
of high surveys & note first, high productivity commercial for a route
through the water. Water level was considered to that should have drive along
the bank area.

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to
Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B,
Salem, OR 97301-5395

Steel Bridge Road



FORMAL WRITTEN COMMENT SHEET

Name: Peter Letting

Address:

81215 Salmon Riv. Hwy
Williamson, OR 97396
503-876-2454

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List) _____

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

THE NEW PROPOSED TRAPPTAGE ROAD IS A "DEAD END" ON THE EAST END. I WOULD LIKE TO SEE THE "DEAD END" MY OPINION IS, IF I HAVE A FILE HOW MUCH WORKER IS IT GOING TO TAKE THE FIRE DEPARTMENT TO GET TO HOUSE ??
IF I SHOULD HAVE A SERIOUS ACCIDENT OR FIRE HOW LONG WILL IT TAKE THE "911" CLEW TO GET TO ME ???

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

Steel Bridge Road



FORMAL WRITTEN COMMENT SHEET

Name:

Linda Fink

Address:

*23000 Grand Lend Rd
Grand Lend OR 97347*

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List) *Advice in mail*

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

I do not like having all the local businesses eliminated for the convenience of out of the area traffic. Access to the highway is the problem you - not accidents. Accidents will increase if access is not improved. We in the area should not have to give up our daily convenience for the convenience of an urban access populations.

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

Do not like an access road that goes through farmland. Please see if a road can be built along the railroad tracks.

DO YOU HAVE ANY ADDITIONAL COMMENTS?

Please, just give us lights at Valley Junction so those of us ~~near~~ living ~~to~~ the south north - up they can get on to the highway going east. Lights regulated to be red/green when traffic is heavy and yellow when it's light (or timed) would solve the problem now. We should have to wait 15 years

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395



FORMAL WRITTEN COMMENT SHEET

Name: Erin E Getzler "Lamers"

Address: 29330 + Sacres to the side
Salmon Riv Hwy

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting? Newspaper Project Newsletter

Other (Please List) Had Canyad Not Hear About this BS

WHAT DO YOU ~~DISLIKE~~ DISLIKE ABOUT THE BUILD ALTERNATIVE?
ODOT is basically pushing out family "Family that has put sweat + hard work for family hand to pass from generation to generation. You are going to make it really hard for residents to get out or in on the property. Why should I give up family land that my family worked for. We pay the taxes yet the your pin is to basically "Repe the grand road community". If this pin goes through it will fall like work living on I-5. We are not Salem, Portland we are small town "country land" and that's the way it should stay.
Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORT HILL INTERCHANGE?

DO YOU HAVE ANY ADDITIONAL COMMENTS? I have tried to better my family but how can I better my family when my Dad's house is going to be like a sandwich and where I want to put my house you want to put a road through it. Is that fair "no". I want to raise my kids in small town values but if you put this damn road it will be like Salem if I wanted Salem in my back yard or if I wanted I-5 at my front door and my back door I'd moved there. But I don't so because my land ain't.

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

Steel Bridge Road



FORMAL WRITTEN COMMENT SHEET

Name:

Erin & Getzel Barnes

Address:

29320 Salmon River Hwy + S Access

Would you like to receive the Revised Environmental Assessment? Yes No

How did you hear about this meeting?

Newspaper

Project Newsletter

Other (Please List) How can you not

WHAT DO YOU ~~DISLIKE~~ DISLIKE ABOUT THE BUILD ALTERNATIVE?

How can I not dislike this plan. you are trying to bring I-5 and the big city to small town farm land. you're going to wipe the whole small town of Grand Ronde out. This plan is in for disaster. It's plan is one way or the other going to self destruct. you may have the road but the people will be gone. How can you put money on family land, family value. # I hope this stops you in the face

Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

WHAT DO YOU ~~DISLIKE~~ DISLIKE ABOUT THE FORT HILL INTERCHANGE?

What makes you think you can chop my land how can you chop the encroachment of Grand Ronde. In order to get to my land I'm coming from Lincoln city I have to go approx. 5 miles to get to my side of the access road then back 5 miles. That's 10 miles out of my way. Vice Verso if I'm coming from Mcminville is this fair "NO" leave Grand Ronde alone

DO YOU HAVE ANY ADDITIONAL COMMENTS?

Please drop this form in the comment box or mail by Monday, November 18, 2002 to Susan Whitney, Environmental Project Manager, 455 Airport Road SE, Building B, Salem, OR 97301-5395

HOLDER Anne P

Public Comment

From: HOLDER Anne P
Sent: Monday, February 24, 2003 2:17 PM
To: DEJAR, John G; WAINMAN, Susan; FOX, Alan J
Cc: BISHOP, David E; ODOT-CORRIDOR Demand I
Subject: HWY 18 Safety Corridor Annual Plan

I sent the draft Annual Plan for each safety corridor out to governmental and known interested citizens for comments. Dave Bishop handled out additional copies for comment of the Hwy 18 Annual Plan at last weeks Yamhill City/County Dinner.

Kathy, These stopped by to tell me she was concerned about not receiving this letter directly. She has been involved on several Hwy 18 projects pasting addresses and also because she owns Hwy 18 Safety Corridor frontage. I explained the safety corridor plan and she seemed OK with it and told her it is a different effort than those of John Dejar, Susan Wainman, Alan Fox etc.

Please do let me know if either of you have a mail list you think I should use to add persons from your committees to my safety corridor annual plan mailing list.

Thank you - Anne

ODOT Region 2, Transportation Safety Coord.
455 Airport Road SE, Building B
Salem, OR 97301-5395
(503) 986-2763
Fax: (503) 986-2840
anne.p.holder@odot.oregon.gov



*How come you guys have so many bills
no numbers? you just have one meeting after
the other - you ask us what we think - then you
plan - so do the opposite! We need Hwy 18
colored! The meeting, it's always been "let's
turn lane" - what are you calling it - just safety
off our taxes with planning - put the numbers
on the line! We've always been asking &
nothing done!*

RE: Draft Oregon Route 18, 2003 Safety Corridor Plan To date there no
Dear Stakeholder: response from law! your top keep!
Oregon Route 18 (Grande Ronde to Sheridan) was designated a safety corridor in August 1996.
A lot of work has been done to make this corridor a safer roadway. Although, the three-year
average fatal and serious injury crash rate is still above the statewide average. The above
average rate is the initial criterion to maintain a safety corridor's official designation. The
consolidation of a safety corridor also rests on the willingness, ownership and empowerment of its
stakeholders - we see willing & committed to carry out safety
can do for safety of their own jurisdiction!
Please provide comment on the attached Draft Annual Safety Corridor Plan & proposed efforts
for this year and volunteer in the "Education" category to demonstrate your continued support.
Then, return your comments by February 25, 2003 to my attention: Anne Holder, Transportation
Safety Coord., 455 Airport Rd, Bldg. D, Salem, OR 97301, (503) 986-2763, Fax (503) 986-
2840, or via email to: anne.p.holder@odot.oregon.gov

Additional information regarding the ODOT's Safety Corridor Program is available online at
http://www.odot.state.or.us/transport/safety/roadway_safety.htm
I look forward to working with each of you throughout the New Year and thank you for your
continued interest in transportation safety!

Sincerely,
** if this is "annual!"
we're more getting on of them before! And if
Dave Bishop had't kicked this from the RT
Anne Holder, ODOT
Bates at the City/County dinner, the so is our
Region 2 Transportation Safety Coordinator
Attachment: ODOT Feb 10 2 v out area out 2 v reply 2 v
This 2 v
* but you took down our "Plan
Market clear" sign. They were put up for safety -
a warning about increased activity ahead - no other
has occurred. Let us purchase. Nothing sign & pay money
for them, then! We always got turned down for them!*

..... 2002-2005 STATE CORRIDOR PLAN
 (Grand Route to Sheridan)
 Milepost 20.7 - Milepost 38.40

Proposed activities based on safety corridor criteria: *just under the road!*
 Enforcement criteria: A minimum of 50 regular enforcement hours per month in addition to any overtime scheduled for the corridor. (This is a multi-agency total.)

Agency: Oregon State Police, 50 Regular Hours Monthly
 Signed: Lt Matt West, Medfordville OSP (503) 472-0294

Agency: Yamhill County Sheriff's Office, 30 Regular Hours Monthly
 Signed: Sgt. Rob Nye, Yamhill County (503) 434-7506

Agency: Polk County Sheriff's Office, 35 Regular Hours Monthly
 Signed: Sgt. J. VanLasson, Polk County (503) 623-9251

Education criterion: A minimum of four quarterly public information efforts. This may be a combination of print, radio, TV, cable, billboards, theater ads, presentations to local schools, civic groups, etc.

Note: Stakeholders please volunteer for proposed efforts. Provide as much information as possible now and report actual events upon completion to Anne Holder, (503) 986-2763.

Educational activity: ODOT press release of Safety Corridor Plan Implementation
 Date: February 2003
 Responsible Party: ODOT Region 2 - Anne Holder (503) 986-2763
 Completion Date: To be reported by Responsible Party/Stakeholder

Educational activity: would include an "accident ahead" sign
 Date: _____
 Responsible Party: OTG or electric sign
 Completion Date: 2003/08/25 before Binley (19)

Educational activity: we are 3/4 mile E of Crivens
 Date: _____
 Responsible Party: permanent sign on
 Completion Date: any 503-671-5479

ODOT has notes of every along the front of one SOS' highway drawings!

Educational activity: would replace the Elm Macklet
 Date: May - "1970"
 Responsible Party: Agony West & Bob of an agency
 Completion Date: to also maintain by security guard!

Engineering Criterion: Annual review of minor safety fixes and updating of traffic control devices (signing, striping, delineation, illumination) for compliance with current standards will be completed by ODOT District 3. *Early this 503-898-5278*

Possible fixes to be discussed at upcoming Ore. 18/22 local traffic safety committee meeting are the entrance to the Dairy Queen and the possibility of safety enhancements. There is no funding identified.

Statewide Transportation Improvement Projects (STIP) in 2002-2005 approved STIP.

Key #: 10623
 Section: OR 18: Fort Hill-Wallace Bridge
 MP #: 24.20-26.90
 Description: Add one lane (median control) May include access consolidation and/or footage road.
 Construction Year: 2004 *Don't do this! There's driveway and to avenue!*
 Key #: 09278
 Section: OR 18: Salmon River Highway @ Fort Hill Road
 MP #: 23.84-23.86
 Description: Realign Fort Hill Road and build left-turn refuge to reduce conflicts.
 Construction Year: 2004 *This is ridiculous!*

*space and then driveway at Ft Hill!
 Waste of money!*

ata Table

Don't make a bypass way out of it or else you'll have more accidents.

ORE 18, Safety Corridor, Established August 1998
 Milepost 20.7 - Milepost 28.4
 Valley Jet Safety Corridor

Year	Avg Daily Traffic	18 Safety Corridor # of Crashes	18 Safety Corridor Rate	State Crash Rate	18 Safety Corridor Fatal and Serious Injury Rate	18 Safety Corridor Fatal and Serious Injury Rate	18 Safety Corridor Fatalities (Persons)	18 Safety Corridor Fatality Rate	State Fatality Rate
1999	7,500	49	1.01	0.98	9	18.62	1	3.04	3.82
1998	7,800	50	0.98	0.76	6	11.91	2	3.67	2.63
1997	7,800	32	0.63	0.78	3	23.46	4	1.94	3.11
1993	8,000	29	0.54	0.75	4	7.74	0	0.00	3.32
1989	8,100	43	0.79	0.70	12	22.12	0	0.00	2.73
1985	8,100	43	0.73	0.74	5	8.51	3	6.11	3.58
1989	10,500	45	0.68	0.79	4	5.94	4	4.38	3.87
1997	12,300	35	0.44	0.72	6	6.50	2	2.62	2.70
1998	12,300	44	0.54	0.71	8	9.78	6	7.32	3.03
1999	12,800	48	0.54	0.73	10	12.10	11	13.31	2.34
2000	12,600	45	0.56	0.82	3	3.09	0	0.00	2.80
2001	12,900	50	0.67	0.79	8	7.55	2	2.40	2.68
						2.68			4.18

Three-year average fatal & serious injury crash rate must be above 110% of the 3-year statewide average for designation.

Year and Annual Average Daily Traffic
 Oregon and Crash Rate Per Million Vehicle Miles Traveled
 Fatal and Serious Injury Crashes and Rates Per Hundred Million Vehicle Miles Traveled
 Fatalities (Persons) and Rates Per Hundred Million Vehicle Miles Traveled

The data shows that the Ore. 18 crash rate is typically less than the statewide average.

The Ore. 18 fatal and serious injury crash rate is higher than the statewide average for year 2001. For the year 2000 the rate shows a reduction to almost half of the statewide average. For the years 1998 and 1999 the rate is higher than the statewide average. In summary the Ore. 18 fatal and serious injury crash rate moves around and the statewide rate remains pretty constant.

The Ore. 18 fatality rate is less than the statewide average for the year 2001. The fatality rate on Ore. 18 moves up and down and the statewide fatality rate remains pretty consistent.

Summary: Round the way you put on they is an accident for safety. Also you could maintain the left turn or "middle lane" cars of one (three) business may highway runs the road, it would be a lot safer than the highway they is or a "highway corridor" like around suggested at our head they is meeting.

2-24-03 - What is needed is a plan to bypass Hwy 18 on Williams following the foothills and coming out at a new mile 20.7 in the corridor. This will be much more cost effective than any and all the improvement now being proposed by ODOT under their present plans for the corridor improvement under the regional problem solving plan. This will provide for better (2 lane) road project that will give us better two lanes. This will also leave Dear Stakeholder: The present business of farmers the highway.

RE: Draft Oregon Route 18, 2003 Safety Corridor Plan
 Address: Two Chaires. This will also leave Dear Stakeholder: The present business of farmers the highway.
 Oregon Route 18 (Granada Route to Sheridan) was designated a safety corridor in August 1998. A lot of work has been done to make this corridor a safer roadway. Although, the three-year average fatal and serious injury crash rate is still above the statewide average. The above average rate is the initial criterion to maintain a safety corridor's official designation. The continuation of a safety corridor also rests on the willingness, ownership and commitment of its stakeholders.

Please provide comment on the attached Draft Annual Safety Corridor Plan's proposed efforts for this year and volunteer in the "Education" category to demonstrate your continued support. Then, return your comments by February 25, 2003 to my attention: Anne Holsler, Transportation Safety Coord., 455 Airport Rd, Bldg. B, Salem, OR 97301, (503) 986-2763, Fax (503) 986-2840, or via email to: anne.holsler@state.or.us.

Additional information regarding the ODOT's Safety Corridor Program is available online at <http://www.odel.state.or.us/transportation/safety>.
 I look forward to working with each of you throughout the New Year and thank you for your continued interest in transportation safety!

Sincerely,
 attaches they now have. The barriered improvement now completed by ODOT you'll cause many problems
 Anne Holsler, ODOT
 Region 3 Transportation Safety Coordinator

Attachments
 for business and farmers for support & press that the weather fire insurance not going up due to access problem
 Nelson's Farm in the area
 30125 Autumn Run Hwy
 Forest Grove, OR 97134
 30035 Solman for Hwy 18
 Highway 18

APPENDIX D
Public Hearing Transcript

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OREGON DEPARTMENT OF TRANSPORTATION

Van Duzer Forest Corridor)
Environmental Assessment)
)

TRANSCRIPT OF PROCEEDINGS

BE IT REMEMBERED, That the above-entitled
cause came on for Hearing at the Grand Ronde Governance
Building, 9615 Grand Ronde Road, Grand Ronde, Oregon,
on Thursday, November 7, 2002, at 6:00 p.m.

Martin Hauge
Official Court Reporter
Polk County Courthouse
Dallas, OR 97338-3178

2

1 FORMAL TESTIMONY
2 MS. GIRARD: Our first speaker will be
3 David Franzen.
4 MR. FRANZEN: My testimony is completely
5 written so I will be able to give that to you when
6 I am done.
7 (Written statement read orally.)
8 --oo0oo--
9
10
11 MS. GIRARD: Our next speaker is Dennis
12 Werth, and after Dennis is Don Yates.
13 MR. WERTH: My name is Dennis Werth. I'm
14 a resident of Valley Junction. My address is 8990
15 Hebo Road, Grand Ronde.
16 I have some written comments I will
17 submit, and so I would like to kind of paraphrase a
18 couple of issues that my written comments address,
19 and I'll give my summary first.
20 As it stands now, my recommendation to
21 ODOT and the Federal Highway Administration is not
22 to do this build alternative. My recommendation is
23 no build.
24 I don't make that recommendation lightly
25 because I was on the steering committee, and I

3

1 think there is a lot of good things going on in
2 this plan, but let me focus on three key areas
3 here: First, as a resident of Valley Junction my
4 focus is strictly on Valley Junction. I don't
5 pretend to be an expert on other parts of this
6 project area.
7 I don't think enough attention was paid
8 in this environmental assessment to impacts on ag.
9 and forest land. ODOT recognizes this is largely a
10 rural area, and I just don't think you gave
11 detailed -- attention to the detail that you should
12 have on what you're going to do with this plan on
13 the rural area.
14 The second point I wanted to focus on
15 here is what I see is a serious flaw, and that is
16 the lack of frontage road east and west of the
17 Casino at Valley Junction on the south side of the
18 Oregon Highway 18.
19 This was brought up in the steering
20 committee and it's still not on your plan and I'm
21 not sure why. I would like ODOT to apply the same
22 standards at Valley Junction that I just heard
23 Alan -- I believe it was Alan -- speak of that was
24 going to happen at Fort Hill; and that is at the
25 same time that you put in a four-lane concrete

4

1 barrier highway you make sure that you have your
2 frontage roads in place.
3 And my position of Valley Junction is
4 that some of us are required to give so much to
5 benefit what we see as a single interest, and
6 that's the Casino, and we're not getting much in
7 return.
8 The last point I would like to focus real
9 quickly is: Why at Valley Junction, why is Oregon
10 22 from the ramp where it rejoins 18 to the dead
11 end at the Casino front door, why is that
12 considered part of Oregon Highway 22? It seems to
13 me that's a local service road. Oregon 22 coming
14 from Tillamook crosses 18 and rejoins 18 at Valley
15 Junction. From then on it's a local service road,
16 or it should be, and it crosses two properties
17 prior to getting to the property. Why doesn't this
18 local service road, which you're calling Oregon 22,
19 why doesn't it service those two properties as well
20 as a third property that we've arrived at?
21 Thank you.
22 --oo0oo--
23 MS. GIRARD: Thank you, Dennis.
24
25

5

1 MS. GIRARD: Don Yates is up next. And I
2 would just like to point out to all of you, anyone
3 who wants to speak privately afterwards with the
4 court reporter in a one-on-one session, there's a
5 sign-up sheet over at this end of the table. So
6 please feel free to come up privately.
7 And I understand that Don has a video
8 presentation which we were not able to accommodate
9 tonight, but maybe after this testimony if any of
10 you are interested, you could gather around his
11 laptop and take a look.
12 MR. YATES: Thank you, Linda. And I want
13 to thank ODOT as well for the flexibility to afford
14 the opportunity to speak this evening when that
15 wasn't part of your planned process.
16 My name is Don Yates. I live at 29940
17 Salmon River Highway here in Grand Ronde. And as
18 she said, I have a Power Point presentation I would
19 love to show anybody that's willing to hang around
20 and watch afterwards. But it's based on data that
21 I obtained, crash data, from the Oregon Department
22 of Transportation; and since I can't show you the
23 data, I am just going to give you the conclusions.
24 First of all, I would point out to you
25 that in your statement there is an erroneous

<p style="text-align: center;">6</p> <p>1 statement on page 108 that says that turning is the 2 most frequent accident on Highway 18. It's not. 3 It's the fourth most frequent accident on Highway 4 18 following rear-end collisions, collisions with 5 fixed objects, which 336 and 338 turning accidents 6 or 191. That's over the last eleven-year period. 7 What does the data show? Crashes happen 8 nearly -- 9 I should tell you I divided the study 10 into three areas. The area on 18 west of this 11 study area, the study area itself, and the area 12 east of the study area from here to -- from Steel 13 Bridge Road to McDougal Junction where it joins 14 99W. 15 What does the data show? Crashes happen 16 nearly twice as frequently east of the study area 17 than in the study area. 18 During the last two years there have been 19 no traffic fatalities in the study area, though 20 nine lives were lost on Highway 18. And that 21 doesn't include 2002, none of this does. 22 Rear-end collisions are the most common 23 type of collision in the study area; however, rear- 24 end collisions east of the study area outnumber the 25 study area by two to one.</p>	<p style="text-align: center;">8</p> <p>1 cannot afford to build interchanges and 2 intersections where the data shows that accidents 3 happen least frequently when the same data shows 4 that the accidents are happening most frequently 5 elsewhere on the same highway. 6 A high-speed rural expressway will only 7 exacerbate the obvious traffic safety problems that 8 already exist elsewhere on Highway 18. 9 There's only one reasonable alternative 10 in the light of the data I have just given you: 11 The no-build alternative. The money must instead 12 be spent directing the intersections on Highway 18 13 where the accidents are happening and where the 14 public is dying. 15 There are some low-cost solutions: You 16 can change the eastbound exit at the Casino to a 17 merge lane controlled with a light during peak 18 traffic periods like the freeway entrances in 19 Portland. 20 You can have electronic reader boards 21 west and east of the Casino to warn traffic of 22 slowing ahead, a progression of three or four 23 boards, activated as traffic warrants. 24 You can install a traffic light at Valley 25 Junction that is a normal flashing yellow and use</p>
<p style="text-align: center;">7</p> <p>1 Accidents involving trucks are occurring 2 with greater frequency outside the study area. 3 Head-on crashes occur more frequently 4 east of the study area. 5 Sideswipe meeting crashes occur twice as 6 frequently east of the study area. 7 Angle crashes occur 15 times more 8 frequently east of the study area. 9 Crashes while turning occur with greater 10 frequency to the east of the study area by over two 11 to one. 12 The greatest number of intersection 13 accidents on Highway 18 occur east of the study 14 area by a margin of six to one. 15 The greater number of truck crashes, 16 turning accidents, traffic fatalities, accidents at 17 intersections, angle crashes, head-on accidents, 18 sideswipe accidents, rear-end collisions on Highway 19 18 all occur east of the study area despite the 20 safety corridor. In fact, every type of accident 21 ODOT keeps statistics on occurs more frequently 22 east of the study area. 23 Now, we all know that money for highway 24 improvement is scarce and, therefore, we must 25 prioritize projects that improve public safety. We</p>	<p style="text-align: center;">9</p> <p>1 sensors on Highway 22 to trigger the function as a 2 stoplight only when traffic backup on Highway 22 3 warrants its operation. The reader boards and 4 Casino exit control light should automatically 5 coordinate. 6 The interim solutions I suggest are cost 7 effective and should be doable within the annual 8 transportation budget. Further, they will provide 9 immediate relief to traffic congestion problems in 10 the study area. We don't have to wait 20 years. 11 --oo0oo-- 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>

10

1 MS. GIRARD: We have next Alan Floyd, and
 2 after Alan is Wes Shenks.
 3 MR. FLOYD: Thank you. My name is Alan
 4 Floyd. I am a resident of Willamina, and I am a
 5 professional environmental coordinator, or
 6 whatever, for an industrial facility, so I have
 7 extensive knowledge of environmental regulations.
 8 Some of this is going to seem like Greek to you
 9 so...
 10 The first issue I want to address is
 11 effective March -- actually in the month of March,
 12 2003, the National Pollutant Discharge Elimination
 13 System, part of the Clean Water Act, will require
 14 all Phase 2 regulations to be initiated.
 15 That includes best practices control
 16 technology, best available technology, best
 17 continuous technology, and new source performance
 18 standards. As I said, it sounds like Greek.
 19 Basically the surmial of that is, there
 20 is many plans that have to be implemented for any
 21 construction or development to occur.
 22 One of those issues is TMDLs, total
 23 maximum daily loading. It refers to water sheds.
 24 In this plan, and I have read it
 25 thoroughly, there is only one issuance of TMDLs

11

1 issue. I would bet, put a lot of money on it, if
 2 there is some other issues that should be
 3 addressed, specifically TSS, which is total
 4 suspended solids, occurring during construction.
 5 Also oil and grease issues. They seem --
 6 This is all impromptu, by the way. It
 7 has been a long time since I did an impromptu
 8 speech in college.
 9 Anyway, these issues were not addressed
 10 in this formal plan so I would like to raise that
 11 concern to the steering committee. I would like to
 12 be involved in that issue.
 13 But now I would like to change and shift
 14 gears to this Fort Hill intersection specifically.
 15 At first I had intentions of being here tonight
 16 with the intentions of the no-build idea.
 17 As I looked at the original one, which is
 18 the one up on the upper-right corner, it seemed
 19 erroneous and kind of vague and had no points and
 20 didn't offer any real solutions.
 21 I come tonight and they have another
 22 option. I don't know how many options I will get
 23 because there is six of them, I think, in here just
 24 of Fort Hill -- or four, excuse me.
 25 I would say, though, I am an advocate for

12

1 an overpass at Fort Hill for any intersection
 2 rather than a surface intersection. Surface
 3 intersections will not improve any conditions that
 4 already exist today.
 5 So if I have one thing I do like about
 6 your plan, I do like the overpass and the on-ramps
 7 and off-ramps better than surface-grade
 8 intersections.
 9 There's no way a person can come up to a
 10 four-lane intersection, merge across two lanes,
 11 stop in the middle and then get up to 55 miles an
 12 hour and merge onto the highway.
 13 Thank you, sir. One minute?
 14 I guess in summary: There's a lot more
 15 planning that needs to be done, and I would be more
 16 than willing to be involved in any of the steering
 17 committee activities, especially related to Clean
 18 Water Act issues and Fort Hill intersections.
 19 Thank you.
 20 MS. GIRARD: Could you give your address.
 21 MR. FLOYD: 128 N.W. Willamina Drive.
 22 --oo0oo--
 23
 24
 25

13

1 MS. GIRARD: Our next speaker is
 2 Wes Shenks followed by Tim Thorp.
 3 MR. SHENKS: My name is Wes Shenks. My
 4 address is 9075 Fort Hill Road, Willamina.
 5 I'm going to speak specifically of the
 6 Fort Hill project.
 7 We own land around the sawmill, my mother
 8 and my father -- or my mother and my brother and I.
 9 And I guess I've raised this question before at
 10 different times: I'm curious whether anybody from
 11 ODOT or anybody has ever went to this Fort Hill
 12 Lumber Company and asked them or quizzed them: Any
 13 idea how long they might be in business?
 14 Again, and has anybody approached Hampton
 15 Lumber Company to see if the railroad right-of-way
 16 might be a possible way to run the frontage road
 17 rather than go out through all the farmland that
 18 you've got designed to go through.
 19 I'm also in favor of the no-build right
 20 now for that plan. I don't like it. To me it's no
 21 good. I will go along with an overpass someplace,
 22 but I don't like where it is.
 23 And so I guess that's about all I have to
 24 say is that I am just concerned. I just really
 25 don't like the project right now. --oo0oo--

14

1 MS. GIRARD: We have Tim Thorp, and then
2 Bruce Harrington follows Tim.
3 MR. THORP: Good afternoon. Tim Thorp.
4 I live at 24195 Salmon River Highway.
5 I am much the same as Wes Shenks. I
6 don't want a road going through the middle of my
7 property and chopping it up. We went into an
8 agreement with the State of Oregon when we put in
9 for the highway, and we basically had access to and
10 from across the highway, and now I think we should,
11 you know, regain that access.
12 I asked one of the people here why we
13 don't have the road next to the highway. He says,
14 "Well, it was wetland."
15 Well, Highway 18 is sitting there. It's
16 wetland. Why do you want to put the access road up
17 in the middle of my field and chop my parcel up
18 into nothing? It decreases the value of my land.
19 And \$13 million? It doesn't make sense to me.
20 Does it to you?
21 That is all I've got to say.
22 --oo0oo--
23
24
25

15

1 MS. GIRARD: Bruce Harrington.
2 MR. HARRINGTON: Good evening. My name
3 is Bruce Harrington. I am with Cascade Energy.
4 We're the owners of the property that the gas
5 station, the restaurant/lounge are on.
6 We were not going to make formal
7 presentation tonight. What we were going to do is
8 send a letter to ODOT, but I just thought, for
9 informational purposes, I thought I would let you
10 know that under the plan that they have now, they
11 will -- our property will not be a viable
12 commercial property because the people going down
13 to the coast, which is the majority of our
14 customers, will not get off the highway, make the
15 turnaround and come down an access road and then
16 turn around and come back.
17 And we are going to meet with ODOT; but
18 if we can't work something out with ODOT, we will
19 lose three businesses and approximately 30 jobs at
20 our location, so hopefully we can work something
21 out with them.
22 Thank you.
23 --oo0oo--
24 MS. GIRARD: Thank you, Bruce.
25

16

1 MR. YATES: Don Yates, and they know I
2 rarely pass up an opportunity to talk.
3 At any rate, I guess my greatest concern,
4 to summarize what I said earlier, is not so much
5 the plan, although I have oogle problems with the
6 plan, but it's the timing of the plan and the fact
7 that we're spending money, when money is scarce, on
8 projects that are public-convenience projects.
9 They look good. It's going to make the Casino look
10 better to have a four-lane highway and nice shiny
11 interchanges all around the area, but that's not
12 where people are dying.
13 And if we look at an expressway and the
14 likelihood of one being built in Newberg that's
15 going to dump eastbound high-speed traffic onto the
16 section of road from McDougal Corner to Steel
17 Bridge Road, and right then we talk about building
18 a rural expressway now that's going to dump
19 westbound traffic onto that same section, and that
20 same section of road is already where 234 to 38, I
21 think -- I can't remember my own statistics off the
22 top of my head -- have occurred over the last 11
23 years, you know, is this really where, if we have
24 the money available, we ought to be spending it in
25 the public's best interest? And I just don't think

17

1 it is.
2 You know, I would echo some of Dave's
3 remarks, you know, without some sort of a plan in
4 addition here to this impact statement that gives
5 us some announced plans about will businesses be
6 located at interchanges or not located at
7 interchanges.
8 You know, I would challenge you to name
9 one existing business in the study area that isn't
10 going to be -- and that includes agriculture --
11 irreparably damaged, if not put completely out of
12 business, except -- except the Casino. Okay.
13 And I'm not an enemy of the Casino by any
14 means. I love to go there and eat. I can't afford
15 to do anything else. But it's -- again, it's
16 public convenience. It looks real good, but the
17 total compilation of things, when you add up the
18 inconvenience to local citizens and the impact that
19 it's going to have -- I mean, I can't even find my
20 driveway on your chart. It's not marked closed but
21 it's not marked open. I don't know what's going
22 on.
23 But, you know, how you can leave an
24 underpass open at the Casino with, according to the
25 document, the expressed opportunities so that the

18

1 landowner can have access to the north side of the
2 highway and then, as Mr. Werth says, turn around
3 and say the landowners on the south side of the
4 highway who happen to live over on the north can't
5 have access to their property, who decides in your
6 organization who gets property access and who
7 doesn't? I mean, it looks very arbitrary. I don't
8 know why. I would hope not.

9 But the appearances of many of these
10 designs, and those of us that participated in the
11 earlier public hearings, is that we showed up at
12 the public hearings and we just sort of beat our
13 gums. And the plan has substantially not changed
14 from when I first started attending the meetings
15 down here. I mean, design has changed, but the
16 notion that you're going to come in here and you're
17 going to -- and when we first started talking about
18 this I don't think the expressway designation even
19 existed because this document started well before,
20 about '98 or '96, something like that. You know,
21 we got the expressway designation in 2000, which I
22 will admit went right by me, and I think by a lot
23 of other people in this room.

24 VOICE: I think they intended it that
25 way.

19

1 MR. YATES: At any rate, I am going at
2 kind of a tirade up here, I guess. But it's real
3 frustrating for those of us that live in the local
4 area to feel that we're just wasting our time. And
5 the decision making process that you shared with us
6 tonight and the people that planned the project
7 that are involved in the project -- no offense to
8 you, John, I don't mean anything personally -- but
9 that designed the project, are then the
10 decision-makers? You know, it doesn't smack of a
11 democratic process.

12 Oh, by the way, here's that paper, Alan,
13 that I was referring to that was the mailing from
14 ODOT. You can read it. It says, "Application
15 needs to demonstrate transportation improvement
16 would not cause a significant change or increase in
17 costs of current farm or forest practices acts."

18 Maybe you want to talk to Mr. Shenks.
19 --oo0oo--
20

21 MS. GIRARD: I would like to add my
22 thanks to all of you for being so flexible tonight
23 and for providing some very thoughtful words. We
24 are now going to adjourn this part of it.
25

20

1 ONE-ON-ONE TESTIMONY WITH COURT REPORTER
2 MR. GORDON: My name is James Gordon.
3 This is my wife Julie. We live at 27620 Salmon
4 River Highway. That's Mile Marker 22.
5 First let me state that this whole
6 process down to the last, oh, what is it, five,
7 six, seven years, whatever it has been, I have been
8 trying -- we have been trying to get involved in.
9 We have been ignored totally on this process. We
10 do get the mailings, you know, that everybody gets
11 normally. Sometimes we haven't.

12 Since we are so heavily affected by any
13 changes to Highway 18, since we live right on the
14 two lanes where there is a bank on one side and our
15 farm on the other, we wanted to get in on it early.
16 We were totally ignored. It seems like there is a
17 few people in this area that try to control
18 everything and, you know, it's been a real bad
19 experience for us as homeowners. From what I am
20 seeing of the plans that are made, they're not in
21 our interest at all.

22 We have a paved entrance at this point.
23 It has taken some time during the road
24 reconstructions and repavings to get what we have.
25 We have moved our mailbox from one side of the

21

1 highway to the other so that we don't have to cross
2 the highway, and other reasons. It's paved there.

3 If they put a frontage road in where we
4 have to combine with the church and come out and
5 only turn to the right heading east and have to go
6 at least up to the Casino to turn around to go
7 west, you know, that's total -- totally -- how do I
8 put it, inconceivable, especially if it's going to
9 cost us to replace the road that we already have
10 into our farm.

11 We were not informed down the line
12 locally of any decisions. We weren't involved in
13 any of it. We tried to get involved in it. We
14 were ignored in that aspect. They probably didn't
15 want to hear from us.

16 At this point we're totally against this
17 project and we would be going for the no-build
18 alternative at this point until such time as ODOT
19 and all the other powers at be can get all their
20 ducks in a row, can handle the issues with the
21 local residents, get input from the local residents
22 that are involved and not some stupid committee
23 that most of the members don't even live on the
24 highway, okay, and the other part are business
25 owners that are worried about losing their

1 businesses which I can understand, okay. But they
2 have to take concerns of the residents also, the
3 people that have to live on this highway.

4 There are a lot of issues that haven't
5 been addressed, as I've said. I have actually two
6 accesses to my property. They are only showing
7 one. One of them is a deeded access to our
8 neighbor that owns the adjoining field. There is a
9 wetland at the end of our property. He cannot get
10 access across the wetland; so, therefore, before we
11 bought the property -- he is part of the Jahn
12 family that owned all of the land in that area at
13 one time. His name is Alvin Jahn. He owns some
14 acreage just to the east of us.

15 He has a deeded access that is on our
16 deed that was given to him by family prior to our
17 buying the property. So he has access to his field
18 off of Highway 18 across the edge of our property
19 around the wetlands into his property. That's not
20 even showing on any of these maps, and I have
21 stated many times at these meetings that that
22 access exists, and they've ignored it. Okay. They
23 have ignored it.

24 I am not willing -- if they close off all
25 of these accesses, I am not willing to give Alvin

1 Jahn access straight across my farm with his
2 tractor equipment and such, you know, to get to his
3 property. They're going to have to deal with that
4 and allow him access somehow.

5 Of course, with all of what ODOT has done
6 here in the recent months and even years is, from
7 my understanding they closed off any new businesses
8 happening, any new buildings going in, anything new
9 going into the area, and they have been kowtowing,
10 in our estimation, they have been kowtowing to the
11 Casino, okay, which doesn't make us very happy.

12 It's not that we're against the Casino.
13 The Casino has brought some prosperity to the area.
14 They have done some good for the area, but they
15 have also brought with that negative aspects: The
16 higher traffic, the problems that we have with
17 where their access from the east to the west with
18 people that aren't familiar with the Casino all of
19 a sudden seeing the Casino and saying, "Oh, how do
20 we get in there?" And as they're looking at the
21 Casino, they are not looking to the right where
22 they have to turn to get into that Casino, they're
23 trying to cross that divider to get in there.
24 There have been accidents that way.

25 Once they realize they missed the Casino,

1 they want to get in there, the next place to turn
2 is our driveway to the left. They have to cross
3 across traffic.

4 I have had a sign there for a number of
5 years now that says "Absolutely No Turnarounds."
6 They ignore it. All nightlong, all daylong we have
7 people turning because they missed the Casino.
8 They turn into our driveway. They back back out
9 into traffic, okay, eastbound traffic, they're
10 backing into that lane to go east again to go back
11 to the Casino. It's a big problem.

12 I've talked to the local law enforcement,
13 I've talked to the State Police about it. I've
14 volunteered to let them utilize part of the front
15 of our property to see what's going on here.
16 Nobody has ever addressed that issue.

17 I understand that it's illegal for people
18 to turn into a private driveway to turn around on
19 the highway just for, you know, to be able to turn
20 around, especially when we have it posted "No
21 Turnarounds," but nothing is being done about it.

22 Over the years, like I said, we have got
23 better access to the frontage of our property.
24 We've got it paved where our mailbox is. We like
25 that very well and we allow -- we did this so that

1 the police would have a safe pullout along that
2 safe section of highway to stop people, okay, and
3 they have been utilizing that now since that has
4 happened. It's well lit, our cost, our lighting,
5 but the police have a place that they can pull
6 people out and be off of the highway at that point.
7 Okay. That would disappear. That would totally
8 disappear.

9 I don't have enough time left to address
10 all of the problems that we have. I know our
11 neighbors also have problems. I noticed Mr. Torres
12 isn't here. His property is just west of the
13 Seventh Day Adventist church and school which is
14 west of us in a corner of what used to be part of
15 our property before we purchased it. He has an
16 orchard, a fruit tree orchard, that he operates
17 down in there. He has an access to it. He has an
18 access to his home which is right alongside of the
19 church access, the same access actually. It's
20 going to affect him tremendously, and I'm concerned
21 about that.

22 Some of the other alternatives I've seen,
23 such as utilizing Andy Rigg Road along the backside
24 of the river. We have property there, too. It
25 continues -- our property continues through the

26

1 river to Andy Rigg Road. We have two acres there.
2 Anyway, if they do extend that back there
3 and we lose some of our property, we have lost a
4 buildable lot which we now have, a buildable lot.
5 It would take away too much property to be able to
6 utilize that two acres on that side of the river,
7 which is now in residential and not in EFU, like
8 the property on the other side of the river that we
9 own.
10 I'll have to wrap it up here because I
11 have been told I am out of time. I would like to
12 give more testimony at a future date, if possible,
13 and I would like more input on this whole situation
14 more than I've gotten. Okay. We seem to be
15 ignored. It seems like most of the time is given
16 to large property owners, businesses and the
17 Casino, with the Casino being No. 1.
18 I think the State is trying to maybe make
19 it easier for people to get to the Casino more than
20 addressing the issues with safety.
21 I know when they put in the new crossing
22 from South Yamhill River Road, I guess it is, over
23 to Willamina, when they changed that intersection
24 of the Wallace Bridge Area, that they caused more
25 of a problem because of the angle. There has been

27

1 more accidents there because of the angle because
2 of the 22 dumping in right there, people trying to
3 cross into Willamina and traffic moving so fast on
4 22 dumping into 18 that it is just flat ridiculous.
5 The angle is not right.
6 You cannot see traffic coming unless
7 you're leaning to look around your passenger or --
8 it depends upon the vehicle that you're in.
9 Anyway, I've got to cut it off there. I
10 am told there are other people that want to speak
11 and I have probably taken too much of your time.
12 Thank you.
13 --oo0oo--
14
15
16 MS. LINDBERG: I am Lucie Lindberg, and
17 my address is 8045 Rowell Creek Road. It is
18 Willamina 97396.
19 The thoughts that I have had, and I was
20 on the steering committee for the regional
21 planning, and my major concern was for the
22 environment and the development that we will have
23 down here, that it will destroy the very thing that
24 makes Oregon beautiful. And we're going to plan
25 this expressway which is -- I didn't know about the

28

1 expressway. But the purpose of the expressway is
2 to bring people down to the Oregon beaches to enjoy
3 what is beautiful, but in the process they are
4 actually destroying the beauty of Oregon by
5 creating these roads and express highways that just
6 moves them rapidly down through the highway, you
7 know, down to the entertainment centers. So people
8 want to see and enjoy Oregon, but yet at the same
9 time they are destroying Oregon in order to see and
10 enjoy it.
11 In other words, we're enjoying the very
12 thing that makes Oregon beautiful that which
13 attracts people to our state and no thought has
14 been given to the wildlife in this area at all.
15 Nothing was mentioned tonight, our elk and deer
16 that live in our valleys and forests around here,
17 the agriculture land. They live outside my
18 windows, and the deer are being killed on the
19 highways when they try to cross over Highway 18 for
20 water. This is my concern that we're destroying --
21 in order to see beauty, we're destroying beauty in
22 the process.
23 Thank you.
24 ---oo0oo--
25

29

1 MR. HOLLMANN: My name is Ernest
2 Hollmann. I live at 26375 Salmon River Highway,
3 Willamina. It's in the Valley Junction area.
4 They have proposed a short frontage road
5 for me and my neighbor, and it presents some
6 problems which maybe they don't know because it
7 goes across a natural high water relief channel.
8 If they don't build it completely up high
9 enough out of the water, I'm going to be flooded
10 out when the high water comes.
11 I would suggest, if it's possible, to
12 just widen the shoulder a little bit and let me
13 enter the highway right turn all the time, entering
14 a right turn all the time, leaving it, and I'll
15 have to go down to the interchanges to get turned
16 around when I want to go the other way.
17 That's about really all -- oh, then on
18 the far west end of it, it's another phase of this,
19 they have no provision for people who have to make
20 a right turn from the north side to get turned
21 around to come east on the end of it. They are
22 going to have to go to Lincoln City to turn around
23 now. That will probably be about the main thing
24 that I have to suggest. Thank you.
25 --oo0oo--

1 MR. BOEHLER: My name is Paul Boehler,
2 spelled B-O-E-H-L-E-R, and I'm a property owner at
3 28410 Salmon River Highway in Grand Ronde, Oregon.

4 I own the old theater building next to
5 the Bonanza Antique Mall. It used to be the
6 Bonanza Restaurant.

7 And my problem here with this whole
8 situation has to do with the limited use overlay.
9 I purchased a commercial building, which I thought
10 I could operate some sort of commercial enterprise
11 in, only to find out after I had purchased the
12 building that my hands were tied as to this limited
13 use overlay.

14 The problem I have with it is I can
15 understand not developing new properties on this
16 expressway, but I can't comprehend not being able
17 to function within a building that has already
18 existed for 40-some years and has been used in the
19 past as commercial enterprises. It may have set
20 for a few years without any business operation in
21 there, but I find that a very minor detail in
22 regards to being able to function there, carry on
23 in this property that is zoned commercial, and it
24 is -- already has entryways and should be able to
25 be presently used. I have a real hard time

1 understanding, and I feel like my hands have been
2 tied. My property taxes are being collected just
3 the same as if I -- on the commercial property
4 value. That is my complaint here on this issue.

5 I have another issue that I would like to
6 address here, and that is that -- also regarding
7 the fact that we pay property taxes in Polk County
8 and we are in the state of Oregon, which is the
9 United States of America, why in the hell are we
10 having these meetings in a sovereign nation
11 property? That just goes totally against anything
12 that I can understand.

13 I think that these meetings should be
14 held in a public facility that is not an enterprise
15 of the Casino. They're not paying taxes on their
16 properties.

17 That's about all I've got to say.

18 --oo0oo--
19
20
21
22
23
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1 MR. YATES: My name is Don Yates. I
2 reside at 29940 Salmon River Highway, Grand Ronde.

3 My testimony this evening deals with the
4 H.B. Van Duzer Steel Bridge Road Environmental
5 Impact Study, and I'm focusing on traffic safety
6 issues.

7 The data that I will give tonight was
8 provided by the Oregon Department of
9 Transportation, and my thanks to Ann Holder of that
10 department for furnishing me with these statistics.

11 Tonight I will update the crash data for
12 January 1, 2000 to December 31, 2001 for the study
13 area since that data is not included in the
14 document. I will provide crash data comparisons
15 between the study area and other sections of
16 Highway 18 during the period January 1, 1991
17 through December 31, 2001, the most recent
18 eleven-year period, and I will draw conclusions
19 based on the data.

20 For the purposes of this I divided
21 Highway 18 into three crash data comparison areas.
22 The first being Highway 101 to the west end of the
23 study area; the second being the H.B. Van Duzer
24 study area itself, and the third being the east end
25 of the study area to McDougal Junction.

1 Looking at the data, the total number of
2 crashes during the two-year period 2000/2001: In
3 the study area there were 64; west of the study
4 area there were 73; east of the study area there
5 were 95.

6 The total number of crashes for the
7 eleven-year period of 1991 through 2001: In the
8 study area there were 292; west of the study area
9 there were 431, and east of the study area there
10 were 530.

11 Looking at fatalities in the two-year
12 period: In the study area there have been none;
13 west of the study area, three; and east of the
14 study area, six.

15 For the eleven-year period looking at
16 fatalities: In the study area there were 18; west
17 of the study area there were 22, and east of the
18 study area there were 42.

19 Looking at crashes by type: First the
20 rear-end collision. The two-year period, there
21 were 21 in the study area; there were 12 west of
22 the study area, and 35 east of the study area.

23 For the eleven-year period, again rear-
24 end collisions: There were 84 in the study area;
25 there were 113 west of the study area, and 166 east

<p>34</p> <p>1 of the study area.</p> <p>2 Looking at turning movements for the two-</p> <p>3 year period: Crashes involving turning movements</p> <p>4 in the study area, there were six; west of the</p> <p>5 study area, ten; and east of the study area, 17.</p> <p>6 And that includes one fatality.</p> <p>7 Turning movements for the eleven-year</p> <p>8 period: In the study area there were 47; west of</p> <p>9 the study area there were 42, and east of the study</p> <p>10 area there were 102, including two fatalities.</p> <p>11 Truck crashes for the two-year period, in</p> <p>12 the study area there were two; west of the study</p> <p>13 area six; east of the study area, eight.</p> <p>14 For the eleven-year period: Truck</p> <p>15 crashes, there were 22 in the study area; 27 west</p> <p>16 of the study area; 37 east of the study area.</p> <p>17 Angle crashes, which is a statistic that</p> <p>18 ODOT keeps that I couldn't explain: For the two-</p> <p>19 year period for the study area there were two; west</p> <p>20 of the study area, zero; east of the study area,</p> <p>21 seven.</p> <p>22 For the eleven-year period, angle</p> <p>23 crashes: In the study area, five; west of the</p> <p>24 study area, two; and east of the study area, 89.</p> <p>25 Head-on crashes in the study area during</p>	<p>36</p> <p>1 nine lives were lost on Highway 18.</p> <p>2 Rear-end collisions are the most common</p> <p>3 type of collision in the study area; however, rear-</p> <p>4 end collisions east of the study area outnumber the</p> <p>5 study area by two to one.</p> <p>6 Accidents involving trucks are occurring</p> <p>7 with greater frequency outside the study area;</p> <p>8 head-on crashes occur more frequently east of the</p> <p>9 study area; sideswipe meeting crashes occur twice</p> <p>10 as frequently east of the study area; angle crashes</p> <p>11 occur 15 times more frequently east of the study</p> <p>12 area; crashes while turning occur with greater</p> <p>13 frequency to the east of the study area by over a</p> <p>14 two-to-one margin, and the number of intersection</p> <p>15 accidents occur on Highway 18 east of the study</p> <p>16 area by a margin of over six to one.</p> <p>17 The summary: The greater number of truck</p> <p>18 crashes, turning accidents, traffic fatalities,</p> <p>19 accidents at intersections, angle crashes, head-on</p> <p>20 accidents, sideswipe accidents, and rear-end</p> <p>21 collisions on Highway 18 all occur east of the</p> <p>22 study area despite the safety corridor. In fact,</p> <p>23 every type of accident ODOT keeps statistics on</p> <p>24 occurs more frequently east of the study area.</p> <p>25 My conclusion: We all know that money</p>
<p>35</p> <p>1 the two-year period: Four; west of the study area,</p> <p>2 one; east of the study area, one. But when we look</p> <p>3 at the eleven-year data on head-on collisions, we</p> <p>4 see there were 12 in the study area, while there</p> <p>5 were 19 west of the study area, and 19 east of the</p> <p>6 study area.</p> <p>7 Sideswipe meeting, near misses for the</p> <p>8 two-year period: There were two in the study area;</p> <p>9 six wrecks west of the study area, and six east of</p> <p>10 the study area.</p> <p>11 Near misses in the eleven-year period:</p> <p>12 In the study area, 15; west of the study area, 26;</p> <p>13 east of the study area, 30.</p> <p>14 Crashes at intersections for the two-year</p> <p>15 period: There were five in the study area; none</p> <p>16 west of the study area; 30 east of the study area.</p> <p>17 For the eleven-year period at</p> <p>18 intersections: There were 38 crashes in the study</p> <p>19 area; 29 west of the study area, and 234 east of</p> <p>20 the study area.</p> <p>21 What does my data show? Crashes happen</p> <p>22 nearly twice as frequently east of the study area</p> <p>23 as in the study area.</p> <p>24 During the last two years there have been</p> <p>25 no traffic fatalities in the study area, though</p>	<p>37</p> <p>1 for highway improvement is scarce. We must</p> <p>2 prioritize projects that improve public safety. We</p> <p>3 simply cannot afford to build interchanges at</p> <p>4 intersections where data shows accidents happen</p> <p>5 least frequently when the same data shows that</p> <p>6 accidents are happening most frequently elsewhere</p> <p>7 on the same highway.</p> <p>8 A rural expressway will only exacerbate</p> <p>9 the obvious traffic safety problems that already</p> <p>10 exists elsewhere on Highway 18.</p> <p>11 The obvious. There's only one reasonable</p> <p>12 alternative in light of the data I have just given</p> <p>13 you, the no-build alternative. The money must</p> <p>14 instead be spent correcting the intersections on</p> <p>15 Highway 18 where the accidents are happening and</p> <p>16 where the public is dying.</p> <p>17 I have three low-cost solutions that I</p> <p>18 would offer: One, to change the eastbound exit of</p> <p>19 the Casino to a merge lane controlled with a light</p> <p>20 during peak traffic periods, like freeway entrances</p> <p>21 in Portland.</p> <p>22 It's my observation as a resident that</p> <p>23 that is where the traffic backup for eastbound</p> <p>24 traffic begins on the weekends, and a controlled</p> <p>25 merge lane would virtually eliminate that.</p>

38

1 I would propose the addition of
2 electronic reader boards west and east of the
3 Casino to warn traffic of slowing ahead, a
4 progression of three or four boards each way that
5 would be activated as traffic warrants.
6 I would suggest that you install a
7 traffic light at Valley Junction that is normally a
8 flashing yellow and uses sensors on Highway 22 to
9 trigger the function as a stoplight only when the
10 traffic on Highway 22 warrants its operation.
11 The reader boards and the Casino exit
12 control light should automatically coordinate and
13 function to warn traffic control when the light
14 functions as a stoplight. This light should be
15 flashing yellow and then go to green and then to a
16 solid amber before a red would come on to stop
17 traffic to allow Highway 22 traffic.
18 I think this would eliminate the need for
19 an interchange at Grand Ronde because Highway 22
20 traffic and the traffic from these tribal offices
21 that wanted to be eastbound on 18 that knew that
22 they had safe passage onto 18 at Valley Junction
23 would utilize that instead of coming down Grand
24 Ronde Road and trying to squeeze in early at Grand
25 Ronde.

39

1 And, finally, the interim solutions that
2 I suggest are cost effective. They should be
3 doable within the annual transportation budget;
4 and, further, they would provide immediate relief
5 to traffic-congestion problems in the study area
6 and we wouldn't have to wait 20 years.
7 Thank you.
8 --oo0oo--
9
10 MR. GORDON: James Gordon again.
11 There were additional comments that I
12 wanted to make. Listening to the prior comments
13 there, he has addressed a heck of a lot of things.
14 But let me get my head together here a moment.
15 Basically in my estimation, as a resident
16 seeing all the problems with the traffic, what has
17 been done and what hasn't been done, I don't see
18 that anything is going to be relieved in any way,
19 shape or form by putting in a four-lane highway or
20 two lanes east, two lanes west, whichever way it
21 goes and in what area it goes in, until such time
22 as the restriction at the Forest Corridor is
23 addressed where you're back down to two lanes
24 again. I don't see where it's relieving a darn
25 thing. It's just allowing more traffic to build in

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1 that area. Okay.
2 I would rather see some way that the
3 truck traffic, the commercial traffic, is taken off
4 of Highway 18, okay, to go to the coast where it's
5 not allowed for them to make a through trip from
6 the coast to Portland, from Portland to the coast
7 on Highway 18, or from Salem to the coast on
8 Highway 18, especially triples.
9 We have a big problem with that, as I
10 probably stated earlier. It has increased over the
11 years. It has caused a lot more accidents to
12 happen because of the large volume of truck
13 traffic.
14 I'm not talking or addressing the local
15 lumber trucks, the local chip trucks and the like.
16 What I'm addressing there is the big delivery
17 trucks. Okay. We're talking Wal-Mart, we're
18 talking all these big huge trucks that are coming
19 down through there, doubles and triples, on a
20 two-lane highway. That needs to be relieved. They
21 need to have another way from getting from point A
22 to point B other than coming down Highway 18.
23 I don't see a solution any time in the
24 near future for the increased traffic from Portland
25 to the coast down 18 or from Salem over to 18 and

41

1 down the coast -- down to the coast. I do not see
2 any.
3 I am like most people in this area, we
4 would rather lose what businesses we have here and
5 have a safe place to live than kowtow or have the
6 State kowtow to the local businesses, and
7 especially the Spirit Mountain Casino and Chinook
8 Winds on the coast.
9 I do have additional there. I will
10 probably put them in writing at this point since
11 it's all gone out of my head listening to some of
12 these other guys in their comments which are, of
13 course, a lot better than mine.
14 And I thank you.
15 --oo0oo--
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Oral testimony ; H. B. Van Duzer Corridor to Steel Bridge Road. November 7, 2002

David C.T. Franzen *DFranzen*
P.O. Box 86
Grand Ronde, Oregon 97347

I am the owner of record of the Historic Landmark Buildings known as the Bonanza Antique Mall. 28405 Salmon River Highway , Grand Ronde Oregon. N.W. corner of Highway 18 and Grand Ronde Road. I want to clear up some false statements presented in ODOTs plan for H.B. Van Duzer Corridor to Steel Bridge Road - Draft, dated October 2002.

On page 220 Site 23 [Bonanza] ODOT has us described as an abandoned structure with a parking area. This property was never abandoned but was vacant for one year [1997]. The Building has been in constant use since 1941. Purchased by me in February 1998, negotiated in December 1997. Extensive renovation followed, reopened June 2000 as Bonanza Antique Mall. No Employees but supports the livelihood of 50 plus Dealers , grossing in the low to mid six figures the past two years. Not bad for " Abandoned Structure with Parking Area "

The Chevron Station listed was closed 1969. DEQ has no listing on this property because the USTs (underground storage tanks) were decommissioned before DEQ came into existence. The USTs were decommissioned properly within all applicable laws of the land in place at the time. The permits were issued in 1974 by Polk County and the work inspected and approved by Polk County and State Fire Marshall, which was to the proper letter of the law at the time! This issue was revisited by Oregon State Courts in 1997 during Bankruptcy Proceeding involving past owner Charlie Cherry and found not polluted by the courts, prior to my purchase of the property.

On page 130 of Draft, ODOT estimates Tax Revenue Loss of the several businesses at \$5000.00 . That figure is way off and a scam to the Public at a time when extra revenues are being sought after, ie; Tax Vote scheduled for January 2003. The property Taxes alone on my 3 acres " Prime Commercial " affected property are \$3200.00. So all the other properties in this plan must only pay \$1800.00 total tax. I don't believe that estimate. With the local Tribe not paying property taxes can we afford to take these properties off the Tax Rolls ?

ODOTs plan takes most of the commercial property in this area , leaving not many Non -Indian businesses paying taxes. ODOT and Polk County have applied a L.U.O. (Limited Use Overlay) to this entire area. The L.U.O. does not allow more than ten (10) cars in or out of any New Businesses until the Highway is done, estimate 20 years. Effectively giving all new commercial enterprise to the Tribe only! Most of the Public does not even know that a L.U.O. exists. This is all wrong for AMERICA . To fix this road for safety's sake would require straitening out the S-Turns approaching Grand Ronde from the East. By doing so we could save this Historic District and Tax paying, Income producing Business Properties ~~intact~~.

The Expressway designation was forced on us without a Public Vote. Most of the people that I've talked to, that travel from the cities (Portland and Salem) to the Beaches , like to stop in Grand Ronde and not just to gamble. Even the Tribe has stopped in my store and purchased thousands of dollars worth of Indian Baskets for their Museum. We the People don't want our community taken from Us. There is a lot of early to mid 1900's socio-economic history here, despite what ODOTs out of town historian reports. People met their spouses here, got jobs here, learned from travelers about the rest of the world here . There unfortunately is not much left here from the late 1800's, but in 100 years these places could still be here to represent life in the early 1900's . I ask you " Let the People have there History " and save this Grand Ronde. *WHILE MY WIFE AND I LOSE OUR BUSINESS AND RENTAL PROPERTY, THE COMMUNITY IS GOING TO LOSE A LOT MORE.*

PG. 2 of 2

From: David Franzen
To: [REDACTED]
Date: 11/7/02 11:13AM
Subject: ODOT hiway plan flawed for west valley

ODOT has issued a report. they want us to believe that to fix highway # 18 woes, we have to bulldoze all the landmark businesses and some houses. Eliminating them from the tax rolls .

ODOT's plan has no overpass at Fort Hill. Just another cross if you dare intersection. At valley Junction, instead of keeping east bound highway # 22 traffic heading east onto # 18, they send it west into Casino cross traffic.

ODOT wants you to believe that the Grand Ronde intersection is causing most of the Sunday backup.

Let me tell you that if ODOT would put in proper deceleration and acceleration lanes in and out of the Casino along with a sane interchange at Valley Junction and four lanes east from Casino to Wallace Bridge with another overpass at Fort Hill, there would be no need for an interchange at Grand Ronde Road .With a good interchange at Valley Junction , ODOT could eliminate left turns at Grand Ronde Road . Remember , currently ODOT has two highways sharing the same roadbed from the Casino to the Salem cutoff at Wallace Bridge . That is the Sunday backup problem, not the Landmark Buildings at Grand Ronde !!

On November 7 th, ODOT held a meeting at our "Sovereign Nation" neighbor with a Court Reporter to hear our thoughts on this matter. If you didn't come vote on November 7 th, you can send your thoughts before November 18 th, 2002.

To: Susan Whitney , Environmental Project Manager, Region 2
ODOT
455 Airport Road. SE, Bld. B
Salem , OR. 97301-5395

Thank You , David Franzen
P.O. Box 86
Grand Ronde Oregon 97347
503-879-6255

ON PAGE 131 THE PLAN STATES "THE DESIREABILITY OF THE PROJECT AREA WOULD LIKELY INCREASE, PROVIDING GREATER VALUE TO EXISTING BUSINESSES AND OPPORTUNITY FOR MORE INTENSIVE COMMERCIAL DEVELOPEMENT THAN MIGHT OTHERWISE OCCUR."

WHAT EXISTING BUSINESSES ARE GOING TO BE LEFT?

WITH THE L.U.O. AND A 20 YEAR COMPLETION DATE, WHAT OPPORTUNITY IS GOING TO EXIST, ? OTHER THAN INDIAN ENTERPRISES?

IF YOU ARE NOT GOING TO LIFT ^{THE} L.U.O.

~~IF YOU ARE NOT GOING TO LIFT THE L.U.O.~~
I MUST VOTE FOR "NO BUILD ALTERNATIVE"

APPENDIX E

Agency Comment Letters

#15



Oregon

John A. Kubitak, M.D., Governor

Department of Land Conservation and Development
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NOV 18 2002

O.D.O.T. REGION

Web Address: <http://www.odot.state.or.us>



Director's Fax (503) 378-5518
Phone (503) 373-0150
655 Capitol St. NE, Suite 130
Salem, Oregon 97301-2540

Main Fax (503) 378-6033
Rural/Coastal Fax (503) 378-5518
TCM/Urban Fax (503) 378-2887

Susan Whitney, Environmental Project Manager
Region 2
Oregon Department of Transportation
455 Airport Road SE, Bldg. B
Salem, Oregon 97301-5395

RE: **OCTOBER 2002 DRAFT ENVIRONMENTAL ASSESSMENT OF THE H.B. VAN
DUZER TO STEEL BRIDGE ROAD CORRIDOR REFINEMENT PLAN**

Dear Susan:

On October 22, 2002, the Department of Land Conservation and Development (DLCD) received the above referenced document and is interested in providing you with written comments. DLCD has invested a great deal of time in assisting Polk County and area residents in the planning for this area, and the transportation refinement plan is an integral part of that effort. Currently, we are in the process of completing our review of the county's revised comprehensive plan and zoning for this area and believe our input into the environmental assessment (EA) will be beneficial.

DLCD has focused its review on providing ODOT with suggested changes to two sections of the draft EA: a) Land Use and Zoning (pages 135-149); and b) Conformance with Land Use, Transportation and Other Planning Regulations (pages 151-161).

We recognize that the section on land use and zoning provides only a "general idea of the project's impacts." However, we believe that additional information is needed to better describe how zoning will be impacted and how Polk County intends to implement their acknowledged plan and zoning provisions adopted pursuant to the Transportation Planning Rule (TPR).

Under the section Land Use and Zoning Changes (page 135), the report currently indicates that one of the purposes of the changes made to zoning under the regional problem solving (RPS) project was to "remove zoning designations from tribal trust properties." It is true lands held in trust by the federal government on behalf of the Tribe are not subject to state and local land use laws. However, an important component of the RPS project was to establish certain tribal trust boundaries that are coordinated with the Tribe's objectives and to include certain tribal trust properties being planned by the Tribe for economic and housing purposes. In fact, this is a critical element in the RPS effort to include their lands, along with other lands already zoned for development, and then to have a "single" unincorporated community land use plan that coordinates development with transportation planning.

Susan Whitney

-2-

November 18, 2002

We also think it would be important to include more detailed zoning information in regards to the Fort Hill to Steel Bridge section of the refinement plan given its stage of development under this project. Our suggested changes attempt to include these details.

DLCD is in the process of completing its review and providing ODOT with suggested language to consider including in the draft EA. I intend to have this to you within the next week or two.

Thank you for the opportunity to comment on the draft EA. Please feel free to contact me at (503) 373-0050, extension, if you have questions.

Sincerely,

Doug R. White
Rural Lands Policy Analyst

cc: Jim Allen, Polk County
DLCD: Cortright, Hallyburton, Knight

The Confederated Tribes of the Grand Ronde Community of Oregon

Public Works Department
(503) 875-2442 / FAX (503) 875-2443
1-800-422-6072

Thompson - Madras - Rogue River - Madras - Clifton

9615 Grand Banks Rd
Grand Ronde OR 97148

25

November 18, 2002

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NOV 18 2002

O.D.O.T. REGION

Susan Whitney, Environmental Project Manager
Region 2
Oregon Department of Transportation
455 Airport Rd. SE, Bldg. B
Salem, OR 97301-5395

Re: Comments on Environmental Assessment of the H.B. Van Duzer Forest
Corridor - Steel Bridge Road Project

Dear Susan:

On behalf of the Confederated Tribes of Grand Ronde and Spirit Mountain Casino, (collectively "the Tribe"), I would like to offer our comments Environmental Assessment (EA) of the H.B. Van Duzer Forest Corridor - Steel Bridge Road Project dated October 2002.

Ft. Hill Interchange

The Tribe generally supports the build alternative with a few notable exceptions. We support the latest proposal to construct a full interchange (overcrossing) just east of Fort Hill Road as recently recommended by the siting committee and presented at the public meeting in Grand Ronde on Oct. 7, 2002, rather than the preferred alternative as proposed in the EA. We believe that the overcrossing alternative provides the safest and most efficient method of ingress and egress from the new frontage road system and re-aligns Fort Hill Road on the North side of Hwy 18 and Yamhill River Road on the South side of Hwy 18. We believe it would be smart angled to construct an at-grade intersection with left turn channels. Cross traffic would be particularly susceptible to crashes as they try to cross 5-lanes. Additionally, the left-hand turn channels would be cumbersome for the traveling public on the highway and would likely require increasing the width on the bridge to provide for curing. We share concerns of the local citizens that commercial establishments along that stretch of roadway would be adversely affected. Every effort should be made to work with DLCD and the County to mitigate the loss of commercial properties. The Tribe would support a land swap of EFU zoning to commercial through RPS or other similar mechanisms. The full interchange alternative also appears to have significantly less impact on Yamhill River and jurisdictional wetlands.

Valley Junction/Casino Interchange

The preferred option calls for a new HWY 18/22 interchange approximately 820 feet west of Valley Junction. We believe that the majority of the east bound Hwy 22 traffic will continue east on Hwy 18 rather than doubling back to the Casino. It is essential that this east bound movement from Hwy 22 to Hwy 18 should be free-flowing. Ideally, traffic from west bound Hwy 18 to the Casino would also be free flowing.

Consideration should be given to locating the south side jughandle on the west side of the overcrossing thereby eliminating the left hand turning movement for east bound traffic from Hwy 22 to Hwy 18. Access for westbound Hwy 18 and Hwy 22 traffic to the Casino could still be accomplished through right turn movements. Other advantages would be a reduction in width of the bridge to provide for acceleration and reduced loss of potentially valuable commercial properties fronting Hwy 18 on the South side of the Highway.

The preferred option also calls for closing of the existing casino interchange. The narrative describes the Valley Junction overcrossing as becoming "a road leading to the casino's road network."

Unfortunately, the overcrossing as shown does not lead to the casino's road network, but instead dumps traffic onto a side street east of the casino, which serves several private residents and the casino's employee parking facilities. This option would require patrons to make two additional turning movements before entering the casino's road network.

We believe the access should lead directly to the casino's road network rather than terminating on the local public road as shown. It should be noted that the elevation of the casino's road network where the ramp would connect is approximately 10' higher than the adjacent side street, thereby reducing the slope of the ramp, which would otherwise be necessary.

We do not believe adequate consideration has been given to a frontage road system on the south side of Hwy 18 both east and west of the casino. Consideration should also be given to a limited right-of-way to provide local access to those properties on the west side of the Casino. The current proposal does not provide for any access whatsoever to those properties immediately west of the Casino. Regardless, the Tribe will consider working with adjoining landowners to provide frontage access through the Tribe's properties if other accommodations cannot be worked out.

With regard to closure of the existing casino interchange, we reluctantly concede that the proximity of the Casino's interchange to the proposed Valley Junction Interchange would not be permitted under the Expressway standards. However, we know through patron surveys that a majority of the Casino's traffic originates from the Salem and Portland metropolitan areas and involves westbound ORE 18 traffic. We also know that a significant number of these visits are unplanned and motivated by impulse after spotting the casino from the highway.

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
Oregon Fish and Wildlife Office
2600 S.E. 98th Avenue, Suite 100
Portland, Oregon 97266
(503) 231-6179 FAX: (503) 231-6195

Re: **Final EIS for the
Van Duzer Forest
Steel Bridge**

November 27, 2002

Susan Whitney, Environmental Project Manager
Region 2
Oregon Department of Transportation (ODOT)
455 Airport Road S.E., Bldg. B
Salem, Oregon 97301-5395

Re: Environmental Assessment (EA) and Draft Section 4(f) Evaluation for
H.B. Van Duzer Forest Corridor-Steel Bridge Road, ORE 18/ORE 22,
Polk County

Dear Ms Whitney:

The Fish and Wildlife Service (Service) has reviewed the above cited EA for the H.B. Van Duzer Forest Corridor-Steel Bridge Road. These comments are provided under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661-666c), the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703-711), and the National Environmental Policy Act (42 U.S.C. 4321-4347). Formal consultation by the Service pursuant to section 7(a)(2) of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.) (ESA) was completed on this project under the subject name: "*Williamina Grande Ronde Corridor Project - Highway 18 (HPL20R_53012;1-7-SF-115)*."

The Scope of the EA

The ODOT proposes to widen 9.4 miles of ORE 18 to four lanes, construct non-traversable medians, construct interchanges at Grand Ronde and Valley Junction interchanges, realign the intersection at Fort Hill, consolidate local accesses and provide access and local service roads at various locations along the route. Median breaks with left-turn channels are proposed at A.R. Ford, Fire Hall, John, and Rowell Creek Roads. Improvements such as straightening curves and widening shoulders on the section of ORE 22 (Three Rivers Highway) between Valley Junction and Grand Ronde Agency would complete the plan.

Although a grade-separated interchange was considered at Fort Hill, it is not part of the proposal at this time. Traffic volumes at the intersection are not projected to meet minimum levels

We are concerned that westbound ORE 18 patrons having inadvertently missed the turnoff at Valley Junction will create a conflict at the Grand Ronde Road interchange as they attempt to double back, only to find that they have to again pass the casino heading east before they are directed to the casino via the South East ramp at Valley Junction. Worse yet, they may try to cross the highway, medium in a frustrated attempt to get into the casino.

Although we are confident that the new interchange at Valley Junction will be adequately marked, we are certain that a significant number of visitors will simply miss the signs or decide "after the fact" to turn around after passing the casino.

We believe that the planned frontage road on the North side of the highway if connected to the existing undercrossing would provide for a return route back to the Casino and an alternate route to Hwy 18 for local traffic using the north side frontage road. This would be further improved if the limited right-in/out at John Road were to instead be located further east. This would also reduce the length of travel for those residences on the eastern end of the North side frontage road. We understand and accept that there may be some height restrictions at the undercrossing due to the potential widening of the bridge for additional travel lanes.

Grand Ronde Interchange west to Van Duzer Corridor

The Tribe generally supports the build alternative.

We would welcome the opportunity to meet with members of the steering committee or technical advisory committee to discuss our concerns. We appreciate your consideration of these issues and we respectfully reserve the right to comment on design elements which effect Tribal properties.

Sincerely,

Confederated Tribes of Grand Ronde


Eric F. Sevil, PE
Director of Engineering and Community Development

Cc: Tribal Council

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required for an interchange during the 20-year planning period used for this project. Over a time period of about 20-years, a series of highway improvements will be implemented.

The purpose of this EA is to identify the location and assess the impacts of elements such as four lanes, with non-traversable medians, interchanges, realigned intersections, consolidated accesses, and local service roads, which would make the highway safer and less congested.

This proposal consists of a number of projects and strategies not yet in the design stage. This EA addresses the impacts of these projects in general terms. Once each project is funded for development and preliminary design, separate environmental documents will be prepared for each and impacts will be addressed in detail.

The purpose of preparing a general location EA is to analyze the overall corridor impacts, reach decisions on individual projects, and, as each project is approved, proceed with development of those projects. The preparation of a location EA also notifies agencies and individuals of the long range plans for the highway.

Purpose and Need

The purpose of these projects is to increase safety and decrease congestion as a result of increased traffic and a relatively high rate of traffic accidents on this stretch of highway.

ODOT's proposed series of short and long-range projects described above address these issues.

Fish and Wildlife Resources

The South Yamhill River Basin and Agency Creek Basin support runs of naturally spawning and rearing winter steelhead and spring chinook. Steelhead found in the South Yamhill River are part of the Upper Willamette River Evolutionary Significant Unit (ESU). This ESU was Federally listed as threatened in March 1999 (64 FR 14517). Critical Habitat was designated for this ESU on February 16, 2000 (65 FR 7764). Chinook salmon utilizing the South Yamhill River Basin are part of the Upper Willamette River ESU. This ESU was Federally listed as threatened on March 24, 1999 (64 FR 14303). Critical Habitat was designated on February 16, 2000 (65 FR 7764). Steelhead and chinook salmon have also been observed spawning and rearing in Cooper, Gold, Rowell and Rock Creeks within the project area. Willamina Creek and the South Yamhill River are designated "essential indigenous salmonid habitat" (OAR 141-102-0000). Essential habitat is that necessary to prevent the depletion of indigenous and anadromous salmonid species during their life history stages. Coastal cutthroat trout reside in all local watersheds in the project area. Sculpin, dace, whitefish, lamprey and other resident species inhabit the river as well.

Large mammals such as black bear, black-tailed deer, Roosevelt elk, and cougar use habitat in the project area. Deer and elk winter range lies in the valley bottom with peripheral winter range in the foothills adjacent to the bottom lands and riparian areas along the South Yamhill River. Birds such as ruffed grouse, blue grouse, and mountain quail inhabit the mountainous portions of

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the corridor; ring-necked pheasants and valley quail use the brush areas and doves and band-tailed pigeons are seasonal residents.

Small mammals, birds, reptiles, and amphibians may include snakes, lizards, turtles, frogs, toads, and salamanders are also found throughout the project area. Mammals include but are not limited to bats, mice, voles, shrews, rabbits, skunks, muskrats, nutria, minks, beavers, opossum, raccoons, and coyotes. Birds using the area include but are not limited to neotropical migrants, raptors, waterfowl, and shore birds.

Eight habitat types were identified: 1) disturbed (25.3%), 2) agricultural (18.0%), old field/scrub/shrub (29.1%), forest (12%), riparian (2.3%), forested wetlands (1.2%), scrub/shrub wetlands (0.4%), and emergent wetlands (11.8%).

General Comments

There are several emerging issues that are itemized and discussed in order of priority. First, we are concerned that the EA may be improperly mixing elements of a locational refinement pre-State Transportation Improvement Plan (STIP) phase of project planning with proposed alternatives that are more commensurate with a construction post-STIP EA or EIS. This is especially a concern because the elements that appear to be left most vague and uncertain are the remedies to fish and wildlife impacts while the impacts themselves appear to be relatively precise and immutable (e.g., there are only two alternatives, build or no-build). Further, while the safety needs for road improvements appear to be fairly straightforward, the data that is meant to support an argument for the need to relieve congestion is confusing. Also, the build-alternative itself appears to add infrastructure (e.g., frontage roads, interchanges, and local street grids) above and beyond that needed to accomplish the desired safety standards and velocity/capacity ratios. The fact that there is only one relatively precise build-alternative increases our concerns. We believe the best way to resolve these concerns is to 1) provide a more straightforward and defensible argument regarding the need to relieve congestion, 2) provide a wider range of alternatives that include minimum, moderate, and heavy levels of development impacts, and 3) provide more detailed information on fish and wildlife impact mitigation (e.g., storm-water treatment, avoidance, and compensatory mitigation).

Second, we are concerned that the build-alternative may in fact lead to an increase in the local traffic volumes and further habitat fragmentation over time as new development is attracted to the newly built infrastructure. As we understand it, the primary purpose of this project is to increase traffic safety and decrease congestion on Highway 18. The number and size of interchanges along with the new frontage roads and accompanying road grids may be over and above the road improvement requirements for meeting the stated project purpose. At a minimum, the rationale behind the proposed additional roads and interchanges needs to be explained in more detail to help the reader understand why it is necessary in order to meet the project purpose.

We could find no discussion that outlines the potential short-term or long-term impacts to migratory birds protected under the Migratory Bird Treaty Act (MBTA). Further, we could find no proposed procedures for assuring compliance under the MBTA during project construction or during project operation and maintenance. Per Executive Order (EO) 13186:

"Migratory birds are of great ecological importance and economic value to this country and to other countries. They contribute to biological diversity and bring tremendous enjoyment to millions of Americans who study, watch, feed, or hunt these birds throughout the United States and other countries."

If five birds or their eggs are killed due to project related actions, then those responsible will have violated the Act and may be subject to an enforcement action. There is no incidental take permit available for migratory birds (see 50CFR Part 10). Unless permitted by regulations, the Act provides that it is unlawful to pursue, hunt, take, capture, or kill; possess, offer to sell, barter, purchase, deliver or cause to be shipped, exported, imported, transported, carried or received and migratory bird, part, nest, egg or product, manufactured or not.

The Service recommends the EA include a discussion on the potential short-term and long-term impacts from the proposed Project on migratory birds protected under the MBTA. Further, we recommend ODOT include a general Plan outlining how ODOT will ensure compliance with the MBTA in the EA for our review and comment. We would be very happy to work with ODOT on the development of such a Plan.

ODOT should determine if there are any opportunities to remove potential fish passage barriers, enhance wetlands, or enhance riparian stream habitat in the general area of this project proposal. If these opportunities exceed that which is required through compensatory mitigation, ODOT should make an effort to determine if any Federal discretionary funds, possibly through the Transportation Equity Act, are available to help take advantage of these opportunities. We have discussed this with our Regional Office and have been told that if a project is still in the Refinement Planning stage and has not been allocated funding through the STIP for project construction, there may be a means to allocate funding towards resource restoration and enhancement efforts in the project budget. We understand that ODOT and the Federal Highway Administration are under no obligation to explore this opportunity. However, we believe that such an effort would go a long way toward improving the Federal, State, tribal and local partnership for transportation project streamlining and help ensure that this particular project meets the intent of the Transportation Equity Act to be mindful of environmental enhancement opportunities, and to take advantage of them when appropriate.

While we understand that we are in the refinement pre-State Transportation Improvement Plan (STIP) phase of project planning, we need a more thorough description of the compensatory mitigation alternatives currently under consideration by ODOT. We will also want to review a general description of the potential mitigation site(s) and the proposed conservation easement process (or its equivalent). For highway projects, we generally prefer off-site mitigation efforts sufficiently far away from the highway corridors and other development pressures to retain a low

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likelihood of elimination or degradation by future development projects. For long and linear habitat impacts, consolidated mitigation actions are often most beneficial for fish and wildlife. Wildlife corridors are generally good candidates for consolidation of habitat mitigation and/or enhancement and restoration outside of the context of mitigation. Habitat banking may be a mitigation option worth exploring.

Modification of highway characteristics and implementation of crossing structures to provide opportunities for animal passage across highway corridors should be undertaken in a number of areas. There are three primary types of structures that have been implemented to provide animals opportunities to cross highways. These include underpasses, bridges and viaducts, and over-passes. In most installations of animal crossing structures, fences that direct animal movement to the crossing structure and prevent animals from moving out onto the road are a critical component of the installation. The EA should identify areas where habitat connectivity could be enhanced, and strategies to achieve this goal. Specific structures to be implemented will need to be designed with the input of highway engineers, wildlife biologists, and adjacent land owners.

Replacement of the culverts that presently impede fish passage with a bridge or elevated highway section would provide the best stream connectivity option. Any new culvert structure should provide natural stream-bed substrates, stream banks with upland vegetation that could be used by animals during normal stream flows, and eliminate any fish barriers imposed by the existing culverts. Note that culvert replacement may require some use of grade control to prevent headcutting in the stream. The Service would be happy to provide assistance on culvert and bridge replacement design strategies that minimize impacts to the stream and riparian environment.

Good locations for installation of wildlife underpasses are limited in this area. Other natural draws or likely locations for underpasses have not been identified along this section of highway. While underpasses could be excavated under the highway, an extensive system of guiding fences would be particularly important if wildlife underpasses were installed because many species are more hesitant to use these types of structures.

Future residential and commercial development has the potential to compromise the value of this area for wildlife movement. Crossing structures should be buffered from human activity and residential development in the area.

One possible wildlife crossing enhancement opportunity would be to widen the area for animal movement along the South Yamhill River by providing a wider bridge over the river. However, human activity in this area could compromise the effectiveness of the structure.

Specific Comments

On page 9 under Table 1 (V/C ratios for Year 2008 at Key Locations on ORE 18), there is no table displaying the present day V/C ratios for each respective section of highway nor an explanation of the rationale for the 2008 ratios.

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On page 10 under the heading "Statewide Highways-National Highway System," the second paragraph reads "... According to traffic studies, a major section of the project currently operates at capacity. Therefore, the need is to provide the capacity for the amount of traffic using the roadway." If the capacity is already met, why do provisions need to be made to provide capacity?

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Also on page 10 under the heading "Rural Expressway," it reads "... A purpose of the proposed project would be to control access to the highway by constructing interchanges, consolidating access points, and constructing local service roads that would allow local traffic to access the highway at controlled entry and exit points." While it may be desirable, we are concerned that one potential design remedy is being stated as a purpose of the project. This kind of circular reasoning may have contributed to our overall concern stated above, that the locational EA, in many ways, resembles a construction level planning document.

The Water Quality discussion on page 256 does not adequately consider stormwater and floodplain issues associated with the proposed alternatives. The Service provides the following general guidance on a stormwater strategy for the proposed Project:

1. Stormwater management for erosion prevention and sediment control during construction should require separate attention than the life-of-project stormwater treatment strategy. Each respective strategy should be explained separately in the text under the central heading of stormwater.
2. There should be a rebuttable presumption that all stormwater is treatable. It should be the project sponsor's burden to demonstrate otherwise.
3. There should be a rebuttable presumption that all stormwater treatment facilities should be designed and constructed to emulate natural systems.
4. There should be a rebuttable presumption that pre-project water quality, water quantity, and seasonality will be retained through the design and operation of the stormwater treatment strategy.
5. There should be a rebuttable presumption that all stormwater treatment facilities will be located in degraded uplands. Further, any unavoidable impacts to upland native vegetation or waters of the United States due to stormwater treatment system installation should require compensatory mitigation.
6. Three overarching goals should be, to the degree possible, 1) to minimize the installation of new impervious surfaces, 2) avoid installation of stormwater treatment facilities in wetlands and floodplains, and 3) utilize opportunities to protect and restore previous surfaces and natural vegetation.

7. Insure that discharges to waters of the state not violate state water quality standards, including Oregon Administrative Rule (OAR 340-041-0026)(1)(c), the Antidegradation Policy for Surface Water; and
8. ODOT should develop a detailed Stormwater Management Plan for the final preferred alternative. This Plan should include the following:
 - A. Description of the implementation, operation, inspection, monitoring and maintenance activities that ensure the capacity and proper function of the quantity and quality control features of the stormwater treatment facilities and the system's best management practices (BMPs).
 - B. An implementation schedule and operation and maintenance plans for all BMPs, including design specifications for construction and implementation. This should include plan view drawings and maps displaying the structural BMP locations in addition to other physical features of the site (existing and proposed).
 - C. Stormwater discharges that require structural stormwater management facilities should be designed to meet local, state, and Federal Stormwater Management Plan requirements.
 - D. An erosion prevention and sediment control plan (as required by Oregon Department of Environmental Quality (DEQ) Erosion Control NPDES Permit, 1200CA), should be prepared and appended to the portion of the Stormwater Management Plan addressing construction activities (including but not limited to clearing, grading, stockpiling, filling, earthwork, excavation, development, building, demolition, or other ground disturbing or denuding activities, etc.) if soil disturbance occurs during construction.
 - E. Employment of erosion control (prevention of soil migration) measures should occur simultaneously with sediment retention measures. Sediment retention measures such as filter bags, sediment traps, catch basin inserts, and the use of BMP systems that are designed to remove sediment from suspension before leaving the site should be implemented in addition to preferred erosion control measures (e.g., streambank bioengineering, riparian vegetation protection and replanting, and tertiary buffering in degraded wetlands) to prevent sedimentation.
 - F. Sediment from disturbed areas or tracked by vehicles onto pavement should not be permitted to leave the site or enter waters of the state. Sufficient aggregate should be placed at all construction exits, and should be used to collect sediment and other materials washed from all earth

moving equipment leaving the sites and traveling on paved roads or other paved surfaces. Other BMPs, such as wheel washes, should also be used.

G. Stormwater inlets or catch basins located downstream of the work areas should be augmented with sediment control measures that prevent debris and turbid flows from reaching waters of the state.

H. Steps for removal and recycling or disposal of temporary structural BMPs, particularly those BMPs for construction but not intended for post-construction use. It should also identify regular and needed inspection, cleaning and repair or replacement, and the proper disposal of all wastes following Oregon solid and hazardous waste management regulations.

I. A hazardous material spill containment and notification plan. The plan should comply with the conditions of 40 CFR 302, and the waste should be managed according to Oregon regulations. Coordination to mitigate pre-existing spill or new release may require coordination with the Land Quality Division of DEQ and the Service.

Conclusion

We believe that there are too few alternatives reviewed under the level of analysis required to make a decision on a preferred alternative. The build-alternative proposed appears to be over-designed for the purpose of the project and while it should be considered as one alternative, other alternatives requiring less construction should be given equal analysis. For example, an alternative that proposes stop lights with left turn lanes combined with road widening and signage, but without interchanges and extensive road grids, may resolve the safety issue, not result in congestion exceeding the 0.70 threshold for the volume/capacity ratio, cost far less, and be far less damaging to fish and wildlife habitat. Or maybe one interchange with limited frontage road is adequate instead of three. Each alternative should disclose the location, acreage, and relative habitat sensitivity and value of the fish and wildlife habitats that will be directly and indirectly adversely affected by the project development. These statistics should be displayed on a map and in a table for trade-off and comparison analysis. Also, stormwater treatment and mitigation strategies will likely require more detail for each of the alternatives before the significance of impacts can be determined. If significant impacts are determined for the preferred alternative, an Environmental Impact Statement (EIS) will be required.

Thank you for the opportunity to review and comment on this evolving document at this early stage of the NEPA review process. If you have any questions or concerns regarding these comments, please call John Marshall at 503-231-6179. These comments provide the position of the Service. They will be forwarded to the U.S. Department of Interior (DOI) for review. While

we do not anticipate substantive changes, the DOI may provide further comments and/or changes to these comments in their response letter to this draft EA.

Sincerely,


Kemper M. McMaster
State Supervisor

ju/IM

cc: Yvonne Vallette, EPA
Judy Linton, COE
Christy Fella, NOAA Fisheries
Jon Hale, USFWS
Tom Melville, DEQ
Patty Snow, ODPFW
Jim Grimes, ODPFW



United States Department of the Interior

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Washington, D.C. 20240

ER-02/1007



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JAN 16 2005

Ms. Susan Whitney
Environmental Project Manager
Region 2
Oregon Department of Transportation
455 Airport Road, SE, Building B
Salem, Oregon 97301-5395

Dear Ms. Whitney:

The Department of the Interior (Department) has reviewed the Environmental Assessment (EA) and Draft Section 4(f) Evaluation for the H.B. Van Duzer Forest Corridor-Steel Bridge Road, ORE 18/ORE 22, Polk County, Oregon. We have the following comments and recommendations.

ENVIRONMENTAL ASSESSMENT COMMENTS

Background

We understand that this EA proposes the location and assesses the impacts of elements such as four lanes with non-traversable medians, interchanges, realigned intersections, consolidated accesses, and local service roads, which would make the highway safer and less congested. This proposal also consists of a number of projects and strategies not yet in the design stage. This location EA addresses the impacts of these projects in general terms.

The purpose of preparing this location EA is to analyze the overall corridor impacts, reach decisions on individual projects, and, as each project is approved, proceed with development of those projects. The preparation of a location EA notifies agencies and individuals of the long-range plans for the highway. Once each project is funded for development and preliminary design, separate environmental documents will be prepared for each and impacts will be addressed in detail. The purpose of these projects is to increase safety and decrease congestion as a result of increased traffic and a relatively high rate of traffic accidents on this stretch of highway.

Fish and Wildlife Coordination Act Comments

The South Yamhill River Basin and Agency Creek Basin in this proposal support runs of naturally spawning and rearing winter steelhead and spring chinook. Steelhead found in the South Yamhill River are part of the Upper Willamette River Steelhead Evolutionary Significant Unit (ESU). This ESU was federally listed as threatened in March 1999 (64 FR 14517). Critical

Habitat in this proposed area was designated for this ESU on February 16, 2000, (65 FR 7764). Chinook salmon utilizing the South Yamhill River Basin are part of the Upper Willamette River Chinook ESU. This ESU was federally listed as threatened on March 24, 1999 (64 FR 14308). Critical Habitat in this area was designated on February 16, 2000, (65 FR 7764). Steelhead and chinook salmon have also been observed spawning and rearing in Cooper, Gold, Rowell and Rock Creeks within the project area. Willamina Creek and the South Yamhill River are designated "essential indigenous salmonid habitat" (Oregon Administrative Rule 141-102-0000). Essential indigenous salmonid habitat is habitat necessary to prevent the depletion of indigenous and anadromous salmonid species during their life history stages. Coastal cutthroat trout reside in all local watersheds in the project area. Sculpin, dace, whitefish, lamprey and other resident species inhabit the river as well.

Large mammals such as black bear, black-tailed deer, Roosevelt elk, and cougar use habitat in the project area. Deer and elk winter range lies in the valley bottom with peripheral winter range in the foothills adjacent to the bottomlands and riparian areas along the South Yamhill River.

Birds such as ruffed grouse, blue grouse, and mountain quail inhabit the mountainous portions of the corridor. Ring-necked pheasants and valley quail use the brush areas, and doves and band-tailed pigeons are seasonal residents.

Small mammals, birds, reptiles, and amphibians that may include snakes, lizards, turtles, frogs, toads, and salamanders are also found throughout the project area. Mammals including but not limited to bats, mice, voles, shrews, rabbits, skunks, muskrats, mink, minks, beavers, opossums, mecoons, and coyotes. Birds using the area include but are not limited to neotropical migrants, raptors, waterfowl, and shore birds.

Eight habitat types were identified: 1) disturbed (25.3 percent); 2) agricultural (18.0 percent); 3) old-field/scrub/shrub (29.1 percent); 4) forest (12 percent); 5) riparian (2.3 percent); 6) forested wetlands (1.2 percent); 7) scrub/shrub wetlands (0.4 percent); and 8) emergent wetlands (1.8 percent).

General Comments

There are several emerging issues that are identified and discussed in order of priority. First, we are concerned that the EA may be mixing elements of a location refinement pre-State Transportation Improvement Plan (STIP) phase of project planning with proposed alternatives that are more commensurate with a construction post-STIP EA or EIS. Further, while the safety needs for road improvements appear to be fairly straightforward, the data that are meant to support an argument for the need to relieve congestion are confusing. Also, the build-alternative itself appears to add infrastructure (e.g., frontage roads, interchanges, and local street grids) beyond that needed to accomplish the desired safety standards and velocity/capacity ratios. The fact that there is only one relatively precise build-alternative increases our concerns. The best way to resolve these concerns is to: (1) provide a more straight-forward explanation regarding the

need to relieve congestion; (2) provide a wider range of alternatives that include minimum, moderate, and heavy levels of development impacts; and (3) provide more detailed information on fish and wildlife impact amelioration (e.g., stormwater treatment, avoidance, and compensatory mitigation).

Second, we are concerned that the number and size of interchanges along with the new frontage roads and accompanying road grids may be in excess of the road improvement requirements for meeting the stated project purpose. At a minimum, the rationale behind the proposed additional roads and interchanges needs to be explained in more detail to help the reader understand why it is necessary in order to meet the project purpose. Otherwise, the build alternative may exceed the scope of the stated purpose and need.

We could find no discussion that outlines the potential short-term or long-term impacts to migratory birds protected under the Migratory Bird Treaty Act (MBTA). The Department recommends that the EA include a discussion on the potential short-term and long-term impacts from the proposed project on migratory birds protected under the MBTA. Further, we recommend the Oregon Department of Transportation (ODOT) include a general plan outlining how the ODOT will ensure compliance with the MBTA. The FWS would be very happy to work with the ODOT on the development of such a plan.

We recommend that the ODOT determine if there are any opportunities to remove potential fish passage barriers, enhance wetlands, or enhance riparian stream habitat in the general area of this project proposal. If these opportunities exceed that which is required through compensatory mitigation, we ask that the ODOT explore whether any discretionary funds are available, possibly through the Transportation Equity Act, to help take advantage of these opportunities. We understand that the ODOT and the Federal Highway Administration are under no obligation to explore this opportunity. However, we believe that such an effort would help meet the intent of the Transportation Equity Act, to be mindful of environmental enhancement opportunities, and to take advantage of them when appropriate.

While we understand this project is currently in the pre-STIP planning phase, a more thorough description of the compensatory mitigation alternatives currently under consideration by the ODOT would be helpful. We would also like to review a general description of the potential mitigation site(s) and the proposed conservation easement process (or its equivalent). For highway projects, we generally recommend off-site mitigation efforts sufficiently far away from the highway corridors and other development pressures to retain a low likelihood of elimination or degradation by future development projects. For long and linear habitat impacts, consolidated mitigation actions are often most beneficial for fish and wildlife. Wildlife corridors are generally good candidates for consolidation of habitat mitigation and/or enhancement and restoration outside of the context of mitigation. Habitat banking may be a mitigation option worth exploring.

Modification of highway characteristics and implementation of crossing structures to provide opportunities for animal passage across highway corridors should be undertaken in a number of areas. Three primary types of structures have been implemented to provide animals opportunities to cross highways. These are underpasses, bridges/viaducts, and over-passes. In most installations of animal crossing structures, fences that direct animal movement to the crossing structure and prevent animals from moving out onto the road are a critical component of the installation. The EA should identify areas where habitat connectivity could be enhanced, and the strategies to achieve this goal. Specific structures to be implemented will need to be designed with the input of highway engineers, wildlife biologists, and adjacent landowners.

Good locations for installation of wildlife underpasses are limited in this area. Other natural draws or likely locations for underpasses have not been identified along this section of highway. While underpasses could be excavated under the highway, an extensive system of guiding fences would be particularly important because many species are more hesitant to use these types of structures. Future residential and commercial development has the potential to compromise the value of this area for wildlife movement. Crossing structures should be buffered from human activity and residential development in the area. A possible wildlife crossing enhancement opportunity would be to widen the area for animal movement along the South Yamhill River by providing a wider bridge over the river.

Replacement of culverts that presently impede fish passage with a bridge or elevated highway section would provide stream connectivity. Any new culvert structure should provide natural streambed substrates, stream banks with upland vegetation that could be used by animals during normal stream flows, and should eliminate any fish barriers imposed by the existing culverts. Note that culvert replacement may require some use of grade control to prevent headcutting in the stream. The Department's Fish and Wildlife Service (FWS) would be happy to provide assistance on culvert and bridge replacement design strategies that minimize impacts to the stream and riparian environment.

Specific Comments

Page 9, Table 1: There is no table displaying the present day Volume to Capacity (V/C) ratios for respective sections of highway nor an explanation of the rationale for the 2008 ratios.

Page 10, Rural Expressways: This section reads "... A purpose of the proposed projects would be to control access to the highway by constructing interchanges, consolidating access points, and constructing local service roads that would allow local traffic to access the highway at controlled entry and exit points." We are concerned that one potential design remedy is being stated as a purpose of the project. This kind of circular reasoning may have contributed to our overall concern stated also, that the location EA, in many ways, resembles a construction level planning document. Please refer to our General Comments above.

The Water Quality discussion on page 256 does not adequately consider stormwater and floodplain issues associated with the proposed alternatives. The FWS provides the following general recommendations on a stormwater strategy for the proposed project. These recommendations are based on the premise that their implementation would help ensure significant impacts would not occur, and would more strongly support a Finding of No Significant Impact (FONSI) for this EA.

1. Stormwater management for erosion prevention and sediment control during construction requires separate attention. Each strategy should be explained separately in the text under the central heading of stormwater.
2. There should be a presumption that all stormwater is treatable. It should be the project sponsor's burden to demonstrate otherwise.
3. All stormwater treatment facilities should be designed and constructed to emulate natural systems.
4. Pre-project water quality, water quantity, and seasonality should be retained through the design and operation of the stormwater treatment strategy.
5. All stormwater treatment facilities should be placed in degraded uplands. Further, any unavoidable impacts to upland native vegetation or other waters due to stormwater treatment system installation should require compensatory mitigation.
6. Three overarching goals should be, to the degree possible: (1) minimize the installation of new impervious surfaces; (2) avoid installation of stormwater treatment facilities in wetlands and floodplains; and (3) utilize opportunities to protect and restore pervious surfaces and natural vegetation.
7. Ensure that discharges to waters of the state do not violate state water quality standards, including Oregon Administrative Rule (OAR 340-041-0026(1)(a), the Antidegradation Policy for Surface Water.
8. The ODOT should develop a detailed Stormwater Management Plan for the final preferred alternative. Recommended elements of this Plan include the following:
 - A. Description of the implementation, operation, inspection, monitoring and maintenance activities that ensure the capacity and proper function of the quantity and quality control features of the stormwater treatment facilities and the system's best management practices (BMPs).

- B. An implementation schedule and operation and maintenance plan for all BMPs, including design specifications for construction and implementation. This should include plan view drawings and maps displaying the structural BMP locations in addition to other physical features of the site (existing and proposed).
- C. Stormwater discharges that require structural stormwater management facilities should be designed to meet local, state, and Federal Stormwater Management Plan requirements.
- D. An erosion prevention/sediment control plan (required by the Oregon Department of Environmental Quality (DEQ) Erosion Control National Pollution Discharge and Elimination System Permit, 1200C(A), should be prepared and appended to the portion of the Stormwater Management Plan addressing construction activities (including but not limited to clearing, grading, stockpiling, filling, earthwork, excavation, development, building, demolition, or other ground disturbing or denuding activities, etc.) if soil disturbance occurs during construction.
- E. Employment of erosion control (prevention of soil migration) measures should occur simultaneously with sediment retention measures. Sediment retention measures such as filter bags, sediment traps, catch basin inserts, and the use of BMP systems that are designed to remove sediment from suspension before leaving the site should be implemented in addition to preferred erosion control measures (e.g., streambank bioengineering, riparian vegetation protection and replanting, and tertiary buffering in degraded wetlands) to prevent sedimentation.
- F. Sediment from disturbed areas or tracked by vehicles onto pavement should not be permitted to leave the sites or enter waters of the state. Sufficient aggregate should be placed at all construction exits, and should be used to collect sediment and other materials washed from all earth moving equipment leaving the sites and traveling on paved roads or other paved surfaces. Other BMPs, such as wheel washes, should also be used.
- G. Stormwater inlets or catch basins located downstream of the work areas should be augmented with sediment control measures that prevent debris and turbid flows from reaching waters of the State.
- H. Steps for removal and recycling or disposal of temporary structural BMPs, particularly those BMPs for construction but not intended for post-construction use. It should also identify regular and needed inspection, cleaning and repair or replacement, and the proper disposal of all wastes following Oregon solid and hazardous waste management regulations.

1. A hazardous material spill containment and notification plan. The plan should comply with the conditions of 40 CFR 302, and the waste should be managed according to Oregon regulations. Coordination to mitigate pre-existing spill or new release may require coordination with the Land Quality Division of DEQ and the FWS.

DRAFT SECTION 4(f) EVALUATION COMMENTS

The ODOT appears to be pursuing the most feasible and prudent alternative among those studied; however, the project would likely have some effect on the character of the historic district in the town of Grande Ronde. Letters from the SHPO and the ODOT suggest that it is too early to prepare a Determination of Eligibility and a Finding of Effect on the project, as the design is not complete and the details and construction plans will not be developed for many years.

Under the proposed build alternative, South Street, currently a dirt road, would be "improved" to create a new service road, bringing traffic and noise and some resulting change in the character of a historic district that dates from the early 20th century. While the effect of such changes might be reduced or even be insignificant when final design details are completed, it seems appropriate to consider more fully at this time whether alternatives requiring less construction, such as are described in the "Conclusion" of this letter, might meet the purpose of the project and also reduce the potential intrusion on the area's historic properties.

CONCLUSION

We believe that there are too few alternatives reviewed under the level of analysis required for a decision on a preferred alternative. Other alternatives requiring less construction should be given equal analysis. For example, an alternative that proposes stop lights with left turn lanes combined with road widening and signage, but without interchanges and extensive road grids, may accomplish the stated purpose of resolving the safety issue, without resulting in congestion exceeding the 0.70 threshold for the volume/capacity ratio, may cost far less, and would be far less damaging to fish and wildlife habitat. Alternatively, perhaps one interchange with limited frontage road is adequate, instead of three. We recommend that each alternative disclose the location, acreage, and relative habitat sensitivity and value of the fish and wildlife habitats that would be directly or indirectly adversely affected by the project development. These statistics could be displayed on a map and in a table for trade-off and comparison analysis. Also, stormwater treatment and mitigation strategies will likely require more detail for each of the alternatives before the significance of impacts can be determined.

Thank you for the opportunity to review and comment at this early stage of the project planning process. If you have questions pertaining to fish and wildlife issues, please contact John Marshall of our Oregon Fish and Wildlife Service Office at 503-231-6179. If you have questions

pertaining to the cultural resources, please contact Laurin Huffman, National Park Service, Seattle Office at (206) 220-4131.

Sincerely,



Willie R. Taylor
Director, Office of Environmental
Policy and Compliance

