## Conversion Factors

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<th>English Units</th>
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<td>foot (ft)</td>
<td>0.3048</td>
<td>meter (m)</td>
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<tr>
<td>mile (mi)</td>
<td>1.609</td>
<td>kilometer (km)</td>
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<tr>
<td>cubic yard</td>
<td>0.7646</td>
<td>cubic meter</td>
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<tr>
<td>acre (ac)</td>
<td>0.4047</td>
<td>hectare (ha)</td>
</tr>
<tr>
<td>miles per hour (mph)</td>
<td>1.609</td>
<td>kilometers per hour (km/h)</td>
</tr>
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## Alternative Format Availability

In compliance with the Americans With Disabilities Act, alternative formats of this document will be made available upon request.
July 21, 2004

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,

David McAllister,
Operations Manager
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 threaten 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

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<th>Full Form</th>
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<tr>
<td>BA</td>
<td>Biological Assessment</td>
</tr>
<tr>
<td>BMP</td>
<td>Best Management Practices</td>
</tr>
<tr>
<td>BO</td>
<td>Biological Opinion</td>
</tr>
<tr>
<td>C.F.R.</td>
<td>Code of Federal Regulations</td>
</tr>
<tr>
<td>CO</td>
<td>carbon monoxide</td>
</tr>
<tr>
<td>DEQ</td>
<td>Oregon Department of Environmental Quality</td>
</tr>
<tr>
<td>DLCD</td>
<td>Oregon Department of Land Conservation and Development</td>
</tr>
<tr>
<td>DOE</td>
<td>Determination of Eligibility</td>
</tr>
<tr>
<td>EA</td>
<td>environmental assessment</td>
</tr>
<tr>
<td>EFU</td>
<td>Exclusive Farm Use</td>
</tr>
<tr>
<td>EPA</td>
<td>U.S. Environmental Protection Agency</td>
</tr>
<tr>
<td>ESA</td>
<td>Endangered Species Act</td>
</tr>
<tr>
<td>ESUs</td>
<td>Evolutionarily Significant Units</td>
</tr>
<tr>
<td>FHWA</td>
<td>Federal Highway Administration</td>
</tr>
<tr>
<td>LCDC</td>
<td>Oregon Land Conservation and Development Commission</td>
</tr>
<tr>
<td>LUO</td>
<td>Limited Use Overlay (Polk County)</td>
</tr>
<tr>
<td>NEPA</td>
<td>National Environmental Policy Act</td>
</tr>
<tr>
<td>NRHP</td>
<td>National Register of Historic Places</td>
</tr>
<tr>
<td>OAR</td>
<td>Oregon Administrative Rule</td>
</tr>
<tr>
<td>ODFW</td>
<td>Oregon Department of Fish and Wildlife</td>
</tr>
<tr>
<td>ODOT</td>
<td>Oregon Department of Transportation</td>
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<td>ODSL</td>
<td>Oregon Division of State Lands</td>
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<tr>
<td>OHP</td>
<td>Oregon Highway Plan</td>
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<tr>
<td>OR 18</td>
<td>Oregon Route 18 (old convention)</td>
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<td>ORE 18</td>
<td>Oregon Route 18 (new convention)</td>
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<td>OR 22</td>
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<td>ORE 22</td>
<td>Oregon Route 22 (new convention)</td>
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<tr>
<td>ORS</td>
<td>Oregon Revised Statutes</td>
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<td>OTP</td>
<td>Oregon Transportation Plan</td>
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<td>PCB</td>
<td>polychlorinated biphenyl</td>
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<tr>
<td>REA</td>
<td>revised environmental assessment</td>
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<tr>
<td>RPS</td>
<td>Regional Problem Solving</td>
</tr>
<tr>
<td>Acronym</td>
<td>Description</td>
</tr>
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<td>---------</td>
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<tr>
<td>SHPO</td>
<td>State Historic Preservation Office</td>
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<tr>
<td>SIP</td>
<td>Safety Improvement Program</td>
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<td>SPIS</td>
<td>State Priority Index System</td>
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<tr>
<td>STIP</td>
<td>Statewide Transportation Improvement Program</td>
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<td>TAC</td>
<td>Technical Advisory Committee</td>
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<td>TDM</td>
<td>Transportation Demand Management</td>
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<td>TPR</td>
<td>Transportation Planning Rule</td>
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<td>Transportation System Management</td>
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<td>TSP</td>
<td>Transportation Systems Plan</td>
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<td>USACE</td>
<td>U.S. Army Corps of Engineers</td>
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<td>USFWS</td>
<td>U.S. Fish and Wildlife Service</td>
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<td>USGS</td>
<td>United States Geological Survey</td>
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<tr>
<td>v/c</td>
<td>volume-to-capacity ratio</td>
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<td>VE</td>
<td>value engineering</td>
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## Glossary

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tr>
<td>Access management</td>
<td>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.</td>
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<tr>
<td>Access road</td>
<td>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.</td>
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<tr>
<td>Alignment</td>
<td>Geometric arrangement of a roadway (e.g., curvature).</td>
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<tr>
<td>Alternative modes</td>
<td>Modes such as rail, transit, carpool, walking, and bicycle that provide transportation alternatives to the use of single-occupancy automobiles.</td>
</tr>
<tr>
<td>Capacity</td>
<td>Maximum volume of traffic that the roadway section is able to carry on a sustained basis.</td>
</tr>
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<td>Clear zone</td>
<td>The total roadside border area, starting at the edge of the traveled way, available for safe use by errant vehicles.</td>
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<tr>
<td>Deviation</td>
<td>A departure from an access management standard, requiring a design exception.</td>
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<tr>
<td>Environmental Assessment (EA)</td>
<td>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.</td>
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<tr>
<td>Expressway</td>
<td>Highways that provide for safe and efficient high speed and high volume traffic movements.</td>
</tr>
<tr>
<td>Highway</td>
<td>A public way for purposes of travel, including the entire area within the public right-of-way.</td>
</tr>
<tr>
<td>Highway-Rail Crossing</td>
<td>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.</td>
</tr>
<tr>
<td>In Attainment</td>
<td>An area with air quality that meets or exceeds the U.S. Environmental Protection Agency health standards used in the Clean Air Act.</td>
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</table>
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.
<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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</thead>
<tbody>
<tr>
<td>Right-of-Way</td>
<td>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.</td>
</tr>
<tr>
<td>Section 4(f)</td>
<td>Section 4(f) of the Department of Transportation Act of 1966 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.”</td>
</tr>
<tr>
<td>Section 106</td>
<td>Section 106 of the National Historic Preservation Act 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.</td>
</tr>
<tr>
<td>Sight Triangle</td>
<td>The area adjacent to the highway needed for unobstructed views for driver’s safety.</td>
</tr>
<tr>
<td>State Highway System</td>
<td>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.</td>
</tr>
<tr>
<td>Transportation Demand Management (TDM)</td>
<td>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.</td>
</tr>
<tr>
<td>Transportation System Management (TSM)</td>
<td>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.</td>
</tr>
<tr>
<td>Volume-to-capacity ratio (v/c ratio)</td>
<td>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.</td>
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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 System
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 letter.

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.
Figure 1: Location and Project Map (West)
Location and Project Map
H.B. Van Duzer Forest Corridor to Steel Bridge Road — East

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.
Phase 1: Projects between Spirit Mountain Casino and Fort Hill
Phase 2: Realignment of ORE 22 (Three Rivers Highway)
Phase 3: Eastbound Highway realignment east of Grand Ronde Road
Phase 4: Westbound Highway widening from Grand Ronde to Van Duzer Forest Corridor
Phase 5: Local service road connections south of ORE 18
Phase 6: Realign curves of ORE 22 (Three Rivers Highway)
Phase 7: Local service road connections south of ORE 18

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 3: Widen Wallace Bridge-Willamina Interchange Area

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


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 of right-of-way of 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:

1. identify reasonable build design alternatives, such as alternatives that are safe and can be constructed at a reasonable cost, with available technology;
2. 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
3. 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

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

NOTE: This figure replaces 23-1 in the EA.
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
* UC-IC = Unincorporated Community-Industrial Commercial
* UC-IH = Unincorporated Community-Heavy Industrial
* UC-CH = Unincorporated Community-Commercial Highway

NOTE: This figure replaces 23-2 in the EA.
### TABLE 13 (FIGURE 13 IN THE EA)
Build Alternative—Land to be Acquired for Right-of-Way by Zone in Hectares/Acres *

<table>
<thead>
<tr>
<th>Highway Segment</th>
<th>AR-5</th>
<th>CG</th>
<th>FF/FFO</th>
<th>EFU</th>
<th>Tribal</th>
<th>IH</th>
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<tr>
<td><strong>H.B. Van Duzer Forest Corridor to Grand Ronde Road</strong></td>
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<td>Access road, A.R. Ford—Fire Hall Road</td>
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<td></td>
<td></td>
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<tr>
<td>Access road, Fire hall to Andy Riggs Road</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>0.6/1.5</td>
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<td>Access road, South Street extended west</td>
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<td></td>
<td>2.3/5.8</td>
<td></td>
<td>0.3/0.6</td>
<td></td>
<td>2.6/6.4</td>
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<td>Grand Ronde interchange</td>
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<td></td>
<td></td>
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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 (19.24 acres) would be AR-5 (five acre residential)
- 8.4 hectares (39.20.7 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
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 hectares (2.0 acres) of land zoned AR-5, CG, 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 (2.9 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. 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 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 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 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 \(\frac{1}{4}\)-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 effect 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. 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

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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 feet 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:

<table>
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<tr>
<th>Date</th>
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<tr>
<td>May 18, 1998</td>
<td>Confederated Tribes of the Grand Ronde Community Center</td>
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<tr>
<td>November 9, 1998</td>
<td>Grand Ronde Elementary School</td>
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<tr>
<td>April 7, 1999</td>
<td>Grand Ronde Elementary School</td>
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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)

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
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**

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

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 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.
**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 not to 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
Dear [Name],

I was pleased to hear from you regarding your interest in the [Name of Program]. I am excited to offer you a position in our [Name of Program] Program, effective [Start Date]. This role will give you the opportunity to work closely with our team on [Specific Project/Task], and I am confident that it will be a rewarding experience.

Please find attached the position description and a brief overview of our [Name of Program]. If you have any questions or concerns, please do not hesitate to contact me.

Thank you for your interest in our [Name of Program]. I look forward to working with you.

Sincerely,

[Your Name]

[Signature]

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Council Of Governments
Mid-Wilmette Valley

Phone: 847-966-0600
Fax: 847-966-9944

6000 Holiday Road
Park Ridge, IL 60068

Website: co-gov.org
Please turn over to record comments on the Fort Hill Interchange

Please drop this form in the comment box or mail to: MNDOT, P.O. Box 655, Airport Road Station, Salem, OR 97301-5555.

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

Would you like to receive the Final Environmental Impact Statement?

How did you hear about this meeting?

Date:

Name:

Address:

Phone:

Project Name:

Please do not sign the form in the comment box or mail to: MNDOT, P.O. Box 655, Airport Road Station, Salem, OR 97301-5555.
DO YOU HAVE ANY ADDITIONAL COMMENTS?

Please turn over to record comments on the Fort Hill Interchange.

I love Fort Hill. However, I feel like the valley function is not good enough. I think it would be better if the interchange was at a lower elevation. The current function needs improvement. It doesn't feel like you are in the city. The valley function needs improvement. The current function seems to be

WHAT DO YOU LIKE OR DISLIKE ABOUT THE FORFT HILL INTERCHANGE?

Please turn over to record comments on the Fort Hill Interchange.

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILDING ALTERNATIVE?

Would you like to receive the revised Environmental Assessment?

Address:

Name:

FORMAL WRITTEN COMMENT SHEET

O.B. Van Duyn Forest Corridor

Steel Bridge Road

RECEIVED

#5

O.B. Van Duyn Forest Corridor

Steel Bridge Road

RECEIVED
Please turn over to record comments on the Fort Hill Interchange

What do you like or dislike about the build alternative?

[Handwritten note]

Would you like to receive the Revised Environmental Assessment?

Yes [ ] No [ ]

Other (Please List)

Please drop this form in the comment box or mail by Monday, November 18, 2012 to:

[Handwritten address]

Thank you for your time and continued input.

Best,
[Signature]

[Handwritten note]
Please return to record comments on the Fort Hill interchange.

Better way to improve at this stage. The must be a

very few who can make sure this happens.

Historic community at the intersection.

I dislike the plan to destroy the

WHAT DO YOU LIKE OR DISLIKE ABOUT THE BUILD ALTERNATIVE?

Formal Project Newsletter

How did you hear about this meeting?

Would you like to receive the latest Environmental Assessment?

Name:

Address:

FORMAL WRITTEN COMMENT SHEET

ODOT Region

Steel Bridge Road

H.B. Van Duzer Forest Corridor

Received
Commercial on Grand Ridge Road, too.

WHAT TO SEE THIS SATURDAY? I don't disappear when I'm not expected.
I don't have this place to shop for pie and
wine again place to stop for pie and
wine. What's the west intersection of Highway 22
with 180 (WeCwLo I 180 Junction) and it
will be used to be a restaurant and gift store?

DO YOU HAVE ANY ADDITIONAL COMMENTS?

THE CASINO CROSS TAPERT.

WHAT DO YOU LIKE OR DISLIKE ABOUT THE POINT HILL INTERCHANGE?

FORMAL WRITTEN COMMENT SHEET

0.01 REGION

Steel Bridge Road

H.B. Yen Duong Forest Corridor

Received

Name:

Address:

Salina Dr 9722
500 West Hills Way NW

SALEM OR 97304

00012

Would you like to receive the Proposed Environmental Assessment
Yes No

How did you learn about this meeting?

Newspaper

Would you like to receive the Final Environmental Assessment

Form 0 701-5955

Please drop this form in the comment box or mail to: Herman Wimmer, November 15, 2001.

Please turn over to record comments on the Point Hill Interchange.

The same roadway in the area where two highways, 180 and 142, From the Casino
 Improving Highway 180 & Grand Ridge Road will do much
 to speed traffic. Also, with Highway 18
 at the west intersection of Highway 22
 there used to be a restaurant and gift store.

Form 0 701-5955

Susan Wimmer, Environmental Project Manager, 655 Marine Road, Building B.

Process drop this form to the comment box or mail to: Herman Wimmer, November 15, 2001.
DO YOU HAVE ANY ADDITIONAL COMMENTS?

WHAT DO YOU LIKE OR DISLIKE ABOUT THE PORT HILL INTERCHANGE?
This is a continuation of the previous page. The text continues from the last line of the previous page and is written in English. The content does not provide enough context to understand the full meaning without the previous pages. The text appears to be a narrative or descriptive passage, possibly involving some form of research or analysis.
WHAT DO YOU LIKE OR DISLIKE ABOUT THE FOR Pitt INTEGRATION?

DO YOU HAVE ANY ADDITIONAL COMMENTS OR QUESTIONS?

PROJECT REMOVER

Would you like to receive the project environmental assessment?

Yes  No

No Box

Address

J.R. Simmons

11440

NAME

Project Comment Sheet

ODOT Region

Seabright Bridge Road

May 6, 2002

H.B. Van Deure Forest Corridor

REVEIVED

17

Formal Written Comment Sheet
<table>
<thead>
<tr>
<th>Name:</th>
<th>H.B. Van Duzer Forest Corridor</th>
</tr>
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<tbody>
<tr>
<td>Address:</td>
<td>Steel Bridge Road</td>
</tr>
<tr>
<td>Phone:</td>
<td>P.O. Box 21</td>
</tr>
</tbody>
</table>

**Revised Environmental Assessment?**
- [ ] Yes
- [ ] No

**How did you learn about this meeting?**
- [ ] Newspaper
- [ ] Other (Please List) [Blank]

**Would you like to receive the Revised Environmental Assessment?**
- [ ] Yes
- [ ] No

**What do you like or dislike about the build alternative?**
[Blank]

**Please turn over to record comments on the Fort Hill Interchange**
Please turn over to receive comments on the front half interchange.

Consider:

1. What are your concerns about the Front Half Interchange?
2. How do you plan to use the Front Half Interchange?
3. The highway from State Route 12 to State Route 7 is a major bottleneck.

Do you have any additional comments?
Ha. Been driving Hubbard for 20 yrs.

Tried it without luck. Can't touch it. New antenna changed. Tried that, still no luck.

Send on. We much need a "win."
Dear [Name],

Thank you for your letter to the Fordham Environmental Protection Agency. I understand the frustration you and the members of the neighborhood feel about the proposed development.

I assure you that we have considered the impact of the proposed development on the neighborhood. This development is in line with the city's environmental policies and will not cause any significant harm to the community.

I am writing to assure you of our commitment to the neighborhood. We will continue to monitor the impact of the development and take necessary actions to ensure the safety and well-being of the community.

Thank you for your understanding.

Sincerely,

[Signature]

Name:

1773 & 1779

Citywide Collection

1772 & 1774

Citywide Collection

[Address]

[City, State ZIP]

[Phone Number]

[Email Address]
588-550-0026  
WILLIAMINA CR 7784  
TO BOX #17  
Faulk Territory

IT'S MOM'S FAVORITE THAT YOU CAN TELL ME THAT

Tom 62 years.

Talk about POOR have "Hothead" me on a

problems. When I turn 70, I'm going to be

problems can arise. I've been waiting for

thanks to the limited life insurance.

producing business erosion.

operating some form of insurance
Please fill out this form in the commenting box on the right.

What do you like or dislike about the build alternative?

[ ] Other (please list):

[ ] Newspaper

[ ] Project Newsletter

How did you hear about this meeting?

Would you like to receive the Joint Environmental Assessment?

[ ] Yes

[ ] No

Health

[ ] Yes

[ ] No

Address:

Name:

H.B. van Duzer Forestry Corridor

Steel Bridge Road

Received: 7/22/02

Formal Written Comment Sheet

Region: Forest

Date: 7/16/02
If this proposal is to be done, there must be done well.

A demonstration that the proposal will be done well must be prepared and presented.

The demonstration of the proposal will be done well must be prepared and presented.

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The demonstration of the proposal will be done well must be prepared and presented.
DO YOU HAVE ANY ADDITIONAL COMMENTS?

Highway: In this section of the Highway. A Surface Grade Interchange may be an acceptable solution to the traffic problems along this portion of the Highway. This is the only way to keep traffic flowing. I feel the Highway is in need of improvement. If it were

WHAT DO YOU LIKE OR DISLIKE ABOUT THIS PORT HILL INTERCHANGE?
Please drop this form in the comment box at Hall of Records, November 15, 2002.

Please turn over to record comments on the flip side.

Name: Alan Ying

Address: 3212 San Diego Ave.

What do you like or dislike about the bridge interchange?

Do you have any additional comments?

Formal written comment sheet

1211 2002

Received: H. Van Duzer

Project Coordinator

Case # 3230

Bargaining Unit

1211 2002

Received: H. Van Duzer

Project Coordinator

Case # 3230

Bargaining Unit
Thanks for planning. Need a bit of long term plan, plan, plan. Ask for feedback and then plan, plan, plan some more.

DO YOU HAVE ANY ADDITIONAL COMMENTS?
Please turn over to record comments on the Fort Hill Interchange.

Dear [Name],

Thank you for your interest in the project. Your comments are valuable in helping us make decisions that affect you.

Please provide your contact information and any comments you have on the project.

Name: [Name]
Address: [Address]

What do you like or dislike about the build alternative?

[ ] How do you hear about this meeting?

[ ] Other (please list)...

[ ] Newspaper
[ ] Project newsletter
[ ] Other...

Non-Emissions:

Do you have any additional comments?

[ ] Yes
[ ] No

Property Address: 25700 Wallow River Rd.

City: Salem

State: OR

ZIP: 97307

Salem Airport, Project Manager: Susan Whitney, Environmental Project Manager; 971-585-1353

Please drop off your comment box or mail it by Monday, November 18, 2002 to Salem Airport, Project Manager: Susan Whitney, Environmental Project Manager; 971-585-1353.
People should have the ability to vote. It's their right, and the Constitution is our guide. Don't destroy it. Don't use it to force the course. Rand, Rand, Rand, Rand, Rand. About it. Don't like it. I have Grand National, I have, I have, here all don't this. It is has to be down. Don't like it. 

What do you like or dislike about the Fort Hill Interchange?

[Checkboxes with options: Other (Please List), Rand Road Community, Newspaper]

What did you like to receive the Regional Environmental Assessment?

Address: 3335 S. Main Ave.

Received:

[Signature]

H.B. Van Duiker Forest Corridor

[Date: 11/3/2000]
**Please turn over to record comments on the Fort Hill Interchange.**

**What do you like or dislike about the build alternative?**

I think the build alternative will be the best for the community. It will bring us closer to the town and make it easier for us to access. I also think it will be safer for our children and families.

**Would you like to receive the Revised Environmental Assessment?**

Yes.

**How did you hear about this meeting?**

Spoke with a neighbor.

**Address:**

26420 School Road

**Job Title:**

Jack Liwan

**Do you have any additional comments?**

I do not have any additional comments.
Return your proposal:

Submit photo card -- no tax return.

To submit my proposal, I checked the box below.

I certify that my project will not exceed the

I certify that my project will not exceed the

What do you like or dislike about the build alternatives:

Would you like to receive the project newsletter?

Address:

City (Please list):

Project newsletter

How did you hear about this meeting?

For written comments, please use the comment sheet.

Formal Written Comment Sheet

Steel Bridge Road

H.B. Van Duzer Forest Corridor
Please turn over to record comments on the Fort Hill interchange.

Formal Written Comment Sheet

Steel Bridge Road

H.B. van Duzer Forest Corridor

Project Name: Environmental Program Manager - 556 Airport Road, Building D.

Please drop the form in the comment box or mail by Monday, November 15, 2002.

NAME:

ADDRESS:

E:

NAME:

ADDRESS:

E:

Note: If you have questions about this survey, please call: 556 Airport Road, Building D, Ft. Lauderdale, FL 33309.
Please turn over to record comments on the Fort Hill Interchange.

What do you like or dislike about the existing condition?
Would you like to receive the B.C. Environmental Assessment?
How did you hear about this meeting?

[ ] Other (please list)
[ ] Newspaper

Don't currently follow a community.

I don't like being close to the airport. My house is only 2 blocks from the airport and the planes are very loud. I would like to move away from the airport.

I don't like the noise and the pollution. I think the airport should be expanded.

There are many other people who feel the same way.

Do you have any additional comments?

[Please write your comments here]

Please return this form in the comment box or mail to Susan Whitley, Environmental Planning Engineer, 45 Airport Road SE, Building B.
What do you like or dislike about the Fort Hill Interchange?

Do you have any additional comments?

NO BUILDING

Not addressed at all. Not acceptable at all.

Either this property or the other property will all of the highway runoff. This property as is.

Please turn over to record comments on the Fort Hill Interchange.

N.B. Van Duzer Forest Corridor
Formal Written Comment Sheet

Steel Bridge Road

H.B. Van Duzer - Forest Corridor

What do you like or dislike about the Fort Hill Interchange?

FORMAL WRITTEN COMMENT SHEET
DO YOU HAVE ANY ADDITIONAL COMMENTS?

What do you like or dislike about the Fort Hill Interchange?

Name: 
H.L. Van Dueren Forest Corridor

FORMAL WRITTEN COMMENT SHEET

Steel Bridge Road

Would you like to receive the revised Environmental Assessment? Yes No

Address:

Date: 8/30/02

Comments:
Don't see how I can help.

Door and my deck door I made there. If I

Doed that or if I used it.

It'll be like secret if I made it to her

Tear of various but if you put this down road

Take me, I don't like the road. I want to put a road through it. It's that

When my eyes was on to put my house

Furniture in and I better my family

DO YOU HAVE ANY ADDITIONAL COMMENTS? I have tried to better my

DO YOU LIKE OR DISLIKE ABOUT THE FORHILL INTERCHANGE?

FORMAL WRITTEN COMMENT SHEET

Steel Bridge Road

H.E. Van Duzer Forest Corridor

San Ramon Valley Environmental Project Manager 555 Airport Road, Building B
Please do not write in the comment box or mail by hand. November 2004

Please turn over to record comments on the Fort Hill interchange

what do you like about the build alternatives

[] Other (please list)

Project Manager

How do you hear about this facility?

San Ramon Valley Environmental Project Manager 555 Airport Road, Building B

Yes

No

Name:

Address:

Comments:

Name & City/County:

Street:

FORHILL INTERCHANGE

[Image 81x420 to 531x768]

[Image 81x25 to 531x372]
Please turn over to record comments on the first half of the plan.

What do you like best about the building alternatives?

What other (if any) issues do you have?

How would you like to receive the results of the environmental assessment?

Address:

Name:

H.E. Van Duiker Forest Corridor
Steel Bridge Road
Emailed, overnight, regular mail + 5 copies
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
FORMAL TESTIMONY

MS. GIRARD: Our first speaker will be
David Franzen.

MR. FRANZEN: My testimony is completely
written so I will be able to give that to you when
I am done.

(Written statement read orally.)

--oo0oo--

MS. GIRARD: Our next speaker is Dennis
Worsham, and after Dennis is Don Yates.

MR. WORSHAM: My name is Dennis Worsham. I'm
a resident of Valley Junction. My address is 8990
Hebo Road, Grand Ronde.

I have some written comments I will
submit, and so I would like to kind of paraphrase a
couple of issues that my written comments address,
and I'll give my summary first.

As it stands now, my recommendation to
ODOT and the Federal Highway Administration is not
to do this build alternative. My recommendation is
no build.

I don't make that recommendation lightly
because I was on the steering committee, and I
think there is a lot of good things going on in
this plan, but let me focus on three key areas
here: First, as a resident of Valley Junction my
focus is strictly on Valley Junction. I don't
pretend to be an expert on other parts of this
project area.

I don't think enough attention was paid
in this environmental assessment to impacts on ag.
and forest land. ODOT recognizes this is largely a
rural area, and I just don't think you gave
detailed -- attention to the detail that you should
have on what you're going to do with this plan on
the rural area.

The second point I wanted to focus on
here is what I see is a serious flaw, and that is
the lack of frontage road east and west of the
Casino at Valley Junction on the south side of the
Oregon Highway 18.

This was brought up in the steering
committee and it's still not on your plan and I'm
not sure why. I would like ODOT to apply the same
standards at Valley Junction that I just heard
Alan -- I believe it was Alan -- speak of that was
going to happen at Fort Hill; and that is at the
same time that you put in a four-lane concrete
barrier highway you make sure that you have your
frontage roads in place.

And my position of Valley Junction is
that some of us are required to give so much to
benefit what we see as a single interest, and
that's the Casino, and we're not getting much in
return.

The last point I would like to focus real
quickly is: Why at Valley Junction, why is Oregon
22 from the ramp where it rejoins 18 to the dead
end at the Casino front door, why is that
considered part of Oregon Highway 22? It seems to
me that's a local service road. 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 this
local service road, which you're calling Oregon 22,
why doesn't it serve those two properties as well
as a third property that we've arrived at?

Thank you.

--oo0oo--

MS. GIRARD: Thank you, Dennis.

MS. GIRARD: Don Yates is up next. And I
would just like to point out to all of you, anyone
who wants to speak privately afterwards with the
court reporter in a one-on-one session, there's a
sign-up sheet over at this end of the table. So
please feel free to come up privately.

And I understand that Don has a video
presentation which we were not able to accommodate
tonight, but maybe after this testimony if any of
you are interested, you could gather around his
laptop and take a look.

MR. YATES: Thank you, Linda. And I want
to thank ODOT as well for the flexibility to afford
the opportunity to speak this evening when that
wasn't part of your planned process.

My name is Don Yates. I live at 29940
Salmon River Highway here in Grand Ronde. And as
she said, I have a Power Point presentation I would
love to show anybody that's willing to hang around
and watch afterwards. But it's based on data that
I obtained, crash data, from the Oregon Department
of Transportation; and since I can't show you the
data, I am just going to give you the conclusions.

First of all, I would point out to you
that in your statement there is an erroneous

MARTIN HAUGE
Official Court Reporter
Accidents involving trucks are occurring with greater frequency outside the study area. 
Head-on crashes occur more frequently east of the study area. 
Sideswipe meeting crashes occur twice as frequently east of the study area. 
Angle crashes occur 15 times more frequently east of the study area. 
Crashes while turning occur with greater frequency to the east of the study area by over two to one. 
The greatest number of intersection accidents on Highway 18 occur east of the study area by a margin of six to one. 
The greater number of truck crashes, turning accidents, traffic fatalities, accidents at intersections, angle crashes, head-on accidents, sideswipe accidents, rear-end collisions on Highway 18 all occur east of the study area despite the safety corridor. In fact, every type of accident ODOT keeps statistics on occurs more frequently east of the study area.

Now, we all know that money for highway improvement is scarce and, therefore, we must prioritize projects that improve public safety. We cannot afford to build interchanges and intersections where the data shows that accidents happen least frequently when the same data shows that the accidents are happening most frequently elsewhere on the same highway.
A high-speed rural expressway will only exacerbate the obvious traffic safety problems that already exist elsewhere on Highway 18.

There's only one reasonable alternative in the light of the data I have just given you: The no-build alternative. The money must instead be spent directing the intersections on Highway 18 where the accidents are happening and where the public is dying.

There are some low-cost solutions: You can change the eastbound exit at the Casino to a merge lane controlled with a light during peak traffic periods like the freeway entrances in Portland.

You can have electronic reader boards west and east of the Casino to warn traffic of slowing ahead, a progression of three or four boards, activated as traffic warrants.
You can install a traffic light at Valley Junction that is a normal flashing yellow and use sensors on Highway 22 to trigger the function as a stoplight only when traffic backup on Highway 22 warrants its operation. The reader boards and Casino exit control light should automatically coordinate. The interim solutions I suggest are cost effective and should be doable within the annual transportation budget. Further, they will provide immediate relief to traffic congestion problems in the study area. We don't have to wait 20 years.

--00:00--
MS. GIRARD: We have next Alan Floyd, and after Alan is Wes Shenks.

MR. FLOYD: Thank you. My name is Alan Floyd. I am a resident of Willamina, and I am a professional environmental coordinator, or whatever, for an industrial facility, so I have extensive knowledge of environmental regulations. Some of this is going to sound like Greek to you so...

The first issue I want to address is effective March -- actually in the month of March, 2003, the National Pollutant Discharge Elimination System, part of the Clean Water Act, will require all Phase 2 regulations to be initiated. That includes best practices control technology, best available technology, and continuous monitoring and new source performance standards. As I said, it sounds like Greek. Basically the crux of that is, there is many plans that have to be implemented for any construction or development to occur. One of those issues is TMDLs, total maximum daily loading. It refers to water sheds. In this plan, and I have read it thoroughly, there is only one issuance of TMDLs.

MS. GIRARD: Could you give your address.

MR. FLOYD: 128 N.W. Willamina Drive.

MS. GIRARD: Our next speaker is Wes Shenks followed by Tim Thorp.

MR. SHENKS: My name is Wes Shenks. My address is 9075 Fort Hill Road, Willamina. I'm going to speak specifically of the Fort Hill project. We own land around the sawmill, my mother and my father -- or my mother and my brother and I. And I guess I've raised this question before at different times: I'm curious whether anybody from ODOT or anybody has ever gone to this Fort Hill Lumber Company and asked them or quizzed them: Any idea how long they might be in business? Again, and has anybody approached Hampton Lumber Company to see if the railroad right-of-way might be a possible way to run the frontage road rather than go out through all the farmland that you've got designed to go through.

I'm also in favor of the no-build right now for that plan. I don't like it. To me it's no good. I will go along with an overpass someplace, but I don't like where it is. And so I guess that's about all I have to say is that I am just concerned. I just really don't like the project right now. --0000--
MR. THORP: Good afternoon. Tim Thorp.
4 I live at 24195 Salmon River Highway.
5 I am much the same as Wes Shenks. I
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--

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.
ONE-ON-ONE TESTIMONY WITH COURT REPORTER

1. MR. GORDON: My name is James Gordon.
2. This is my wife Julie. We live at 27620 Salmon River Highway. That's Mile Marker 22.
3. First let me state that this whole process down to the last, oh, what is it, five, six, seven years, whatever it has been, I have been trying -- we have been trying to get involved in.
4. We have been ignored totally on this process. We do get the mailings, you know, that everybody gets normally. Sometimes we haven't.
5. Since we are so heavily affected by any changes to Highway 18, since we live right on the two lanes where there is a bank on one side and our farm on the other, we wanted to get in on it early.
6. We were totally ignored. It seems like there is a few people in this area that try to control everything and, you know, it's been a real bad experience for us as homeowners. From what I am seeing of the plans that are made, they're not in our interest at all.
7. We have a paved entrance at this point. It has taken some time during the road reconstructions and repavings to get what we have. We have moved our mailbox from one side of the highway to the other so that we don't have to cross the highway, and other reasons. It's paved there.
8. If they put a frontage road in where we have to combine with the church and come out and only turn to the right heading east and have to go at least up to the Casino to turn around to go west, you know, that's total -- totally -- how do I put it, inconceivable, especially if it's going to cost us to replace the road that we already have into our farm.
9. We were not informed down the line locally of any decisions. We weren't involved in any of it. We tried to get involved in it. We were ignored in that aspect. They probably didn't want to hear from us.
10. At this point we're totally against this project and we would be going for the no-build alternative at this point until such time as ODOT and all the other powers be at can get all their ducks in a row, can handle the issues with the local residents, get input from the local residents that are involved and not some stupid committee that most of the members don't even live on the highway, okay, and the other part are business owners that are worried about losing their...
they want to get in there, the next place to turn is our driveway to the left. They have to cross across traffic.

I have had a sign there for a number of years now that says "Absolutely No Turnarounds."

They ignore it. All nightlong all daylong we have people turning because they missed the Casino.

They turn into our driveway. They back out into traffic, okay, eastbound traffic, they're backing into that lane to go east again to go back to the Casino. It's a big problem.

I've talked to the local law enforcement, I've talked to the State Police about it. I've volunteered to let them utilize part of the front of our property to see what's going on here.

Nobody has ever addressed that issue.

I understand that it's illegal for people to turn into a private driveway to turn around on the highway just for, you know, to be able to turn around, especially when we have it posted "No Turnarounds," but nothing is being done about it.

Over the years, like I said, we have got better access to the frontage of our property.

We've got it paved where our mailbox is. We like that very well and we allow our drive.

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 all of the problems that we have. I know our neighbors also have problems. I noticed Mr. Torres isn't here. His property is just west of the
10 Seventh Day Adventist church and school which is
11 west of us in a corner of what used to be part of our property before we purchased it. He has an
12 orchard, a fruit tree orchard, that he operates down in there. He has an access to it. He has an
13 access to his home which is right alongside of the church access, the same access actually. It's
go to affect him tremendously, and I'm concerned about that.

22 Some of the other alternatives I've seen,
23 such as utilizing Andy Riggs Road along the backside
24 of the river. We have property there, too. It continues -- our property continues through the
river to Andy Rigg Road. We have two acres there.
Anyway, if they do extend that back there
and we lose some of our property, we have lost a
buildable lot which we now have, a buildable lot.
It would take away too much property to be able to
utilize that two acres on that side of the river,
which is now in residential and not in EFU, like
the property on the other side of the river that we
own.

I'll have to wrap it up here because I
have been told I am out of time. I would like to
give more testimony at a future date, if possible,
and I would like more input on this whole situation
more than I've gotten. Okay. We seem to be
ignored. It seems like most of the time is given
to large property owners, businesses and the
Casino, with the Casino being No. 1.

I think the State is trying to maybe make
it easier for people to get to the Casino more than
addressing the issues with safety.

I know when they put in the new crossing
from South Yamhill River Road, I guess it is, over
to Willamina, when they changed that intersection
of the Wallace Bridge Area, that caused more
of a problem because of the angle. There has been
more accidents there because of the angle because
of the 22 dumping in right there, people trying to
cross into Willamina and traffic moving so fast on
22 dumping into 18 that it is just flat ridiculous.
The angle is not right.

You cannot see traffic coming unless
you're leaning to look around your passenger or --
it depends upon the vehicle that you're in.
Anyway, I've got to cut it off there. I
am told there are other people that want to speak
and I have probably taken too much of your time.
Thank you.

---oo00oo---

MS. LINDBERG: I am Lucie Lindberg, and
my address is 8045 Rowell Creek Road. It is
Willamina 97396.
The thoughts that I have had, and I was
on the steering committee for the regional
planning, and my major concern was for the
environment and the development that we will have
down here, that it will destroy the very thing that
makes Oregon beautiful. And we're going to plan
this expressway which is -- I didn't know about the
expressway. But the purpose of the expressway is
to bring people down to the Oregon beaches to enjoy
what is beautiful, but in the process they are
actually destroying the beauty of Oregon by
creating these roads and express highways that just
moves them rapidly down through the highway, you
know, down to the entertainment centers. 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.

In other words, we're enjoying the very
ding that makes Oregon beautiful that which
attracts people to our state and no thought has
been given to the wildlife in this area at all.
Nothing was mentioned tonight, our elk and deer
that live in our valleys and forests around here,
the agriculture land. They live outside my
windows, and the deer are being killed on the
highways when they try to cross over Highway 18 for
water. This is my concern that we're destroying --
in order to see beauty, we're destroying beauty in
the process.

Thank you.
---oo00oo---

MR. HOLLANN: My name is Ernest
Hollmann. I live at 26375 Salmon River Highway,
Willamina. It's in the Valley Junction area.
They have proposed a short frontage road
for me and my neighbor, and it presents some
problems which maybe they don't know because it
goes across a natural high water relief channel.
If they don't build it completely up high
enough out of the water, I'm going to be flooded
cut out when the high water comes.
I would suggest, if it's possible, to
just widen the shoulder a little bit and let me
enter the highway right turn all the time, entering
a right turn all the time, leaving it, and I'll
have to go down to the interchanges to get turned
around when I want to go the other way.
That's about really all -- oh, then on
the far west end of it, it's another phase of this,
they have no provision for people who have to make
a right turn from the north side to get turned
around to come east on the end of it. They are
going to have to go to Lincoln City to turn around
now. That will probably be about the main thing
that I have to suggest. Thank you.

---oo00oo---
MR. BOEHLER: My name is Paul Boehler, spelled B-O-E-H-L-E-R, and I'm a property owner at 28410 Salmon River Highway in Grand Ronde, Oregon. I own the old theater building next to the Bonanza Antique Mall. It used to be the Bonanza Restaurant. And my problem here with this whole situation has to do with the limited use overlay. I purchased a commercial building, which I thought I could operate some sort of commercial enterprise in, only to find out after I had purchased the building that my hands were tied as to this limited use overlay. The problem I have with it is I can understand not developing new properties on this expressway, but I can't comprehend not being able to function within a building that has already existed for 40-some years and has been used in the past as commercial enterprises. It may have set for a few years without any business operation in there, but I find that a very minor detail in regards to being able to function there, carry on in this property that is zoned commercial, and it is already has entryways and should be able to be presently used. I have a real hard time understanding, and I feel like my hands have been tied. My property taxes are being collected just the same as if I - and the commercial property value. That is my complaint here on this issue. I have another issue that I would like to address here, and that is that - also regarding the fact that we pay property taxes in Polk County and we are in the state of Oregon, which is the United States of America, why in the hell are we having these meetings in a sovereign nation property? That just goes totally against anything that I can understand. I think that these meetings should be held in a public facility that is not an enterprise of the Casino. They're not paying taxes on their properties. That's about all I've got to say.

---0000---

MR. YATES: My name is Don Yates. I reside at 29940 Salmon River Highway, Grand Ronde. My testimony this evening deals with the H.B. Van Duzer Steel Bridge Road Environmental Impact Study, and I'm focusing on traffic safety issues. The data that I will give tonight was provided by the Oregon Department of Transportation, and my thanks to Ann Holder of that department for furnishing me with these statistics. Tonight I will update the crash data for January 1, 2000 to December 31, 2001 for the study area since that data is not included in the document. I will provide crash data comparisons between the study area and other sections of Highway 18 during the period January 1, 1991 through December 31, 2001, the most recent eleven-year period, and I will draw conclusions based on the data. For the purposes of this I divided Highway 18 into three crash data comparison areas. The first being Highway 101 to the west end of the study area; the second being the H.B. Van Duzer study area itself, and the third being the east end of the study area to McDougal Junction. Looking at the data, the total number of crashes during the two-year period 2000/2001: In the study area there were 64; west of the study area there were 73; east of the study area there were 95. The total number of crashes for the eleven-year period of 1991 through 2001: In the study area there were 292; west of the study area there were 431, and east of the study area there were 530. Looking at fatalities in the two-year period: In the study area there have been none; west of the study area, three; and east of the study area, six. For the eleven-year period looking at fatalities: In the study area there were 18; west of the study area there were 22, and east of the study area there were 42. Looking at crashes by type: First the rear-end collision. The two-year period, there were 21 in the study area; there were 12 west of the study area, and 35 east of the study area. For the eleven-year period, again rear-end collisions: There were 84 in the study area; there were 113 west of the study area, and 166 east...
nine lives were lost on Highway 18.

Rear-end collisions are the most common

type of collision in the study area; however, rear-

end collisions east of the study area outnumber the

study area by two to one.

Accidents involving trucks are occurring

with greater frequency outside the study area;

head-on crashes occur more frequently east of the

study area; sideswipe meeting crashes occur twice

as frequently east of the study area; angle crashes

occur 1.5 times more frequently east of the study

area; crashes while turning occur with greater

frequency to the east of the study area by over a
two-to-one margin, and the number of intersection
accidents occur on Highway 18 east of the study
area by a margin of over six to one.

The summary: The greater number of truck

crashes, turning accidents, traffic fatalities,

accidents at intersections, angle crashes, head-on

accidents, sideswipe accidents, and rear-end

collisions on Highway 18 all occur east of the

study area despite the safety corridor. In fact,
every type of accident ODOT keeps statistics on
occurs more frequently east of the study area.

My conclusion: We all know that money

for highway improvement is scarce. We must
prioritize projects that improve public safety. We
simply cannot afford to build interchanges at
intersections where data shows accidents happen
least frequently when the same data shows that
accidents are happening most frequently elsewhere
on the same highway.

A rural expressway will only exacerbate
the obvious traffic safety problems that already
exists elsewhere on Highway 18.

The obvious. There's only one reasonable
alternative in light of the data I have just given
you, the no-build alternative. The money must
instead be spent correcting the intersections on
Highway 18 where the accidents are happening and
where the public is dying.

I have three low-cost solutions that I
would offer: One, to change the eastbound exit of
the Casino to a merge lane controlled with a light
during peak traffic periods, like freeway entrances
in Portland.

It's my observation as a resident that
that is where the traffic backup for eastbound
traffic begins on the weekends, and a controlled
merge lane would virtually eliminate that.
I would propose the addition of electronic reader boards west and east of the Casino to warn traffic of slowing ahead, a progression of three or four boards each way that would be activated as traffic warrants. I would suggest that you install a traffic light at Valley Junction that is normally a flashing yellow and uses sensors on Highway 22 to trigger the function as a stoplight only when the traffic on Highway 22 warrants its operation. The reader boards and the Casino exit control light should automatically coordinate and function to warn traffic control when the light functions as a stoplight. This light should be flashing yellow and then go to green and then to a solid amber before a red would come on to stop traffic to allow Highway 22 traffic. I think this would eliminate the need for an interchange at Grand Ronde because Highway 22 traffic and the traffic from these tribal offices that wanted to be eastbound on 18 that knew that they had safe passage onto 18 at Valley Junction would utilize that instead of coming down Grand Ronde Road and trying to squeeze in early at Grand Ronde.

And, finally, the interim solutions that I suggest are cost effective. They should be doable within the annual transportation budget; and further, they would provide immediate relief to traffic-congestion problems in the study area and we wouldn't have to wait 20 years. Thank you.

--oo0oo--

MR. GORDON: James Gordon again. There were additional comments that I wanted to make. Listening to the prior comments there, he has addressed a heck of a lot of things. But let me get my head together here a moment. Basically in my estimation, as a resident seeing all the problems with the traffic, what has been done and what hasn't been done, I don't see that anything is going to be relieved in any way, shape or form by putting in a four-lane highway or two lanes east, two lanes west, whichever way it goes and in what area it goes in until such time as the restriction at the Forest Corridor is addressed where you're back down to two lanes again. I don't see where it's relieving a darn thing. It's just allowing more traffic to build in that area. Okay.

I would rather see some way that the truck traffic, the commercial traffic, is taken off of Highway 18, okay, to go to the coast where it's not allowed for them to make a through trip from the coast to Portland, from Portland to the coast on Highway 18, or from Salem to the coast on Highway 18, especially triples. We have a big problem with that, as I probably stated earlier. It has increased over the years. It has caused a lot more accidents to happen because of the large volume of truck traffic. I'm not talking or addressing the local lumber trucks, the local chip trucks and the like. What I'm addressing there is the big delivery trucks. Okay. We're talking Wal-Mart, we're talking all these big huge trucks that are coming down through there, doubles and triples, on a two-lane highway. That needs to be relieved. They need to have another way from getting from point A to point B other than coming down Highway 18. I don't see a solution any time in the near future for the increased traffic from Portland to the coast down 18 or from Salem over to 18 and down the coast — down to the coast. I do not see any.

I am like most people in this area, we would rather lose what businesses we have here and have a safe place to live than kowtow or have the State kowtow to the local businesses, and especially the Spirit Mountain Casino and Chinook Winds on the coast. I do have additional there. I will probably put them in writing at this point since it's all gone out of my head listening to some of these other guys in their comments which are, of course, a lot better than mine.

And I thank you.

--oo0oo--
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 ODOT's 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 a Bankruptcy Proceeding involving past owner Charles 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?

ODOT's 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 straightening out the S-Turns approaching the 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 ODOT's cut 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.
From: David Franzen  
To:  
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 same 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 7th, 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 7th, you can send your thoughts before November 18th, 2002.

To: Susan Whitney, Environmental Project Manager, Region 2  
ODOT  
455 Airport Road, SE, Bld. B  
Salem, OR 97301-5385

Thank You, David Franzen  
P.O. Box 88  
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 DEVELOPMENT THAN MIGHT OTHERWISE OCCUR."

WHAT EXISTING BUSINESSES ARE GOING TO BE LEFT?

WITH THE L.U.O. AND A 30 YEAR COMPLETION DATE, WHAT OPPORTUNITY IS GOING TO EXIST OTHER THAN INDIAN ENTERPRISES?

IF YOU ARE NOT GOING TO LIFT THE L.U.O.

I MUST VOTE FOR "NO BUILD ALTERNATIVE."

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 DEVELOPMENT THAN MIGHT OTHERWISE OCCUR."

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APPENDIX E

Agency Comment Letters
Project proposal

by [Author]

Decision-makers in [Region] believe that the current situation in [Village] is a significant issue requiring urgent attention. The [Village] is facing difficulties in [Issue], which is not only affecting the local population but also has implications for the wider community. This situation is not only affecting the quality of life for the residents but also has implications for the economic stability of the area. The aim of this project is to [Objective].

[Body of the proposal]

[Resources required]

With the support of [Funding Body], we aim to establish [Project Details]. This will involve [Activities]. The project will be carried out over [Duration] and is expected to yield [Expected outcomes].

[Conclusion]

We believe that this project will have a significant impact on [Village]. It will provide [Benefits] and contribute to [Sustainable Development Goals]. We are committed to ensuring that the project is implemented efficiently and effectively, and we are confident that it will deliver the desired results.
Special Comments:

Specific comments written in the margins of the text are not visible in the provided image. It appears that there may be an error or issue with the image, as the text is not displayed in a readable format.
Specific Comment

Section and Comment

[Text]

[Text]

[Text]

[Text]
I. Express the workers' opinion of the company's policies and the way the business is run.

II. Present the workers' opinions of the company's management and the way the business is run.

III. Make sure the workers are properly trained and that the training is effective. Changes in the training program and other policies and procedures to be implemented.

IV. Present the workers' opinions of the company's management and the way the business is run.

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CONCLUSION

Despite the potential, it is clear that the most significant improvements have occurred in the use of the software and the web as the primary means of communication and collaboration. However, the lack of integration between the software and the web limits the effectiveness of the system. The integration of the software with the web could enhance the ability of the system to support collaboration and communication.

We believe that the use of the software is an effective tool for improving communication and collaboration in the workplace. Further research is needed to better understand the potential of the software and the web in this context.

PART II: SECONDARY QUESTIONS AND EVALUATION COMMENTS

The FMS

The FMS plays an important role in facilitating communication and collaboration within the workplace. It is a comprehensive and user-friendly tool that provides a valuable platform for both internal and external communication.

However, there are areas for improvement. For example, the FMS could benefit from the integration of various communication channels such as email, instant messaging, and social media. Additionally, the FMS could be enhanced by providing more detailed and personalized feedback to users.

Overall, the FMS is a valuable tool that supports communication and collaboration within the workplace. Further development and improvement would enhance its effectiveness and utility.