

APPENDIX B

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

Responses to Public and Agency Comments (Summarized)

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

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

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

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

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

Category 1: Oral Testimony

- I. David Franzen
- II. Dennis Werth

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

Category 2: Written Comments Submitted at Public Hearing

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

Category 3: Written Comments Submitted During Public Comment Period

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

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

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

Summaries of Comments and ODOT's Responses

Socioeconomics

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

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

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

This response addresses or partially addresses comment 29.

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

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

This response addresses or partially addresses comment M.

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

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

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

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

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

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

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

This response addresses or partially addresses comment 2.

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

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

This response addresses or partially addresses comment B.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

This response addresses or partially addresses comment 29.

Access Issues

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

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

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

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

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

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

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

This response addresses or partially addresses comments II and 2.

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

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

This response addresses or partially addresses comment III.

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

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

This response addresses or partially addresses comment 10.

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

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

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

This response addresses or partially addresses comments VI and 21.

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

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

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

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

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

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

This response addresses or partially addresses comment VIII.

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

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

This response addresses or partially addresses comment I.

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

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

This response addresses or partially addresses comment I.

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

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

This response addresses or partially addresses comment M.

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

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

This response addresses or partially addresses comment 10.

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

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

This response addresses or partially addresses comment 20.

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

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

This response addresses or partially addresses comment 21.

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

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

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

This response addresses or partially addresses comment 29.

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

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

This response addresses or partially addresses comment 29.

Proposed Solutions

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

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

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

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

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

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

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

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

This response addresses or partially addresses comment 25.

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

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

This response addresses or partially addresses comment 35.

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

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

This response addresses or partially addresses comments I and 17.

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

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

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

This response addresses or partially addresses comment 13.

Grand Ronde Community

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

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

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

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

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

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

This response addresses or partially addresses comment H.

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

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

This response addresses or partially addresses comment K.

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

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

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

This response addresses or partially addresses comment 3.

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

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

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

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

Citizen Participation

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

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

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

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

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

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

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

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

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

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

Land Use and Zoning

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

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

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

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

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

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

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

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

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

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

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

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

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

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

This response addresses or partially addresses comment 16.

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

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

This response addresses portions of comment 29.

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

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

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

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

This response addresses portions of comment 29.

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

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

This response addresses portions of comment 29.

Fort Hill Interchange

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

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

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

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

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

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

This response addresses or partially addresses comment 25.

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

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

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

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

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

This response addresses or partially addresses comments H and 33.

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

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

This response addresses or partially addresses comment 4.

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

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

This response addresses or partially addresses comment C.

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

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

This response addresses or partially addresses comment 29.

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

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

This response addresses or partially addresses comment 29.

Traffic Safety

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

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

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

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

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

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

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

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

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

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

This response addresses or partially addresses comment III.

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

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

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

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

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

This response addresses or partially addresses comments III and 36.

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

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

This response addresses or partially addresses comment III.

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

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

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

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

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

This response addresses or partially addresses comment VIII.

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

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

This response addresses or partially addresses comment 16.

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

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

This response addresses or partially addresses comments VIII and X.

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

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

This response addresses or partially addresses comment 2.

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

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

This response addresses or partially addresses comment L.

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

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

This response addresses or partially addresses comment 29.

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

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

This response addresses or partially addresses comment 18.

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

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

This response addresses or partially addresses comment 22.

Natural Resources

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

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

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

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

This response addresses or partially addresses comments VI and 21.

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

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

This response addresses or partially addresses comment IX.

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

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

This response addresses or partially addresses comment 2.

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

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

This response addresses or partially addresses comment 13.

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

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

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

This response addresses or partially addresses comment IV.

Historic Resources

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

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

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

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

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

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

Valley Junction Interchange

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

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

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

This response addresses or partially addresses comment I.

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

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

This response addresses or partially addresses comment II.

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

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

This response addresses or partially addresses comment 2.

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

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

This response addresses or partially addresses comment 25.

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

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

This response addresses or partially addresses comment 25.

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

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

This response addresses or partially addresses comment 25.

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

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

This response addresses or partially addresses comment 25.

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

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

This response addresses or partially addresses comment 31.

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

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

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

Inaccuracies

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

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

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

This response addresses or partially addresses comment 2.

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

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

This response addresses or partially addresses comment 26.

Expressway Designation

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

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

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

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

More Study Needed

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

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

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

This response addresses or partially addresses comments IV and 19.

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

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

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

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

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

This response addresses or partially addresses comment 29.

Aesthetics

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

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

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

This response addresses or partially addresses comments IX and 13.

Flooding

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

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

ODOT Response: Flood-prone areas exist along the South Yamhill and Little Rogue Rivers, and Rock, Rowell, Gold, and Cospers Creeks (Figure 25, page 173 of the EA, and page 215 of the EA). Impacts to these areas pertaining to flooding potential will be assessed and

addressed as the construction projects are designed, and the appropriate agencies will be consulted about mitigation and/or design measures.

This response addresses or partially addresses comment X.

COMMENT: *Highway water runs off onto certain properties every year, causing flooding which is not acceptable. How would this project impact, address this issue?*

ODOT Response: ODOT realizes that water quality is a concern in the project area. ODOT will develop a Stormwater Management Plan once preliminary design is begun for each construction phase of the project which will address stormwater treatment. Erosion and sediment control plans will also be developed which will meet the requirements of the NPDES 1200-CA permit.

This response addresses or partially addresses comment G.

Noise

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

COMMENT: *A sound barrier will be needed near the intersection of ORE 18 with Fort Hill Road.*

ODOT Response: Noise measurements were taken on July 21, 1999. The measured noise levels in this area indicate that the residence in this area may be noise impacted. ODOT will evaluate the cost effectiveness of recommending noise mitigation for the residence in this area. Typically, noise mitigation for one residence is seldom cost-effective. It is unlikely that cost-effective noise mitigation can be provided for one residence.

This response addresses or partially addresses comment A.

Hazardous Materials

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

COMMENT: *The Chevron Station listed was closed in 1969. DEQ has no listing on this property because the USTs (underground storage tanks) were decommissioned before DEQ came into existence. The USTs were decommissioned properly within all applicable laws of the land in place at the time. The permits were issued in 1974 by Polk County and the work inspected and approved by Polk County and State Fire Marshall, which was to the proper letter of the law at the time! This issue was revisited by Oregon State Courts in 1997 during Bankruptcy Proceeding involving past owner Charlie Cherry and found not polluted by the courts, prior to my purchase of the property.*

ODOT Response: The EA states that the DEQ has no information regarding this property, but that property records show that a Chevron gasoline service station was formerly located at this property. The EA stated a concern for residual soil and groundwater contamination from the former gasoline service station. Based on the absence of information, this concern remains valid.

The USTs were reportedly decommissioned in 1974. It is not known if 'decommissioning' means that the tanks were physically removed from the subsurface or if the tanks were opened and filled with an inert substance. Decommissioning USTs in 1974 did not require

the collection of any soil or groundwater samples. Therefore, it is unlikely that any soil or groundwater samples were collected at that time to document the presence or absence of petroleum hydrocarbons in the subsurface.

Further investigations are needed for all identified hazardous materials sites in the project area to determine the extent of any soil or groundwater contamination. Also, see Hazardous Materials under Summary of Mitigation and Conservation Measures in this REA.

This response addresses or partially addresses comment I.

Response to Agency Comments and Comments from Tribal Governments

Appendix E includes letters received from Resource Agencies on the EA. Summarized responses to these comments are as follows:

Department of Land Conservation and Development (Comment 15)

Land Use Zoning

COMMENT: *How does Polk County intend to implement their acknowledged plan and zoning provisions adopted pursuant to the Transportation Planning Rule?*

ODOT Response: Oregon law allows counties to permit certain transportation uses listed in Oregon law and in Oregon Administrative Rule 660-012-065 through a conditional use permit procedure. Polk County has amended its land use regulations to provide for these uses. All of the improvements called for in the Preferred Alternative can be permitted through this procedure. However, ODOT has been informed that Polk County also intends to amend its Transportation System Plan and Comprehensive Plan to include ODOT's Preferred Alternative (i.e., this project).

COMMENT: *Provide more detailed zoning for the Fort Hill to Steel Bridge section given that further stage of development.*

ODOT Response: The Land Use Zoning section of the EA has been updated and included in the REA. This section provides zoning information for the project area. In addition, the Land Use Findings section of the REA addresses project impacts to resource zones.

United States Fish and Wildlife Service (Comment 37)

United States Department of the Interior (Comment 39)

General Comments

COMMENT: *The EA may be mixing elements of a location refinement pre-State Transportation Improvement Plan (STIP) phase of project planning with proposed alternatives that are more commensurate with a construction post-STIP EA or EIS.*

ODOT Response: The intent of the location EA is to broadly identify and estimate the potential environmental impacts in relation to a set of future projects based on conceptual-level design. Preliminary design is typically not included in a location EA, and was not included in this EA. The individual construction phases of the project comprising the Preferred Alternative will follow different timelines for project development depending on project need and available construction funding. Potential environmental impacts resulting from these specific projects will be identified and addressed as each specific project is advanced through the process of development and design.

COMMENT: *The Build Alternative appears to add infrastructure beyond that needed to accomplish the desired safety standards and velocity/capacity ratios.*

ODOT Response: The proposed infrastructure improvements included in the Build Alternative were developed based on traffic analysis of existing and forecasted future traffic conditions. Results of this traffic analysis were described in two sections of the EA. The project Purpose and Need section provides an overview of volume-to-capacity (v/c) ratios at key locations along ORE 18 (see Table 1 on pg. 9 of the EA) and the Transportation Analysis section provides current and forecasted v/c ratios within the project area (see pages 103-112 of the EA). Several intersections and sections of ORE 18 currently exceed maximum acceptable volume-to-capacity ratio standards as defined in the Oregon Highway Plan, and additional exceedances are expected by the 2008 forecast year.

Coordination with Other Agencies

COMMENT: *Recommend that ODOT prepare a general plan outlining how the agency will comply with the Migratory Bird Treaty Act, and determine opportunities to remove potential fish passage barriers, enhance wetlands, enhance riparian stream habitat, install wildlife crossings, and prepare compensatory mitigation alternatives.*

ODOT Response: ODOT will coordinate with appropriate local, state, and federal agencies during the design of each construction phase of the project to identify and incorporate elements that avoid, minimize, and/or mitigate the direct and indirect effects, as required for compliance with applicable local, state and federal regulations. ODOT will incorporate the following general measures, as appropriate and to the extent practicable, for each construction phase of the project:

- ODOT will avoid and minimize impacts to streams, riparian zones, floodplains, wildlife/rare plant species, wildlife habitat, and wetlands by project elements including interchanges, highway widening and frontage roads. The project footprints will be minimized to be consistent with the Purpose and Need of the location-level EA/REA in addition to meeting applicable design and safety standards. Project elements will be located to avoid sensitive or irreplaceable habitats to the extent practicable, and as is feasible from a roadway design standpoint.
- To the extent practicable, bridge crossings over streams will fully bridge the bankfull width of their respective channel. Bridge/culvert replacements will be designed to the extent feasible to allow for wildlife passage. Opportunities to remove existing fish and wildlife crossing blockages will be investigated.
- ODOT will develop erosion and sediment control plans that meet the requirements of the NPDES 1200-CA permit for discharge of stormwater from construction. Stormwater treatment will be provided where topography and other constraints allow. To the extent allowed by project design and local conditions, treatment will be provided by filtration through vegetation. As a condition of this permit, sediment from disturbed areas or tracked by vehicles onto pavement would not be permitted to leave the sites or enter waters of the State.
- ODOT will design construction and post-construction stormwater treatments to meet pre-project water quality, hydrology, and seasonality, with a preference for upland stormwater treatment sites.

- Mitigation for project-related impacts will be commensurate with the area and severity of the impact. Mitigation for habitat impacts will be measured by the ecological value lost as a result of the project impact.
- Compensatory wetland mitigation actions will be implemented in advance of or within the same year of project-related construction activities. Mitigation actions may include but are not necessarily limited to restoring, creating, or enhancing wetlands. Opportunities for establishment of a wetland mitigation bank, or use of an existing wetland bank, will be investigated.

Water Quality

COMMENT: *The water quality discussion does not adequately consider stormwater and floodplain issues.*

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

Erosion and sediment control plans will be developed after the preliminary design of each individual project is completed. These plans will meet the requirements of the NPDES 1200-CA permit for discharge of stormwater from construction sites. The actual techniques used to prevent erosion and control sediment are site specific and depend on the local topography, soils, proximity to water bodies, and right of way available. Typical techniques include, but are not limited to, diverting runoff from entering disturbed areas and use of temporary ground cover (mulch or erosion control fabric) on disturbed ground, maintaining vegetated buffers, silt fencing, and temporary settling ponds. As noted in the Draft EA, the erosion and sediment control plans are completed prior to the beginning of construction. The NPDES 1200-CA permit requires periodic inspection of erosion and sediment control facilities during construction to ensure that they are maintained and functioning as intended. Because on-the-ground conditions may vary from what was anticipated during erosion and sediment control plan development, alterations to the plans would be made at the direction of or with the concurrence of the project engineer.

Water quality treatment facilities are described in the Water Quality Design Concept Report for the location-level Build Alternative in July 2000 and will be further described/developed in each construction project's plans and for that project phase. Following design of water quality treatment facilities, a Water Quality Design Report will be prepared.

Treatment of stormwater for water quality is usually provided by one or more techniques. To the extent allowed by project design and local conditions, treatment will be provided by filtration through vegetation, either in vegetated swales or filter strips. Where that form of treatment is not possible, detention facilities may be used. Vegetated swales, whether engineered or not, depend primarily on trapping of contaminated sediments by vegetation, with a smaller percentage of the water subject to infiltration into the soil, with subsequent filtration and chemical bonding of pollutants. Detention facilities function primarily by

allowing the deposition of sediments. By using permeable beds, some infiltration also occurs. Detention facilities can incorporate vegetation, but they are subject to periodic disruption by maintenance activities necessary to maintain the effectiveness of the facility.

Detention facilities can be designed to maintain peak flows at pre-project conditions for up to a given storm size, though doing so increases the footprint of the basin. Storm flow detention facilities can do the same thing, but again their footprint may be large. Depending on the location and local land cover, these facilities may actually do more harm than good. Additional mitigation for hydrologic impacts may be a secondary benefit of actions such as wetland mitigation.

As described in the EA, stormwater treatment will prevent an increase in net pollutant loading to the receiving waters. Because phosphorus is a TMDL pollutant for the project corridor's main receiving water, treatment options will address that specifically. This would meet any water quality requirements. It is expected that stormwater treatment facilities will be designed to treat 140% the area of new impervious surface. Due to a variety of constraints, such as topography and other sensitive resources (T&E species, archaeological sites, historic properties, high quality wetlands), it may not be possible to provide treatment at all locations along a project, but "over-compensation" at other locations is then used at other sites to achieve the overall project goal.

The placement of water quality treatment facilities and storm flow detention facilities is entirely dependent on topography and the location of other constraints, such as regulated resources. Frequently these facilities are placed adjacent to the roadway, especially filter strips and vegetated swales, but at other locations they may need to be placed away from the highway. As mentioned above, some places may not be at all suitable for treatment. At other sites, the need for treatment may exceed the desire to not disturbed undegraded uplands, though degraded uplands would be preferable if suitably situated. In most situations, the presence of wetlands or other waters would preclude the placement of a stormwater treatment facility. If impacts are absolutely necessary, they would be permitted as part of the total impact for the project, and mitigation provided as required. There is no regulatory or statutory requirement to provide mitigation for impacts to uplands that do not involve impacts to other regulated resources.

ODOT will encourage the use of recyclable or degradable on-site erosion control materials. Hazardous material spill containment and notification plans will be included in the Pollution Control Plan. This will be developed by the contractor prior to construction.

Wetlands

COMMENT: *Explore opportunities to enhance wetlands.*

ODOT Response: Limited opportunity for wetland creation or enhancement exists within the project corridor since the majority of the ground surrounding the project area is currently being used for agriculture.

ODOT is currently working with the Confederated Tribes of Grand Ronde to develop a joint rare plant and wetlands mitigation site near the project area. Other current compensatory mitigation opportunities may include ODOT acquiring a private parcel at the east end of the

project area. This site will be analyzed to determine its suitability as a wetland mitigation site.

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

Other Alternatives Considered

COMMENT: *Too few alternatives were reviewed under the level of analysis required to make a decision on a preferred alternative. Other alternatives requiring less construction should be given equal analysis.*

ODOT Response: ODOT, in coordination with project stakeholders, considered several alternatives prior to the publication of the EA, including a limited build alternative, a bypasses alternative, a five-lane highway with a center turn lane, a four-lane divided highway with a non-traversable median, and interchange design options at A.R. Ford Road, Grande Ronde, and Valley Junction. These alternatives, after undergoing an evaluation screening process analysis, public involvement, and much consideration, were not advanced for further study in the EA. The EA includes a description of these alternatives as well as the rationale used for dismissing them (see page 55 of the EA). In addition, ODOT worked with Yamhill and Polk Counties, the City of Willamina, the Confederated Tribes of Grande Ronde, and the public on the development of the Refinement Plan. The Refinement Plan analyzed several possible alternatives for ORE 18 and ORE 22 corridors, and recommends the coordinated set of improvements analyzed in the EA.

The Confederated Tribes of the Grand Ronde Community (Comment 25)

Access Issues

COMMENT: *We do not believe adequate consideration has been given to a frontage road system on the south side of ORE 18 both east and west of the casino. Consideration should also be given to a limited right-in/out to provide local access to those properties on the west side of the Casino.*

ODOT Response: The plan provides for an access road north of the highway as an extension of Jahn Road to approximately the existing casino access. Left turns to and from the highway will be provided for at Jahn Road. Farm properties south of the highway will continue to be accessed from the highway west of the casino. East of the casino, property access will be developed via the public road system that will connect to the future interchange at Valley Junction. The access management strategy for this area calls for private property accesses to be consolidated and/or limited to right-in/right-out movement. An access road is planned for the north and south side of ORE 18 at Rowell Creek Road. ODOT will work with property owners concerning access south of Valley Junction.

COMMENT: *The planned frontage road on the north side of the highway would provide for a return route back to the Casino and an alternate route to Hwy 18 for local traffic using the north side frontage road if connected to the existing undercrossing. This would be further improved if the limited right-in/right-out at Jahn Road were to be located further east.*

ODOT Response: As the project goes into the design stage for each construction phase, additional study may be required for specific access management issues. The project would allow left and right turns at the proposed Jahn Road location. Relocating this intersection would also impact the church located opposite the proposed ORE 18/Jahn Road intersection. Additional study will occur when funding becomes available to complete this phase of the project.