

Highway 199 Expressway Upgrade

Oregon Department of Transportation

REVISED Environmental Assessment

Highway 199
City of Grants Pass and Josephine County, Oregon



ALTERNATIVE FORMAT AVAILABILITY

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Oregon

Theodore R. Kulongoski, Governor

Department of Transportation

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FILE CODE:

April 30, 2008

TO INTERESTED PARTIES OF THE

**Highway 199 Expressway Upgrade Project
Highway 199 (US 199)
City of Grants Pass and
Josephine County, Oregon
Key No. 14019**

The Oregon Department of Transportation is distributing this **Revised Environmental Assessment and Finding of No Significant Impact** for your information.

If you wish to further comment on the project or its impacts, please address your comments within 30 days to the Federal Highway Administration, the Equitable Center, Suite 100, 530 Center Street N.E., Salem, Oregon 97301. This office would appreciate a copy of your comments.

Thank you,

Art Anderson
ODOT Area Manager





**FEDERAL HIGHWAY ADMINISTRATION
FINDING OF NO SIGNIFICANT IMPACT**

for

**HIGHWAY 199 (US 199) EXPRESSWAY UPGRADE PROJECT
Phase I (MP 3.18 to 4.58)
Josephine County, OR
Key No. 14019 / Federal Aid No. X-STP-S025(034)**

The Federal Highway Administration (FHWA) has determined that Alternative A will have no significant impact on the human environment. This finding is based on the information provided in the Environmental Assessment, Supplemental Environmental Assessment, and the attached Revised Environmental Assessment which have been independently reviewed by the FHWA and found to adequately and accurately discuss the environmental issues and impacts of the proposed project and appropriate mitigation measures. These documents provide sufficient evidence and analysis for determining that an environmental impact statement is not required. The FHWA takes full responsibility for the accuracy, scope, and content of the environmental analysis.

Under Alternative A, US 199 will be improved from two lanes in each direction to three lanes in each direction from Tussey Lane to Dowell Road. Redwood Avenue at Allen Creek Road will be realigned to the north to accommodate future traffic volumes and queues. Median barrier and/or raised curb median will be constructed from Dowell Road to Midway Avenue to improve safety and eliminate crossing turn movements. The intersections of US 199 at Midway Avenue and US 199 at Hubbard Lane will be improved to allow u-turns. The existing signals at US 199 at Redwood Avenue and US 199 at Fairgrounds Road will be removed. A new signal will be installed at US 199 and Hubbard Lane. The estimated cost for the project is \$39.4 million (2010 dollars).

This Finding of No Significant Impact (FONSI) covers the portion of the alternative extending from Rogue Community College (RCC) (MP 3.18) to Midway Avenue (MP 4.58), Phase I. Construction activities in this section are limited to installation of median barrier and minor roadway widening. In addition, a small detention pond near RCC will be constructed to reduce runoff into nearby irrigation canals. The cost of Phase 1 is approximately \$3 million (2008 dollars).

4/28/08
Date

Phillip A. Ditzler
Phillip Ditzler
Federal Highway Administration
Oregon Division Administrator

TABLE OF CONTENTS

PAGE

CHAPTER 1	INTRODUCTION	1
1.1	Project Identification	1
1.2	Purpose of the REA	3
1.3	Organization of the REA	3
1.4	Summary of the Purpose and Need	4
CHAPTER 2	PREFERRED ALTERNATIVE	5
2.1	Midway Avenue to Dowell Road.....	5
2.2	Dowell Road to Fairgrounds Road.....	10
2.3	Fairgrounds Road to Tussey Lane.....	14
CHAPTER 3	REASONS FOR RECOMMENDING THE PREFERRED ALTERNATIVE	17
3.1	Decision-making Process	17
3.2	Alternatives Considered	17
3.3	Recommendation of the Preferred Alternative	18
3.4	Rationale for Recommending the Preferred Alternative.....	19
3.4.1	<i>Purpose and Need</i>	19
3.4.2	<i>Goals and Objectives</i>	20
CHAPTER 4	SUMMARY OF PROPOSED MITIGATION AND CONSERVATION MEASURES	21
4.1	Summary of Proposed Mitigation and Conservation Measures	21
4.2	Additional Discussion on Select Environmental Resources	28
4.2.1	<i>Biology</i>	28
4.2.2	<i>Noise</i>	29
4.2.3	<i>Right of Way Acquisition and Relocation</i>	30
4.2.4	<i>Socioeconomics</i>	31
4.2.5	<i>Water</i>	31
CHAPTER 5	ADDITIONS AND CHANGES TO THE EA AND SUPPLEMENTAL EA	35
5.1	Additions and Changes Documented in the Supplemental EA	35
5.2	Additions and Changes Documented in the Revised EA	36
5.2.1	<i>Additions and Changes to the EA</i>	36
5.2.2	<i>Additions and Changes to the Supplemental EA</i>	37
CHAPTER 6	PUBLIC INVOLVEMENT AND AGENCY COORDINATION	41
6.1	Project Coordination and Public Involvement.....	41
6.2	Summary of Responses to Comments on the EA and Supplemental EA.....	44

CHAPTER 7 CONFORMANCE WITH LAND USE, TRANSPORTATION, AND OTHER PLANNING REGULATIONS	47
CHAPTER 8 CONCLUSION	49

LIST OF EXHIBITS	PAGE
Exhibit 1-1. Project Location and Area of Potential Impact.....	2
Exhibit 2-1. Preferred Alternative	6
Exhibit 2-2. Preferred Alternative between Midway Avenue and Dowell Road	7
Exhibit 2-3. Shared Use Path Realignment near Rogue Community College.....	9
Exhibit 2-4. Preferred Alternative between Dowell Road and Fairgrounds Road.....	11
Exhibit 2-5. Preferred Alternative between Fairgrounds Road and Tussey Lane.....	15
Exhibit 4-1. Summary of Proposed Mitigation and Conservation Measures for the Preferred Alternative .	22
Exhibit 6-1. CAC and PDT Meeting Dates	42

LIST OF APPENDICES	
Appendix A	Evaluation of the Preferred Alternative against the Purpose and Need / Goals and Objectives Screening Criteria
Appendix B	Agency Coordination Letters
Appendix C	Additions and Changes to the Preferred Alternative Description
Appendix D	Responses to Comments on the EA and Supplemental EA
Appendix E	List of Technical Reports Prepared for the Project
Appendix F	List of REA Preparers and Reviewers

CHAPTER 1 Introduction

1.1 Project Identification

The Highway 199 Expressway Upgrade Project is located in Grants Pass in Josephine County, Oregon. The project is 4.24 miles long, from mileposts 0.20 to 4.58. The area of potential impact (API) is the area within which potential environmental, social, and economic impacts from the project may occur. The API is defined as the general area of Highway 199 bounded by: Midway Avenue to the west and Tussey Lane to the east; Hubbard Lane from Highway 199 to Demaray Drive to the south; Redwood Avenue from Highway 199 to Dowell Road to the north, and 500 feet north of Highway 199 along Ringuette Street (Exhibit 1-1).

The western segment of the project (Midway Avenue to Dowell Road) is located in an area that is rural with intermittent, residential neighborhoods on either side of the highway. Rogue Community College is located in the western portion of the project, along with a few churches. There are some large, intact stands of mature trees in this area and the terrain slopes gently.

The central segment of the project (Dowell Road to Fairgrounds Road) transitions to a more urban and developed setting. This segment supports a variety of uses ranging from residential to large commercial facilities, including the Josephine County Fairgrounds. Development density and traffic congestion increase as one travels from west to east. In addition, there are some stands of mature trees and some individual trees, shrubs, and bushes, and the terrain begins to transition from sloping to flat.

Project Name: Highway 199 Expressway Upgrade Project

Funding Source: FHWA and ODOT

County: Josephine

City: Grants Pass

ODOT Region: 3

Highway/Roadway: Highway 199

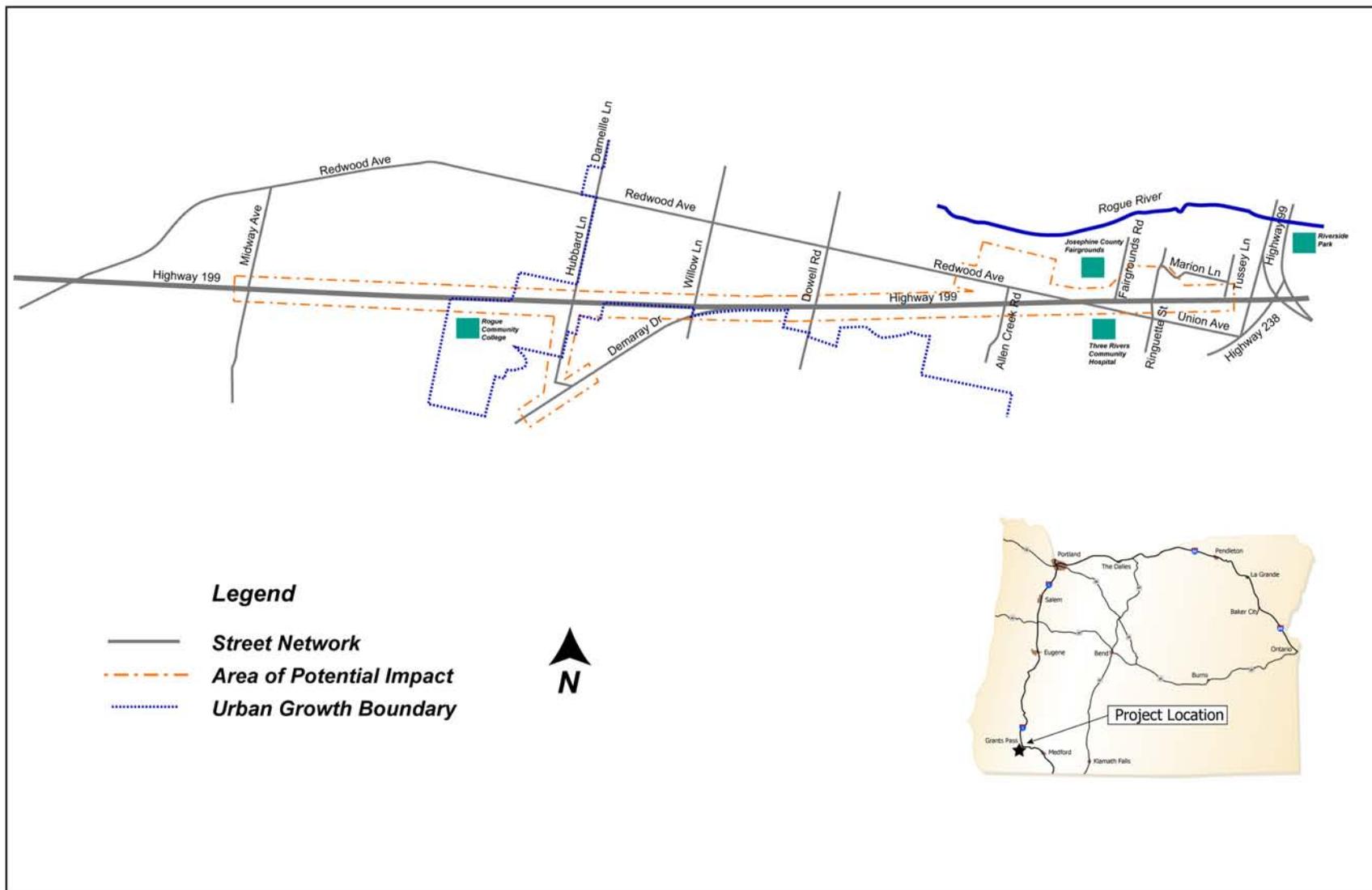
State Improvement Program Status:
ENVDOC

Beginning Milepost: 0.20

Ending Milepost: 4.58

Length: 4.24 miles

EXHIBIT 1-1. PROJECT LOCATION AND AREA OF POTENTIAL IMPACT



The eastern segment (Fairgrounds Road to Tussey Lane) of the project is in a highly and densely developed, urban part of Grants Pass. There are a variety of uses in this portion including but not limited to small businesses, neighborhoods, and a hospital. There is substantial congestion in this area. There are a few trees, shrubs, and bushes, and the terrain is mostly flat.

1.2 Purpose of the REA

This Revised Environmental Assessment (REA) for the Highway 199 Expressway Upgrade project in Josephine County completes the Environmental Assessment (EA), which was circulated for public review during a 30-day period beginning January 22, 2007, and the Supplemental Environmental Assessment (Supplemental EA), which was circulated for public review during a 30-day period beginning December 5, 2007. Copies of the EA and Supplemental EA are available upon request from the ODOT Region 3 office and available electronically at <http://www.oregon.gov/ODOT/HWY/REGION3/>.

The REA describes the Preferred Alternative and reasons for its recommendation, provides a summary of the proposed mitigation and conservation measures, identifies additions and changes to the EA and Supplemental EA, summarizes the public involvement and agency coordination, and includes comments on the EA and Supplemental EA and ODOT responses to the comments.

1.3 Organization of the REA

Chapter 1 provides information on project location, explains the purposes of this REA, and provides a summary of the purpose and need for the project. Chapter 2 provides a detailed description of the Preferred Alternative, and Chapter 3 presents the reasons for recommending the Preferred Alternative. Chapter 4 summarizes the proposed mitigation and conservation measures that would be implemented to avoid, minimize, or compensate for negative effects that could occur as a result of the project. Chapter 5 describes any additions or changes to the EA and Supplemental EA. Chapter 6 summarizes the public involvement process and agency coordination that has occurred as well as the comments received on the EA and Supplemental EA during the public comment periods. Chapter 7 discusses the project conformance with land use, transportation and other planning regulations. Chapter 8 concludes that the project impacts will not have a significant effect on the environment and,

To receive a copy of the Supplemental EA or EA contact:

ODOT Region 3 Office

541-774-6299

<http://www.oregon.gov/ODOT/HWY/REGION3/>

therefore, an Environmental Impact Statement (EIS) will not need to be prepared.

1.4 Summary of the Purpose and Need

The purpose of the project is to address vehicular and pedestrian safety, and current and future congestion and operational deficiencies along Highway 199 between Midway Avenue and Tussey Lane.

The need for the project is based on the crash history, congestion, access, growth of surrounding area, and system efficiency of Highway 199.

For a detailed description of the project's purpose and need see the EA and Supplemental EA.

A detailed description of the project's purpose and need can be found:

In the EA here:

http://www.oregon.gov/ODOT/HWY/REGION3/docs/h199e/ea/03_Hwy_199_EA_Chapter_1_introduction.pdf

In the SEA here:

http://www.oregon.gov/ODOT/HWY/REGION3/docs/h199e/supp_ea/03Hwy199SEACChapter1.pdf

CHAPTER 2 Preferred Alternative

Alternative A, one of the three possible build alternatives considered, has been recommended as the Preferred Alternative. This alternative includes improvements from Midway Avenue to Tussey Lane as well as a realignment of the Allen Creek Road intersection with Redwood Avenue. The following sections discuss details of the proposed improvements split into three segments: 1) Midway Avenue to Dowell Road, 2) Dowell Road to Fairgrounds Road, and 3) Fairgrounds Road to Tussey Lane.

The general alignment of Preferred Alternative is shown in Exhibit 2-1. The design goal of this alternative was focused on engineering elements that improved safety and reduced congestion. In tandem with roadway design elements, an access management strategy was applied to reduce the number of access points. By defining driveways with curb, gutter and sidewalk as well as combining driveways for adjacent properties, reasonable access will be maintained to properties adjacent to Highway 199. This access management strategy improves Highway 199 efficiency, particularly in the Fairgrounds Road to Tussey Lane segment where many properties on the north side of Highway 199 currently have many conflict points where vehicle collisions can occur.

2.1 Midway Avenue to Dowell Road

Exhibit 2-2 shows the general improvements proposed as part of the Preferred Alternative between Midway Avenue and Dowell Road, with insets to provide greater design detail at major intersections. This segment has the following design features:

EXHIBIT 2-1. PREFERRED ALTERNATIVE

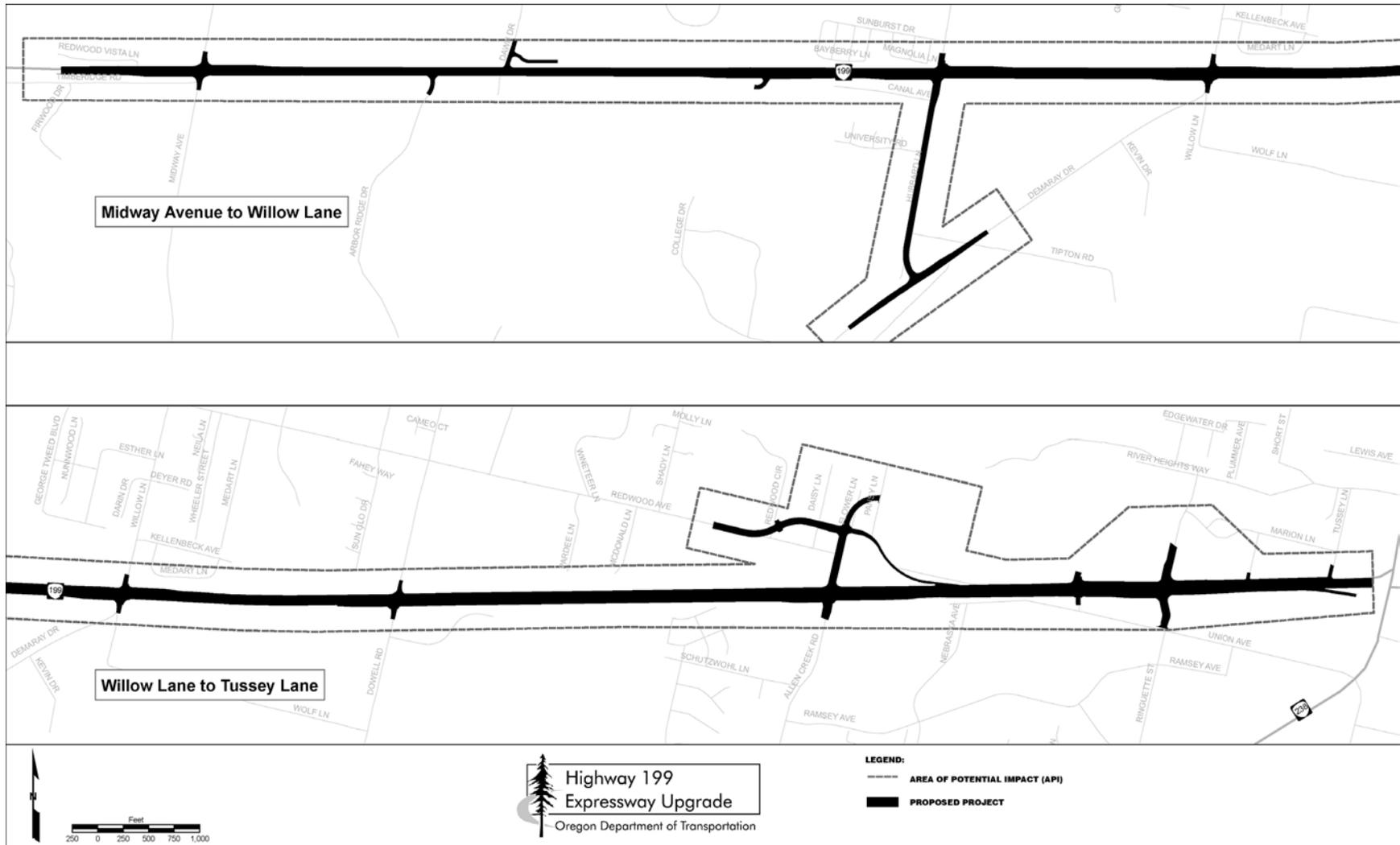
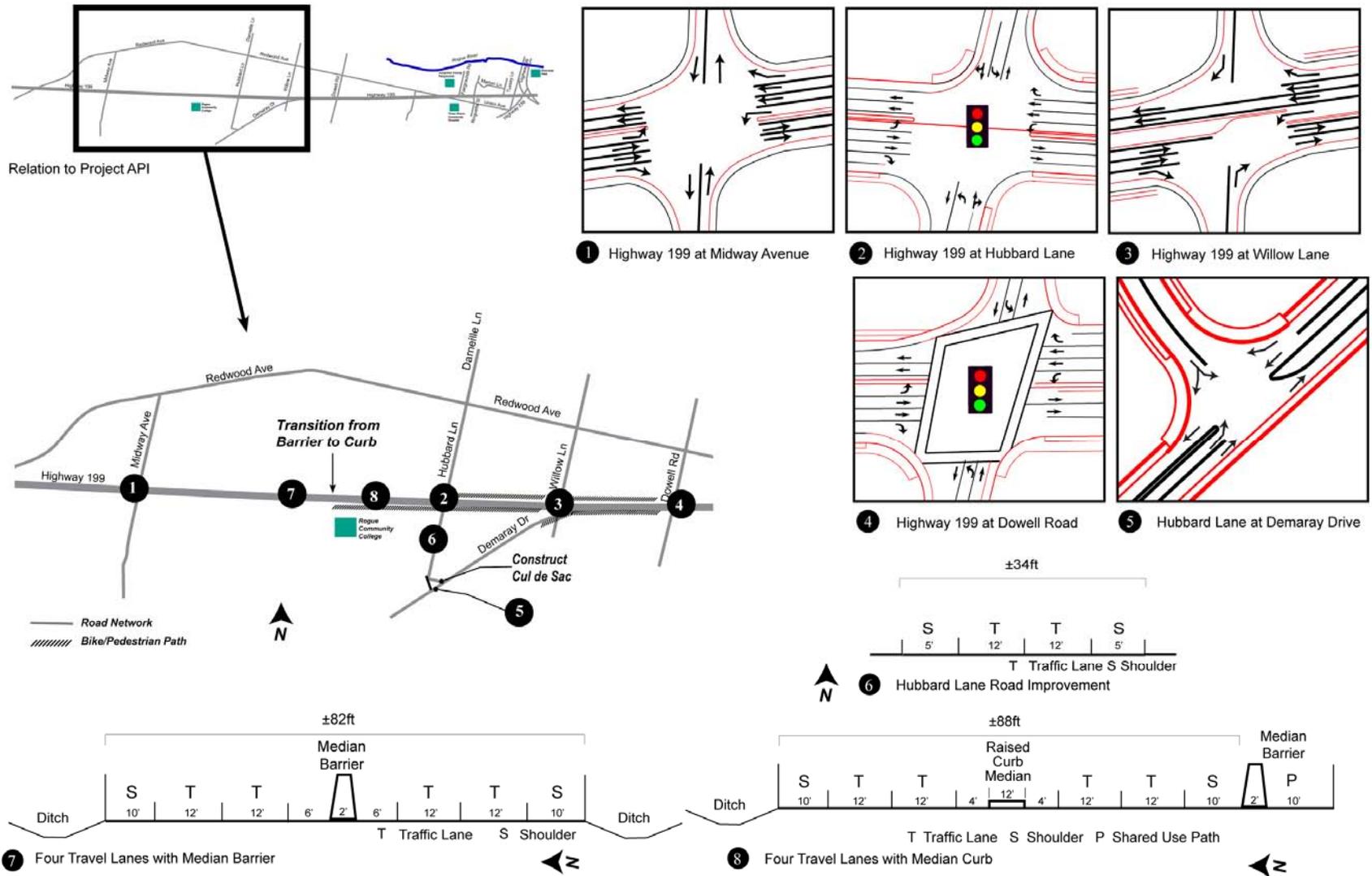


EXHIBIT 2-2. PREFERRED ALTERNATIVE BETWEEN MIDWAY AVENUE AND DOWELL ROAD

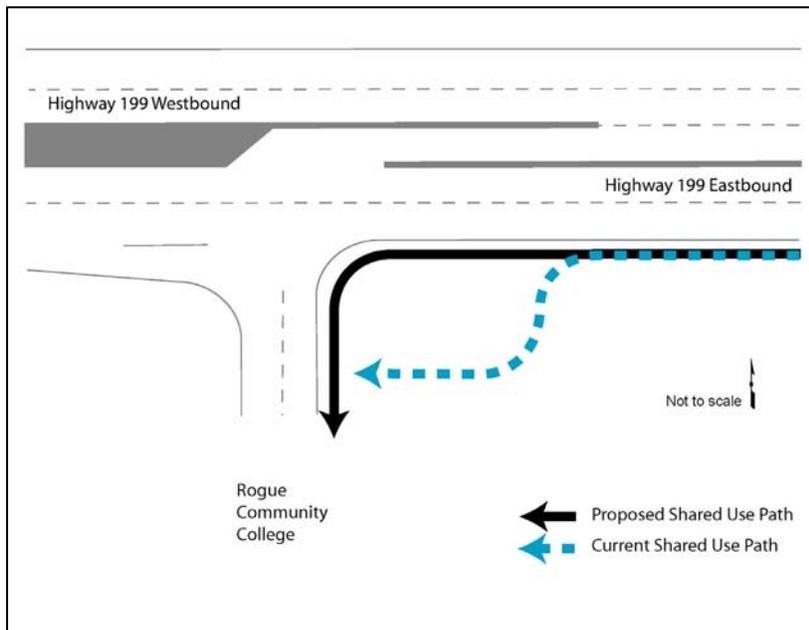


- Highway 199 would continue to have four travel lanes (two in each direction) but a median barrier would be added between the eastbound and westbound lanes. From Midway Avenue to the Rogue Community College entrance, the barrier would be an approximately 42-inch-high concrete median barrier. This median barrier would transition to a raised curb median (approximately 5 inches high) in the vicinity of the Rogue Community College entrance. The raised curb median would continue east to Dowell Road. Insets 7 and 8 of Exhibit 2-2 illustrate these typical road sections.
- The existing configuration of the Highway 199 at Midway Avenue intersection would remain two through lanes in each direction and left-turn-only and right-turn-only lanes from Highway 199 north and south onto Midway Avenue (Exhibit 2-2, Inset 1). Traffic on Midway Avenue would be able to make left and right turns onto Highway 199 as well as cross Highway 199. Improvements to this intersection would include widening Highway 199 to accommodate u-turn movements.
- Arbor Ridge Drive, Dawn Drive, and various private driveways would be restricted to right in/right out movements due to the median barrier along Highway 199. A new combined driveway for multiple properties nearly 500 feet long would also be constructed east from Dawn Drive.
- The entrance to Rogue Community College from eastbound Highway 199 would have a dedicated right turn pocket into the college. Entrance to the college from westbound on Highway 199 would be from a protected left-turn-only lane. Exit from the college would be right out only. A portion of the South Highline Canal adjacent to the southeast corner of the intersection of Highway 199 and the Rogue Community College entrance would be realigned for about 150 feet to accommodate the highway widening and modified connection of the multi-use path to the college access road.
- Highway 199 at the intersection with Hubbard Lane would include left-turn-only lanes, two through lanes, and right-turn-only lanes in both directions. Traffic on Hubbard Lane

would be able to cross Highway 199 in both directions and make left and right turns onto Highway 199. U-turns would be permissible. This intersection would be constructed to accommodate the new traffic signal once traffic conditions warrant signal installation (Exhibit 2-2, Inset 2).

- Hubbard Lane would be improved to City of Grants Pass design standards south of Highway 199 (Exhibit 2-2, Inset 6). The southern-most 400 feet of Hubbard Lane would be realigned to create a new intersection with Demaray Drive (Exhibit 2-2, Inset 5). The new intersection of Hubbard Lane and Demaray Drive would have a left-turn-only pocket on northbound Demaray Drive. The existing intersection of Hubbard Lane and Demaray Drive would be closed and made into a cul-de-sac.
- A separated bicycle and pedestrian shared use path would be constructed along the north side of Highway 199 between Hubbard Lane and Dowell Road. The existing bicycle and pedestrian shared use path along the south side of Highway 199, beginning at the Rogue Community College entrance and continuing east past Dowell Road, would be reconstructed and slightly realigned (Exhibit 2-3).

Exhibit 2-3. Shared Use Path Realignment near Rogue Community College



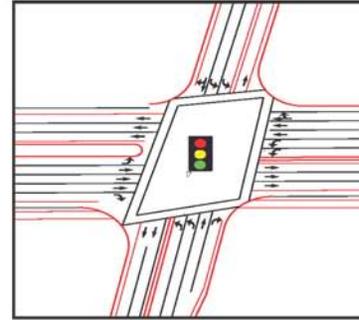
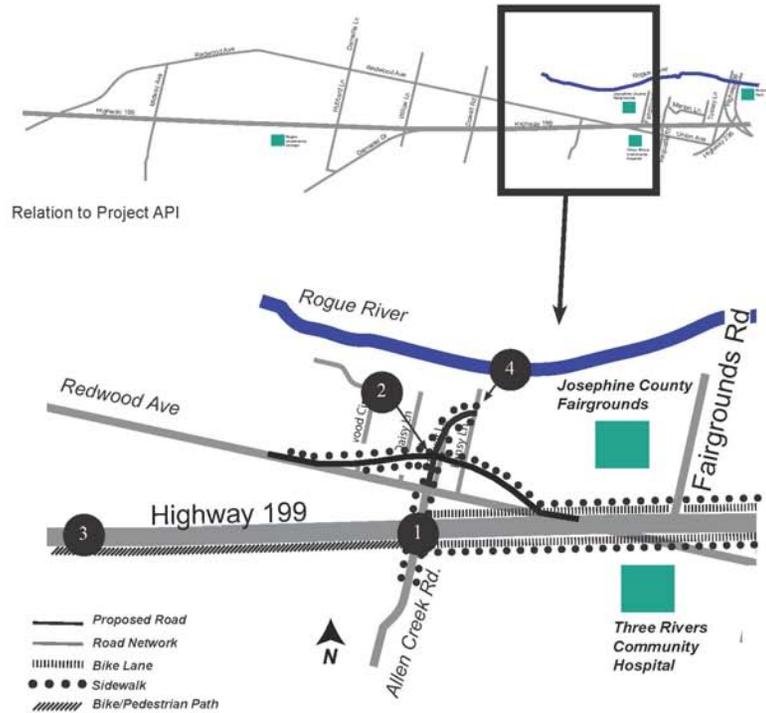
- Highway 199, at the intersection with Willow Lane, would remain two through lanes in each direction, right-turn-only lanes in both directions, and raised curb median allowing left-turn-only from a dedicated turn pocket for westbound traffic (Exhibit 2-2, Inset 3). Eastbound traffic would continue to be prohibited from making left turns. Willow Lane would continue to be right in/right out only north and south of Highway 199.
- Highway 199, at the intersection with Dowell Road, would continue to be signalized. Highway 199 eastbound and westbound at the intersection would continue to have two through lanes and dedicated left and right turn lanes. Traffic on Dowell Road would be able to cross Highway 199 in both directions and make left and right turns onto Highway 199. U-turns would also be permitted.

2.2 Dowell Road to Fairgrounds Road

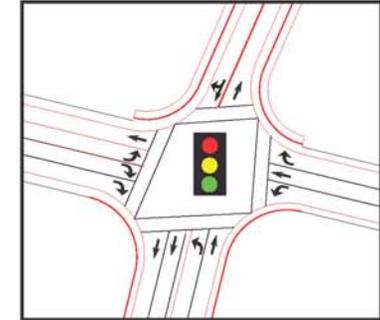
Exhibit 2-4 shows the general improvements proposed as part of the Preferred Alternative between Dowell Road and Fairgrounds Road, with insets to provide greater design detail at major intersections. This segment of the Preferred Alternative has the following design features:

- At Dowell Road, Highway 199 would transition from four travel lanes to six travel lanes with raised curb median continuing between the eastbound and westbound lanes (Exhibit 2-4, Inset 3). For westbound Highway 199 traffic, the right lane approaching Dowell Road would become a right-turn-only lane onto northbound Dowell Road.
- The intersection of Highway 199 and Allen Creek Road, as shown in Inset 1 of Exhibit 2-4, would remain signalized and include the following features:
 - Eastbound Highway 199 would have three through lanes, one left-turn-only lane, and one right-turn-only lane.
 - Westbound Highway 199 would have three through lanes, with the right-hand lane also allowing for right turns, and two left-turn-only lanes.

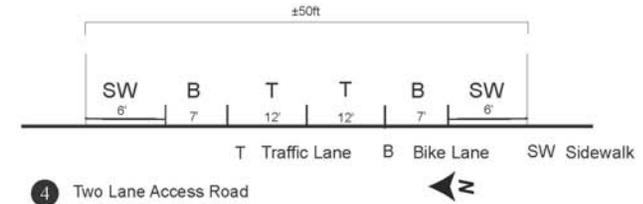
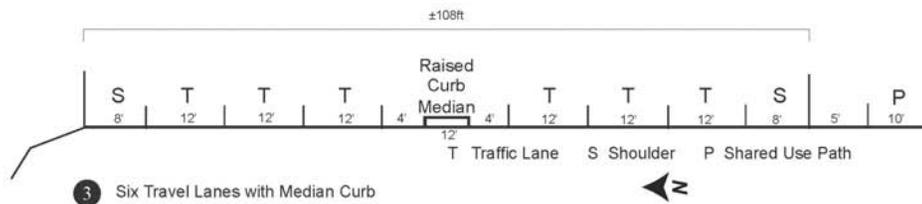
EXHIBIT 2-4. PREFERRED ALTERNATIVE BETWEEN DOWELL ROAD AND FAIRGROUNDS ROAD



1 Highway 199 at Allen Creek Road



2 Allen Creek Road at Redwood Avenue



- Northbound Allen Creek Road would have one through lane, two left-turn-only lanes, and one right-turn-only lane.
- Southbound Allen Creek Road would have one combined through and right-turn lane and two left-turn-only lanes.
- Allen Creek Road would be extended approximately 250 feet north of the existing Redwood Avenue where it currently ends at a “T” intersection (Exhibit 2-4, Inset 2). Sidewalks would be added on both sides of Allen Creek Road and u-turns would be permissible at the intersection of Allen Creek Road, Redwood Avenue, and the new access road. This new intersection would be signalized and:
 - Northbound from Allen Creek Road would have one through lane and one left-turn-only lane.
 - Eastbound from a realigned Redwood Avenue would have no through lanes, one left-turn-only lane, and two right-turn-only lanes.
 - Southbound from a new access road would have a single combined through lane and right-turn lane.
 - Westbound from a realigned westbound Highway 199 slip ramp would have one through lane, one left-turn-only lane and one right-turn-only lane.
- From its current connection, Redwood Avenue would be changed from a two-way to a one-way (westbound) slip ramp. The slip ramp from westbound Highway 199 to Redwood Avenue would be shifted north (Exhibit 2-4, Inset 3). This slip ramp would allow westbound traffic to either continue through the new Allen Creek Road intersection to the realigned Redwood Avenue, turn right onto the new access road, or turn left towards the Highway 199 at Allen Creek Road intersection. This realignment requires relocating access to the Young Men's Christian Association (YMCA) and nearby parcels from Redwood Avenue to an existing driveway that has access on Pansy Lane. YMCA traffic can connect to Redwood Avenue via the new

extension of Allen Creek Road that curves north and east to connect to Pansy Lane.

- To connect with the new extension of Allen Creek Road, Redwood Avenue would be realigned starting just west of Redwood Circle (Exhibit 2-4). The realigned portion of Redwood Avenue would curve to the north.
- A new local street would be constructed to connect Daisy Lane with Redwood Circle; thereby providing properties along Daisy Lane access to Redwood Avenue. The local street would have two lanes and a sidewalk on both sides of the street.
- Access to the Josephine County Fairgrounds, the Young Men's Christian Association (YMCA), and other county-owned parcels east of the YMCA would be from a new access road and Pansy Lane (Exhibit 2-4 and sidebar graphic). The access road would bulb out to the north of the new Allen Creek Road extension, curve east, and connect to Pansy Lane. It would have two lanes and a sidewalk on both sides of the road (Exhibit 2-4, Inset 4). An existing driveway on Pansy Lane would continue to provide access to the YMCA and the fairgrounds.
- Access to properties along the old Redwood Avenue alignment east of Allen Creek Road would still be via old Redwood Avenue. Access to properties along old Redwood Avenue west of Allen Creek Road would be via Redwood Circle and then the old Redwood Avenue. Cul-de-sacs would be constructed on the east end of the old Redwood Avenue alignment. Properties along Flower Lane would have access via a new connection to the access road. Properties on Daisy Lane would connect to Redwood Avenue via a new connector to Redwood Circle. The City of Grants Pass may consider adding a signal at the intersection of Redwood Avenue and Redwood Circle.
- The existing signal at the Highway 199 and Redwood Avenue intersection would be removed.
- The existing separated bicycle and pedestrian shared use path along the south side of Highway 199, which begins at



Access to the west side of the fairgrounds and YMCA would be provided by a new access road extending from the realigned intersection of Allen Creek Road and Redwood Ave. to Pansy Lane which connects to an existing driveway into the fairgrounds (see Exhibit 2-4, Inset 4, to view roadway cross-section of the new access road).

the Rogue Community College entrance, would continue east to Nebraska Avenue. At this point, the pedestrian traffic would use the sidewalks on Union Avenue or Highway 199; the bicycle traffic would either use the paved shoulders on Highway 199 or Union Avenue.

- A bike lane along the north side of Highway 199 between the Redwood Avenue slip ramp and Fairgrounds Road and continuing east to Tussey Lane, would be striped on the roadway shoulder.
- A bike lane would be added along the south side of Highway 199 between Allen Creek Road and Ringuette Street and would be striped on the roadway shoulder.
- Sidewalk, separated by a planter strip, would be added to the north side of Highway 199 from the Redwood Avenue slip ramp to Fairgrounds Road and on to Tussey Lane. A sidewalk would be added to the south side of Highway 199 from Nebraska Avenue to Ringuette Street.

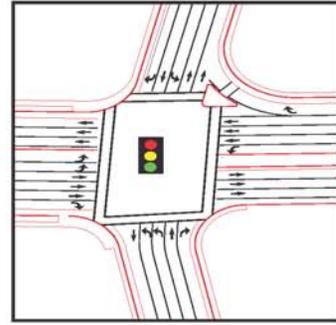
2.3 Fairgrounds Road to Tussey Lane

Exhibit 2-5 shows the general improvements proposed as part of the Preferred Alternative between Fairgrounds Road to Tussey Lane, with insets to provide greater design detail at major intersections.

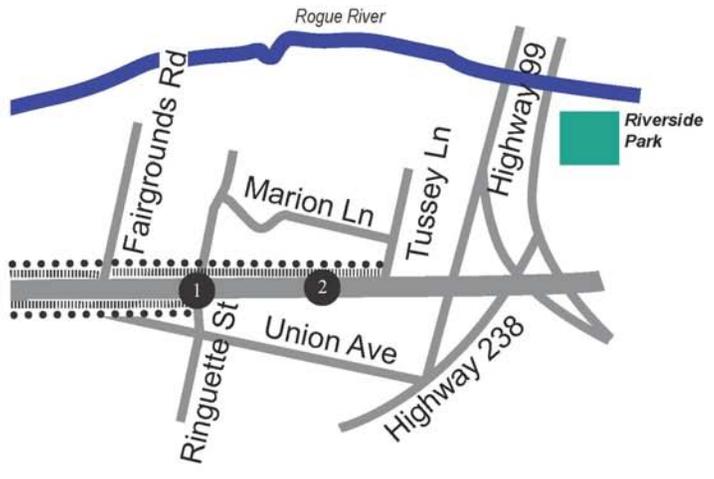
This segment has the following design features:

- This segment of Highway 199 would provide six travel lanes with raised curb median continuing between the eastbound and westbound lanes (Exhibit 2-5, Inset 2).
- Where permitted, direct access to Highway 199 would be right in/right out only. Curb and a detached sidewalk would be constructed along the westbound portion of Highway 199. Access would be defined by driveways with some shared access between parcels.
- The existing signal at the intersection of Highway 199 and the Fairgrounds Road would be removed and traffic movements would be restricted to right in/right out.

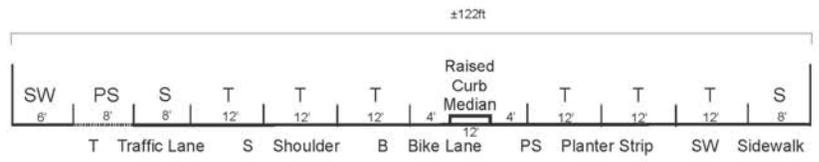
EXHIBIT 2-5. PREFERRED ALTERNATIVE BETWEEN FAIRGROUNDS ROAD AND TUSSEY LANE



1 Highway 199 at Ringuette Street



— Road Network
 ▨▨▨▨▨ Bike Lane
 ●●●● Sidewalk



2 Six Travel Lanes with Median Curb



- The intersection of Highway 199 and Ringuette Street, as shown in Inset 1 of Exhibit 2-5, would continue to be signalized and include the following features:
 - Westbound Highway 199 would have three through lanes, one left-turn-only lane, and one channelized right-turn-only lane.
 - Eastbound Highway 199 would have three through lanes, two left-turn-only lanes, and one right-turn-only lane.
 - Northbound Ringuette Street would have one through lane, two left-turn-only lanes, and one right-turn-only lane.
 - Southbound Ringuette Street would have one through lane, one left-turn-only lane, and one right-turn-only lane.
 - The left-turn-only lane on northbound Ringuette Street would be extended from Union Avenue to Highway 199.
- Henderson Lane and Tussey Lane would continue to provide access to Highway 199 and traffic would continue to be restricted to right in/right out movements due to raised curb median along Highway 199.
- A sidewalk, separated from Highway 199 by a planter strip, would continue along the north side of Highway 199 between Fairgrounds Road and Tussey Lane. A sidewalk would also be constructed along both sides of Ringuette Street north of Highway 199 for approximately 300 feet. A sidewalk along the south side of Highway 199 would continue from Nebraska Avenue to Ringuette Street.
- The bike lane striped on the roadway shoulder along the north side of Highway 199, starting at Allen Creek Road, would continue between Fairgrounds Road and Tussey Lane. The bike lane striped on the roadway shoulder along the south side of Highway 199, starting at Allen Creek Road, would continue to Ringuette Street.

CHAPTER 3 Reasons for Recommending the Preferred Alternative

3.1 Decision-making Process

For the Highway 199 Expressway Upgrade project ODOT has conducted an open decision-making process by gathering information from the Citizen Advisory Committee (CAC), Project Development Team (PDT), and the public throughout the project. From December 2004 through January 2005, members for the CAC and PDT were sought out and meetings with each committee were initiated in February 2005. Over the past three years, these committees, members of the public, and various governmental agencies have been involved in developing alternative solutions to the identified transportation problems on Highway 199. The responsibility for making project recommendations was assigned to the PDT. All recommendations were independently reviewed by FHWA, which is the lead federal agency responsible for NEPA compliance.

The PDT considered recommendations forwarded by the CAC, which usually met one day in advance of PDT meetings. The CAC represented multiple stakeholder interests in the Grants Pass vicinity.

In addition to the input, recommendations, and decisions made by these committees, ODOT also coordinated with and incorporated input from other governmental agencies, project stakeholders and the public into project decisions.

3.2 Alternatives Considered

The CAC and PDT considered a wide range of alternatives, including nine for the west segment between Midway Avenue and

Voting Members of the PDT included:

- City of Grants Pass
- Josephine County
- Grants Pass Chamber of Commerce
- Oregon State Police
- Freight/trucking industry
- ODOT (Roadway Design, Traffic and Environmental)
- Citizen at-large

Non-voting Members of the PDT included:

- FHWA
 - CAC representative
 - Other ODOT technical specialists
-

Members on the CAC included:

- Residents
 - Commuters
 - Business owners
 - Property owners
 - Special interest groups
-

Dowell Road and 14 for the east segment between Dowell Road and Tussey Lane. The alternatives were evaluated in terms of meeting the project purpose and need as well as achieving project goals and objectives. A full description of alternatives considered during the project decision-making process is documented in the EA and Supplemental EA.

Two build alternatives, Alternatives A and C, were evaluated and compared with the No Build Alternative in the EA (December 2006). During the EA public review period (January – February 2007), the City of Grants Pass and Josephine County voiced dissatisfaction with the two build alternatives analyzed in the EA. The City of Grants Pass with support by Josephine County established an independent process (called the Working Group) to develop and evaluate new alternatives for the Highway 199 Expressway Upgrade project. ODOT participated in the Working Group, which was designed to thoroughly investigate additional alternatives that could provide greater benefits and/or fewer adverse impacts to the community.

The culmination of the Working Group process was a new alternative (named the Working Group Alternative) that was presented to the Highway 199 Expressway Upgrade CAC and PDT during the summer of 2007. In August 2007, the PDT recommended including the Working Group Alternative in the EA range of alternatives.

ODOT prepared a Supplemental EA (November 2007) to evaluate the Working Group Alternative with a similar level of analysis and design that was conducted on Alternatives A and C in the EA. A 30-day public review period (December 2007 – January 2008) was provided for public comment on the Supplemental EA. Upon review and response to public comments on both the EA and Supplemental EA, meetings with the CAC and PDT were scheduled to recommend the Preferred Alternative.

3.3 Recommendation of the Preferred Alternative

The CAC met on January 31, 2008 to recommend a Preferred Alternative to the PDT. A majority vote by the CAC recommended that Alternative C be recommended as the Preferred Alternative.

On February 1, 2008, the PDT met to recommend the Preferred Alternative to FHWA. Before voting, the PDT considered the CAC recommendation, a review of public comment received on all alternatives during the EA and Supplemental EA public review periods, technical presentations on the features of each alternative, public comment at the meeting, and deliberation among PDT members.

The PDT voted among four alternatives to recommend Alternative A as the Preferred Alternative for the Highway 199 Expressway Upgrade project.

Range of Alternatives Considered in the EA and SEA:

Alternative A (Preferred)
Alternative C
Working Group Alternative
No Build Alternative

3.4 Rationale for Recommending the Preferred Alternative

3.4.1 Purpose and Need

The Preferred Alternative will best meet the purpose and need of the project by improving safety for vehicle, bicycle, and pedestrian traffic as well as reducing congestion and operational deficiencies along Highway 199 between Midway Avenue and Tussey Lane. The Preferred Alternative was selected for the following reasons:

- Provides the greatest overall safety improvements by minimizing conflict points, providing adequate spacing between signals, reducing number of vehicle stops, and alleviating unnecessary weave and merge movements.
- Improves traffic flow on Highway 199 through the removal of the Fairgrounds Road and Redwood Avenue signals.
- Improves capacity on Highway 199 with the addition of a through lane in each direction from Dowell Road to Tussey Lane.
- Retains a slip ramp from westbound Highway 199 to westbound Redwood Avenue to improve traffic flow.
- Provides a solution that best meets the anticipated growth over the next 20 years.
- Enables flexibility in the design to accommodate future, unanticipated growth in a cost effective manner without requiring major infrastructure modifications.

- Includes common and simple design elements that meet driver expectations and minimizes driver errors and confusion.
- Adds adequate storage capacity on local streets, such as Redwood Avenue and Allen Creek Road, to reduce local street and Highway 199 congestion.
- Improves the highway function as an expressway.

3.4.2 Goals and Objectives

The Preferred Alternative achieves many of the project goals and objectives identified by the CAC and PDT as summarized below:

- Provides safe turnout locations for school buses and other service vehicles that use the roadway shoulders by minimizing deviations from design standards.
- Addresses all users (local, through and tourism) and local street impacts.
- Accommodates freight access to commercial and industrial properties and minimizes flow interruptions, especially for large trucks.
- Improves connectivity of bike and pedestrian facilities across and adjacent to the highway and provides safe, convenient bicycle and pedestrian travel and reduces conflicts between vehicle traffic and bicycle and pedestrian users.
- Avoids or minimizes impacts to fish and wildlife and wetlands, and reduces visual clutter in the corridor.
- Alternative can be constructed in phases while adding incremental transportation benefits to the system.

Appendix A provides the full set of criteria that the Preferred Alternative was evaluated across.

CHAPTER 4 Summary of Proposed Mitigation and Conservation Measures

4.1 Summary of Proposed Mitigation and Conservation Measures

The following chapter provides a summary of proposed mitigation and conservation measures for each environmental resource. Mitigation measures involve improvements to things such as species habitat and/or site conditions following disturbance of an area. Conservation measures are plans or actions developed prior to construction in order to minimize or avoid potential long-term effects to environmental resources.

The construction contractor will also be required to abide by applicable conservation measures identified in ODOT's Standard Specifications for Construction. Key sections addressing environmental concerns that would be followed for this project include: Section 00280 Erosion and Sediment Control and Section 00290 Environmental Protection. In addition, special provisions will be developed prior to construction to ensure that the contractor complies with the applicable terms and conditions of the environmental permits.

Exhibit 4-1 recaps the anticipated long-term effects from the Preferred Alternative as well as a summary of the mitigation and conservation measures to be included on the construction plans and specifications and other general measures. Within the table, those measures that are general measures are noted with an asterisk (*). The remaining measures are measures for construction plans and specifications.

A complete copy of ODOT's Standard Specifications for Construction can be found at:

http://www.oregon.gov/ODOT/HWY/SPECS/standard_specifications.shtml

EXHIBIT 4-1. SUMMARY OF PROPOSED MITIGATION AND CONSERVATION MEASURES FOR THE PREFERRED ALTERNATIVE

Environmental Resource	Long-Term Effects	Mitigation and Conservation Measures
Air Quality	<ul style="list-style-type: none"> Regional conformity with the State Implementation Plan is in process. Project would not cause or contribute to a new violation of the PM₁₀ (particulate matter less than 10 microns in diameter) National Ambient Air Quality Standards, or increase the frequency or severity of violation. 	<ul style="list-style-type: none"> None required.
Archaeology	<ul style="list-style-type: none"> There would be no long-term adverse effects to archaeological resources since there are no significant resources in the area of potential effect (APE). 	<ul style="list-style-type: none"> Should previously unidentified archaeological resources or human remains be encountered, work should immediately cease in the vicinity of the discovery to avoid further damages to the resource. ODOT, FHWA, State Historic Preservation Office (SHPO), and the Oregon State Museum of Anthropology would be notified so the significance of the discovery can be evaluated and the appropriate course of action implemented.
Biology	<p><i>Fisheries Resources/Water Quality</i></p> <ul style="list-style-type: none"> No effect to water quality or stream geomorphology from net increase of impervious surface area. <p><i>Wildlife Resources</i></p> <ul style="list-style-type: none"> Wildlife passage restricted by median barrier. Wildlife-vehicle incidents may increase. Tree removal may result in slight decrease in habitat for Migratory Bird Treaty Act protected nesting birds. <p><i>Botanical Resources</i></p> <ul style="list-style-type: none"> Minimal effects to non-Endangered Species Act (ESA) botanical species. No effects to ESA protected plant species. Trees would be removed. 	<ul style="list-style-type: none"> Implement a Pollution Control Plan (PCP). Prepare an Erosion and Sediment Control Plan (ESCP). Construct stormwater treatment facilities, including water quality swales and detention ponds to ensure that the construction does not change the existing water quality or quantity conditions. Remove trees outside bird nesting season (March 1 – September 1). Fully span the active channel width of the Sand Creek and avoid in-water work during construction of the pedestrian bridge. Develop and implement a riparian planting plan. Prepare special provisions for construction to ensure compliance with all permit conditions of approval and/or mitigation measures. Follow the requirements of the applicable federal, state, and local regulations.*
Hazardous Materials	<ul style="list-style-type: none"> 28 sites (12 identified and 16 possible) have recognized and potential environmental conditions. Public health hazards from possible changes in the amount of hazardous materials located above and below ground. Increased effects to the environment through exposure of hazardous materials. 	<ul style="list-style-type: none"> Investigate recognized and potential environmental conditions sites (i.e. subsurface sampling) to eliminate or minimize effects that sites could have on project activities and vice versa.* Prepare Level 2 Preliminary Site Investigation report to document the presence or absence of potential contamination identified in the Hazardous Materials Corridor Study for the project.* Remediate contaminated sites as necessary and appropriate.

Environmental Resource	Long-Term Effects	Mitigation and Conservation Measures
	<ul style="list-style-type: none"> Increased project costs. Knowing where hazardous materials may exist could be a positive benefit to public health and safety. Removal of hazardous materials would be a positive benefit to public health and safety. 	
Historic Resources	<ul style="list-style-type: none"> No long-term effects to any significant historic-period buildings. 3 canals (Main, South Main, and South Highline) are historic resources eligible for listing on the National Register of Historic Places. Effects to the 3 historically significant canals would involve increasing culvert lengths at all 3 canals and realigning a portion of the South Highline Canal. No adverse effect on canals which are part of an eligible historic resource (SHPO concurrence received on January 29, 2007, Appendix B). Use of the 3 historically significant canals would result in a <i>de minimis</i> effect under Section 4(f) (FHWA concurrence received on June 11, 2007, Appendix B). 	<ul style="list-style-type: none"> Mitigation and conservation measures could be necessary if project design plans change and project effects to the three canals would be greater than stated in the Final Historic Resources Technical Report.
Land Use	<ul style="list-style-type: none"> 120 parcels affected by acquisition. Acquisitions: 2 full, 118 partial. No land use plan amendments or zone changes required. Compliance: Oregon Bicycle and Pedestrian Plan, ORS 366.514, Oregon's Statewide Planning Goal 12, the City of Grants Pass MTP, and the Josephine County Rural TSP. 	<ul style="list-style-type: none"> Work with property and business owners in the API to minimize conflicts and inconveniences from construction-related activities. Provide property and business owners in the API with advanced notice of potential access or utility disruptions resulting from construction activities. Schedule the most disruptive construction activities during off-peak hours to minimize the effect to traffic. Follow the requirements of the applicable federal, state, and local land use and zoning regulations.* Coordinate with Josephine County and the Fair Board on alternative access to the fairgrounds.* Coordinate with the City of Grants Pass and Josephine County on any amendments needed to each agency's respective transportation plan to address design and access management elements associated with the Preferred Alternative. *

Environmental Resource	Long-Term Effects	Mitigation and Conservation Measures
Noise	<ul style="list-style-type: none"> • 51 residences, seven commercial sites, and the YMCA outdoor basketball courts would experience noise levels that approach or exceed the noise abatement criteria. 	<ul style="list-style-type: none"> • Mitigation evaluated, none proposed.
Right of Way Acquisition and Relocation	<ul style="list-style-type: none"> • 120 parcels affected. • Estimated total area required (not including temporary easements): 12.4 acres. • 5 residential relocations. • 8 commercial relocations. • 2 full acquisitions. • Cost: \$17.1 million (2010 dollars). 	<ul style="list-style-type: none"> • Implement provisions as required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, for all residential and commercial displacements and real property acquisitions. All property owners would be compensated at fair market value and relocation assistance would be provided in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.*
Section 4(f) and 6(f)	<ul style="list-style-type: none"> • Sections of canals placed in culverts. • Canals: de minimis use. • Recreation field at Rogue Community College (RCC): Access changes from RCC but no impacts to the recreation field, and no use of Section 4(f) resource. • Picnic area, playground, and equestrian arena at fairgrounds: Access changes to fairgrounds, but no impacts to picnic area, playground, or equestrian area, and no use of Section 4(f) resource. • Other resources were evaluated and determined to not be Section 4(f) resources. These included a BMX track, the remaining portion of the Josephine County Fairgrounds, a shared use path along the south side of Highway 199, and an informal picnic area on the south side of Highway 199 just east of Dowell Road. 	<ul style="list-style-type: none"> • Provide advanced public notice of planned temporary road closures and detours, and changes in access routes that would affect Section 4(f) resources and the River City Trail. • Implement dust and noise mitigation during work hours.
Socioeconomics and Environmental Justice	<ul style="list-style-type: none"> • 5 residential relocations. • 8 commercial relocations. • Bicycle motocross (BMX) course relocated. • Conversion of private parcels to public: parcels paid \$2,638 in taxes (2005). • Improved safety and decreased congestion. • Access more limited along Highway 199. • Some access changes from full access to right in/right out only. • No disproportionate or adverse effects to EJ populations. 	<ul style="list-style-type: none"> • Provide notices of planned construction activities, planned temporary road closures and detours, and changes in other access routes. • Provide advance notice for major utility shut-offs and schedule during low use times. • Distribute periodic press releases, newsletters, or notices to residents in the API to advise them of changes in pedestrian, bicycle, or transit routes during construction. These should be prepared in English and for languages that meet or exceed the U.S. Department of Justice's 5 percent threshold.

Environmental Resource	Long-Term Effects	Mitigation and Conservation Measures
Traffic and Transportation	<ul style="list-style-type: none"> • 5 intersections on Highway 199 and Highway 238 fail to meet mobility standards in year 2025; however, 4 of the 5 improve the v/c ratio and 1 has an increased v/c ratio as compared to the No Build Alternative. • 2 local street intersections fail to meet ODOT mobility standards in year 2025. • Safety on Highway 199 would improve; 105 conflict points would exist between Allen Creek Road and Tussey Lane, compared to 150 existing conflict points. • Median barrier and raised curb median on west end of Highway 199 would be a safety benefit. • Raised curb median on east end of Highway 199 would be a safety benefit. • Decrease in crash severities would be expected. • Reduces traffic flow interruptions at Fairgrounds Road and Redwood Avenue. • Provides safe, convenient bicycle and pedestrian travel. • Improves bicycle and pedestrian facilities connectivity. • Reduces conflicts between vehicle traffic and bicycle and pedestrian users. • Decreases overall travel time by 6 and 7 minutes (30% eastbound and 50% westbound reductions) and travel delay by 5.5 and 7 minutes (39% eastbound and 75% westbound reductions) along Highway 199. • Increases average speed by 5 miles per hour (mph) eastbound and 16 mph westbound (38% and 89% increases respectively) along Highway 199. • Decreases number of vehicle stops on Highway 199 by 48%. • Eliminates major queuing along Highway 199 except at the South Y Interchange. • Decreases travel time and travel delay by 30% eastbound and 37% 	<ul style="list-style-type: none"> • Implement dust and noise mitigation during work hours. • Plan construction activities to allow reasonable access to private residential and commercial properties, and community and social services.* • Implement a Mobility Plan and Traffic Control Plan. • Implement a Transportation Management Plan.

Environmental Resource	Long-Term Effects	Mitigation and Conservation Measures
	<p>westbound in the transportation study area.</p> <ul style="list-style-type: none"> • Travel distance in the transportations study area increases by 19%. • Positive benefits would be realized under all measures of effectiveness, except vehicle miles traveled, over the No Build Alternative. • Positive safety and operational benefit of adding lane capacity between Tussey Lane and Dowell Road with straightforward and intuitive lane configurations that promote efficient lane utilization and balance. • In comparison to the No Build Alternative, the Preferred Alternative results in overall improvements to Highway 199 and transportation system. 	
Visual	<ul style="list-style-type: none"> • Some vegetation removal, minor terrain modification, and increased pavement for widened and new roads. • Decreased congestion and a more visually ordered roadway. • Visual quality would remain the same between Midway Avenue and Fairgrounds Road, and would improve slightly between Fairgrounds Road and Tussey Lane. 	<ul style="list-style-type: none"> • Restore construction staging areas that are not needed once the project is completed to pre-project existing conditions to the extent practicable. • Minimize to the extent practicable the amount of vegetation removal in clear and grub areas. • Shield and/or focus construction lighting on work areas to minimize ambient spillover of light into adjacent areas. • Implement a boulevard treatment (landscaping, decorative lighting, etc) along Highway 199 between Allen Creek Road and Tussey Lane to improve visual quality. • Use colored concrete and/or stamped patterns for barrier and median areas to blend into the natural environment.
Water	<ul style="list-style-type: none"> • 12.4 acres of new right of way, with 5.5 acres associated with expanding the Highway 199 and 6.9 acres associated with the modifications to the local street network. • 7.0 acres of net new impervious for the Highway 199 and 4.2 acres of net new impervious for the local street network. The total amount of net new impervious is 11.2 acres. • Mitigation provided by the stormwater treatment facilities would ensure that the 3-year, in-stream concentrations of copper and zinc remain below acute water quality criteria. • Mitigation provided by the stormwater treatment components would decrease the pollutant loads to levels less than baseline conditions. 	<ul style="list-style-type: none"> • Route runoff from 10.3 acres of impervious surface through new stormwater treatment facilities. These facilities include five bioswales, five vortex manholes, five detention ponds and two detention pipes.

Environmental Resource	Long-Term Effects	Mitigation and Conservation Measures
Wetlands	<ul style="list-style-type: none"> • 0.55 acres of effect to palustrine forested wetlands. • No effects to palustrine scrub-shrub. • 0.63 acres of effect to palustrine emergent wetlands. • 0.68 acres of effect to Sand Creek critical habitat for Southern Oregon Northern California coho salmon. • 0.01 acres of effect to riverine, upper perennial, aquatic bed. • 0.07 acres of effect to palustrine open water/aquatic bed. 	<ul style="list-style-type: none"> • Identify wetlands and waters as “no work zones” or “restricted work zones” on plans and in the field. • Implement best management practices. • Prepare an erosion and sedimentation control plan and a pollution control plan. • Implement a wetland restoration plan and site restoration plans. • Add guardrail to the design where appropriate to avoid effects to wetlands by increasing roadway fill slope steepness. • Construct the pedestrian bridge over Sand Creek to fully span the ordinary high water mark (OHWM). • Implement stormwater management plans to avoid direct effects to wetlands to the extent practicable. • Implement a compensatory wetland mitigation plan to replace functions lost as a result of permanent effects to wetlands. • Consider use of ODOT Vernal Pool Wetland Mitigation Bank.*

4.2 Additional Discussion on Select Environmental Resources

This section provides additional discussion regarding potential long-term effects and proposed mitigation and conservation measures for resources where ODOT minimized impacts through specific design elements.

4.2.1 Biology

Impacts to biological resources in the project area will be minimized by incorporating specific design elements into the Preferred Alternative. These design elements include:

- Construct a new pedestrian bridge over Sand Creek as a portion of the new shared use path north of Highway 199 between Willow Lane and Hubbard Lane. Foundations for the bridge will be located outside the ordinary high water mark of the creek to avoid in-water work during construction and result in negligible effects to fisheries, stream geomorphology, riparian vegetation, and water quality resources.
- Construct the proposed stormwater treatment facility that reduces the level of pollutants (including copper, zinc, and total suspended solids) in stormwater runoff prior to outfall into streams and other water bodies. As a result of the Preferred Alternative, the pollutant loads will be decreased to levels less than baseline (existing) conditions and the 3-year in-stream concentrations of copper and zinc will remain below acute water quality criteria set by the State of Oregon. The proposed stormwater detention facilities will prevent changes to the peak and base stormwater flows. Thus, there will be no effect on biological resources (species or habitat) as a result of stormwater runoff from the increased impervious surface associated with the Preferred Alternative.

Proposed mitigation and conservation measures to address construction impacts to biological resources associated with the Preferred Alternative include:

- Implement an erosion and sediment control plan (ESCP) prior to the start of construction and adhere to it throughout the construction process.
- Implement a pollution control plan to prevent the release of toxic substances during construction.
- Construct the proposed stormwater treatment facilities, including water quality swales and detention ponds.
- Remove trees outside bird nesting season (March 1 – September 1) to mitigate potential effects to nesting birds protected by the Migratory Bird Treaty Act.
- Develop and implement a riparian planting plan.
- Perform construction monitoring to ensure compliance with environmental permits, and follow reporting guidelines in permits.

General mitigation measures such as the following are proposed to partially or fully mitigate effects on biological resources:

- Comply with all permit conditions of approval and/or mitigation measures.
- Follow the requirements of the applicable federal, state, and local regulations to ensure protection of resource lands and environmentally sensitive areas.
- Consider opportunities to enhance existing habitat and riparian areas.
- Consider using median barrier with cutouts along the bottom to allow small mammal passage.
- Provide provisions for the replacement of landscaping elements to the extent possible.
- Prepare special provisions for construction to ensure compliance with the terms and conditions of the environmental permits.

4.2.2 Noise

Several long-term traffic noise abatement measures were evaluated where noise impacts are predicted. Noise walls were found to be

generally feasible in mitigating traffic noise impacts; however, they were found to be unreasonable based on a number of criteria. Noise walls would not be incorporated into the project design. Specific criteria supporting the unreasonable determination include:

- Change in Noise Level (Existing noise levels compared to Future Build Noise Level) – Noise level increase of one to three decibels is not perceptible to the average human ear.
- Date of Development – Per Section 4.526 of the 2007 ODOT Noise Manual, noise mitigation is not normally recommended for residences constructed after 1996 unless the noise level increases by 5 decibels or more.
- Zoning – Noise walls are typically not recommended for commercial or industrial areas.
- Total cost – To be cost effective, noise wall mitigation typically requires a minimum of three or more residences grouped closely together. The Preferred Alternative has five sites that have two or fewer residences in areas considered for noise walls.
- Cost per residence – The ODOT applied reasonable maximum dollar amount per benefited residence toward the construction of noise walls would not be met.

4.2.3 Right of Way Acquisition and Relocation

When the project proceeds to the acquisition phase, individual deliberations between ODOT and property owners will occur to discuss specific impacts to structures, access, and other property considerations. Property owners will be offered Just Compensation for the required rights-of-way. Just Compensation is based on the valuation of the needed property and an estimation of the compensable economic damages to the remaining property and improvements. Reasonable access would be provided to each property or damages, if compensable, would be determined by the appraisal process. Easements and encumbrances affecting the use and development of the property being appraised will be considered.

For those displaced by the project, ODOT provides a relocation assistance program. The “Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970” and the “Uniform

Relocation Act Amendments of 1987” ensure the fair and equitable relocation and re-establishment of persons, businesses, farms and nonprofit organizations displaced as a result of federal or federally assisted programs. This is done so that displaced persons will not suffer disproportionate injuries as a result of projects designed for the benefit of the public as a whole. Eligible businesses and nonprofit organizations displaced by the project will also be offered relocation benefits.

4.2.4 Socioeconomics

During the 30-day public comment period on the EA and Supplemental EA, ODOT received many comments concerning the impacts associated with the removal of the signal on Highway 199 at Fairgrounds Road and the ability of vehicles in the future to make left turns into and out of the fairgrounds main entrance. ODOT is committed to continue working with Josephine County to provide alternate access to the fairgrounds property before the Fairgrounds Road signal is removed.

Several other comments received concerned the impacts associated with the bicycle motocross (BMX) track, which is a tenant on the west end of the fairgrounds property. Under the Preferred Alternative, the BMX track would need to be relocated since the remainder of the parcel would likely be too small and would likely not support any track reconfiguration that matches the function of the current track. ODOT is committed to coordinating with Josephine County and the BMX track operator to minimize impacts to the BMX track or to mitigate impacts in accordance with the Uniform Relocation Act for impacts that cannot be avoided.

4.2.5 Water

Impacts to water resources in the project area will be minimized by incorporating specific design elements into the Preferred Alternative. These design elements include:

- Construct a new pedestrian bridge over Sand Creek as a portion of the new shared use path north of Highway 199 between Willow Lane and Hubbard Lane. Foundations for the bridge will be located outside the ordinary high water mark of the creek and result in negligible effects to water quality.

- Construction of the proposed stormwater treatment facility to reduce the level of pollutants (including copper, zinc, and total suspended solids) in stormwater runoff prior to outfall into streams and other water bodies. As a result of the Preferred Alternative, the pollutant loads will be decreased to levels less than baseline (existing) conditions and the 3-year in-stream concentrations of copper and zinc will remain below acute water quality criteria set by the State of Oregon. The proposed stormwater detention facilities will prevent changes to the peak and base stormwater flows.

Mitigation and conservation measures to address construction impacts to water resources associated with the Preferred Alternative include:

- Prepare an ESCP prior to the start of construction and adhere to throughout the process.
- Meet or exceed ODOT's Erosion Control Manual practices during the construction of the project, and all erosion and stormwater control measures should be used along with other required erosion management techniques established for road construction in the ESCP.
- Implement the requirements of ODOT's NPDES 1200-CA permit, including the preparation of an ESPC, to take all reasonable steps to minimize or prevent any discharge or disposal in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.
- Perform regular maintenance and monitoring of the erosion and sediment control facilities, perform turbidity monitoring, maintain written records of visual monitoring, and follow the reporting requirements of noncompliance incidents as outlined in the NPDES 1200-CA permit. Provide written documentation of monitoring results.
- Prepare a spill prevention and control countermeasures (SPCC) plan to control pollutants throughout the project work areas. These areas can include but are not limited to staging, storage, maintenance, refueling areas, and waste sites.

General mitigation measures such as the following would be employed to partially or fully mitigate effects on water resources:

- Perform contract management activities, including regularly scheduled environmental compliance oversight of construction contractors, to ensure that the project is in compliance with the conditions and requirements of the ESPC and SPCC. Provide written documentation of monitoring results.
- Perform contract management activities, including regularly scheduled environmental compliance oversight of construction contractors, to ensure that the project is in compliance with the conditions and requirements of the environmental permits. Provide written documentation of monitoring results.
- Structure operations in a manner that reduces the risk of releases of suspended sediment into waterbodies that would increase turbidity to above background levels.
- Structure operations in a manner that reduces the risk of spills or the accidental exposure of fuels or hazardous materials to waterbodies or wetlands.
- Structure operations in a manner that provides for the prompt and effective cleanup of spills of fuel and other hazardous materials.
- Treat increased stormwater runoff from new impervious surfaces with stormwater treatment facilities. These facilities are part of the proposed action, and thus no further mitigation would be necessary.
- Design the facilities in such a way that the water quality (treatment) and the water quantity (detention) requirements presented in the Stormwater Technical Report are met.
- Design all stormwater facilities so that required routine inspection and maintenance could be easily conducted. Special attention should be placed upon access needs, specifically for detention ponds and manhole structures.

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CHAPTER 5 Additions and Changes to the EA and Supplemental EA

5.1 Additions and Changes Documented in the Supplemental EA

Additions and changes to the EA were documented in the Supplemental EA. The EA documented environmental analysis on Alternatives A and C as well as the No Build Alternative. Additions and changes documented in the Supplemental EA that pertained to those alternatives are summarized below:

- Alternatives A and C were defined in the EA as including two phases of improvements. In the Supplemental EA, Phase 2 improvements were withdrawn. Please see the Supplemental EA, Chapter 2, which describes this withdrawal of design elements from Alternatives A and C.
- Construction and right of way acquisition costs were updated and presented in 2010 dollars.
- Traffic and transportation analysis was updated to reflect revisions to the description of intersection movements, volume/capacity ratios, and measures of effectiveness as well as additional data presented for comparative analysis with the Working Group Alternative.
- Comparison of Visual Quality Scores exhibit was revised to illustrate correct scores in the Fairgrounds Road to Tussey Lane segment.
- Minor typographical errors were corrected.

The Supplemental EA also documented new environmental analysis performed on the Working Group Alternative, which was an alternative not considered in the EA.

5.2 Additions and Changes Documented in the Revised EA

5.2.1 Additions and Changes to the EA

The Revised EA includes further additions and changes to the EA. Appendix C shows corrections made to the description of the Preferred Alternative (Alternative A) from its original description in the EA. Other additions and changes to the EA are noted below. These changes are noted below; deletions are shown as ~~striketrough~~ and additions are underlined.

Chapter 3, page 3-29, last paragraph

According to the City of Grants Pass and Josephine County development codes, transportation facilities (public roads) are a permitted use within all city and county zoning districts. In addition to the development codes, there are several state and local plans and regulations applicable to land uses in the API. Applicable local plans include the City of Grants Pass Comprehensive Plan, Josephine County Comprehensive Plan, and the local transportation system plans (TSPs). The applicable state plans and regulations include the Oregon Transportation Plan (OTP), Oregon Highway Plan (OHP), Oregon Bicycle and Pedestrian Plan, ORS 366.514 (use of highway funds for footpaths and bicycle trails), Oregon's statewide planning goals, OAR 734 division 051 (Highway Approaches, Access Control, Spacing Standards and Medians), and other Oregon Administrative Rules (OAR). The Highway 199 Expressway Upgrade project complies with these state plans, goals, and regulations and is identified for funding in the Oregon Statewide Transportation Improvement Program (STIP).

Chapter 4, page 4-5, Section 4.6.2 General Measures

Where appropriate and feasible, general mitigation measures such as the following would be employed to partially or fully mitigate effects on land uses:

- Comply with all permit conditions of approval and/or mitigation measures.

- Follow the requirements of the applicable federal, state, and local land use and zoning regulations to ensure protection of land uses, resource lands, and environmentally sensitive areas.
- Provide provisions for the replacement of landscaping elements to the extent possible.
- Coordinate with Josephine County and the Fair Board on alternative access to the fairgrounds.
- Coordinate with the City of Grants Pass and Josephine County on any amendments needed to each agency's respective transportation plan to address design and access management elements associated with the Preferred Alternative.

5.2.2 Additions and Changes to the Supplemental EA

The following additions and changes to the Supplemental EA are noted below. Deletions are shown as ~~strikethrough~~ and additions are underlined.

Executive Summary, page 7, Air Quality, Potential Effects (right column for Alternative A, Alternative C, and the Working Group Alternative)

~~Regional conformity with the State Implementation Plan has not been established at this time; regional conformity shall be established prior to the FHWA's NEPA decision. It is the responsibility of the Rogue Valley Council of Governments to complete the regional conformity determination.~~

Regional conformity with the State Implementation Plan is in process.

Executive Summary, page 8, Land Use, Potential Effects (right column for the Working Group Alternative)

~~124 parcels affected by acquisition~~

~~Acquisitions: 0 full, 124 partial~~

104 parcels affected by acquisition

Acquisitions: 0 full, 104 partial

Chapter 2, Section 2.3 Working Group Alternative, page 2-13 (fourth major bullet and second minor bullet)

- The intersection of Highway 199 and Ringuette Street (Exhibit 2-5, Inset 1) would continue to be signalized and include the following features:
 - Westbound Highway 199 would have three through lanes, one left-turn-only lane, and one right-turn-only lane.
 - ~~- Eastbound Highway 199 would have three through lanes, one left turn only lane, and one right turn only lane.~~
 - Eastbound Highway 199 would have three through lanes, two left-turn-only lanes, and one right-turn-only lane.

Particulate Matter 10 (PM₁₀)

Particulate pollution is composed of solid particles or liquid droplets that are small enough to remain suspended in the air. PM₁₀ refers to particulate matter less than 10 microns in diameter, about one-seventh the thickness of a human hair. Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals.

SIP

Required by Section 110 of the Clean Air Act, the SIP outlines adopted federally approved control strategies to minimize air pollution. SIPs generally establish limits or work practice standards to minimize emissions of the criteria pollutants or their precursors.

Chapter 3, Section 3.1 Air Quality, page 3-3 (last two paragraphs)

The Highway 199 Expressway Upgrade project has been determined to be regionally significant. An air quality regional emissions analysis must be completed for the Preferred Alternative prior to the completion of the FHWA NEPA decision (prior to issuance of a finding of no significant impact, if applicable). ~~The regional conformity has not yet been established; it is the responsibility of the Rogue Valley Council of Governments to complete the regional conformity determination.~~

~~Therefore, project conformity with the State Implementation Plan (SIP) can not be established until regional conformity has been established.~~

The regional air quality conformity with the Grants Pass PM₁₀ Maintenance Plan and the State Implementation Plan (SIP) is in process by the Rogue Valley Council of Governments.

Chapter 3, Section 3.8 Right of Way Acquisition and Relocation, page 3-3, Exhibit 3-7

EXHIBIT 3-7. ESTIMATED RIGHT OF WAY ACQUISITION AREA AND COSTS

	Working Group Alternative	Alternative A	Alternative C
Acquisition Area	9.5 acres	12.4 acres	11.5 acres
Cost of Acquisitions	\$13.6 million	\$15.2 million \$17.1 million	\$15.4 million \$17.3 million

Chapter 5, Section 5.2 Public Involvement, page 5-3, Sidebar

Highway 199 Public Involvement Activities in 2007

- Newspaper articles and advertisements, radio and television information broadcasts, and project website updates
 - CAC and PDT meetings: 3 meetings between June and August
 - Open House 3/Public Hearing:
February 8, 2007
 - Open House 4/Public Hearing:
~~November 2007~~ December 19, 2007
-

Chapter 5, Section 5.2 Public Involvement, page 5-4, First paragraph

The fourth open house is scheduled for ~~November 2007~~ December 19, 2007.

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CHAPTER 6 Public Involvement and Agency Coordination

ODOT has conducted a variety of public outreach activities to gather the community's interest and concerns about the Highway 199 Expressway Upgrade project. ODOT has also coordinated with multiple stakeholders internally and externally. Internal coordination has occurred across disciplines and with ODOT's managers and decision makers. External coordination has occurred at both the local and regional level as well as at the state and federal levels.

6.1 Project Coordination and Public Involvement

A Citizen Advisory Committee (CAC) was assembled to ensure that the project considered the community's interests, issues, knowledge, and recommendations. The CAC's role was to assist identifying project and community issues, discuss project activities with constituencies and neighbors and report back to the CAC, discuss and evaluate potential alternatives, and make recommendations to the Project Development Team (PDT). The CAC met a total of 17 times (13 times before the release of the EA, three times between the release of the EA and Supplemental EA, and one time after the release of the Supplemental EA); four of those meetings were a joint meeting with the PDT. The dates of all 17 meetings are presented in Exhibit 6-1.

Members on the CAC included:

- Residents
 - Commuters
 - Business owners
 - Property owners
 - Special interest groups
-

EXHIBIT 6-1. CAC AND PDT MEETING DATES

Meeting Number	CAC Meeting Date	PDT Meeting Date
Meetings held prior to the release of EA		
1	February 10, 2005	February 11, 2005
2	March 10, 2005	March 11, 2005
3	April 14, 2005	April 15, 2005
4	May 12, 2005	May 13, 2005
5	June 9, 2005	June 10, 2005
6	August 11, 2005	August 12, 2005
7	October 13, 2005	October 14, 2005
8	November 3, 2005	November 4, 2005
9	April 17, 2006 (Joint CAC and PDT meeting)	
10	May 11, 2006	May 12, 2006
11	June 8, 2006	June 9, 2006
12	July 13, 2006	July 14, 2006
13	October 11, 2006 (Joint CAC and PDT meeting)	
Meetings held between the release of EA and Supplemental EA		
14	June 6, 2007 (Joint CAC and PDT meeting)	
15	July 12, 2007 (Joint CAC and PDT meeting)	
16	August 9, 2007	August 10, 2007
Meetings held after the release of the Supplemental EA		
17	January 31, 2008	February 1, 2008

Voting Members of the PDT included:

- City of Grants Pass
- Josephine County
- Grants Pass Chamber of Commerce
- Oregon State Police
- Freight/trucking industry
- ODOT (Roadway Design, Traffic and Environmental)
- Citizen at-large

Non-voting Members of the PDT included:

- FHWA
 - CAC representative
 - Other ODOT technical specialists
-

The PDT was assembled to represent the interests of the public and make project recommendations to FHWA. When making project recommendations the PDT considered input from the CAC, ODOT, and the public through the public involvement process. The PDT was responsible for recommending the project's Preferred Alternative. The PDT also met a total of 17 times (13 times before the release of the EA, three times between the release of the EA and Supplemental EA, and one time after the release of the Supplemental EA); four of those meetings were a joint meeting with the CAC. The dates of all 17 meetings are also presented in Exhibit 6-1.

In addition to the CAC and PDT, ODOT also coordinated with other state and federal agencies throughout the project to discuss potential project effects and mitigation. Agency consultation letters can be found in Appendix B. ODOT will continue to coordinate with the

applicable state and federal agencies as needed throughout the project.

A comprehensive public involvement process was undertaken for the project. Initial public comments were collected from early stakeholder surveys in December 2004 through March 2005.

On March 3, 2005 the first of two open houses was held. The purpose of this first open house was to conduct the scoping for the project's EA. The open house was conducted as a self-guided tour of the project, with project staff stationed at displays to discuss the project and answer questions. At this open house 71 people signed the attendance sheet.

On August 25, 2005 a second open house was held. The purpose of this open house was to discuss the conceptual alternatives developed by the PDT and CAC, including the NEPA process used to formulate these alternatives, and to present the alternatives recommended for detailed study in the EA. At this open house 61 people signed the attendance sheet.

On February 8, 2007 the first of two public hearings was held. This public hearing occurred during the 30-day public review of the EA. ODOT held the public hearing at the Rogue Community College to present information about the project and two build alternatives studied in the EA and gather public comment on those alternatives as well as the environmental analysis documented in the EA. During the 30-day comment period, ODOT received 85 public comments. A summary of responses to comments on the EA is provided in Appendix D.

An outcome of the public comment period on the EA was the City of Grants Pass formation of an independent Working Group. The Working Group was organized in February 2007 to engage in a parallel process to the EA to examine additional alternatives for the eastern segment of the Highway 199 Expressway Upgrade project. Their process resulted in a new alternative, the Working Group Alternative. In August 2007, the PDT voted to include the Working Group Alternative into the range of alternatives to be evaluated. The Working Group Alternative was evaluated in the Supplemental EA.

On December 19, 2007 a second public hearing was held. This public hearing occurred during the 30-day review of the

Timeline of Major Public Involvement Events:

- December 2004 – March 2005
Stakeholder Surveys
 - March 3, 2005
Open house #1 (EA scoping)
 - August 25, 2005
Open house #2 (Conceptual alternatives)
 - February 8, 2007
Public hearing #1 (EA)
 - December 19, 2007
Public hearing #2 (Supplemental EA)
-

Supplemental EA. Again, ODOT held the public hearing at the Rogue Community College to present information about the project and three build alternatives studied in the Supplemental EA (Alternatives A and C and the Working Group Alternative) and gather public comment on those alternatives as well as the environmental analysis documented in the Supplemental EA. During the 30-day comment period, ODOT received 37 public comments. A summary of responses to comments on the Supplemental EA is also provided in Appendix D.

Highway 199 Expressway Upgrade Website

<http://www.oregon.gov/ODOT/HWY/REGION3/>

In addition to the stakeholder surveys, open houses, and public hearings, news articles and ads about the project appeared in the *Grants Pass Daily Courier* and the free weekly circulation *Sneak Preview*. ODOT staff arranged to have information broadcast on local radio (KAJO) and on the public access cable television system (RVTV). In addition, articles on the project were included in *Moving Ahead with ODOT* — a bi-monthly publication distributed in the Medford Mail Tribune. ODOT has also maintained a publicly accessible project website. The internet address for the project website was provided throughout the project, including publication in a letter that ODOT distributed in December 2005 to 470 stakeholders in the project area. This letter also encouraged people to contact ODOT staff to learn more about the project.

6.2 Summary of Responses to Comments on the EA and Supplemental EA

ODOT received 85 comments during the EA comment period and 37 comments during the Supplemental EA comment period. These comments were submitted as letters, e-mail, comment forms distributed at the public hearing, and oral testimony that was recorded verbatim by Oregon-licensed court recorders at the public hearing. Each comment was assigned a number for identification and tracking. The EA comments were numbered 1-85 and the Supplemental EA comments were numbered 86-122. All comments were reviewed and categorized into common topic areas. The following topic areas were identified:

- Alternative A, Alternative C, and Working Group
- Environment
- EA Process

- Josephine County Fairgrounds
- Right of Way Acquisition and Access Management
- Safety
- Traffic Analysis

Most comments addressed more than one topic area. A matrix was developed to track the various topic areas addressed within each comment and ensure all substantive issues within each comment received a response.

ODOT prepared responses to each topic area to address all substantive issues raised in the comments. Each response identifies the corresponding comments by comment identification number that the response addresses. These responses are included in Appendix D of this REA.

In addition to the topic areas that were addressed in the comments, many comments were received about a proposal presented by a group of local citizens known as the Association of Concerned Citizens Endorsing Sensible (traffic) Solutions (ACCESS). ACCESS, through its legal representative, submitted a new proposal to ODOT in December 2006. At the EA public hearing (February 8, 2007), ACCESS was provided space to display its proposal in the same room where the Highway 199 Expressway Upgrade project information was presented. In March 2007, ODOT evaluated the ACCESS proposal by applying the same design standards, traffic analysis, and evaluation criteria that were applied to other alternatives studied for the Highway 199 project.

One comment letter on the Supplemental EA was received from the City of Grants Pass (dated January 3, 2008) and warranted a point-by-point response. This response is also included in Appendix D.

Copies of all comments submitted to ODOT during the 30-day EA and Supplemental EA public comment periods as well as ODOT's responses to the comments are provided in Appendix D.

Analysis of the ACCESS Proposal

The results of the ODOT analysis of the ACCESS proposal are presented in a separate report titled "Analysis of the ACCESS Proposal" that can be found on the project website located at:

http://www.oregon.gov/ODOT/HWY/REGIO/N3/h199e_index.shtml

EA and SEA Comments

Copies of all comments submitted to ODOT during the 30-day EA and SEA public comment periods are also on the project website located at:

http://www.oregon.gov/ODOT/HWY/REGIO/N3/h199e_index.shtml

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CHAPTER 7 Conformance with Land Use, Transportation, and Other Planning Regulations

The Highway 199 Expressway Upgrade project is located within the City of Grants Pass and Josephine County planning jurisdictions. As a result, the comprehensive plans and development codes from both jurisdictions are applicable to the project. The Transportation System Plans for the City of Grants Pass and Josephine County also includes goals and objectives for developing the city and county transportation system.

In the City's jurisdiction, the project is considered an exempt project and a formal building permit or land use review is not required. A letter from the City explaining the exemption is provided in Appendix B. In the County's jurisdiction the project involves work within the ODOT right of way and, therefore, no review or permits are required from the County. A letter from the County is also provided in Appendix B.

In addition to the local planning regulations, there are several other applicable state plans and regulations. The project complies with these applicable state plans and goals and is identified for funding in the Oregon Statewide Transportation Improvement Program (STIP).

Applicable Land Use, Transportation and Other Planning Regulations:

- City of Grants Pass Comprehensive Plan
 - Development Code of the City of Grants Pass
 - Grants Pass Urban Area Master Transportation Plan
 - Josephine County Comprehensive Plan
 - Josephine County Rural Development Code
 - Josephine County Rural Transportation System Plan
 - Oregon Transportation Plan
 - Oregon Bicycle and Pedestrian Plan
 - ORS 366.514
 - Oregon Highway Plan
 - Oregon Statewide Planning Goals
-

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CHAPTER 8 Conclusion

As a result of the information presented in the EA and the Supplemental EA, FHWA has determined that the Highway 199 Expressway Upgrade Project will not result in significant adverse environmental impacts. Proposed mitigation noted in Chapter 4 will sufficiently off-set any adverse impacts that result from implementation of the project.

Given these findings, FHWA has issued a Finding of No Significant Impact (FONSI). An Environmental Impact Statement is not required.

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APPENDIX A

Evaluation of the Preferred Alternative against the Purpose and Need / Goals and Objectives Screening Criteria

EVALUATION OF PREFERRED ALTERNATIVE

○ = High ◐ = Medium ● = Low

	Midway Ave to Dowell Rd		Dowell Rd to Tussey Ln		Notes
	No Build Alternative	Alternative A (Preferred)	No Build Alternative	Alternative A (Preferred)	
Purpose and Need					
Meets project purpose and need	●	○	●	◐	
Safety					
Minimize conflicts at access points	●	○	●	◐	
No. of conflict points	n/a	n/a	140	105	
Provide safe turnout locations for school buses and other service vehicles that use the roadway shoulders					
Minimize deviations from design standards					
Promote driver education and safety awareness					
Operation					
Address all users (local, through, and tourism)	○	○	●	◐	
Meet design year (2030) volume/capacity ratios for expressway			●	◐	Red shading: v/c ratio > 1.00 Yellow shading: v/c ratio > 0.70
6th Street at Hwy 199			1.72	1.72	This intersection is outside the project study area but is shown for comparative purposes.
Tussey Ln at Hwy 199			1.04	0.63	
Henderson Ln at Hwy 199			1.04	0.64	
Ringuette St at Hwy 199			1.24	0.71	
Fairgrounds Rd at Hwy 199			1.88	0.48	Alternative A modifies Fairgrounds Rd intersection to right in/right out at Hwy 199.
Redwood Ave at Hwy 199			0.89	N/A	
Allen Creek Rd at Hwy 199			0.89	0.84	
Dowell Rd at Hwy 199			0.86	0.78	
Willow Ln at Hwy 199	○	○			
Hubbard Ln at Hwy 199	●	○			
RCC Entrance at Hwy 199	○	○			
Arbor Ridge/Dawn Dr at Hwy 199	○	○			
Midway Ave at Hwy 199	○	○			
Redwood Ave at Allen Creek Rd			LOS F	LOS D	
Dowell Rd at Redwood Ave			LOS C	LOS B	
Union Ave at OR 238			1.16	0.98	
Address off-system/local street impacts			●	○	
Maintain adequate local access	○	◐	○	◐	
Improve highway function as an expressway	◐	◐	●	◐	
Encourage the use of all roads to their correct function					
Consider ITS solutions					

EVALUATION OF PREFERRED ALTERNATIVE

○ = High ◐ = Medium ● = Low

	Midway Ave to Dowell Rd		Dowell Rd to Tussey Ln		Notes
	No Build Alternative	Alternative A (Preferred)	No Build Alternative	Alternative A (Preferred)	
Freight					
Accommodate freight access to commercial and industrial properties			○	○	
Minimize traffic flow interruptions, especially for large trucks	◐	◐	●	○	
Multimodal Transportation					
Provide safe, convenient bicycle and pedestrian travel	●	○	●	○	
Improve connectivity of bike and pedestrian facilities across and adjacent to the highway	●	○	●	◐	
Reduce conflicts between vehicle traffic and bicycle and pedestrian users	●	○	●	○	
Provide bicycle and pedestrian facilities that meet current standards					
Environmental Impacts					
Comply with all applicable environmental laws and regulations					
Avoid or minimize impacts to fish and wildlife	N/A	○	N/A	○	
Avoid or minimize impacts to wetlands	N/A	◐	N/A	◐	
Minimize noise impacts to residences adjacent to Highway 199			◐	◐	
Enhance visual clues from rural to urban to ease travel in the corridor	●	◐			
Reduce visual clutter			●	◐	
Minimize residential displacements	N/A	◐	N/A	◐	
Minimize business displacements	N/A	○	N/A	◐	
Cost					
Define a project that can be built either with available funding or in phases	N/A	○ Phaseable Fundable	N/A	○ Phaseable Fundable	
Design Concerns					
Topography Constraints			N/A	○	
New Structures (SF)			N/A	0	
New Road Construction (SF)			N/A	425,000	

Not scored; criterion not a differentiator among alternatives

Not scored; criterion not applicable to segment

N/A Not applicable

APPENDIX B

Agency Coordination Letters



Oregon

Theodore R. Kulongoski, Governor

RECEIVED

JAN 26 2007

Department of Transportation

Transportation Building

355 Capitol St. NE

Salem, Oregon 97301

January 25, 2007

STATE HISTORIC
PRESERVATION OFFICE

FILE CODE:

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

RECEIVED

JAN 30 2007

07-0138

ODO.
370 ENVIRONMENTAL

**Subject: Request for Concurrence
Finding of No Historic Properties Affected (Archaeology)
US 199 Expressway Upgrade Environmental Assessment
Josephine County, Oregon
Key # 14019**

Dear Mr. Roper,

The Oregon Department of Transportation (ODOT) proposes improvements along 4.2 miles of US 199 in Josephine County, Oregon. The project area is located in Section 19 of Township 36 South, Range 5 West, and Sections 22, 23, 24, 26 and 27 of Township 36 South, Range 6 West, Willamette Meridian. Improvements include reconfiguration of intersections between Midway Avenue and Tussy Lane, widening of the highway for travel and turn lanes, construction of a new frontage road and development of bicycle and pedestrian facilities.

No previous archaeological surveys have been conducted nor any archaeological sites recorded within the project area. However, numerous sites have been recorded in the vicinity of the project. Due to the presence of these sites, archaeologists with the Oregon State Museum of Anthropology (OSMA) conducted a pedestrian survey of the project area in February 2006 (O'Neill 2006). Ground visibility was limited in six high probability areas and subsurface investigations were recommended for these areas. Thus, OSMA conducted exploratory subsurface probing of these areas in August 2006 (O'Neill 2007). The OSMA investigations identified four prehistoric isolates, represented by a total of seven pieces of debitage. Because additional probes placed around these isolates recovered no other artifacts, no further work is recommended.

Based on the current APE for the project, the findings from the 2006 and 2007 OSMA reports indicate that this project will have no effect on archaeological resources. **However, if the scope of work for the project changes (this includes material disposal and staging areas), additional archaeological investigations will be necessary.**



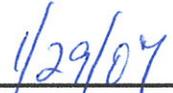
Preliminary application of Section 106 Criteria for Identification and Evaluation of Historic Properties [36 CFR 800.4(d)] indicates a finding of "No Historic Properties Affected" for the US 199 Expressway Upgrade Environmental Assessment, based on the findings outlined above. ODOT, acting as an agent of the Federal Highway Administration, requests your concurrence with a FINDING OF NO HISTORIC PROPERTIES AFFECTED (Archaeology) for the project.

Sincerely,



James B. Norman
Environmental Planning Unit Manager

The State Historic Preservation Office concurs that the US 199 Expressway Upgrade Environmental Assessment will have **No Historic Properties Affected (Archaeology)**.


SHPO Official
Date

Copies with attachments:

Robert Kentta, Confederated Tribes of Siletz
Khani Schultz, Confederated Tribes of Grand Ronde
Alexis Sleight, Cow Creek Band of Umpqua Indians
Angela Findley, Parsons Brinckerhoff
Jerry Marmon, ODOT NEPA Project Manager
Key # 14019, File Type C

Copies without attachments:

Tobin C. Bottman, ODOT Archaeologist

References:

O'Neill, Brian

2006 Archaeological Survey (Phase I) of the Highway 199 Expressway Upgrade,
Josephine County. OSMA Report No. 2006-028. University of Oregon, Eugene.

2007 Archaeological Investigations of the Highway 199 Expressway Upgrade,
Josephine County. OSMA Report No. 2007-002. University of Oregon, Eugene.



Oregon

Theodore R. Kulongoski, Governor

Department of Transportation

Transportation Building

355 Capitol St. NE

Salem, Oregon 97301

RECEIVED

JUN 15 2007

ODOT
GEO-ENVIRONMENTAL

FILE CODE:

June 6, 2007

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

**Subject: De Minimis 4(f) Finding
Highway 199 Expressway Upgrade Project
Redwood Highway (US 199)
Grants Pass, Josephine County
ODOT Key No. 14019
Federal Aid Number X-STP-S025(034)**

RECEIVED

JUN - 8 2007

FHWA
OREGON DIVISION

Ms. Eraut,

The purpose of this letter is to request FHWA approval of a de minimis 4(f) finding for the Grants Pass Irrigation District (GPID) canal system associated with the Highway 199 Expressway Upgrade Project in Grants Pass. The purpose of this project is to address vehicular and pedestrian safety, and current and future congestion and operational deficiencies along Highway 199 between Tussey Lane and Midway Avenue. The project's NEPA Classification is a Class 3, Environmental Assessment. The Draft Environmental Assessment is currently available for public review and comment.

Three 4(f) resources exist within the project Area of Potential Impact. These include the Josephine County Fairgrounds, the Rogue Community College recreation field, and the Grants Pass Irrigation District (GPID) canal system. The Josephine County Fairgrounds have only three areas that are open to the public year-round that serve as recreation facilities. These include the picnic pavilion, the playground, and the equestrian area. The Fairgrounds are located on the north side of Highway 199 at Fairgrounds Road. The Rogue Community College recreation field is located on the south side of the highway west of Hubbard Lane. The GPID canal system is comprised of three separate canals that cross through the project API or parallel the highway in a number of locations. These 4(f) resources are shown on the enclosed map taken from the Final Section 4(f) and Section 6(f) Technical Report.

One planned recreation facility also exists in the project area. This resource, the River City Trail, will be located in the Dowell Road – Fairgrounds Road segment of the project. The City of Grants Pass has acquired the necessary land and easements for the trail (completed in the summer of 2005), but trail design and construction has not started.

Josephine County Fairgrounds. Based on the latest project information, the Josephine County Fairgrounds will not be affected by the proposed project. There will be no change in the function of the three public recreation areas within the fairgrounds, but access to these areas will be modified by the construction of a new access road. This change in access will not result in a substantial impairment to the activities, features, or attributes of the Josephine County Fairgrounds that qualify them for protection under Section 4(f). The project will not use any land from this 4(f) resource, and will not affect its significant recreational characteristics.

Rogue Community College Recreational Field. The project impact to the Rogue Community College recreation field consists of a modification of the existing access to the college (and field) under both Alternative A and Alternative C. This change in access will not result in a substantial impairment to the activities, features, or attributes of the recreation field that qualifies it for protection under Section 4(f). No land from this 4(f) resource will be incorporated into the transportation facility and the proposed project will not affect its significant recreational characteristics.

Planned River City Trail. The planned River City Trail would be affected under both Alternative A and Alternative C. Under both alternatives, the trail alignment would be affected (1194 feet under Alternative A and 1508 feet under Alternative C). But neither build alternative will prohibit the construction of the trail or its connections to existing facilities. Construction of the River City Trail will require coordination between the City and ODOT to ensure pedestrian safety and adequate connections and crossings. Neither Build Alternative A nor Build Alternative C will affect the function of the planned trail. Because this trail is simply described as occupying a portion of the right of way purchased for trail purposes, but has not been constructed, a 4(f) use of this resource will not occur as adjustments to the alignment of the trail can be made to allow it to function and provide continuity. The proposed River City Trail will fit within the right of way already purchased for the trail, and the alignment will be slightly altered according to the build alternative selected.

GPID Canal System. The GPID canal system was determined eligible for listing on the National Register of Historic Places by the Oregon SHPO in February 2006. Portions of the GPID canal system will be similarly affected under both Alternative A and Alternative C. This canal system is comprised of the South Highline Canal, the South Main Canal, and the Main Canal, as described in the attached Determination of Eligibility. The project would realign approximately 427 feet of the South Highline Canal in an area near Rogue Community College that was previously realigned in the 1960s. The project would also grade around the existing crossing of the South Main Canal near Dowell Road, and this culvert may need to be lengthened to accommodate the increased shoulder widths. Finally, the project would lengthen the culvert where the Main Canal crosses Highway 199 near Henderson Lane. A Section 106 Finding of Effect was sent to the SHPO in December 2006, and SHPO concurred with a Finding of No

Adverse Effect for the GPID canal system in January 2007. SHPO was informed of FHWA's intention to use de minimis to satisfy the requirements of Section 4(f) when the Section 106 Finding of Effect was submitted. Both the Determination of Eligibility and Finding of Effect for this historic resource are included with this letter.

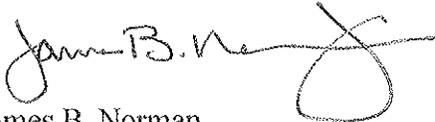
Public involvement for the proposed project has been through the Region 3 process for this NEPA document. There have been numerous public meetings and stakeholder group meetings as part of the development of this project.

According to Section 6009 of SAFETEA-LU, the project's 4(f) impact is considered de minimis for the GPID canal system. SHPO has concurred in writing with the Finding of No Adverse Effect. No 4(f) evaluation is required for the other resources in the project area, as the proposed project will not have a 4(f) use of any of these resources.

Your prompt attention to this coordination request is appreciated. If you have any questions regarding the use of de minimis for the GPID Canal System, or need further information, please contact Alex McMurry, ODOT Cultural Resources Program Coordinator, at (503) 986-3853.

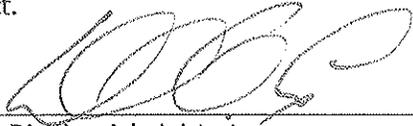
Please indicate your approval of the use of de minimis for the GPID Canal System in the signature block below and return a copy of this letter to James Norman, Geo-Environmental Section Environmental Planning Unit Manager.

Sincerely,



James B. Norman
Environmental Planning Unit Manager

The Oregon Division of the Federal Highway Administration approves the 4(f) de minimis impact finding for the GPID Canal System which is associated with the Highway 199 Expressway Upgrade Project.



FHWA Division Administrator

June 11, 2007

Date

Attachments:

Map depicted 4(f) resources

Section 106 Determination of Eligibility: GPID Canal System

Section 106 Finding of Effect: GPID Canal System

Copies to:

Jerry Marmon, Region 3 Environmental Project Manager

Jerry Vogt, Region 3 Environmental Coordinator

Alex McMurry, Cultural Resources Program Coordinator

Key No. 14019, File Type E: Cultural Resources



Oregon

Theodore R. Kulongoski, Governor

Department of Transportation

Region 3

Geo/Environmental Unit

3500 NW Stewart Parkway Blvd., Suite 120

Roseburg, OR 97470

(541) 957-3602

FAX (541) 957-3604

February 27, 2007

Mr. Nick Forte
Ms. Michelle Eraut
Oregon Division Environmental Program
Federal Highway Administration
530 Center Street N.E.
Salem, OR 97301

FILE CODE:

SUBJECT: NO EFFECT DOCUMENT
Highway 199 Expressway Upgrade Project, KN 14019
US 199 (Redwood Highway), MP 0.78-4.44
Josephine County

Dear Mr. Forte and Ms. Eraut,

Enclosed is a No Effect document for the US 199 Expressway Upgrade project (KN14109). After evaluating the potential effects, Oregon Department of Transportation (ODOT) Environmental Services concludes that the proposed action described herein will have no effect to the Southern Oregon-Northern California Coho Salmon Evolutionarily Significant Unit (ESU) or any other federal or state listed species found in Josephine County. Therefore, we have made a determination of **no effect** for this ESU.

Please provide comments within one week of receipt of this document. If ODOT does not receive comments within one week, it will be presumed that FHWA concurs with the no effect determination.

If you need further assistance or additional information, please contact Ken Cannon of my staff at 541-957-3535 or by email at Ken.h.cannon@odot.state.or.us.

Sincerely,

Jim Collins
Region 3 Geo-Environmental Manager

Enclosure: No Effect Document



Copies with Enclosure:

ODOT Geo-Environmental Central Files in Salem (NRU-Trans)
Jerry Marmon, Environmental Project Manager, ODOT
Debbie Timms, Project Leader, ODOT
Doug Sharp, Region Permit Specialist, ODOT
Ken Cannon, Region Biologist, ODOT
Jerry Vogt, Region Environmental Coordinator, ODOT

Date: February 27, 2007

To: Nick Forte, Federal Highway Administration
Michelle Eraut, Federal Highway Administration

From: Ken Cannon, ODOT Region 3 Biologist, Roseburg, Oregon

RE: No Effect document for Highway 199 Expressway Upgrade Project
City of Grants Pass, Josephine County, Oregon
Redwood Highway, Tussey Lane to Midway Avenue (MP 0.78-4.44)
KN 14019

This No Effect Document addresses potential impacts to state and federally listed threatened and endangered (T&E) species as related to the construction of the US199 Expressway Upgrade project in Josephine County, Oregon. The No Effect determination was made based on listed species not being present within the area of potential impact (API) or because impacts will be self-mitigated to a No Effect level within the API.

This document considers potential impacts to species protected by the state and federal Endangered Species Act (ESA) from both Alternative A and C as outlined in the US 199 Expressway Upgrade Environmental Assessment (EA). Potential impacts to T&E species are the same for both alternatives.

This project may be constructed in phases depending on funding availability and completion of the NEPA process. The western section of the project, Rogue Community College (Dowell Road) to Midway Avenue, has independent utility and will likely be constructed first to address immediate safety concerns.

Project Description and Location:

Highway 199, also known as Redwood Highway is an important link between Interstate 5 and US Highway 101. The improvement project is a 4-mile segment of Highway 199 beginning from Tussey Lane (Mile Post (MP) 0.78) and ending at Midway Avenue (MP 4.44). For the past decade this segment of Highway 199 has experienced a crash rate that is consistently higher than the statewide average for similar facilities. In 2004, 25 percent of all traffic fatalities within Josephine County happened within the Highway 199 project limits.

The existing Highway 199 is designated as a four-lane expressway. The project consists of the East segment (Tussey Lane to Dowell Road) and the West Segment (Dowell Road to Midway Avenue). The project area classification varies from urban in the East segment to rural in the West segment. The purpose of the project is to address vehicular and pedestrian safety, alleviate congestion, improve access and traffic control, and meet future traffic demand. The proposed Highway 199 Expressway project evaluated in this report consists of two build alternatives (Alternative A and C). The main difference between the two alternatives is the configuration of the intersection of Hwy. 199/Allen Creek Road/Redwood Avenue within the East segment. The preliminary roadway improvement plans show a detailed illustration of these alternatives (see appendix for plan sheets showing the east and west segments).

In general, the existing highway would be widened and the existing intersections would be reconfigured to improve the functional characteristics and safety of the highway. Barriers, raised medians, traffic signals, and appropriate signing and striping would be installed to improve traffic movements and access control.

The existing four-lane configuration of the west segment would remain, but would require widening to accommodate a raised median or a median with concrete barrier for a total paved width from 84' to 88'. A new ten-foot bike path is proposed on the North side of the highway from Dowell Road to Hubbard Lane including a new pedestrian bridge over Sand Creek. The East segment would be widened to a 6-lane highway with a raised median for a total pavement width of 122'. Two options for the proposed Hwy. 199/Allen Creek Road/Redwood Avenue intersection and traffic circulation on the East segment were evaluated as part of the build alternatives.

In addition to the mainline widening, the required turning lanes would be added to satisfy the forecasted traffic volume. Local roads intersecting the main highway would also receive the necessary improvements. As part of the highway improvements, a Storm Drainage Conveyance System and several Stormwater Treatment Facilities will be integrated into the project to mitigate the potential impacts to the water quality and quantity of the project area. Existing ditch flow and overland sheet flow would be maintained where feasible.

In summary, impacts to protected natural resources from this project could occur from constructing a wider roadway, constructing a pedestrian bridge over Sand Creek, removing trees from selected locations and from the subsequent increase in stormwater runoff from net new impervious surfaces. However, all new and upgraded highway features were designed to avoid impacts to state and federally listed threatened and endangered (T&E) species. In the case of additional stormwater runoff, water quality treatment facilities were designed to have 'no effect' on water quality or quantity in receiving streams.

Threatened and Endangered Species in Josephine County:

The federal and state Endangered Species Act (ESA) protects several species found in Josephine County. Species listed by the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), the Oregon Department of Fish and Wildlife (ODFW) and the Oregon Department of Agriculture (ODA) are listed below. The Oregon Natural Heritage Information Center (ORNHIC) database was also searched by township, range and section for known populations of state and federally listed species within the area of potential impact (API). The 2005 Isaacs/Anthony Bald Eagle Nest Survey database was searched for eagle nest sites with the API. StreamNet was also used to determine presence of fish species within the API.

ESA LISTED SPECIES for Josephine County

(Source: USFWS list, December 2005 and ORNHIC, Oregon Department of Agriculture and Oregon Department of Fish and Wildlife)

FEDERAL ESA LISTED SPECIES in Josephine County^{1/}

Birds

Marbled murrelet^{2/} *Brachyramphus marmoratus* CH T

Bald eagle^{3/} *Haliaeetus leucocephalus* T

Northern spotted owl^{4/} *Strix occidentalis caurina* CH T

Fish

Coho salmon (Southern Oregon Coast)^{5/} *Oncorhynchus kisutch* CH T

Plants

Macdonald's rockcress *Arabis macdonaldiana* E

Gentner mission-bells^{6/} *Fritillaria gentneri* E

Cook's lomatium^{7/} *Lomatium cookii* P\E

PROPOSED SPECIES

None

CANDIDATE SPECIES

Mammals

Fishers^{8/} *Martes pennanti*

Birds

Streaked horned lark^{9/} *Eremophila alpestris strigata*

(E) - Listed Endangered (T) - Listed Threatened (CH) - Critical Habitat has been designated for this species

(PE) - Proposed Endangered (PT) - Proposed Threatened (PCH) - Critical Habitat has been proposed for this species

(S) - Suspected (D) - Documented

^{1/} U. S. Department of Interior, Fish and Wildlife Service, October 31, 2000, Endangered and Threatened Wildlife and Plants, 50 CFR 17.11 and 17.12

^{2/} Federal Register Vol. 57, No. 45328, October 01, 1992, Final Rule - Marbled Murrelet

^{3/} Federal Register Vol. 60, No. 133, July 12, 1995 - Final Rule - Bald Eagle

^{4/} Federal Register Vol. 57, No. 10, January 15, 1992, Final Rule-Critical Habitat for the Northern Spotted Owl

^{5/} Federal Register Vol. 62, No. 87, May 6, 1997, Final Rule-Coho salmon

^{6/} Federal Register Vol. 64, No. 237, December 10, 1999, Final Rule -*Fritillaria gentneri*

^{7/} Federal Register Vol. 67, No.216, November 7, 2002, Final Rule - *Lomatium cookii*

^{8/} Federal Register Vol. 69, No.68, April 8, 2004, 12-Month Finding for a Petition to List the West Coast Distinct Population Segment of the Fisher

^{9/} Federal Register Vol. 69, No. 86, May 4, 2004, Notice of Review - Candidate or Proposed Animals and Plants

STATE ESA LISTED SPECIES IN JOSEPHINE COUNTY

Birds

Marbled murrelet (*Brachyramphus marmoratus*) T

Bald eagle (*Haliaeetus leucocephalus*) T

Northern spotted owl (*Strix occidentalis caurina*) T

American Peregrine Falcon (*Falco peregrinus anatum*) E

Plants

Sexton Mt. mariposa lily (*Calochortus indecorus*) (thought extinct, Mt. Sexton)

Gentner's fritillaria (*Fritillaria gentneri*) (E), also federally listed, see above

Cook's desert parsley (*Lomatium cookii*) (E), also federally listed, see above

Shiny-fruited popcorn flower (*Plagiobothrys lamprocarpus*) (thought extinct)

Howell's mariposa lily (*Calochortus howellii*) (T) (southern Josephine Co.)

Large-flowered rush lily (*Hastingsia bracteosa*) (T) (Illinois Valley)

Howell's microseris (*Microseris howellii*) (LT)

Note: according to the ORNHIC database and field investigations only the Southern Oregon-Northern California Coho salmon occur within the API.

ESA Protected Resources and Habitat within the Project Area:

Methods: Literature searches were completed to determine if known populations of listed species occur within or near the API. Search results were verified by contacting local federal and state agency specialists to determine the accuracy of literature findings. Field surveys were completed by ODOT specialists, ODFW biologists and USFWS botanists to confirm presence or absence of listed species or suitable habitat for listed species within the API.

Plants: Rare plant surveys were completed by the ODOT biologist, Region Environmental Coordinator (REC), Wetland Specialist and USFWS botanist to field verify the presence and/or absence of ESA listed species within the API. Surveys were completed in all locations where construction activities will likely occur. Particular attention was given to seep areas and other locations within the API not disturbed or severely impacted by previous development. Surveys were timed to coincide with the flowering season of listed plants to confirm presence or absence of rare plants within the API.

Finding and conclusion: No listed species were found in database searches or field investigations. The project will have no effect to listed plant species.

Wildlife: The USFWS threatened and endangered species list cites three threatened wildlife species within Josephine County: Marbled murrelet (*Brancyramphus marmoratus*), Bald eagle (*Haliaeetus leucocephalus*), and Northern spotted owl (*Strix occidentalis caurina*). None of these species are known to occur within the API of the project (ORNHIC, ODFW Farrell, T.).

The Isaacs/Anthony Bald Eagle database does not list any known eagle nest sites within two miles of the API. The closest known nest sites are on Sloan Mountain (several miles west of the API) and Finley Bend on the Rogue River, several miles away. Because of the proximity of large rivers near by, Bald eagles may occasionally fly over the API in route to and from preferred habitat, but it is unlikely Bald eagles utilize trees within the API.

Habitat surveys revealed no suitable nest, perching or staging areas occur within the API for murrelets and spotted owls (ODOT).

ODFW lists the American Peregrine falcon (*Falco peregrinus anatum*) as a state endangered species. Though present in Josephine County, this species is not known to nest in or utilize habitat within the API (ORNHIC and Oregon Eagle Foundation, Isaacs F.).

The Streaked horned lark (*Eremophila alpestris strigata*) a federal candidate species may occur within Josephine County. This lark nests on the ground in sparsely vegetated sites in short-grass dominated habitats, such as native prairies, coastal dunes, fallow agricultural fields, lightly to moderately grazed pastures, seasonal mudflats, airports, and dredged-material formed islands in the Columbia River. Since most of the highway widening will occur with the existing road prism or in areas with no suitable habitat it is unlikely the project will have any impact on this species.

The Pacific Fisher (*Martes pennanti*) is known to occur in Josephine County in high elevation mixed conifer and hardwood forests of the Coast Range and Siskiyou Mountains. No suitable habitat exists within the API for this candidate species.

Migratory Bird Treaty Act (MBTA)- Various migratory bird species occur within the API. Most of these species are protected by the Migratory Bird Treaty Act (MBTA). The MBTA has no provision for 'take', so birds and eggs in nests are protected by law. If habitat disturbance occurs causing adult birds to abandon a nest with eggs or chicks leading to mortality, that would constitute a violation of the MBTA. Some species can be affected by highway construction projects by elevated noise levels, culvert and bridge construction activities, ground disturbance activities and tree removal. The proposed action will require tree removal in several locations. Trees to be removed have the potential to provide habitat for nesting migratory birds as well as small mammal and herptile species. Areas where trees will be removed include: the realigned intersection of Demaray Drive and Hubbard Lane; construction of a short frontage road at Fawn Drive along US 199; Sand Creek downstream of the US 199 culvert; and small selected locations along Highway 199. Though the exact number of trees to be removed is unknown at this time, it is believed that impacts to birds protected by the MBTA will be minimal. To further minimize impacts, removal of trees will be timed to occur outside the nesting season (September 1- March 1). If this strategy is not feasible because of the construction timeline, birds will be discouraged from nesting by a method approved by the USFWS.

Conclusion- Though migratory birds may be present throughout the API, no 'take' of species protected by the MBTA is anticipated from this project.

Wildlife passage- The project will construct approximately 5500 linear feet (1.04 miles) of 42-inch high concrete barrier between the north bound and south bound travel lanes along Highway 199 between Midway Avenue and the Rogue Community College. The median barrier is an important element of the project to improve traffic safety in the area. Numerous traffic accidents and several fatalities have occurred along this section of highway within the last few years (ODOT).

Constructing a median barrier may pose a wildlife passage obstacle for both large and small animal species found in the area. During project development, constructing periodic off-set gaps in the barrier was considered to mitigate impacts to passage. This strategy would require widening the road prism that would add fill in adjacent wetlands. Since regulatory agencies require minimizing and/or avoiding impacts to wetlands, wildlife gaps constructed in this manner were dropped as a mitigation option. Furthermore, off-set wildlife gaps constructed in Central Oregon (Hwy 97, south of Bend) have not proven to be effective for wildlife crossings (ODOT, ODFW). Other wildlife passage strategies were explored, but none were feasible at this location.

The Oregon Department of Fish and Wildlife does not consider this section of the highway to be a major migration corridor for wildlife (ODFW, Farrell, T.). Additionally, ODOT wildlife incident data (recorded road kill information) does not suggest this section of highway to be heavily used by wildlife (ODOT, unpublished).

Wildlife will still have opportunity to cross the highway at either end of the median barrier and small animals can utilize culverts to cross under the highway in numerous locations.

Finding and Conclusion: Species protected by the state and federal ESA are either not present within the API or construction will be completed in such a way so as to result in a 'no effect' determination.

Fish: The Rogue River supports native stocks of summer and winter steelhead (*O. mykiss*), spring and fall Chinook salmon (*O. tshawytscha*), Coho salmon (*O. Kisutch*), cutthroat trout (*O. clarki*) and Pacific lamprey (*Lampetra tridentata*). Additionally, non-game resident species and exotics are present in the Rogue and its tributaries. Hatchery stocks of summer and winter steelhead, spring Chinook and Coho salmon are also present in the system (StreamNet, ODFW).

The Southern Oregon-Northern California (SONC) Coho salmon, listed threatened (LT) by NMFS and state sensitive-critical (SC) by ODFW, is present in the Rogue Basin and known to occur in the lower reaches of Allen Creek, Sand Creek and Sparrowhawk Creek. ODFW has documented adult and juvenile salmonids (steelhead and Coho salmon) above the Allen Creek culvert within the API (ODFW, fish distribution data, 2004, 2006). No other fish species are listed or proposed to be listed at this time (USFWS species list).

Allen Creek, Sand Creek, Sparrowhawk Creek and the Rogue River have been designated Critical Habitat for SONC Coho salmon by NOAA Fisheries. The Federal Registry (Vol. 62, No. 87, May 6, 1997, Final Rule) contains detailed information about this designation. Generally, critical habitat has been defined as the area within 300 feet from the ordinary high water mark (OHWM) of a stream where a listed species is present or was historically present. Small tributary streams and artificial waterways (irrigation canals) without fish are considered critical habitat if they influence water quality downstream where ESA protected fish are present.

The Oregon Department of State Lands (ODSL) has designated the Rogue River as essential salmonid habitat (ESH). ODSL defines ESH as habitat necessary to prevent the depletion of native salmon species (Chum, Sockeye, Chinook and Coho salmon, and Steelhead and Cutthroat trout) during their life history stages of spawning and rearing (ODSL). Allen Creek and upper Sand Creek, within the API, have not been designated ESH. Lower Sand Creek (outside the API) is considered ESH.

The Oregon Water Resources (OWR) map identifies Sparrowhawk Creek crossing Highway 199, west of Sand Creek within the API. Other resource maps indicate Sparrowhawk Creek ends at Redwood Avenue outside and north the API. The OWR map shows two irrigation canals crossing this creek, one runs parallel to Hwy 199 (Highline Canal) and one is near Redwood Avenue (South Main). The Sparrowhawk 'creek' in this reach is apparently now used to route irrigation water to customers and no longer exists as a stream channel within the API. Sparrowhawk Creek is mentioned because the Highline Canal and South Main Canal (both within the API) cross and can influence hydrology in Sparrowhawk Creek where listed fish are present. In theory, surface flow from within the API can enter the irrigation canals and flow into Sparrowhawk Creek near Redwood Avenue. Anadromous fish still have access to the lower 1.1 miles (to Redwood Avenue) of this small tributary to the Rogue.

Summary: SONC Coho salmon (Federal LT, not state listed) are present in Allen Creek within the API. Listed fish are also present in lower Sand Creek and lower Sparrowhawk Creek, outside the API. Allen Creek, Sand Creek and Sparrowhawk Creek are considered designated critical habitat (NMFS). The same creeks, within the API, are not considered Essential Salmonid Habitat by ODSL.

Culverts within the API:

Allen Creek Culvert (US199)- Allen Creek crosses under Highway 199, Redwood Avenue and the Josephine County Fairgrounds within the API. The existing culvert has a large trash rack at the inlet to prevent drift from moving into the culvert and potentially plugging the pipe. The outfall of the culvert is perched approximately 6 feet above the streambed. The perched nature of the culvert is a partial fish passage barrier during most stream flows. ODFW has documented adult and juvenile fish (steelhead and Coho salmon) above this culvert (ODFW). Some adult anadromous fish are able to pass through the culvert and spawn and rear young successfully. The channel down stream of the culvert is deeply incised and lined with Himalayan blackberries. The riparian area includes alder, cottonwood, scattered Ponderosa pine and a few Douglas fir trees.

The proposed road work described in Alternative A and C of the Environmental Assessment (EA) will not trigger the Oregon fish passage law (ORS 509.585) (ODOT and ODFW, T. Farrell). This law is triggered if a culvert is extended or if 50% or more of its linear length is replaced. Another trigger includes fill or removal of over 50% of the roadbed material directly above the culvert. None of these trigger actions are anticipated from the project.

Sand Creek culvert (US 199)- The project will cross Sand Creek, a tributary of the Rogue River. This culvert is a double box concrete, cast in-place structure. An extension was constructed several years ago on the south end of the culvert to accommodate a bicycle lane along Highway 199. The east barrel of the culvert was retrofit with baffles to improve fish passage. The inlet and outlet are currently at stream grade and do not limit fish passage. Rip rap protects the wing walls from scour at both the inlet and outlet of the culvert. Stream bank conditions up and downstream of the culvert are stable with no active erosion.

To facilitate construction of a new single-span pedestrian bridge across Sand Creek four small (4-6 inch dbh) deciduous trees (alder and ash) and one medium sized (12-15" dbh) conifer tree will be removed. These trees are within designated critical habitat and may provide some organic matter recruitment and shade for Sand Creek. Impacts from tree removal will not change the baseline conditions of the creek. The riparian area along this reach of Sand Creek has a dense canopy of trees and shrubs. Removal of a few trees will have no measurable effect to baseline conditions or adversely affect SONC Coho salmon that may be present more than a mile downstream of the API. Further, no work will occur within the ordinary high water mark (OHWM) of Sand Creek during construction of the pedestrian bridge.

The US 199 culvert at Sand Creek is located immediately upstream of the proposed pedestrian bridge. The proposed action will not require extending the Highway 199-Sand Creek culvert. The anticipated work will not trigger state fish passage requirements.

Sand Creek (Redwood Avenue)- The project may extend west on Redwood Avenue but will end before crossing Sand Creek. No work will be done on or above the culvert at this location. The anticipated work will not trigger fish passage requirements.

Highline Canal- The project will require realigning approximately 180 feet of the Highline Canal near the entrance to the Rogue Community College (RCC). This canal conveys water from the Rogue River for irrigation purposes. The Highline Canal eventually empties into Sparrowhawk Creek several miles from where work will be completed. Since the canal is connected to the Rogue River and Sparrowhawk Creek

it is considered jurisdictional to the USACOE. Planned work on the canal will require a permit from the Corps. Work will be done when the canal is dry so will have no effect to water quality in the receiving water body. Work on the Highline Canal will be completed with the Dowell Road to Midway Avenue section (Western Section).

In summary, the Oregon fish passage statute will not be triggered by this project. No work is planned on any fish bearing culverts within the API. Several small cross drainage culverts will be extended because of roadway widening actions, but none are fish bearing or had historic fish presence. Note: Roadway widening will result in minor fill in wetlands jurisdictional to ODSL, but not the USACOE. Work in the Highline Canal is jurisdictional to the USACOE, but not ODSL.

Stormwater Management/Water Quality - During construction, erosion from exposed soils (either disturbed soil areas or soil stockpiles) could increase the amount of sediment, suspended solids, and turbidity entering Sand and Allen Creeks. Erosion will be prevented by the implementation of appropriate conservation measures in an Erosion and Sediment Control Plan (ESCP). The project includes constructing erosion and sediment control facilities that would mitigate these temporary effects; these erosion and sediment control facilities would be inspected, maintained, and modified (if necessary) to ensure their effectiveness (Parsons, Brinckeroff, Quade and Associates, abbr. PB).

The project will result in 11.2 acres of net new impervious surface if Alternative A is selected and 10.7 acres of net new impervious surface if Alternative C is selected (Stormwater Technical Report, PB). Increased impervious surface and additional stormwater runoff could cause changes to base and peak flows in waterways within the API and downstream of the API. Increasing peak flows can result in bank scour and adverse affect to designated critical habitat. Decreased base flows can lead to higher water temperatures and reduced stream flows that could adversely affect protected species. Additionally, pollutant loading could increase as stormwater runoff increases and thus adversely affect water quality.

Impacts from net new impervious surface and subsequent increase in stormwater runoff will be mitigated on-site by constructing water quality treatment swales and detention facilities in selected locations. Much of the runoff from net new impervious surface along the western section of the API will continue to sheet flow into adjacent pervious areas. Runoff in these areas will have ample opportunity to infiltrate into adjacent shoulders and isolated seep/wetland areas.

Stormwater treatment (detention) facilities near Allen Creek will be sized to mitigate affects to base and peak flows and water quality in the receiving stream. Post construction base and peak flows in Allen Creek will not exceed pre-construction amounts. Water quality (chemistry) will be maintained at pre-construction levels by using water quality manholes and vegetated swales. The engineered 'treatment train' will result in no measurable change to the baseline condition in Allen Creek from this project (see Water Resources and Stormwater Technical Reports- PB).

Water quality in Sand Creek will be maintained at current levels by filtering and detaining roadway runoff in vegetated swales and detention facilities. This treatment will mitigate affects from vehicle pollutants and to base and peak flows in the creek from increased impervious surface. Stormwater swales will be sized and located so the addition of net new impervious surface will have 'no effect' to water quality or quantity in Sand Creek.

Stormwater summary- Though the project will add a significant amount of net new impervious surface, stormwater treatment facilities and natural sheet flow infiltration will mitigate potential adverse affects to Allen Creek, Sand Creek and Sparrowhawk Creek. The project will not change baseline conditions in these streams.

Conclusion and No Effect Determination:

This No Effect letter summarizes the proposed project and presents a review of habitat and ESA listed species within the API for the US199 Expressway project. This information was used to determine if any federal or state listed species are likely to be present within the action area and, if so, determine the potential for the project to impact those species.

After thorough investigation, it was determined SONC Coho salmon are the only listed species present within the API. Particular attention was given to this species during project development to avoid impacts either to the species or designated critical habitat. To avoid impact from net new impervious surface, stormwater runoff will be treated to a 'no effect' level. In other words, post construction water quantity and water quality conditions in Allen Creek, Sand Creek and Sparrowhawk Creek will mimic pre-construction conditions. To further avoid impacts to protected resources, no in-water work is planned for this project. No work will occur on culverts in fish bearing streams within the API and the new pedestrian bridge across Sand Creek will fully span the active channel.

Based on review of best available natural resource data, several on-site field investigations and innovative project design, ODOT concludes the project, as currently designed, will have no effect to ESA protected species or designated critical habitat. If significant design changes occur during final design of the preferred alternative this 'no effect' determination will be revisited.

References:

Bald Eagle Nest Locations and History of Use in Oregon, 2005
Frank B. Isaacs and Robert G. Anthony

Oregon Department of Agriculture:
Plant Listing/Delisting Overview:
<http://www.oregon.gov/ODA/PLANT/CONSERVATION/listdelist.shtml>
Plants: Wildflowers and Endangered, Threatened and Candidates Species:
http://arcweb.sos.state.or.us/rules/OARS_600/OAR_603/603_073.html

Oregon Department of Fish and Wildlife:
Oregon Endangered Species List, <http://www.dfw.state.or.us/fish/esa/>
Farrell, Terry, ODFW-ODOT Liaison, 2006, personal communication concerning historic and current fish presence (fish passage), wildlife migration/passage.
Oregon Fish Passage Statute- ORS 509.580-910, <http://www.dfw.state.or.us/fish/passage/>
Upper Rogue District Fish Distribution Database, 2005

Oregon Depart of State Lands:
Essential Salmon Habitat (ESH) map, <http://www.oregon.gov/DSL/PERMITS/esshabitat.shtml>

Oregon Department of Transportation:

Environmental Assessment, Highway 199, City of Grants Pass and Josephine County, Oregon, December 2006. http://www.oregon.gov/ODOT/HWY/REGION3/h199e_index.shtml
ODOT Crash Data, 2005, personal communication, David Breshears, ODOT Traffic Investigator. <http://www.oregon.gov/ODOT/HWY/REGION3/docs/board3.pdf>
ODOT Grants Pass Maintenance District Road Kill Data, 2006, personal communication, Roger Allemand, TMM.
Erosion and Sediment Control Plan (ESCP), ODOT Standard Specifications for Construction, 2002.

Oregon Natural Heritage Information Center (ORNHIC):
2005 database (GIS data).

Oregon Water Resources:

Rogue Drainage Basin Map, 1980

Parsons, Brinckerhoff, Quade and Douglas, Inc.:

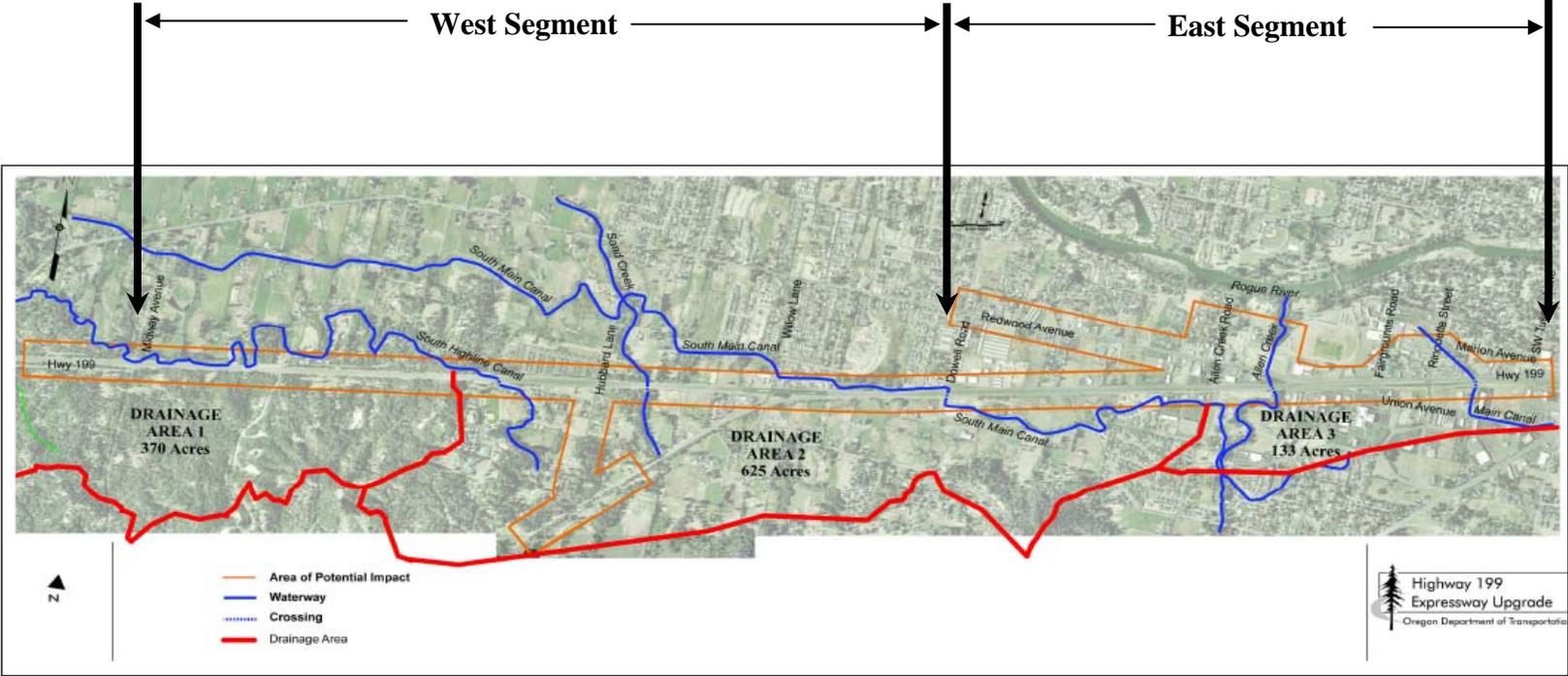
US 199 Expressway Upgrade Stormwater Technical Report, December 2006
http://www.oregon.gov/ODOT/HWY/REGION3/docs/h199e/010807/Hwy_199_Final_Stormwater_Tech_Rpt_Dec_06.pdf
US 199 Expressway Upgrade Water Resources Technical Report, November 2006
http://www.oregon.gov/ODOT/HWY/REGION3/docs/h199e/010807/Hwy_199_Final_Visual_Tech_Rpt_Sept_06.pdf

StreamNet: <http://www.streamnet.org/index.html>

US Fish and Wildlife Service:

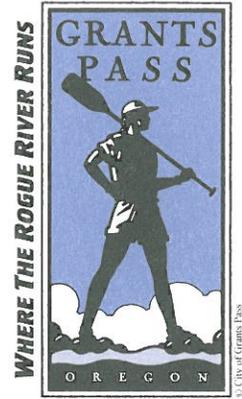
Endangered Species Act List for Josephine County, November 28, 2005.
Migratory Bird Treaty Act (MBTA) <http://www.fws.gov/migratorybirds/>
Sam Friedman, Botanist, Plant Survey, 2006

Appendix: East and West Project Segments



October 8, 2007

City of Grants Pass



Janell Stradtner
3500 NW Stewart Parkway
Roseburg, Oregon 97470

Subject: Land use review for Highway 199 project

Dear Janell:

The Oregon Department of Transportation has been diligently working with the Grants Pass community on proposed plans for the upgrade of the Redwood Highway corridor from 6th Street to Midway. The plans are still under review and the final design still needs to be completed and agreed upon.

Chapter 4 (Roadway Element) of the Grants Pass Urban Area Master Transportation Plan includes the planned transportation improvements for the Grants Pass Urban Area. The chapter is separated into two sections. The first describes the process used to identify and evaluate proposed improvements for the transportation system and the second outlines the capitol improvement program, which includes transportation system improvement projects and transportation system upgrades for existing City, County and State facilities. Chapter 4 provides a table which outlines the proposed upgrades to various roadways under the jurisdiction of the City, County and State. The widening and overlay of Redwood Highway from 6th Street to seven (7) miles west is identified as a state project in the plan.

Under the permitted uses and site plan review procedures chart in Article 12 of the City of Grants Pass Development Code, transportation facilities outlined in the Master Transportation Plan and local access plan are considered a Type P-1-(c) procedure. Table note (c) provides the following explanation for this procedure type:

“Type I-A, except the following are exempt (Type I-EX): operation, maintenance, repair, and preservation of existing transportation facilities; dedication or public acquisition of rights-of-way and easements; authorization of construction and construction of facilities and improvements, where the improvements are within the existing right-of-way or easement area or are consistent with clear and objective dimensional standards; and emergency measures necessary for the safety and protection of property.”

Typically, a Type I-A decision is a Type I procedure in which the Building Permit serves as the Development Permit. The exemption note (c) further explains that work done to the transportation facilities under the context of the above parameters does not require a building permit and is exempt from having to secure a Development Permit.

The highway project falls under the described exemption noted above and a building permit or land use review is not required for the project. The City will continue to be involved in discussions and review of the project through the State’s process; however a formal land use action is not required.

If you have any questions about this determination, please feel free to contact me at the office at 541-474-6355 extension 6417 or by e-mail at cangeli@grantspassoregon.gov.

Respectfully,

Carla Angeli Paladino, Senior Planner
Community Development Department

Cc: c/f, tax lot file (07-00100004), James E. Huber, CD Director

Paul	Terry H	Daryl	Mark T
Janell S	Jennie	Mindy	Ray L
Scott A	OCT 16 2007		Mike
Lisa			Dave
Tom G			Bob S
Mike B			Craig
Shirley R			Ron H
Shelly R	Elizabeth	Savannah	John O
John McD	Bill S	Lori B	Chris W

Josephine County, Oregon

Board of Commissioners: Dwight Ellis, Jim Raffenburg & Dave Toler



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April 2, 2007

Janell Stradtner
 Oregon Dept. of Transportation
 3500 NW Stewart Parkway
 Roseburg, OR 97470

Re: US 199 Expressway Project (Key No. 14019)

Dear Janell,

Thank you for the opportunity to review the proposed expressway project. The work proposed here covers areas within the city of Grants Pass, the urban growth boundary for the city and rural Josephine County. We have looked at the portion of the project that is outside the city and the UGB and find this work involves existing right-of-way. The project is, therefore, outside the land use jurisdiction of Josephine County. No further review or permits are required.

Sincerely,

Lora Glover
 Planner
 Ext. #5420

Enclosure: Receipt

cc: Carla Angeli Paladino, Senior Planner, City of Grants Pass

☛ OFFICE HOURS 8-12 & 1-3 (Mon & Fri) 8-12 (Tue, Wed & Thur) ☚

APPENDIX C

Additions and Changes to the Preferred Alternative Description

Note: This appendix shows corrections made to the description of the Preferred Alternative (Alternative A) from its original description in the EA.

2.3 Alternative A

Alternative A would be constructed in two phases. Phase 1 would include improvements from Midway Avenue to Tussey Lane and a realignment of the Allen Creek Road intersection with Redwood Avenue. Phase 2 would include additional improvements north of Highway 199 from Pansy Lane to Tussey Lane.

2.3.1 Phase 1

The general alignment of Alternative A is shown in Exhibit 2-3.

Alternative A: Midway Avenue to Dowell Road

Exhibit 2-4 shows the general improvements proposed as part of the Alternative A between Midway Avenue and Dowell Road, with insets to provide greater design detail at major intersections. This segment has the following design features:

- Highway 199 would continue to have four travel lanes (two in each direction) but a median barrier would be added between the eastbound and westbound lanes. From Midway Avenue to the Rogue Community College entrance, the barrier would be an approximately 42-inch-high concrete median barrier. This median barrier would transition to a raised curb median (approximately 5 inches ~~8 inches~~ high) in the vicinity of the Rogue Community College entrance. The raised curb median would continue east to Dowell Road. Insets 7 and 8 of Exhibit 2-4 illustrate these typical road sections.
- The existing configuration of the Highway 199 at Midway Avenue intersection would remain two through lanes in each direction and left-turn-only and right-turn-only lanes from Highway 199 north and south onto Midway Avenue (Exhibit 2-4, Inset 1). Traffic on Midway Avenue would be able to make left and right turns onto Highway 199 as well as cross Highway 199. Improvements to this intersection would include widening Highway 199 to accommodate u-turn movements.

EXHIBIT 2-3. ALTERNATIVE A

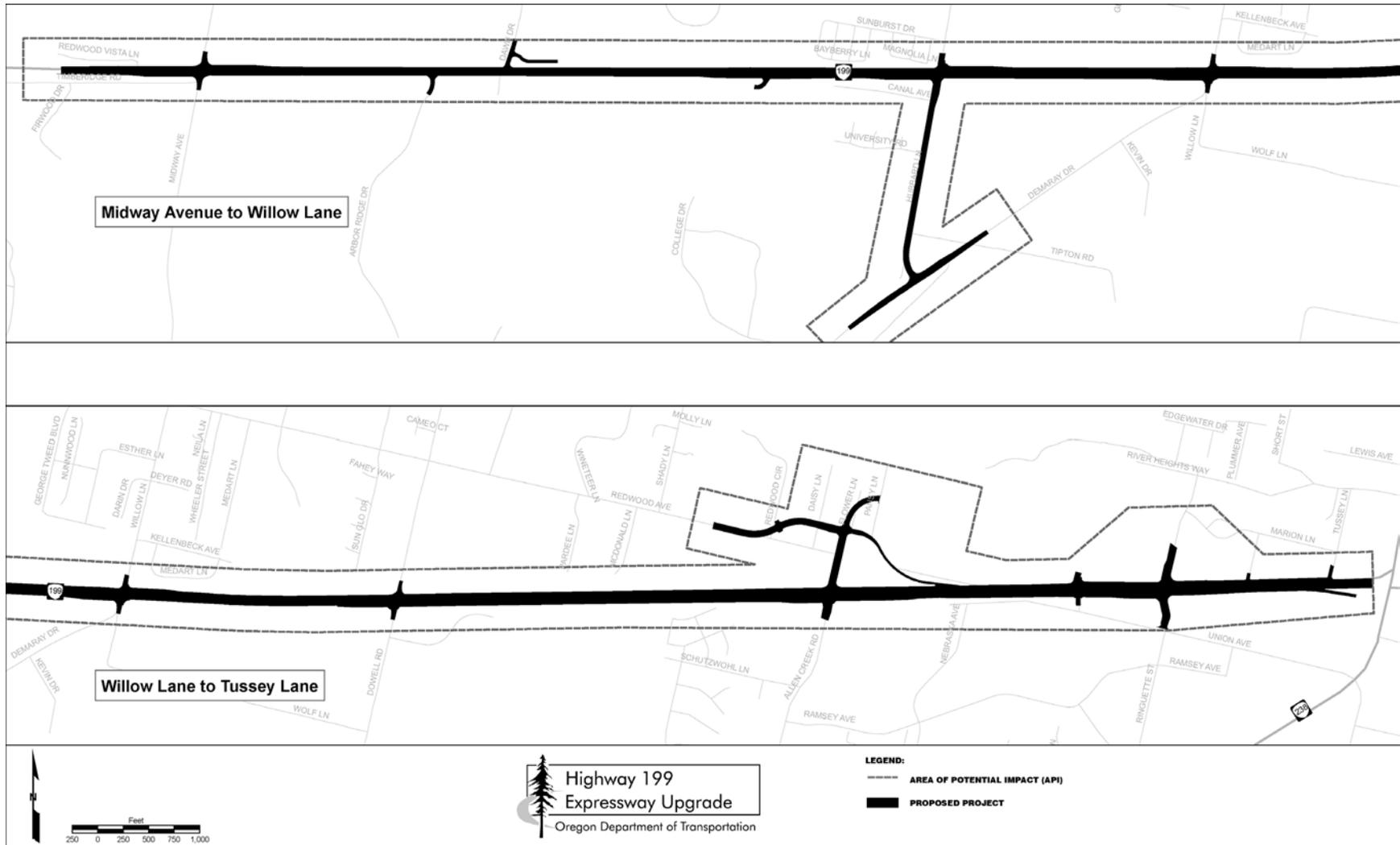
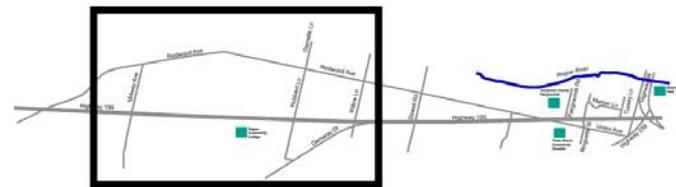
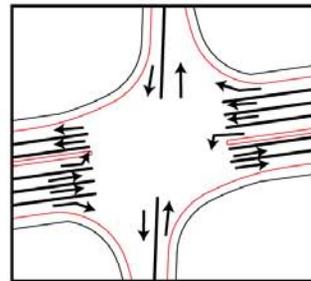


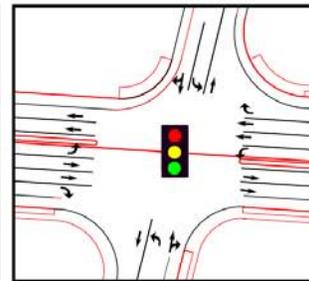
EXHIBIT 2-4. ALTERNATIVE A BETWEEN MIDWAY AVENUE AND DOWELL ROAD
Exhibit updated April 2008



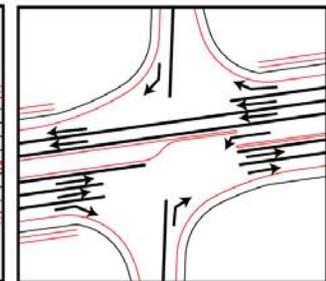
Relation to Project API



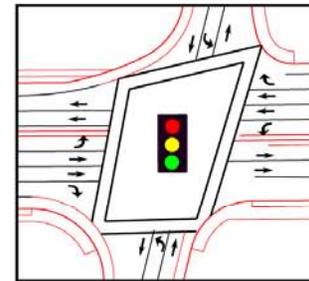
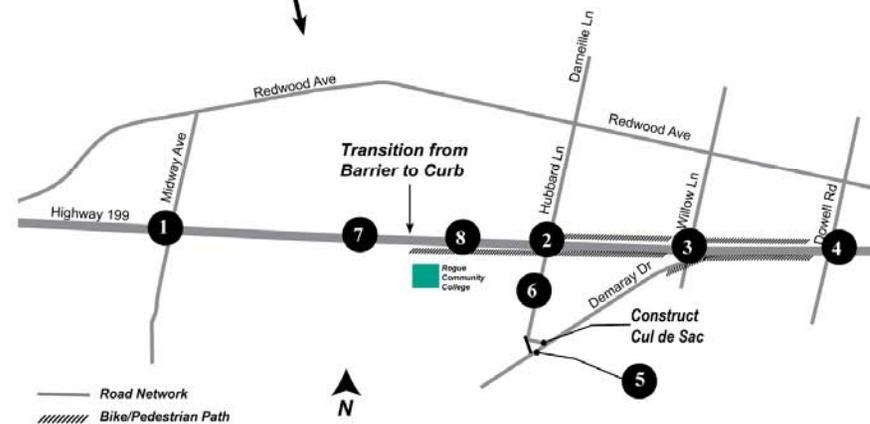
1 Highway 199 at Midway Avenue



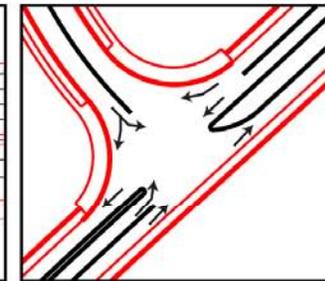
2 Highway 199 at Hubbard Lane



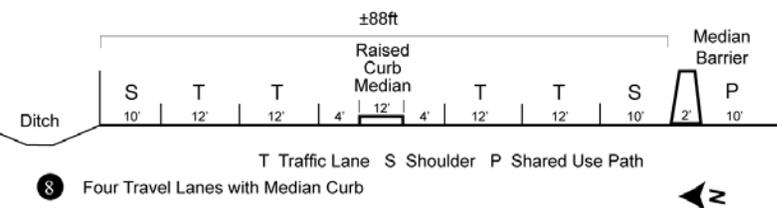
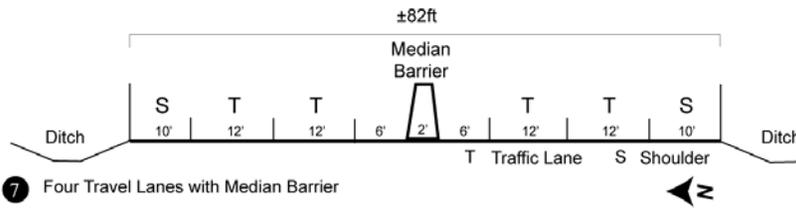
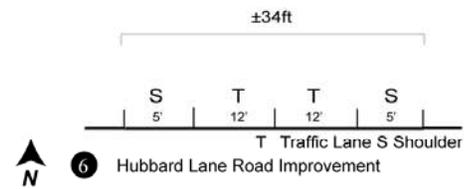
3 Highway 199 at Willow Lane



4 Highway 199 at Dowell Road

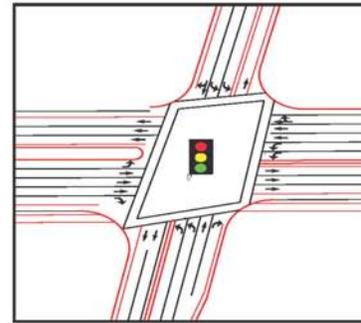
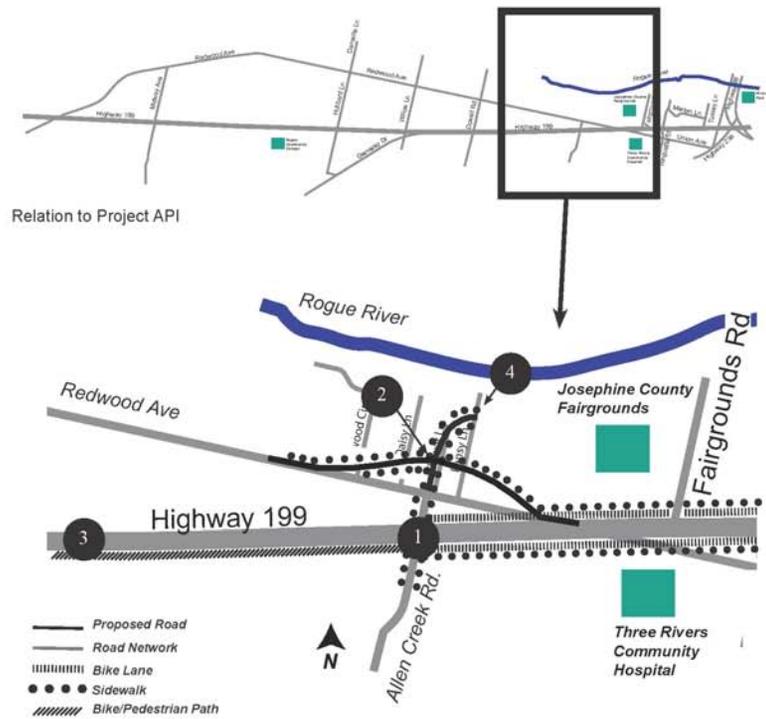


5 Hubbard Lane at Demaray Drive

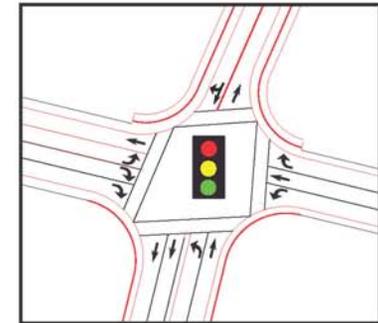


- Arbor Ridge Drive, Dawn Drive, and various private driveways would be restricted to right in/right out movements due to the median barrier along Highway 199. A new driveway combined driveway for multiple properties ~~collector~~ nearly 500 feet long would also be constructed east from Dawn Drive.
- The entrance to Rogue Community College from eastbound Highway 199 would have a dedicated right turn pocket ~~deceleration lane for right turns~~ into the college. Entrance to the college from westbound on Highway 199 would be from a protected left-turn-only lane. Exit from the college would be right out only. A portion of the South Highline Canal adjacent to the southeast corner of the intersection of Highway 199 and the Rogue Community College entrance would be realigned for about 150 feet to accommodate the highway widening and modified connection of the multi-use path to the college access road.
- Highway 199 at the intersection with Hubbard Lane would include left-turn-only lanes, two through lanes, and right-turn-only lanes in both directions. Traffic on Hubbard Lane would be able to cross Highway 199 in both directions and make left and right turns onto Highway 199. U-turns would be permissible. This intersection would be constructed to accommodate the new a future traffic signal once traffic conditions warrant signal installation (Exhibit 2-4, Inset 2).
- Hubbard Lane would be improved to City of Grants Pass design standards south of Highway 199 (Exhibit 2-4, Inset 6). The southern-most 400 feet of Hubbard Lane would be realigned to create a new intersection with Demaray Drive (Exhibit 2-4, Inset 5). The new intersection of Hubbard Lane and Demaray Drive would have a left-turn-only pocket on northbound Demaray Drive. The existing intersection of Hubbard Lane and Demaray Drive would be closed and made into a cul-de-sac.

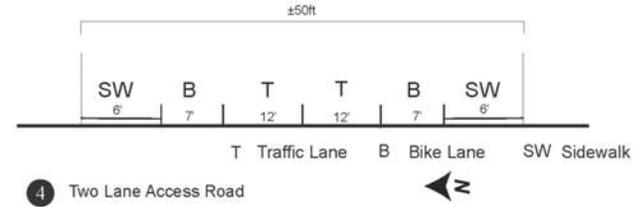
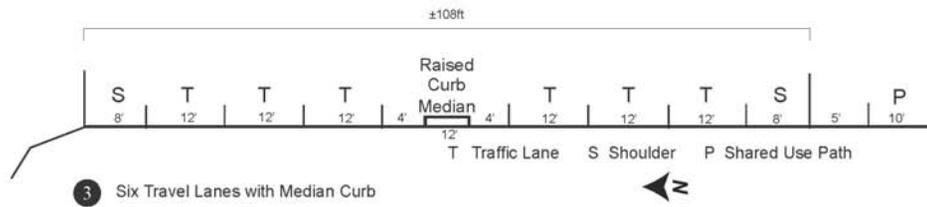
EXHIBIT 2-5. ALTERNATIVE A BETWEEN DOWELL ROAD AND FAIRGROUNDS ROAD
Exhibit updated April 2008



1 Highway 199 at Allen Creek Road

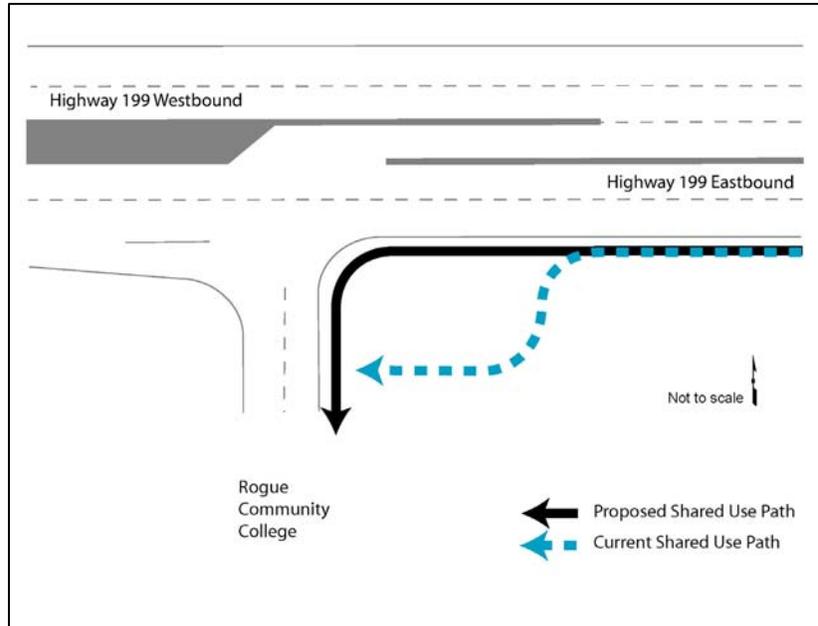


2 Allen Creek Road at Redwood Avenue



- A separated bicycle and pedestrian shared use path would be constructed along the north side of Highway 199 between Hubbard Lane and Dowell Road. The existing bicycle and pedestrian shared use path along the south side of Highway 199, beginning at the Rogue Community College entrance and continuing east past Dowell Road, would be reconstructed and slightly realigned (Exhibit (new)).

EXHIBIT (NEW). SHARED USE PATH REALIGNMENT NEAR ROGUE COMMUNITY COLLEGE



- Highway 199 at the intersection with Willow Lane would remain two through lanes in each direction, right-turn-only lanes in both directions, and raised curb median allowing left-turn-only from a dedicated turn pocket for westbound traffic (Exhibit 2-4, Inset 3). Eastbound traffic would continue to be prohibited from making left turns. Willow Lane would continue to be right in/right out only north and south of Highway 199.
- Highway 199 at the intersection with Dowell Road would continue to be signalized. Highway 199 east and westbound at the intersection would continue to have two through lanes and dedicated left and right turn lanes. It would include left-turn only and right turn only lanes off Highway 199. Traffic on Dowell Road would be able to cross Highway 199 in both

directions and make left and right turns onto Highway 199.
U-turns would also be permitted.

Alternative A: Dowell Road to Fairgrounds Road

Exhibit 2-5 shows the general improvements proposed as part of Alternative A between Dowell Road and Fairgrounds Road, with insets to provide greater design detail at major intersections. This segment of Alternative A has the following design features:

- At Dowell Road, Highway 199 would transition from four travel lanes to six travel lanes with raised curb median continuing between the eastbound and westbound lanes (Exhibit 2-5, Inset 3). For westbound Highway 199 traffic, the right lane approaching Dowell Road would become a right-turn-only lane onto northbound Dowell Road.
- The intersection of Highway 199 and Allen Creek Road, as shown in Inset 1 of Exhibit 2-5, would remain signalized and include the following features:
 - Eastbound Highway 199 would have three through lanes, one left-turn-only lane, and one right-turn-only lane.
 - Westbound Highway 199 would have three through lanes, with the right-hand lane also allowing for right turns, and two left-turn-only lanes.
 - Northbound Allen Creek Road would have one through lane, two left-turn-only lanes, and one right-turn-only lane.
 - Southbound Allen Creek Road would have one combined through and right-turn lane and two left-turn-only lanes.
- Allen Creek Road would be extended approximately 250 feet north of the existing Redwood Avenue where it currently ends at a “T” intersection (Exhibit 2-5, Inset 2). Sidewalks would be added on both sides of Allen Creek Road and u-turns would be permissible at the intersection of Allen Creek Road, Redwood Avenue, and the new access road. This new intersection would be signalized and:

- Northbound from Allen Creek Road would have one through lane and one left-turn-only lane.
 - Eastbound from a realigned Redwood Avenue would have no through lanes, one left-turn-only lane, and two right-turn-only lanes.
 - Southbound from a new access road would have a single combined through lane and right-turn lane.
 - Westbound from a realigned westbound Highway 199 slip ramp would have one through lane, one left-turn-only lane and one right-turn-only lane.
- From its current connection, Redwood Avenue would be changed from a two-way to a one-way (westbound) slip ramp. The slip ramp from westbound Highway 199 to Redwood Avenue would be shifted north (Exhibit 2-5). This slip ramp would allow westbound traffic to either continue through the new Allen Creek Road intersection to the realigned Redwood Avenue, turn right onto the new access road, or turn left towards the Highway 199 at Allen Creek Road intersection. This realignment requires relocating access to the Young Men’s Christian Association (YMCA) and nearby parcels from Redwood Avenue to an existing driveway that has access on Pansy Lane. YMCA traffic can connect to Redwood Avenue via the new extension of Allen Creek Road that curves north and east to connect to Pansy Lane.



Access to the fairgrounds and YMCA would be via a new access road that would connect connects to Pansy Lane which connects to an existing driveway into the fairgrounds (see Exhibit 2-5, Inset 4, to view roadway cross-section of the new access road).

- To connect with the new extension of Allen Creek Road, Redwood Avenue would be realigned starting just west of Redwood Circle (Exhibit 2-5). The realigned portion of Redwood Avenue would curve to the north. ~~The remaining portion of Redwood Avenue east of the new curve would cul-de-sac just before Allen Creek Road. Properties along this stretch would use this road to access the realigned Redwood Avenue at an intersection with Redwood Circle. The City of Grants Pass may consider adding a signal at this intersection.~~
- A new local street would be constructed to connect Daisy Lane with Redwood Circle; thereby providing properties along Daisy Lane access to Redwood Avenue. The local

street would have two lanes and a sidewalk on both sides of the street.

- Access to the Josephine County Fairgrounds, the Young Men's Christian Association (YMCA), and other county-owned parcels east of the YMCA would be from a new access road and Pansy Lane (Exhibit 2-5 and sidebar graphic). The access road would bulb out to the north of the new Allen Creek Road extension, curve east, and connect to Pansy Lane. It would have two lanes and a sidewalk on both sides of the road (Exhibit 2-5, Inset 4). An existing driveway on Pansy Lane would continue to provide access to the YMCA and the fairgrounds.
- ~~The access road would have two lanes and a sidewalk on both sides of the road (Exhibit 2-5, Inset 4).~~
- ~~A realigned one-way slip ramp from westbound Highway 199 would be constructed (Exhibit 2-5, Inset 3). This slip ramp would allow westbound traffic to either continue through the new Allen Creek Road intersection to the realigned Redwood Avenue, turn right onto the new access road, or turn left towards the Highway 199 at Allen Creek Road intersection.~~
- Access to properties along the old Redwood Avenue alignment east of Allen Creek Road would still be via old Redwood Avenue. Access to properties along old Redwood Avenue west of Allen Creek Road would be via Redwood Circle and then the old Redwood Avenue. Cul-de-sacs would be constructed on the east end of the old Redwood Avenue alignment. Properties along Flower Lane would have access via a new connection to the access road. Properties on Daisy Lane would connect to Redwood Avenue via a new connector to Redwood Circle. The City of Grants Pass may consider adding a signal at the intersection of Redwood Avenue and Redwood Circle.
- The existing signal at the Highway 199 and Redwood Avenue intersection would be removed.
- The existing separated bicycle and pedestrian shared use path along the south side of Highway 199, which begins at the Rogue Community College entrance, would continue east to

Nebraska Avenue. At this point, the pedestrian traffic would use the sidewalks on Union Avenue or Highway 199; the bicycle traffic would either use the paved shoulders on Highway 199 or Union Avenue.

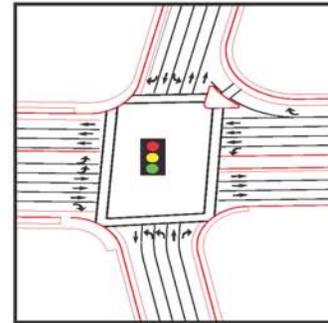
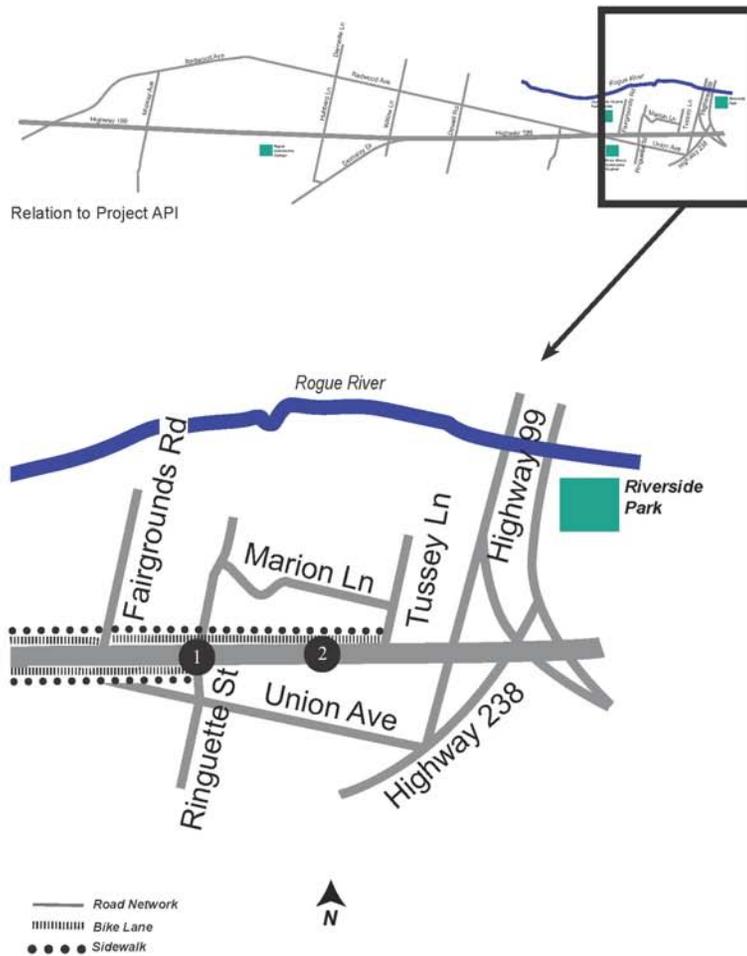
- A bike lane along the north side of Highway 199 between the Redwood Avenue slip ramp and Fairgrounds Road and continuing east to Tussey Lane, would be striped on the roadway shoulder.
- A bike lane would be added along the south side of Highway 199 between Allen Creek Road and Ringuette Street and would be striped on the roadway shoulder.
- Sidewalk, separated by a planter strip, would be added to the north side of Highway 199 from the Redwood Avenue slip ramp to Fairgrounds Road and on to Tussey Lane. A sidewalk would be added to the south side of Highway 199 from Nebraska Avenue to Ringuette Street.

Alternative A: Fairgrounds Road to Tussey Lane

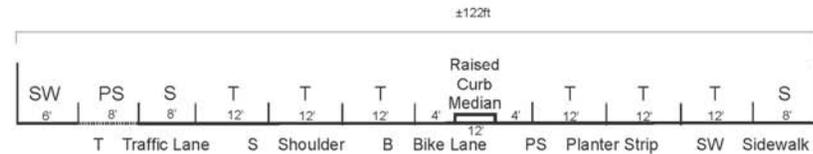
Exhibit 2-6 shows the general improvements proposed as part of Alternative A between Fairgrounds Road to Tussey Lane, with insets to provide greater design detail at major intersections. This segment has the following design features:

- This segment of Highway 199 would provide six travel lanes with raised curb median continuing between the eastbound and westbound lanes (Exhibit 2-6, Inset 2).
- Where permitted, direct access to Highway 199 would be right in/right out only. Curb and a detached sidewalk would be constructed along the westbound portion of Highway 199. Access would be defined by driveways with some shared access between parcels.
- The existing signal at the intersection of Highway 199 and the Fairgrounds Road would be removed and traffic movements would be restricted to right in/right out.
- The intersection of Highway 199 and Ringuette Street, as shown in Inset 1 of Exhibit 2-6, would continue to be signalized and include the following features:

EXHIBIT 2-6. ALTERNATIVE A BETWEEN FAIRGROUNDS ROAD AND TUSSEY LANE
Exhibit updated April 2008



1 Highway 199 at Ringuette Street



2 Six Travel Lanes with Median Curb



- Westbound Highway 199 would have three through lanes, one left-turn-only lane, and one channelized ~~free-flowing~~ right-turn-only lane.
- Eastbound Highway 199 would have three through lanes, two left-turn-only lanes, and one right-turn-only lane.
- Northbound Ringuette Street would have one through lane, two left-turn-only lanes, and one right-turn-only lane.
- Southbound Ringuette Street would have one through lane, one left-turn-only lane, and one right-turn-only lane.
- ~~The A~~ left-turn-only lane on northbound ~~would be added to southbound~~ Ringuette Street would be extended from at the intersection with Union Avenue to Highway 199.
- Henderson Lane and Tussey Lane would continue to provide access to Highway 199 and traffic would continue to be restricted to right in/right out movements due to raised curb median along Highway 199.
- A sidewalk, separated from Highway 199 by a planter strip, would continue along the north side of Highway 199 between Fairgrounds Road and Tussey Lane. A sidewalk would also be constructed along both sides of Ringuette Street north of Highway 199 for approximately 300 feet. A sidewalk along the south side of Highway 199 would continue from Nebraska Avenue to Ringuette Street.
- The bike lane striped on the roadway shoulder along north side of Highway 199, starting at Allen Creek Road, would continue between Fairgrounds Road and Tussey Lane. The bike lane striped on the roadway shoulder along the south side of Highway 199, starting at Allen Creek Road, would continue to Ringuette Street.

2.3.2 Phase 2

~~Phase 2 of Alternative A could extend the access road east to Tussey Lane, which could create a full access road connection between Allen Creek Road and Tussey Lane. This access road would be north and parallel to Highway 199. At this stage in the Highway 199 Expressway Upgrade project, Phase 2 is considered preliminary and~~

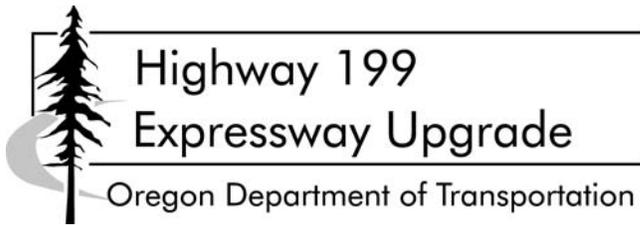
impacts resulting from Phase 2 are generally discussed in this environmental assessment.

Phase 2 will be studied in more detail during the South Y Interchange Planning Study, which is scheduled to begin in 2007. The South Y Interchange Planning Study will develop and consider a range of alternatives that address congestion affecting traffic operations at the interchange. Construction of the Highway 199 Expressway Upgrade Phase 2, and the actual alignment, would not be set unless this access road concept is found to be part of the overall solution for the South Y Interchange Planning Study.

APPENDIX D

Responses to Comments on the EA and Supplemental EA

Note: A CD of the original public comments received on the EA and Supplemental EA has also been provided with this REA.



RESPONSES TO PUBLIC COMMENTS ON THE ENVIRONMENTAL ASSESSMENT AND THE SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT



County: Josephine
Oregon Department of Transportation Region: 3
Key Number: 14019

Township, Range, Section: T36S, R5W, S19; T36S, R6W, Sections 22-28

Prepared for
Oregon Department of Transportation
by Parsons Brinckerhoff

April 2008

Table of Contents

INTRODUCTION	1
TOPIC: ALTERNATIVE A, ALTERNATIVE C, AND WORKING GROUP ALTERNATIVE.....	2
EXPRESSWAY DESIGNATION	2
SAFETY IMPROVEMENTS	3
CONGESTION	3
AESTHETICS/LANDSCAPING	4
RIGHT OF WAY AND ACCESS TO PROPERTIES.....	4
INTEGRATION WITH OTHER PROJECTS.....	5
PHASE 2 IMPROVEMENTS	6
PROJECT FUNDING AND PHASING.....	6
OTHER ALTERNATIVES STUDIED.....	6
TOPIC: ENVIRONMENT	8
NOISE	8
CANALS.....	8
PEDESTRIAN AND BICYCLE PATHS	8
TOPIC: ENVIRONMENTAL ASSESSMENT PROCESS	9
ALTERNATIVE SELECTION PROCESS.....	9
PUBLIC INVOLVEMENT	10
EA COMMENT PERIOD	10
TOPIC: JOSEPHINE COUNTY FAIRGROUNDS.....	11
SIGNAL AT FAIRGROUNDS ROAD AND ACCESS TO FAIRGROUNDS PROPERTY	11
TRAFFIC PATTERNS	12
ECONOMIC IMPACTS TO THE FAIRGROUNDS.....	13
BMX TRACK.....	13
TOPIC: RIGHT OF WAY AND ACCESS MANAGEMENT	13
TOPIC: SAFETY	14
MEDIAN BARRIER	14
U-TURNS	15
BICYCLE AND PEDESTRIAN SAFETY	15
EMERGENCY VEHICLE ACCESS	15
SPEED LIMIT AND SIGNAGE.....	16
TOPIC: TRAFFIC ANALYSIS	16
EXPRESSWAY DESIGNATION	16
CONGESTION AND TRAFFIC FLOW.....	16
WIDENING OF HIGHWAY 199	19
RINGUETTE STREET INTERSECTION.....	20
FAIRGROUNDS ROAD INTERSECTION.....	20
REDWOOD AVENUE INTERSECTION	20
ALLEN CREEK ROAD INTERSECTION	21
HUBBARD LANE INTERSECTION	22
ROGUE COMMUNITY COLLEGE EAST ENTRANCE INTERSECTION	22
SIGNAL TIMING	22

COORDINATION WITH THE CITY OF GRANTS PASS TRANSPORTATION MANAGEMENT PLAN AND JOSEPHINE COUNTY TRANSPORTATION SYSTEM PLAN 22

ATTACHMENT A. COMMENT TRACKING MATRIX

ATTACHMENT B. RESPONSES TO THE CITY OF GRANTS PASS LETTER DATED JANUARY 3, 2008

Introduction

An environmental assessment (EA) was prepared for the Highway 199 Expressway Upgrade project. The EA was circulated for public review during a 30-day period beginning January 22, 2007 and ending February 22, 2007. On February 8, 2007, the Oregon Department of Transportation (ODOT) held a public hearing at the Rogue Community College to present information about the project and two build alternatives studied in the EA and gather public comment on those alternatives as well as the environmental analysis documented in the EA.

An outcome of the public comment period on the EA was the City of Grants Pass formation of an independent Working Group. The Working Group was organized in February 2007 to engage in a parallel process to the EA to examine additional alternatives for the eastern segment of the Highway 199 Expressway Upgrade project. Their process resulted in a new alternative, the Working Group Alternative. In August 2007, the Project Development Team (PDT) voted to include the Working Group Alternative into the range of alternatives to be evaluated. The Working Group Alternative was evaluated in a supplemental environmental assessment (SEA).

The SEA was circulated for public review during a 30-day period beginning December 5, 2007 and ending January 7, 2008. On December 19, 2007, ODOT held a public hearing at the Rogue Community College to present information about the project and three build alternatives studied in the SEA (Alternatives A and C and the Working Group Alternative) and gather public comment on those alternatives as well as the environmental analysis documented in the SEA.

ODOT received 85 comments during the EA comment period and 37 comments during the SEA comment period. These comments were submitted as letters, e-mail, comment forms distributed at the public hearing, and oral testimony that was recorded verbatim by Oregon-licensed court recorders at the public hearing. Each comment was assigned a number for identification and tracking. The EA comments are numbered 1-85 and the SEA comments are numbered 86-122. All comments were reviewed and categorized into common topic areas. The following topics were identified:

- Alternatives A and C
- Environment
- Environmental Assessment Process
- Josephine County Fairgrounds
- Right of Way Acquisition and Access Management
- Safety
- Traffic Analysis

Most comments addressed more than one topic. A matrix (Attachment A) was developed to track the various topics addressed within each comment and ensure all substantive issues within each comment received a response.

ODOT prepared responses to each topic area to address all substantive issues raised in the comments. The remainder of this document contains these responses. Each response identifies the corresponding comments by comment identification number that the response addresses.

In addition to these topics that were addressed in the comments, many comments were received about a proposal presented by a group of local citizens known as Association of Concerned Citizens Endorsing Sensible (traffic) Solutions (ACCESS). ACCESS, through its legal representative, submitted a new proposal to ODOT in December 2006. At the EA public hearing (February 2007), ACCESS was provided space to display its proposal in the same room where the Highway 199 Expressway Upgrade project information was presented. ODOT evaluated the

ACCESS proposal by applying the same design standards, traffic analysis, and evaluation criteria that were applied to other alternatives studied for the Highway 199 project. The results of this analysis are presented in a separate report titled "Analysis of the ACCESS Proposal" which is located at: http://www.oregon.gov/ODOT/HWY/REGION3/h199e_index.shtml.

One comment letter on the SEA was received from the City of Grants Pass (dated January 3, 2008) and warranted a point-by-point response. Responses to this comment letter are provided in Appendix B.

Copies of all comments submitted to ODOT during the 30-day EA and SEA public comment periods are provided on the project website located at: http://www.oregon.gov/ODOT/HWY/REGION3/h199e_index.shtml.

TOPIC: Alternative A, Alternative C, and Working Group Alternative

EA Letters Addressed: 1, 4, 8, 18, 20a, 21, 22, 24, 25b, 26, 27, 33, 34, 36, 37, 38, 39, 40, 42, 43, 47, 48, 51, 53, 56, 57, 58, 61, 63, 64, 70, 73, 74, 75, 76, 77, 79, 81, 82, 84, and 85

SEA Letters Addressed: 86, 87, 88, 89, 91, 92, 93, 96, 100, 102, 103, 104, 105, 107, 110, 112, 113, 114, 115, 119 and 120

Response:

Of the 122 comments received, 41 expressed a direct preference for Alternative A, Alternative C or the Working Group Alternative.. Twenty-nine of 41 preferred Alternative C; 11 preferred the Working Group Alternative; and one preferred Alternative A. Most of those voicing a preference for Alternative C preferred the lessened impacts to the BMX track located on Pansy Lane compared to Alternative A and the Working Group Alternative. Many comments received were concerned about Alternative A, Alternative C and the Working Group Alternative and asked ODOT to consider the alternative proposed by ACCESS. Please see a separate report titled "Analysis of the ACCESS Proposal" at: http://www.oregon.gov/ODOT/HWY/REGION3/h199e_index.shtml) for further discussion on that proposal.

Many comments were received that requested clarification on Alternative A, Alternative C and the Working Group Alternative, which the following response provides.

Expressway Designation

The project management team developed and considered alternatives that would address the current and projected congestion and safety issues associated with Highway 199. The projected traffic volumes were key considerations that the project management team, PDT and CAC contemplated as they evaluated which alternatives performed well in terms of reducing congestion and improving safety. Although Highway 199 is a designated expressway in the Oregon Highway Plan (see page 1-7 in the EA and page 1-6 to 1-7 in the SEA), all of the alternatives considered could not fully meet the design standards associated with the expressway designation. Thus, the process of evaluating alternatives considered the level of success that each alternative improved the function of Highway 199 – both in terms of addressing the projected traffic volumes and the extent that the highway performed closer to the intent of an expressway as defined in the Oregon Highway Plan. If the expressway designation of Highway 199 were to change, including a change to an Urban Business Area designation, before the preferred alternative was constructed, ODOT is committed to reevaluating the improvements proposed to Highway 199.

Safety Improvements

Safety improvements associated with Alternative A, Alternative C and the Working Group Alternative include reducing the number of conflict points along Highway 199. For Alternatives A and C in the eastern section of the project area, conflict points are reduced by removing the signals at Fairgrounds Road and Redwood Avenue as well as consolidating driveways. The Working Group Alternative reduces conflict points by removing the signal at Fairgrounds Road and consolidating driveways. Under the No Build Alternative, there are 140 conflict points between Tussey Lane and Allen Creek Road. Alternatives A and C reduces the number of conflict points by 25 percent. The Working Group Alternative reduces the number of conflict points by 19 percent. The reduction in conflict points is directly linked to reducing the number of rear-end crashes and associated property damage type crashes that have been problematic in this section. Data on the number of conflict points will be presented in the Revised EA.

Other factors that characterize safety issues include signal spacing, number of vehicle stops, and merge and weave movements. The Working Group Alternative differs from Alternatives A and C in the 'triangle' area bound by Highway 199, Allen Creek Road, and Redwood Avenue. The safety issues associated with the Working Group Alternatives design are detailed on pages 3-28 to 3-33 of the SEA. When compared to Alternatives A and C, the Working Group Alternative does not achieve as much improvement in safety factors since the Working Group Alternative would have an extra signal on Highway 199 and would require additional weave and merge movements for through or left turning vehicles,

In the west section of the project area, a median would be added as part of Alternative A, Alternative C, and the Working Group Alternative. This median would be either a raised median curb or a median barrier. Both types of median would limit locations for left turn movements to Dowell Road, Willow Lane, Hubbard Lane, the east entrance to Rogue Community College, and Midway Avenue. Left turn movements vary by intersection. All other turning movements would be limited to right turns and u-turns, which are much safer since a vehicle will be stopped in a protected turn lane or driveway while waiting for gaps in traffic that is traveling in only one direction. This is safer than being stopped in a travel lane on Highway 199 as other vehicles are speeding by; or trying to turn left from a side street or driveway and looking for gaps across both directions of traffic. (Please see additional response about u-turns in the section called "Topic: Safety.")

These safety improvements are expected to reduce the number of crashes, both the high number of property damage crashes in the east section and the number of severe and sometimes fatal crashes that occur in the west section.

Congestion

Alternative A, Alternative C, and the Working Group Alternative provide substantial improvement in traffic congestion on Highway 199 over the No Build Alternative. This improvement was documented in the SEA in Exhibit 3-9 Comparison of 2025 V/C Ratios and LOS at Various Intersections (page 3-20) and Exhibit 3-17 Comparison of Measures of Effectiveness (page 3-37). ODOT selected these measures to have a balanced approach that compared the traffic operations for both local users and through users.

Exhibit 3-9 shows that if no improvements are made (No Build Alternative), ten intersections along Highway 199 will exceed applicable mobility standards by the year 2025. In contrast, Alternative A, Alternative C and the Working Group Alternative reduce the congestion by improving five of the ten intersections to meet the applicable mobility standard. These improvements can be seen in terms of the measures shown in Exhibit 3-17, where travel times along Highway 199 are quicker, time spent stopped in a vehicle (travel delay) is reduced, average travel speeds increase and are closer to the posted speed limits, and traffic queues are reduced.

In the greater transportation study area, which includes travel along Highway 199 and other local streets, Alternative A, Alternative C and the Working Group Alternative also show improved travel times, reduced travel delays, fewer numbers of stops per vehicle, less fuel used, and less carbon monoxide produced. Alternative A, Alternative C and the Working Group Alternative slightly increase the distance vehicles must travel when compared to the No Build Alternative.

Overall, Alternative A, Alternative C and the Working Group Alternative improve travel along Highway 199 and within the greater transportation system. The Working Group Alternative differs from Alternatives A and C in terms of the lane configuration of westbound Highway 199 from Fairgrounds Road to Dowell Road. This difference is described in the SEA (pages 3-24 to 3-27), which indicates the Working Group Alternative could diminish the operational performance of the highway in this segment compared to Alternatives A and C due to increased weave/merge movements necessary to move within the segment.

Aesthetics/Landscaping

Alternative A, Alternative C, and the Working Group Alternative include aesthetic improvements. These improvements include incorporating stamped/stained concrete in the raised curb median from Rogue Community College to Willow Lane and planting low-growing vegetation in the raised curb median from Willow Lane to Tussey Lane. Additional vegetation, such as trees and shrubs, would be planted in planter strips on the north side of Highway 199 between the YMCA and Tussey Lane. The planter strips would also include decorative lighting. A schematic describing the proposed landscaping will be added to the Revised EA.

Sidewalks could be designed to support stamped concrete to give texture and decoration. Raised median curb and median barrier could be made from a variety of colors to also provide improved aesthetics along the corridor. Specific aesthetic treatments to enhance the Highway 199 corridor will be coordinated with the City of Grants Pass, Josephine County, and other interested stakeholders during the final design phase of the project.

Right of Way and Access to Properties

Right of Way Acquisition:

To fit additional travel lanes on Highway 199 between Tussey Lane and Allen Creek Road, Alternative A, Alternative C, and the Working Group Alternative would use the right of way that is currently used for the median ditch. By using this right of way, fewer rights of way will need to be acquired from private properties in the east section.

Throughout the alternatives development process, ODOT applied the criteria of minimizing impacts to residences and businesses to all alternatives. Alternative A, Alternative C and the Working Group Alternative necessitate the relocation of some residences and businesses (see section 3.8 and 3.10 of the EA and the SEA). ODOT avoided relocating residences and businesses where possible, and will mitigate in accordance with the Uniform Relocation Act for these relocations where avoidance was not possible (see section 4.8 and 4.10 of the EA).

BMX Track:

Several comments were made about how Alternative A, Alternative C and the Working Group Alternative would impact the BMX track.

Alternative C would retain most of the parcel that the BMX track currently is located. Many believe that the track can be reconfigured on the remaining parcel and operate similarly to the way it does today. Parking would likely occur on the southern remainder of the current BMX track parcel. A crosswalk could be installed on the new access road or Pansy Lane to enable safe crossing between the parking lot and the BMX track. From the realigned/reconfigured intersection of Allen Creek Road and Redwood Avenue, the access road was designed to provide access for two city streets (Flower Lane and Pansy Lane) and the west parking lot for the Fairgrounds Property. ODOT minimized the extent of impact on the BMX track by shifting the curvature as far south as

possible while balancing the need to provide access to the local streets, address standards per the Highway Design Manual, and consider minimums allowed in the City's design standards.

Under Alternative A and the Working Group Alternative, the remainder parcel would likely be too small to reconfigure the BMX track while maintaining current functions of the track. During final design, further refinements to the design of the new access road that extends east from Allen Creek Road and the new road that connects Pansy Lane to Flower Lane can be considered to minimize impacts to the BMX track parcel, regardless of which alternative is chosen. The only alternate alignment for the access road that would completely eliminate impacts to the Josephine County property where the BMX track currently sits would require following the existing alignment of Flower Lane further to the north and not turning towards Pansy Lane until the north end of the county property. This alignment would have right-of-way impacts to three adjacent properties not currently affected by the project and would move the reconnection to Pansy Lane approximately 200 feet to the north, which would further limit its usefulness as an alternate access to the Josephine County Fairgrounds west parking lot.

Access Management:

An Access Management Strategy was prepared as part of the Highway 199 project. Maps indicating proposed access changes to properties are shown in Appendix B of the EA. ODOT consolidated many driveways to businesses and residences to minimize the conflict points along Highway 199, which in turn makes Highway 199 safer. Unchanged or alternate access was provided to all parcels except the parcels that would be fully acquired for public right of way.

Integration with Other Projects

Three future projects that are proposed that require integration with the Highway 199 project:

1. Improving the South Y Interchange, which is the intersection of 6th Street (OR 99 southbound), 7th Street (OR 99 northbound), Rogue River Highway (OR 99), Williams Highway (OR 238), and Highway 199
2. Adding a fourth bridge over the Rogue River
3. Widening Redwood Avenue

Unlike the Highway 199 project, neither the South Y Interchange project nor the Fourth Bridge projects are funded. Furthermore, neither project has conducted an alternatives study and selected a preferred alternative. Thus, the future location and improvements associated with the South Y and Fourth Bridge cannot be fully coordinated with the Highway 199 project. The Highway 199 project management team, Citizen Advisory Committee, and Project Development Team evaluated many alternatives and considered the integration of proposed Highway 199 improvements to potential South Y and Fourth Bridge projects, even though the latter two projects were undeveloped. Alternative A, Alternative C and the Working Group Alternative were developed so that the Fourth Bridge and South Y projects could still move forward at a later time with minimal modifications to the Highway 199 project improvements. It was determined that delaying the Highway 199 project until solutions were found for the South Y and Fourth Bridge would not benefit the community. Alternative A, Alternative C and the Working Group Alternative propose improvements that add value to the current congestion and safety issues that exist on Highway 199 and are anticipated to worsen over time. Therefore, ODOT chose to move the Highway 199 project ahead so that these improvements could be made and the community could benefit from these improvements in the near term.

When the South Y Interchange alternatives are developed, ODOT will work with the City of Grants Pass, Josephine County, and other stakeholders to integrate the two projects together with as little disruption as possible.

Alternatives A, Alternative C and the Working Group Alternative were developed to minimize modifications if the Fourth Bridge project was implemented and selects an alignment along Allen

Creek Road/Flower Lane. This alignment is the location identified in the City of Grants Pass Transportation Management Plan and is currently where property has been acquired by Josephine County for the project.

The City of Grants Pass has plans to widen Redwood Avenue. Alternative A, Alternative C and the Working Group Alternative will enable the City's Redwood Avenue widening project to connect to the ODOT improvements to the east end of Redwood Avenue.

ODOT will continue to work with all stakeholders to integrate the Highway 199 improvements with future projects to the extent possible.

Phase 2 Improvements

ODOT agrees with many EA commenters that the impacts associated with improvements proposed as Phase 2 are challenging to quantify. As stated in Chapter 2 of the EA, all Phase 2 improvements were going to be coordinated with the South Y Interchange project. The SEA removed all references to Phase 2 as part of the Highway 199 improvements under Alternatives A and C. Any improvements similar to what was proposed as Phase 2 will be evaluated in the South Y Interchange project and no longer considered to be part of the Highway 199 Expressway Upgrade project.

Project Funding and Phasing

One goal of this project is to address project funding constraints: "Define a project that can be built either with available funding or in phases" (page 1-10 of the EA and page 1-9 of the SEA). Funding is an important consideration in this project and was taken into account in the alternative selection process by evaluating each alternative in terms of whether it could be built in phases to match funding that would be available in various increments. Each phased construction element would also need to provide a discrete benefit to the safety and congestion issues on Highway 199.

Alternative A, Alternative C and the Working Group Alternative can be and would be constructed in various phases to provide incremental benefit to safety and congestion. The initial phases of construction will be implemented on the west segment of the project between Midway Avenue and Rogue Community College and then Rogue Community College to Dowell Road. Specific construction schedules for all construction phases cannot be determined until funding is allocated for each phase.

In January 2008, the Rogue Valley Area Commission on Transportation (RVACT) prioritized state-funded transportation projects for Josephine and Jackson counties. This prioritization was needed due to the state's short-fall in its transportation budget, which required delaying some projects. The result of this vote included delaying the following projects in Josephine County:

- South Y Interchange environmental study (\$600,000)
- Highway 199 Expressway Upgrade Unit 1 (west segment, partial funding reduction of \$1.4 million)
- Highway 199 Expressway Upgrade Unit 2 (east segment, \$4.5 million)

Although some funding of this project was delayed as a result of the RVACT vote, ODOT continues to complete the EA process so that the remaining funds for the west segment (Unit 1) can be implemented.

Other Alternatives Studied

ODOT, the Citizen Advisory Committee, and the Project Development Team studied a wide range of alternatives to improve the safety and reduce congestion along Highway 199. Several

commenters asked about whether the following concepts were studied. Most were studied and presented in the EA.

1. Exit off Highway 199 near Cartwright's – this was studied and called the Union Slip Ramp. A discussion of this alternative and why it was withdrawn from detailed study is described on page 2-30 of the EA.
2. Grade-separated interchanges at major intersections along the corridor – the concept was briefly discussed by the project management team, but was not considered due to extremely high cost of new infrastructure, severe access restrictions to the local street network and properties, and extensive amount of right of way acquisitions/relocations.
3. Grade-separated connection of Redwood Avenue to Union Avenue – an overpass that connected Redwood Avenue to Union Avenue was studied as a component of East PDT 2 (see Appendix C in the EA). This concept was withdrawn from detailed study because of the impacts to local streets, inability to phase the costs and construction, and the likely loss of access to most properties that currently have access on Redwood Avenue and Union Avenue (this loss of access would occur from the Redwood Avenue/Allen Creek Road intersection to the Union Avenue/Fairgrounds Road intersection). A structure (bridge) is quite costly and could not be phased with other improvements to provide incremental benefits to the transportation system with incremental funding that ODOT will obtain for the project. This concept also would exacerbate the congestion that occurs at the Ringuette Street/Union Avenue and OR 238/Union Avenue/Harbeck Drive intersections. One commenter suggested a similar concept that included an underpass below Highway 199 to connect Redwood Avenue to Union Avenue. This concept would function similarly to the overpass concept and result in the same adverse impacts. Furthermore, adverse impacts to Allen Creek would likely result with an underpass.
4. Bypass Highway 199 with corridors on the outskirts of Grants Pass – alternatives this far off the current alignment were not considered due to the high costs and impacts associated with establishing a new corridor.
5. Provide a center turn lane in areas where median barrier is proposed – this concept was studied and called West 2. A discussion of this alternative and why it was withdrawn from detailed study is described on page 2-28 of the EA.
6. Connect West Park to Pansy Lane or Allen Creek Road – this concept was studied and called the West Park Connection. A discussion of this alternative and why it was withdrawn from detailed study is described on page 2-29 of the EA.
7. Provide alternative access to the fairgrounds from Ringuette Street – ODOT and Josephine County considered this option. Upon further study, Josephine County determined this option was not acceptable to them.
8. Provide new bridge connection over the Rogue River to link the community north of the river to the community south of the river – this concept was studied and called "Add a new bridge over the Rogue River" and labeled Alternative East 6. A discussion of this alternative and why it was withdrawn from detailed study is described on page 2-29 of the EA.

TOPIC: Environment

EA Letters Addressed: 22, 58, 64 and 70

SEA Letters Addressed: 87 and 122

Response:

Noise

This project seeks to minimize noise impacts during construction. Impacts related to construction would be temporary in nature. ODOT proposed mitigation measures to limit noise during construction (see Section 3.7 of the EA).

Under Alternative A, Alternative C and the Working Group alternative, noise levels are predicted to increase by zero to three decibels at most locations throughout the project area. This amount of change is imperceptible to the average human ear. Two locations would have substantial noise increases; under Alternative A the maximum predicted noise increase is to 11 decibels. Under Alternative C the maximum predicted noise increase 4 decibels; and under the Working Group Alternative it is 3 decibels. The increase in noise level is due to increased traffic volume and reconfiguration of roadways.

Several long-term noise abatement measures were evaluated for all of the alternatives. Only noise walls were found to be feasible in mitigating traffic noise. There were no locations along the corridor where mitigation was determined to be feasible and reasonable. This determination was made due to one or more of the following reasons; the noise walls were too costly per residence based on ODOT evaluation criteria, the zoning of the property affected did not support mitigation, or the residence was build after 1996.

The noise effects of each scenario are detailed in Chapter 3, *Affected Environment and Environmental Consequences*, Section 3.7 of the EA and SEA. Mitigation measures for noise impacts are described in Section 4.7 of the EA and SEA.

ODOT recognizes that some properties rely on vegetation to soften existing noise from Highway 199. In areas where construction activities would require removal of vegetative landscaping, ODOT will revegetate areas with trees, shrubs, grasses, or other vegetation to the extent possible and appropriate to the setting.

Canals

Exact impacts to the existing South Main Canal crossing west of Dowell Road and south of Highway 199 have not been determined. However, the location of this canal crossing and the local access bridge are so close together there is a potential that extending the canal crossing (within a box culvert) past the bridge may be the most cost efficient option. If this was to occur then the easement would be modified to go over the extended box culvert. There is no intention to modify the existing access to this property. During the final design stage, ODOT will coordinate directly with the property owner to address any issues related to the box culvert extension.

Pedestrian and Bicycle Paths

Bicycle and pedestrian safety are important components of project design. Alternative A, Alternative C, and the Working Group Alternative add facilities for bicycles and pedestrians that improve connectivity along Highway 199 and furnish crossings for these users at signalized and stop sign controlled intersections. The location and types of bicycle and pedestrian facilities with each alternative are:

- Alternative A, Alternative C, and the Working Group Alternative – South Side of Highway 199
 - shared-use path: Rogue Community College to Nebraska Avenue
 - bike lane: Allen Creek Road to Ringuette Street
 - sidewalk: Nebraska Avenue to Ringuette Street
- Alternative A and the Working Group Alternative – North Side of Highway 199
 - shared-use path: Hubbard Lane to Dowell Road
 - bike lane and sidewalk: Redwood Avenue slip ramp to Tussey Lane
- Alternative C – North Side of Highway 199
 - shared-use path: Hubbard Lane to Dowell Road
 - bike lane and sidewalk: Allen Creek Road to Tussey Lane

Pedestrians and bicyclists would be able to cross Highway 199 at all signalized intersections, which would be striped as crosswalks. These bike lanes, paths, crosswalks, and sidewalks would serve to increase pedestrian and bicycle safety and increase multimodal connectivity along Highway 199 and to the RCC. Please refer to Chapter 2, *Project Alternatives*, or Appendix A of the EA for detailed descriptions and plan sheets of the bicycle and pedestrian paths.

TOPIC: Environmental Assessment Process

EA Letters Addressed: 1, 5, 9, 10, 21, 25, 26, 30, 32, 40, 43, 44, 52, 57, 61, 63, 64, 68, 70, and 72

SEA Letters Addressed: 93, 106, and 120

Response:

Alternative Selection Process

The purpose of this project is to improve vehicular and pedestrian safety, and relieve congestion and operational deficiencies along a portion of Highway 199 through Josephine County. A range of alternatives were collaboratively developed by the Project Development Team, Citizen Advisory Committee, and ODOT project management team. These alternatives were then evaluated using criteria that represented the purpose and need for the project as well as the goals and objectives identified by the Project Development Team and the Citizen Advisory Committee. Alternatives were screened based on the following criteria: project purpose and need, safety improvements, operational improvements, consistency with existing freight travel, multi-modal transportation improvements, environmental considerations, project funding, and design standards. The alternatives development and evaluation process is detailed in section 2.1 of the EA and section 2.2 of the SEA.

Alternative A, Alternative C, and the Working Group Alternative were determined to be the alternatives that provided the best improvements to safety and congestion while also minimizing impacts to the community and the environment (see section 2.6 of the EA for an explanation of withdrawn alternatives). Therefore, these were the alternatives that were forwarded by the Project Development Team for detailed study that was documented in the EA and SEA.

Many of the comments received during the EA and the SEA comment period requested that ODOT consider the alternative proposed by ACCESS. The ACCESS Alternative was evaluated by ODOT using the same design standards, traffic analysis, and evaluation criteria that was applied to all other alternatives. Results of that analysis are documented in a separate report

titled "Analysis of the ACCESS Proposal" and located on the project website at http://www.oregon.gov/ODOT/HWY/REGION3/h199e_index.shtml. Results of the ACCESS Alternative evaluation were shared with the Project Development Team and the Citizen Advisory Committee.

In February 2007, the City of Grants Pass initiated a Working Group to evaluate the ACCESS Alternative independently of ODOT. The City's Working Group eventually considered other alternatives in addition to the ACCESS Alternative and chose to forward the Working Group Alternative to the Highway 199 project CAC and PDT for consideration.

Public Involvement

ODOT has continually sought public involvement in the Highway 199 Expressway Upgrade project, which began in January 2005. A Citizen Advisory Committee (CAC) was established and composed of local residents of Grants Pass and greater Josephine County. This committee reviews all project information and makes recommendations to the Project Development Team (PDT) (please see Chapter 5 of the EA and of the SEA for a list of agencies, organizations, and interests that are represented by CAC and PDT members). The PDT considers input from the CAC, other public input, and technical information presented by ODOT technical staff to make project decisions. All CAC and PDT meetings are open to the public and time is always allotted at these meetings for public comment. The community's interests, particularly impacts to local businesses and residences, are a key component of the CAC recommendations and PDT decisions as documented in these meetings' minutes which are posted on the project website. ODOT has also met with the City of Grants Pass City Council, Josephine County Commissioners, the Grants Pass Chamber of Commerce, the Josephine County Fair Board, and others to discuss the project and get an understanding of each agency or organization's interests in the project.

ODOT provided other opportunities for the public to stay informed about the project and provide comment, including four open houses, multiple media releases to the local newspaper and radio, and a project website (see Chapter 5 of the EA and the SEA for more detail on the public involvement opportunities).

ODOT will continue to involve the community in the project and is committed to keeping the community well-informed throughout the final design, right of way acquisition, and construction phases of the project. ODOT will coordinate one-on-one with each property owner affected by right of way acquisition and access modification, where specific mitigation and compensation will be determined for property owners. During construction activities, ODOT will provide notice of planned construction activities, including road closures and temporary changes to access as stated on pages 4-15 to 4-16 of the EA. Press releases, newsletters, and notices to those in the Area of Potential Impact (API) will be distributed to notify community members of route changes during construction.

ODOT is committed to continued coordination with the City of Grants Pass, Josephine County, and all concerned citizens to move this project forward and improve the safety and congestion on Highway 199. All public comments received during the EA and the SEA comment periods will be incorporated in the Revised EA and closely considered in determination of the preferred alternative.

EA Comment Period

The EA and the SEA comment periods are an opportunity for all interested parties to provide input and comment on the project information presented in the EA and the SEA. Two 30-day comment periods were publicized through various notices, including direct mailings to all persons and organizations on the project mailing list, the project website, and media releases to local newspapers, and radio stations.

Several commenters on the EA requested that the 30-day comment period be extended to 120 days. This extension was requested to allow the City of Grants Pass more time to evaluate new alternatives to those presented in the EA. ODOT did not formally extend the 30-day comment period; however, ODOT did put the project on hold until the City of Grants Pass formed a Working Group and performed an independent alternatives development and evaluation process. The outcome of the City's Working Group process yielded the Working Group Alternative, which was presented to the Highway 199 CAC and PDT in August 2007. The Working Group Alternative was then included in the range of reasonable alternatives for study, and led to the analysis of a new alternative that was documented in the Supplemental EA (November 2007).

As stated in the EA and the SEA and throughout all public involvement activities, ODOT is committed to working closely with the City of Grants Pass, Josephine County, and the community to improve safety and congestion on Highway 199 while minimizing impacts to the community and the environment. ODOT will continue to work with these stakeholders throughout the final design, right of way acquisition, and construction phases of this project.

TOPIC: Josephine County Fairgrounds

EA Letters Addressed: 4, 8, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25, 28, 29, 30, 33, 34, 36, 37, 39, 40, 48, 53, 58, 59, 62, 69, 73, 74, 76, 80, and 84

SEA Letters Addressed: 88, 90, 93, 95, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 108, 109, 111, 114, 115, 116, 117 and 118

Response:

Signal at Fairgrounds Road and Access to Fairgrounds Property

ODOT agrees with many commenters that the Josephine County Fairgrounds, including the YMCA and BMX track are important and valuable community assets. ODOT also recognizes that there are access concerns associated with Alternative A, Alternative C and the Working Group Alternative with respect to the fairgrounds property, including the rental properties, maintenance vehicle area, and the YMCA. Many comments were concerned about the impacts associated with the removal of the Fairgrounds Road signal and the ability of vehicles in the future to make left turns into and out of the Fairgrounds main entrance as well as access properties south of Highway 199. The signal would be removed to provide greater mobility along Highway 199 for local users traveling between residences, business and other community destinations as well as for through traffic. By removing the signal, safety is improved as there would be fewer vehicle paths that cross one another so the potential for crashes is reduced. The loss of left turns can be mitigated by use of alternative accesses, including the new access road that connects Pansy Lane to Redwood Avenue and Allen Creek Road, and u-turns. ODOT and Josephine County have explored alternative access to the fairgrounds from Ringuette Street; however, the county has determined that that alternative access is not acceptable. ODOT is committed to continue working with Josephine County to provide alternate access to the fairgrounds property while it maintains the safety and mobility of traffic on Highway 199. The Revised EA will contain a fuller description of impacts that the preferred alternative would have on the Josephine County Fairgrounds.

Alternatives A and C both provide direct access from Highway 199 to the fairgrounds rental properties. The access to the three parcels that contain the rental properties is consolidated into one driveway to reduce the number of conflict points, thereby improving the safety on Highway 199 (see EA Appendix B: Alternative A, Sheet 4, and Alternative C, Sheet 4). This one access point may or may not be needed depending on the future fairgrounds internal traffic circulation

plan. The Working Group Alternative would not provide direct access to these properties from Highway 199 since these properties are located where the modified ramp to Redwood Avenue would diverge from Highway 199 and it would be unsafe to have driveways at a highway exit location. Access to these rental properties would need to be integrated into the internal traffic circulation on the fairgrounds property, so that access to Highway 199 would occur via the main fairgrounds entrance, an entrance on Pansy Lane, or other location to be determined.

ODOT is committed to working with Josephine County throughout the project. ODOT will coordinate with the county to provide alternate access to the fairgrounds property before the Fairgrounds Road signal is removed. This commitment will be documented in the Revised EA, in the section that addresses mitigations measures for socioeconomic resources. Adequate compensation measures and mitigation measures will be addressed during the right of way acquisition process.

Traffic Patterns

Josephine County expressed concern that long-established traffic corridors would be redirected from state facilities to county facilities. Under Alternative A, Alternative C and the Working Group Alternative, some traffic would be redirected onto city streets and include those vehicles heading towards or away from the YMCA and the west end of the fairground properties. YMCA traffic would be redirected from its current access point on the Redwood Avenue slip ramp to the entrance on Pansy Lane, which results in up to 0.6 miles extra travel. Fairgrounds traffic that requires left turns out of the main fairgrounds entrance would be redirected to Allen Creek Road to turn around and head east requiring up to 1 mile extra travel. Traffic currently making right turns into or out of the main fairgrounds entrance would be unchanged under Alternative A, Alternative C, and the Working Group Alternative. Redirected westbound traffic wanting to turn left into the fairgrounds would be able to make u-turns at the Ringuette Street intersection, which results in 0.3 miles of extra travel.

Another area where traffic could be redirected is vehicles traveling south of Highway 199 on Hubbard Lane and Willow Lane. Under Alternative A, Alternative C, and the Working Group Alternative, Hubbard Lane would be reconfigured to connect to Demaray Drive, and this may encourage some trips that currently use Willow Lane/Demaray Drive to use Hubbard Lane in the future. This redirection shortens trips by about one-half mile and is not expected to place a burden on Hubbard Lane. As part of Alternative A, Alternative C and the Working Group Alternative, ODOT will improve Hubbard Lane to an appropriate design standard to meet the projected traffic volumes and comply with the applicable local transportation plans. A traffic signal on Highway 199 at Hubbard Lane would be installed under Alternative A, Alternative C, and the Working Group Alternative when traffic signal warrants are met.

Properties with access on Highway 199 from Dowell Road to Midway Avenue may also experience redirected routes of up to 2.3 miles. This section of Highway 199 does not currently have raised median curb or median barrier. Under Alternative A, Alternative C, and the Working Group Alternative, this section would have median and traffic that currently makes left turns into or out of these accesses would be redirected to intersections where u-turns could be made.

All other established traffic corridors would be maintained under Alternative A, Alternative C and the Working Group Alternative including patterns associated with the heavily-traveled Redwood Avenue. ODOT would make necessary improvements to Allen Creek Road, Redwood Avenue and Hubbard Lane to accommodate projected traffic on these established corridors as shown in the design plans for Alternative A, Alternative C, and the Working Group Alternative (see Appendix A in the EA and the SEA). All other local streets that are affected by redirected travel patterns would not require modifications, as the volume of traffic redirected is minimal and would not exceed the current capacities of those streets. The projected traffic volumes account for the projected growth and development that the City of Grants Pass and Josephine County have established through their respective land use plans.

As stated above, ODOT is committed to working with the County throughout the project. ODOT will coordinate with the County and provide alternate access to the fairgrounds property before the Fairgrounds Road signal is removed.

Economic Impacts to the Fairgrounds

This project seeks to enhance the efficiency and safety of all users of the highway: vehicles, bicycles, and pedestrians. In order to enhance the expressway and increase its safety, some acquisitions will be required and some access points will be modified. ODOT's goal is to minimize the impact of these changes on property owners and businesses in the corridor. While the project will attempt to reduce impacts to the fairgrounds, including its access, as described above, and its use, ODOT cannot control how the fairgrounds performs as a business nor quantify its economic viability. ODOT will work closely with Josephine County to minimize acquisition of and changes in access to the fairgrounds property.

BMX Track

One goal of the project is to minimize impacts to existing properties associated with Highway 199 improvements. The purpose of this project is to address vehicular and pedestrian safety, as well as the operational deficiencies that currently exist along Highway 199 (see page 2 of the EA and SEA). To address these concerns and to enhance safety along the corridor, some property acquisitions are required. Alternative A, Alternative C, and the Working Group Alternative vary in alignment and impact to neighboring property-owners and businesses, including the BMX track (see plan drawings in Appendix A of the EA and the SEA). Under Alternative A and the Working Group Alternative, the BMX track would need to be relocated since the remainder of the parcel would likely be too small and would likely not support any track reconfiguration that matches the function of the current track. Under Alternative C, the BMX track could be reconfigured to preserve much of the current track function. Please see earlier discussion on how impacts were minimized to the BMX track through design efforts under "TOPIC: Alternative A, Alternative C, and Working Group Alternative" and subheading "Right of Way and Access to Properties."

ODOT will continue to coordinate with Josephine County and the BMX track operator to minimize impacts to the BMX track to the extent possible, and mitigate in accordance with the Uniform Relocation Act for impacts that cannot be avoided.

TOPIC: Right of Way and Access Management

EA Letters Addressed: 4, 6, 7, 8, 20a, 20b, 22, 24, 32, 40, 45, 46, 47, 55, 58, 61, 63, 66, 67, 68, and 85

SEA Letters Addressed: 87, 90 and 121

Response:

This project seeks to minimize impacts to neighboring residences and businesses by limiting acquisitions and providing access to properties.

ODOT will use the existing "depressed" median for the new roadway, raised median, and additional lanes to minimize new right of way acquisition. No right of way acquisition along the north side of Highway 199 is needed for widening of the road except at the intersection of Ringuette Street. All right of way needed in this area is for the purpose of delineating driveways and providing planter strips and pedestrian/bike facilities. The existing alignment of Highway 199 will be moved south to use as much of the existing right of way on that side of the road as possible. Impacts along Redwood Avenue and the west side of the fairgrounds in Alternative A

are caused by the realignment of Redwood Avenue to provide necessary storage on Allen Creek Road between the Highway 199 and Redwood Avenue. ODOT applied as many design options as possible and feasible to reduce acquisition of new right of way.

While the number of access points to properties along the corridor will be reduced, access to all properties will be provided during and post-construction. If permanent access cannot be provided, then the property would be acquired. Discussions with property and business owners will occur throughout the process to minimize conflicts during design and construction activities. ODOT will continue to coordinate with Josephine County to provide alternate access to the fairgrounds. The acquisitions will not affect access near the South Main Canal.

Measures to mitigate the impacts resulting from right of way acquisitions are listed in section 4.8 of the EA. This section speaks to relocation assistance, residential and commercial displacements, and property owner compensation. As plans are further developed, these mitigation measures, as well as how they relate to individual property owners, will become more well-defined. ODOT will speak with property owners on an individual basis to discuss effects of the project on their residence or business and the extent of mitigation that will be provided.

The right of way acquisition will be done in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and Oregon Administrative Rules (OAR), specifically OAR 734 division 51, and other applicable regulations. ODOT will take necessary steps to develop an Access Management Plan (AMP) that complies with local transportation plans.

TOPIC: Safety

EA Letters Addressed: 20, 25, 32, 47, 49, 54, 55, 57, 64, and 65

SEA Letters Addressed: 106

Response:

Improving safety along Highway 199 in the project area is a primary purpose of the project. Crash statistics for the highway are provided in Chapter 1 of the EA and the SEA, which present the need for roadway improvements.

Comments on the EA and the SEA regarding safety covered the following general issues: median barrier, u-turns (cars, trucks, and trailers), emergency vehicle (police, fire, ambulance) access and movement, signal coordination, and speed limits, enforcement, and signage.

Median Barrier

A median (barrier, raised curb or landscaped median) is proposed in Alternative A, Alternative C, and the Working Group Alternative. For these alternatives, median barrier would be added to Highway 199 from Midway Avenue to the Rogue Community College entrance to separate the westbound and eastbound travel lanes. At the Rogue Community College, the median barrier would transition to raised curb and extend to Willow Lane. The raised curb median would include landscaping from Willow Lane to Tussey Lane. In addition to the added median on Highway 199, the Working Group Alternative would include median on Redwood Avenue from approximately Daisy Lane to Highway 199.

The purpose of the barrier is to minimize crashes, particularly those that occur when vehicles turn left onto/off Highway 199 from/to a side road or driveway, or when a car crosses the highway from one side to another. These movements are particularly dangerous in the western segment of

the project corridor due to high traffic speeds and the number of lanes an entering vehicle must navigate to cross the highway or make a left turn. Currently a median that prohibits left turns already exists from Tussey Lane to Redwood Avenue.

U-turns

U-turns are proposed at several intersections along Highway 199 to allow vehicles to change travel direction, or to appropriately enter or exit properties along the highway corridor. In terms of safety, u-turns are an improvement over current conditions in the west segment (Midway Avenue to Dowell Road) because vehicles must only wait for a traffic gap in two lanes rather than four (the difference between crossing one-directional traffic lanes versus bi-directional). The project would incorporate the following key elements that make u-turns effective and safe:

- The highway would be widened to allow for u-turns;
- The intersections would have dedicated, protected left-turn lane(s) to provide a refuge for vehicles to wait to make a u-turn;
- All but one location for u-turns would be at signalized intersections where turn movements can be controlled and signals can be coordinated to incorporate u-turns while preventing conflicts with other vehicle movements. The one location that would not be signalized is Midway Avenue on the western edge of the project. This location does not meet the criteria for a signal based on low traffic volumes on the intersecting road and being a rural setting.

Using u-turns would require out-of-direction travel for residents who have driveways or other access on Highway 199 between Dowell Road and Midway Avenue. Up to 2.3 miles of additional travel may be necessary to travel to or from their homes. Although this redirected travel route adds time to a person's travel, the route is safer than making left turns across multiple lanes of high speed traffic on Highway 199.

Bicycle and Pedestrian Safety

Bicycle and pedestrian safety would be increased as a result of this project due to the creation of shared use paths and sidewalks along the highway, and new bike lane striping on the expanded roadway. For pedestrian and bike path alignments, please refer to Chapter 2 of the EA and the SEA documents, or the plan sheets in Appendix A of both the EA and the SEA. Further information about pedestrian and bicycle paths are presented in the environmental response to comments. (Please see additional response to this in the section called "Topic: Environment.")

Emergency Vehicle Access

Emergency vehicle access and movement has been considered during design of highway improvements. The purpose of this project is to reduce congestion and improve safety on Highway 199. By reducing congestion, emergency vehicles benefit from the ability to travel more quickly throughout the corridor. Where landscaped medians are added between lanes of opposing traffic, there will be mountable curbs in the landscaping allowing emergency vehicles to make quick u-turns. In the project area with median barrier, reduced u-turn opportunities will not substantially delay emergency vehicles from getting to/from emergency situations or traveling to the Three Rivers Community Hospital located just off Highway 199. The hospital's emergency entrance will remain on Union Avenue, so the only change to emergency vehicles heading to the emergency entrance would be for westbound routes. These westbound routes would need to use the prior signal (at Ringuette Street) to get to Union Avenue instead of having the option to use the Fairgrounds Road signal. While there may be a minor increase in response time in the area where median barrier is proposed on Highway 199 (Midway Avenue to Rogue Community College), it is anticipated that emergency vehicles will have fewer traffic crashes to respond to on the highway due to the increase in overall safety in the corridor.

Speed Limit and Signage

In compliance with the Oregon Highway Plan (OHP), ODOT sets posted speed limits based on analysis of the 85 percentile speed. Currently this corridor is posted below that standard since it is a designated safety corridor.

Speed limit reductions, speed enforcement, and increased signage are methods that ODOT, in conjunction with the Oregon State Police (OSP), have used in an effort to increase safety in the highway corridor. These methods have caused only slight improvements in safety, but not enough improvement to substantially reduce the number of crashes. Alternative A, Alternative C, and the Working Group Alternative include engineering solutions to make Highway 199 a safer facility to drive. ODOT will continue to work with OSP to enhance safety along the corridor through enforcement, signage and public outreach/education following construction of the project.

Any future change to posted speed limits would be undertaken after construction of the project. It is standard practice after a project like the Highway 199 Expressway Upgrade project to conduct a speed analysis to determine if posted speed limits should be adjusted. At this point in the design, ODOT does not expect any substantial changes in posted speed limits.

TOPIC: Traffic Analysis

EA Letters Addressed: 3, 22, 25a, 31, 32, 35, 41, 46, 47, 50, 54, 57, 58, 59, 60, 64, 77, 81, and 85

SEA Letters Addressed: 96, 106, 114 and 120

Response:

ODOT received many comments that pertained to the traffic operations associated with Alternative A, Alternative C, and the Working Group Alternative and how components of these alternatives would be consistent with the City of Grants Pass and Josephine County's respective transportation plans. Comments covered a variety of sub-topics, which are addressed below.

Expressway Designation

All traffic modeling for the Highway 199 Expressway Upgrade project assumed that the current expressway designation of the highway would not change. Please see additional response to this in the section called "Topic: Alternative A, Alternative C, and the Working Group Alternative."

Congestion and Traffic Flow

The purpose of the Highway 199 Expressway Upgrade project is to address vehicular and pedestrian safety, and current and future congestion and operational deficiencies along Highway 199 between Midway Avenue and Tussey Lane (page 1-3 in the EA and page 1-2 in the SEA). In addition, a variety of goals and objectives identified by the Citizen Advisory Committee and Project Development Team further stressed the need to find a solution that balanced the needs of all Highway 199 users: local users, through users, tourists, freight vehicles, pedestrians, and bicyclists (pages 1-8 to 1-10 in the EA and pages 1-8 to 1-9 in the SEA).

As discussed in Chapter 2 of the EA and the SEA, many alternatives were considered and were evaluated on the ability to provide the best solution for all Highway 199 users. Alternative A, Alternative C, and the Working Group Alternative were the alternatives that were voted by the Project Development Team to provide the best solution for all users.

Alternative A, Alternative C, and the Working Group Alternative were designed to include improvements that reduced congestion and improved safety for all vehicle users. The evaluation

that demonstrates Alternative A, Alternative C, and the Working Group Alternative achieve the transportation purpose of the project was summarized in Exhibit 3-9 (page 3-20 of the SEA) and Exhibit 3-17 (page 3-37 of the SEA).

ODOT understands the traffic analysis can be challenging to understand, so the following points are made to clarify how Alternative A, Alternative C, and the Working Group Alternative improve congestion at the intersections, overall traffic flow on Highway 199, and safety.

Improvements that are included in Alternative A, Alternative C, and the Working Group Alternative to improve congestion and safety of all users:

- Added third travel lane, eastbound and westbound from Dowell Road to 6th Street (Alternatives A and C) or approximately Allen Creek Road to 6th Street (Working Group Alternative)
- Median from Midway Avenue to Tussey Lane: barrier from Midway Avenue to the Rogue Community College, raised median curb with various landscaping (plants)/aesthetic treatments from Rogue Community College to Tussey
- Protected turning lanes
- Removal of traffic signal(s): two signals at Fairgrounds Road and Redwood Avenue (Alternatives A and C); one signal removed at Fairgrounds Road (Working Group Alternative)
- Various modifications to intersections
- Sidewalks, bicycle lanes, and a shared use path

Traffic Analysis:

- Traffic analysis was projected to the year 2025 to analyze future conditions and take into account the growth that is projected and consistent with the City of Grants Pass and Josephine County land use plans. The future growth was based on the travel demand model using the current adopted land use and projected local street connections as submitted by the city and county. This model was built, calibrated, and validated according to industry's "Best Practices".
- Traffic models were developed and tailored to fit the specific local street network of this project area and assumed the planned projects listed in the local transportation plans would be funded and constructed when the Highway 199 improvements were implemented. This enabled ODOT to analyze the Highway 199 alternatives in the context of planned projects that the city and county would implement so future benefits of the entire network were considered. It was not possible to include all planned projects proposed by the city and county, because some of those projects are not well defined or funded. These macro and micro simulation models were visually calibrated for existing conditions and then checked for reasonableness in the future forecasted applications.

Congestion:

Congestion at intersections was analyzed by calculating the volume to capacity (v/c) ratio. Exhibit 3-9 in the SEA presented the results of this analysis.

The following conclusions are drawn from the data presented in Exhibit 3-9.

- Most of the congestion along Highway 199 in the project area occurs between 6th Street and Dowell Road. There are eight intersections in this congested area where Highway 199 intersects with public roads: 6th Street, Tussey Lane, Henderson Lane, Ringuette Street, Fairgrounds Road, Redwood Avenue, Allen Creek Road, and Dowell Road.

- The measure used to evaluate congestion was the volume to capacity (v/c) ratio. For a designated expressway, the v/c ratio standard must be equal to or less than 0.70.
- If nothing is done to Highway 199 (this is known as the No Build Alternative), then ten intersections would fail to meet the v/c ratio standard in 2025. In Exhibit 3-9, please note all the black-colored cells in the table, under the column labeled “No Build Alternative 2025.”

The improvements associated with Alternative A, Alternative C, and the Working Group Alternative would reduce the number of failing intersections by half. Although the Ringuette Street intersection would have a v/c ratio of 0.79 (slightly failing) under both Alternatives A and C and a v/c ratio of 0.82 (slightly failing) under the Working Group, this intersection would function better than the No Build Alternative (v/c ratio would be 1.30). Alternative C and the Working Group Alternative have a slightly better improvement to the Highway 199 at Allen Creek intersection than the No Build Alternative and Alternative A. The Working Group Alternative retains a signalized intersection at Highway 199 and Redwood Avenue, which has v/c ratio of 0.67 that approaches, but does not exceed the expressway standard. This location would be free-flowing under Alternatives A and C, so no v/c ratio was calculated.

Traffic Flow:

Several measures were used to evaluate traffic flow. These were called Measures of Effectiveness (MOEs) and were listed in Exhibit 3-17 in the SEA.

The following conclusions are drawn from the data presented in Exhibit 3-17 of the SEA.

- Traffic flow was evaluated for vehicle movement along Highway 199 (top half of Table 2) and for vehicle movement throughout the larger transportation study area, which includes Highway 199 and local roads (bottom half of Table 2).
- Traffic flow was compared among the No Build Alternative, Alternative A, Alternative C, and the Working Group Alternative.
- Alternative A, Alternative C and the Working Group Alternative provide better traffic flow than the No Build Alternative. For example, if no improvements are made, it would take a vehicle 20 minutes to drive from Midway Avenue to the South Y Interchange. Alternative A (14 minutes), Alternative C (14.5 minutes) and the Working Group Alternative (12 minutes) improve this time by 30%, 28% and 40% respectively. Westbound flow for Alternative A, Alternative C, and the Working Group Alternative would improve traffic flow time 46-50%.
- Overall, the average travel speeds between Midway Avenue and the South Y interchange increases from 13 mph in the No Build Alternative to 18 mph in Alternatives A, 17 mph in Alternative C and 21 mph in the Working Group Alternative. These increased speeds are still at or below the posted speed limit, so there is no concern that speeds in the developed part of the project area would experience excessive speeds. ODOT realizes the importance of controlling speeds where many businesses are located and does not plan to change any of the posted speeds within the project area.
- Congestion related to traffic queuing would also be greatly reduced. Under the No Build Alternative, traffic queuing would occur at Redwood Avenue, Fairgrounds Road, Ringuette Street, and 6th Street when traveling east. When traveling west, queuing would occur at Ringuette Street and Redwood Avenue. Under Alternative A, Alternative C, and the Working Group Alternative, the only queuing that would occur would be at 6th Street when traveling east.
- When analyzing travel time and travel delays on Highway 199 combined with the local streets (bottom half of Exhibit 3-17 from the SEA), Alternative A, Alternative C and the Working Group Alternative also perform better than the No Build.

Safety:

- One measure of safety that can be projected through traffic modeling is the number of stops that vehicles must make as they travel from one point to another. In Exhibit 3-17 of the SEA, the number of stops required under the No Build Alternative within the transportation study area is 4.1 per vehicle. Alternative A decreases that number to 3.4, Alternative C decreases it to 3.1 and the Working Group Alternative decreases the number of stops to 3.8. This measure is shown for the number of stops for all vehicles traveling in the transportation study area, which includes travel on Highway 199 combined with travel on local streets.
- The SEA also provided data for travel that occurs solely on Highway 199 (see Exhibit 3.17 of the SEA). The total number of vehicle stops on Highway 199 is reduced 48% by Alternative A (6,490 vehicle stops), 50% by Alternative C (6,340 vehicle stops) and 52% by the Working Group Alternative (6,110 vehicle stops) when compared to the No Build Alternative (12,600 vehicle stops). This reduction, in turn, leads to a similar reduction in the number of rear-end crashes that are quite prevalent in the east section of the project area. Therefore, Alternative A, Alternative C and the Working Group Alternative improve safety on Highway 199 in the east section by reducing the number of stops related to queuing and the potential for rear-end crashes.

Other factors that characterize safety issues include signal spacing, number of vehicle stops, and merge and weave movements. The Working Group Alternative differs from Alternatives A and C in the 'triangle' area bound by Highway 199, Allen Creek Road, and Redwood Avenue. The safety issues associated with the Working Group Alternatives design are detailed on pages 3-28 to 3-33 of the SEA. When compared to Alternatives A and C, the Working Group Alternative does not achieve as much improvement in safety factors since the Working Group Alternative would have an extra signal on Highway 199 and would require additional weave and merge movements for through or left turning vehicles,

Overall, the traffic analysis demonstrates through a variety of measures that the improvements proposed as part of Alternative A, Alternative C, and the Working Group Alternative substantially improve the traffic operations of Highway 199 for all users while also considering impacts to the local street network. There are some differences between the safety improvements offered by Alternative A, Alternative C, and the Working Group Alternative.

Widening of Highway 199

Based on the projected traffic volumes, Alternative A and Alternative C include widening Highway 199 from four travel lanes to six travel lanes between 6th Street and Dowell Road. The Working Group Alternative provides similar widening between 6th Street to just west of Allen Creek Road. This widening equates to having three travel lanes compared to the existing two travel lanes in both directions. This widening was also recommended because of the extensive amount of lane changes occurring as a result of the number of access points (driveways) particularly on the north side of Highway 199 and the frequent maneuvering of westbound Highway 199 vehicles desiring to make left turns southbound onto Ringuette Street and southbound Allen Creek Road to the hospital and many business locations. The traffic volumes and maneuvering contribute to congestion that can be relieved by adding an extra travel lane in both directions.

ODOT, the Citizen Advisory Committee, and Project Development Team considered frontage road options on the north side of Highway 199 to reduce the number of access points (driveways) directly onto Highway 199. This option provided a substantial improvement to safety by reducing the number of access points, since each access point provides the potential for crashes to occur. In addition, the frontage road would improve congestion but had adverse impacts to businesses that the community did not support (see section 2.5.1 in the EA). Thus, the frontage road option was withdrawn from study on the Highway 199 Expressway project. The compromise is to have three travel lanes with the right travel lane generating a fair amount of congestion to accommodate vehicles turning on to or off of Highway 199.

Ringuette Street Intersection

Several comments raised a concern about the size of the proposed intersection of Highway 199 at Ringuette Street. The lane configuration for all legs of this intersection is based on the projected traffic volumes and what is needed to adequately move this volume through that intersection. Pedestrian and bicycle safety is a component of the design, which includes painted crosswalks and refuges in the Highway 199 median for pedestrians and bicycles that cross the highway.

Fairgrounds Road Intersection

Alternative A, Alternative C and the Working Group Alternative would remove the signal at Fairgrounds Road, which affects left turns into and out of the Josephine County Fairgrounds main entrance. Traffic turning right in or right out of the fairgrounds would be unchanged.

The traffic that previously made left turns would have two alternate options to access the fairgrounds based on the current fairgrounds circulation: 1) enter/exit a driveway on Pansy Lane that connects to Allen Creek Road and a signalized intersection with Highway 199. The Pansy Lane driveway to the fairgrounds property provides direct access to the YMCA and allows vehicles to travel behind the grand stands and points east; or 2) use the fairgrounds back entrance from West Park Street that connects to Ringuette Street, which is also a signalized intersection with Highway 199. As both the Ringuette Street and Allen Creek Road intersections with Highway 199 are signalized, left turns would be permitted and thereby mitigating the loss of left turns previously afforded at Fairgrounds Road. These two intersections were also designed to support u-turns for both passenger vehicles, recreational vehicles (RVs), and vehicles towing trailers. The signals would be timed to enable safe u-turns by stopping other traffic that would cause a conflict with the u-turning vehicles. Routing larger vehicles, such as semi-trucks with trailers and maintenance vehicles to and from the fairgrounds is under discussion with ODOT and Josephine County.

ODOT is committed to continue working with Josephine County to provide alternate access to the fairgrounds property while maintaining safety and mobility for all traffic on Highway 199. Please see additional response regarding impact to the Josephine County Fairgrounds this under the "Topic: Josephine County Fairgrounds."

Some comments were received on similar impacts to the businesses on the south side of Highway 199 at the Fairgrounds Road signal. Again, traffic that currently makes a right turn into or out at Fairgrounds Road would remain unchanged. The traffic that currently makes left turns in or out would be redirected onto Union Avenue via the Ringuette Street signalized intersection. The volume of redirected traffic to Union Avenue and then to Ringuette Street to access Highway 199 eastbound would be minor. The Ringuette Street/Union Avenue intersection is congested and is projected to operate at Level of Service (LOS F) under the No Build Alternative. LOS F exceeds the local mobility standard of LOS D and indicates a failing intersection, so a minor increase in traffic volumes would be negligible to the overall performance at the Ringuette Street/Union Avenue intersection.

Redwood Avenue Intersection

Some comments supported the removal of the current signal at the intersection of Highway 199 and Redwood Avenue. Both Alternatives A and C provide alternate routes via Allen Creek Road for traffic that currently use this signal to access Highway 199. Other comments favored keeping the signalized intersection of Highway 199 at Redwood Avenue, which is a component of the Working Group Alternative.

A key difference among these three alternatives is the traffic circulation in the 'triangle' area bounded by Highway 199, Allen Creek Road, and Redwood Avenue. Some out-of-direction travel

would occur in this triangle area under Alternative A and the Working Group Alternative. Please see Exhibit 3-15 in the SEA for more detail.

Allen Creek Road Intersection

ODOT, the Citizen Advisory Committee, and the Project Development Team have spent much of the past three years evaluating various options to optimize the traffic operations while minimizing impacts to businesses, residences, and other properties in the Allen Creek Road and Redwood Avenue vicinity.

ODOT recognizes the importance of the connection Highway 199 and Redwood Avenue provides in terms of the local transportation network. All alternatives considered by ODOT, the Citizen Advisory Committee, and the Project Development Team have been evaluated in terms of traffic flow from the Redwood Avenue area to Highway 199 and points beyond (north to downtown, east to I-5, south to OR 238 and OR 99). ODOT is committed to maintaining this intersection to preserve as much of the current travel patterns between the Redwood Avenue area and the downtown Grants Pass area. To that end, the traffic analysis established the minimum amount of lane storage necessary to hold the vehicles stopped at the Highway 199 and Allen Creek Road intersection while maintaining an acceptable level of operation. The length of lane storage needed dictated the distance needed to separate the Highway 199/Allen Creek Road intersection from the reconfigured Allen Creek Road/Redwood Avenue/New access road intersection.

Alternative A, Alternative C, and the Working Group Alternative reflect the integration of traffic analysis and design engineering standards to develop three alternatives that meet the purpose of the project as well as minimize community and environmental impacts to the extent feasible in this location and throughout the project area. ODOT recognizes there are still adverse impacts to some of the properties in the Redwood Avenue and Allen Creek Road vicinity. Mitigation for business and residential relocation is proposed to off-set these impacts. Alternate access would be provided to some businesses and residences that were not relocated but have a modified local street network.

Other alternatives were studied to improve local connectivity:

- Extending West Park to Allen Creek Road - After analyzing a potential West Park Connection, ODOT found this option would not substantially reduce congestion or improve safety on Highway 199. In addition, moving traffic on to West Park would cause adverse impacts to the neighborhood, including increased noise, change in neighborhood character, and substantial number of residential displacements (please see Section 2.6.2 of the EA).
- Grade-separated connection of Redwood Avenue to Union Avenue – This concept was withdrawn from detailed study because of the impacts to local streets and inability to phase the costs and construction. This concept also would exacerbate the congestion that occurs at the Ringuette Street/Union Avenue and OR 238/Union Avenue/Harbeck Road intersections.
- Union Slip Ramp would provide eastbound travelers on Highway 199 to exit directly onto Union Avenue. This concept was withdrawn from study due to the considerable increase in congestion it would have added to the Union Avenue/Ringuette Street intersection and the OR 238/Union Avenue/Harbeck Road intersection.

One commenter asked if the option to close Allen Creek Road between Highway 199 and Albertsons was considered. Under this option, a frontage road would be built to connect Union Avenue and Schutzwahl Lane, which would provide access to Albertsons and nearby retail businesses from Highway 199 via Dowell Road to the frontage road or Ringuette Street to the frontage road. ODOT did not consider this option due to the extent of out-of-direction travel this would cause to high volumes of northbound and southbound traffic that use the Allen Creek Road intersection with Highway 199. As part of ODOT'S analysis of the ACCESS group's alternative,

submitted during the EA comment period, ODOT analyzed the connection of Schutzwahl Lane on the south side of Highway 199 between Dowell Road and Allen Creek Road. This extension would result in extensive impacts to wetlands while failing to provide substantive benefits to traffic operations on Highway 199; thus, it was determined other alternatives provided greater benefits with fewer impacts.

Hubbard Lane Intersection

One comment was received about the Highway 199 intersection at Hubbard Lane. A request was made for additional overhead lighting at the intersection to make the intersection safer to navigate during nighttime or inclement weather. Alternative A, Alternative C, and the Working Group Alternative would install a traffic signal at this intersection when the traffic volumes meet ODOT traffic signal warrant standards. The signal would include illumination.

Rogue Community College East Entrance Intersection

Alternative A, Alternative C, and the Working Group Alternative would provide a protected left turn lane for westbound traffic to make a left turn into the Rogue Community College (RCC) from Highway 199. Eastbound traffic would have a right turn in and out of the college. Vehicles currently turning left out of the college would have two options to travel west on Highway 199: 1) exit the college through its west entrance and drive to Hubbard Lane via Demaray Drive where left turns onto Highway 199 would be available; or 2) turn right out of the RCC East Entrance and make a u-turn at the Highway 199 and Hubbard Lane intersection.

Signal Timing

ODOT continually monitors signal timing along all stretches of Highway 199. Adjustments are made as needed; however, when signalized intersections have a v/c ratio that exceeds 1.0, signal timing adjustments have little to no effect in improving traffic flow. Under Alternative A, Alternative C, and the Working Group Alternative, the signal timing for all signals on Highway 199 would be adjusted when the Fairgrounds Road (all three alternatives) and Redwood Avenue (Alternatives A and C only) signals are removed. All signal timing accounts for associated bicycle and pedestrian movements as well as u-turns.

Coordination with the City of Grants Pass Transportation Management Plan and Josephine County Transportation System Plan

The City of Grants Pass Transportation Management Plan (TMP) is a plan for the city's local street system that takes into account local land use growth and associated local land use plans. Similarly, Josephine County's Transportation System Plan (TSP) establishes a plan for the county's transportation system. The Oregon Transportation Plan and the Oregon Highway Plan (OHP) are similar plans for the state highway system. To determine which plan applies when a local street or highway is proposed, the underlying facility ownership is considered.

For the Highway 199 Expressway Upgrade project, modifications are proposed to state, city, and county facilities. Modifications to Highway 199 must comply with the state plans; modifications to the city streets (Ringuette Street, Fairgrounds Road, Allen Creek Road to name a few) must comply with the city's TMP; and modifications to county roads (Midway Avenue) must comply with the county's TSP.

Comments were received about the modifications associated with Alternative A, Alternative C, and the Working Group Alternative at intersections of Highway 199 with local streets. A question was raised about how ODOT would coordinate with the city or county if the local plans differ at these intersections. Intersections such as Highway 199 at Fairgrounds Road, Willow Lane, and Hubbard Lane are within the state right of way; therefore, compliance with the OHP is required by ODOT. ODOT has discretion to make improvements on the state highways to address safety or to meet current and future transportation needs. In some instances, the city or county may

indicate a preferred treatment in its TMP or TSP at these intersections and these treatments may differ from an improvement that ODOT implements. In these cases, ODOT can coordinate with the local jurisdiction to assist amending the local transportation plan to reconcile ODOT's improvements with the local plans. The county's TMP and the city's TSP are periodically updated. Upon selection of a preferred alternative for the Highway 199 Expressway Upgrade project, ODOT will then work with the county and the city when they each conduct a new update to their respective plans.

When ODOT proposes a change to a local street, ODOT will comply with the applicable local plan. ODOT is committed to working with the City of Grants Pass and Josephine County to amend local transportation plans to take into account the selected preferred alternative that will be documented in the Revised EA and carried forward for final design engineering and construction.

ODOT recognizes that the City of Grants Pass TMP also includes the Fourth Bridge as a planned project. Alternative A, Alternative C, and the Working Group Alternative were developed to accommodate the Fourth Bridge if it is determined to be constructed at the Allen Creek Road/Flower Lane location. However, the location of the Fourth Bridge has not been selected, so ODOT was not able to fully evaluate the integration and resulting impacts between the Highway 199 Expressway Upgrade project and the Fourth Bridge project. As the City of Grants Pass moves the Fourth Bridge project forward, ODOT will continue to coordinate with the city on integrating the two projects (please see additional response under "Topic: Alternatives A and C").

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Attachment A. Comment Tracking Matrix

Highway 199 Expressway Upgrade Project: Comments Received on the Environmental Assessment

Each comment was assigned a "Letter ID" and categorized into topic areas.

Letter ID	Commenter	Topics Addressed							
		ACCESS	Alternatives A & C	Environment	EA Process	Josephine Co Fairgrounds	Right of Way & Access	Safety	Traffic Analysis
1	Anderson, Darrell & Geraldine	x	x		x				
2	Anderson, Lowell	x							
3	Anonymous (1)								x
4	Arellano, Virginia		x			x	x		
5	Baker, Buck	x			x				
6	Boone, Clive (1)						x		
7	Boone, Clive (2)						x		
8	Booth, Steve & Elaine	x	x			x	x		
9	Bovy, Bonnie				x				
10	Brown, Benjamin	x			x				
11	Brown, Don	x							
12	Brown, Patti	x							
13	Campos, Churchwell, Teller					x			
14	Campos, Daniel					x			
15	Campos, Daylan					x			
16	Campos, Kes					x			
17	Campos, Tricia					x			
18	Carpenter, Larry (1 Feb 20th email)		x			x			
19	Carpenter, Larry (2 Feb 22nd email)					x			
20a	Carpenter, Larry (3a letter rec'd 2/20/07)		x			x	x		
20b	Carpenter, Larry (3b letter rec'd 2/21/07)						x	x	
21	Carpenter, Larry (4 comment form)	x	x		x	x			
22	City of Grants Pass		x	x		x	x		x
23	Clark, Melissa & Krissi					x			
24	Combe, Bud & Janet		x				x		
25a	Cook, William (letter 2/17/07)	x			x	x		x	x
25b	Cook, William (design drawing)		x						
26	Edin, Ruth		x		x				
27	Farrugia, Anthony		x						
28	Fear, Danielle					x			
29	Gamble, Deb					x			
30	Gamble, Rob				x	x			
31	Gunn, Jack & Ruth	x							x
32	Harris, Randy	x			x		x	x	x
33	Hewlett, Alfred		x			x			
34	Hewlett, Laura		x			x			
35	Horizon Village								x
36	Hull, Jim		x			x			
37	Ireland, Michael		x			x			
38	Jaynes, Lavonda	x	x						
39	Josephine County		x			x			
40	Josephine County Fair Board	x	x		x	x	x		
41	King, Patsy								x
42	Krauss, Ken		x						
43	Layne, Roger	x	x		x				
44	Leagjeld, Jerry	x			x				x
45	Lewis, Mark	x					x		
46	Lincoln, Kathryn						x		x
47	Lombardo, Kathy		x				x	x	x

Highway 199 Expressway Upgrade Project: Comments Received on the Environmental Assessment

Each comment was assigned a "Letter ID" and categorized into topic areas.

Letter ID	Commenter	Topics Addressed							
		ACCESS	Alternatives A & C	Environment	EA Process	Josephine Co Fairgrounds	Right of Way & Access	Safety	Traffic Analysis
48	Lowe, James	x	x			x			
49	Lyons, Steve (1)							x	
50	Lyons, Steve (2)								x
51	Martin, Larry		x						
52	Masters, Michael	x			x				
53	McMurray, Tom		x			x			
54	Mesman, Bruce & Tamerie	x						x	
55	Mesman, Shannon	x					x	x	
56	Moore, James		x						
57	Moser, Jay		x		x			x	x
58	Mueller, Charles & Eleanor	x	x	x		x	x		x
59	Nelson, Linda					x			x
60	Norman, Jan								x
61	Paquin, Phil		x		x		x		
62	Peterson, Marianne					x			
63	Porter, Bill and Cartmell		x		x		x		
64	Rafferty, Jim	x	x	x	x			x	x
65	Ramme, Kurt							x	
66	Raskin, Carl	x					x		
67	Raskin, Marilyn	x					x		
68	Redd, Scott	x			x		x		
69	Reha, Jon					x			
70	Schmitz, Tim		x	x	x				
71	Schultz, Duane	x							
72	Seagraves, Charles & JoAnn	x			x				
73	Segovia, Paula & Janet Manley		x			x			
74	Serrage, Samuel		x			x			
75	Stafford, Neil		x						
76	Stevens, Jason		x			x			
77	Still, Gary		x						x
78	Usher, Shirley	x							
79	Watkins, Nancy	x	x						
80	Weldon, Eric					x			
81	Wendle, Dean		x						x
82	Wendle, DonnaJean		x						
83	Willford, Jim & Sandi	x							
84	Woolsey, Ann		x			x			
85	Wright, Russ		x				x		x

Highway 199 Expressway Upgrade Project: Comments Received on the Supplemental Environmental Assessment

Continuing from the EA comments, each SEA comment was assigned a "Letter ID" and categorized into topic areas.

Letter ID	Commenter	Topics Addressed							
		ACCESS	Alternatives A, C, & WG	Environment	EA Process	Josephine Co Fairgrounds	Right of Way & Access	Safety	Traffic Analysis
86	Anderson, Lowe	x	x						
87	Bailey, Glenda		x	x			x		
88	Banuelos, Raul, Dawn & Josh		x			x			
89	Berkey, Garrett & Gretchen		x						
90	Bransfield, Robert & Sheri					x	x		
91	Brown, Don		x						
92	Brown, Patti		x						
93	Carpenter, Larry	x	x		x	x			
94	City of Grants Pass *								
95	Drew, Peter & Nikas, Florence & Alex					x			
96	Farrer, Geoffrey		x						x
97	Grover, John					x			
98	Grover, Johnny					x			
99	Hull, Jim					x			
100	Ireland, Michael		x			x			
101	Kaufmann, Larry					x			
102	Lindorf, Melody, Mason & Eric		x			x			
103	Lindorf, Tracy		x			x			
104	Locac Construction		x			x			
105	Lowe, James		x			x			
106	Martin, Betty				x	x		x	x
107	Mitchell, Trey		x						
108	Newton, Megan					x			
109	Newton, Troy & Megan					x			
110	Norton, Laura		x						
111	Perkins, Joel					x			
112	Robertson, Alex		x						
113	Robertson, Ryan		x						
114	Schultz, Duane		x			x			x
115	Serrage, Sam		x			x			
116	Sharp, Raymond					x			
117	Sheppard, Curtis & Anthony					x			
118	Sheppard, Curtis & Anthony					x			
119	Sheppard, Tony		x						
120	Sutton, Philip		x		x				x
121	Wright, Russ						x		
122	YMCA			x					

* Letter 94 from the City of Grants Pass received a point-by-point response (See Attachment B)

Attachment B. Responses to the City of Grants Pass Letter dated January 3, 2008

The City of Grants Pass letter dated January 3, 2006 was assigned identifier number 94; a copy of this letter is provided on the project website along with all comment letters, forms, testimony, and email received during the SEA comment period. The City raised 13 issues, which are responded point-by-point below.

General Comments

1. Comparing alternatives

Detailed descriptions, design sheets, and comparative graphics of the alternatives were provided in the EA (Alternatives A and C) and the SEA (Working Group Alternative). These various text and graphical descriptions of the alternatives provided explanation of common elements of the three build alternatives as well as an explanation on where they differed. Please refer to Chapter 2 in the EA and SEA for the detailed descriptions and design graphics; Chapter 3, Transportation section (in particular pages 3-17 through 3-18 in the SEA); and, Appendix A in the EA and SEA for detailed design sheets.

There was one error in the SEA, Chapter 2, page 2-13, in the text description of lane configurations at the Highway 199 at Ringuette Street intersection. All other graphics and design sheets in the SEA accurately depicted the dual left turn lanes at this intersection. The Revised EA will be corrected to state that on eastbound Highway 199, there would be two left-turn-only lanes in addition to three through lanes and one right-turn-only lane.

2. Interchangeability of Design Elements

Neither the EA nor SEA stated that design elements may be interchangeable; however, in regular discussions with the project Citizen Advisory Committee (CAC) and Project Development Team (PDT) over the past two and half year, ODOT has demonstrated that some design elements may be interchangeable among the alternatives. In other cases, design elements are not interchangeable due to the design feasibility, resulting traffic analysis on operation, and environmental impacts.

After ODOT received the City's letter, ODOT inquired with the City and its consultant to learn if a specific recommendation was proposed to interchange certain design elements, particularly on the Working Group Alternative. Neither the City nor its consultant proposed a specific recommendation.

The Working Group Alternative's lane configuration on westbound Highway 199 is designed for a two-lane westbound exit at Redwood Avenue. Alternative A has one-lane exit generally in the same location with more distance to the Redwood Avenue/Allen Creek Intersection. Alternative C relocates the westbound exiting movement to Allen Creek Road where dual right lanes are developed from a single highway lane. ODOT considered whether the lane configurations in Working Group Alternative for westbound Highway 199 could be changed to match Alternatives A or C, but there are advantages and disadvantages to both options in terms of the impact on traffic operations, safety, design layout, and right of way impacts, which affects whether these elements can be interchangeable. Because of the different geometric and traffic operations requirements it is a very detailed process to determine what and how much, if any, can be interchanged. This final evaluation can occur in the final design stage, once the preferred alternative (with its key components) is selected.

3. Expressway Designation

The expressway designation is set by the Oregon Transportation Commission. ODOT recognizes that the section of Highway 199 between Tussey Lane and Midway Avenue does not currently meet all the desired characteristics of an expressway; however, as projects are developed along this corridor, the improvements should strive to move incrementally to the appropriate standards.

This project, like all ODOT modernization projects, must strive to address traffic conditions projected 20 years into the future. This is called the 20-year design horizon. Each build alternative considered in the EA and SEA provide at-grade design solutions that address projected traffic conditions expected to occur during the 20-year design horizon. A grade-separate solution (e.g., an interchange at one or more intersections) may be an improvement necessary in the future beyond the 20-year design horizon. Several grade-separated options were considered by ODOT early in the EA/SEA process but were withdrawn from study due to the substantial amount of new right-of-way required from private properties, visual impacts to the community, loss of local businesses visibility by vehicles traveling on Highway 199, and high cost when lower cost solutions were available and would allow improvements to be made sooner to benefit all users of Highway 199.

Each of the build alternatives can accommodate future grade-separation in the future.

4. Episodic Peaks

The analysis presented in the EA and SEA recognizes that the Josephine County Fairgrounds is an important community resource, and therefore, requires access directly and indirectly from Highway 199 during its events.

ODOT does not design improvements to the highest peak event. The resulting design needed to handle the amount of traffic volume during an episodic peak, such as the County Fair, is not cost effective or practical in terms of the right-of-way that would be needed to provide vehicle storage and turn lanes. Episodic peaks happen only a few times a year and are typically managed by special routing and flaggers.

The EA/SEA traffic modeling analysis was based on standard practices to model near highest peak (85-95 percentiles) in traffic volumes, which address more common or day-to-day peaks. This is called the 30th Highest Hour Volume and is widely accepted assumption in traffic modeling analyses.

5. Highway 199 Traffic Origin-Destination Patterns

Exhibit 1-6 in the SEA illustrated only as a concept that shows there are two distinct types of trip patterns: local trips and through trips. It was not an attempt to quantify origin and destination patterns since a specific origin-destination study was not performed for this project. The purpose of this exhibit was to highlight that there are regional through trips as well as local trips, and therefore, this project would need to conduct a balanced analysis and find a solution for both types of trip, not just one type.

There appear to be differences of opinion between ODOT and the City in what constitutes a 'local' trip as evident in the attachment that the City cites in its letter. ODOT considered many trips as "through trips" by users if they needed to travel through the section of the highway between the South Y and Allen Creek Road. This assumption did not distinguish between travels having a Grants Pass address or not; if the travel does not stop to access points within the area, then they are a 'through' movement. And, solutions for the project must address both groups of travelers – those who access points within the project area, and those who are passing through.

6. Intersection Spacing

Intersection spacing is relevant to improving safety on Highway 199 as well as bringing the highway closer into compliance with the expressway designation. ODOT believes retention of the Highway 199 at Redwood Avenue signal would continue to perpetuate the numerous rear-end crashes associated with the need to slow and stop at the signal as well as turning crashes that occur when drivers fail to stop at red lights or “push” a yellow light. These crashes are expected to increase as future traffic volumes increase.

7. Conflict Points

The project team selected the use of conflict points in the traffic analysis since both the east and west end of this project have safety concerns related to crashes. ODOT uses a method to calculate all conflict points since there is a potential for crashes to occur at signalized intersections when motorists run red lights, fail to yield properly, or rear-end other vehicles while slowing or stopping. Regardless of the assumptions ODOT or the City uses to calculate conflict points, the Working Group will have proportionally more conflict points than Alternatives A and C due to the Working Group including an extra signalized intersection in its design. The extra signal will have ‘conflicting volume’ in a location where Alternatives A and C do not.

The east section has a high number of crashes (SEA page 1-3, Exhibit 1-4) regardless of the severity. ODOT strives to reduce the possibility for any crash to occur so that injury and property damage is reduced. Reductions in crashes also reduce impacts to the highway by minimizing the delays to all motorists.

8. Impact to Grants Pass Arterial Circulation

ODOT recognizes that Highway 199 is used for both local and regional travel. This is demonstrated in the EA and SEA as both documents include measures for both the state highway and local street intersections (v/c ratios and LOS as shown on Exhibit 3-9 in the SEA). All three alternatives show improvement at comparable intersections.

In addition to intersection operations, ODOT focuses on the operation of the corridor as a whole, which can often be a better predictor of real driving conditions. Additional information was presented in the SEA to compare how each alternative performs along the corridor and resulting impacts on the local street system. The SEA documented these performance factors and how each build alternative compared to one another in:

- Exhibit 3-10, Westbound Highway 199 Lane Configurations
- Exhibit 3-11, Westbound Highway 199 Lane Utilization and Queuing at Allen Creek Road
- Exhibit 3-14, Weaving and Merging Movements for the Working Group Alternative (no comparative exhibits for Alternatives A or C were provided because these issues did not occur under those two alternatives)
- Exhibit 3-15, Out of Direction Travel along Highway 199, Redwood Avenue, and Allen Creek Road ‘Triangle Area’
- Exhibit 3-17, Measures of Effectiveness for both Highway 199 and the larger Transportation Study area, which includes the local street system
- Exhibit 3-19, Northbound Allen Creek Road Queues

Specific Comments

9. Intersection Analysis: Left Turns

ODOT uses an ideal saturation flow rate of 1800 vehicles-per-hour based on Oregon collected data as an input into the traffic analysis/modeling software. The traffic modeling software (Synchro) adjusts this rate based on up to eleven factors including lane utilization. ODOT procedures are to use the ODOT based data and appropriate factors or to use a site measured saturation flow rate without the adjustments.

Without a field measure of lane utilization, the Highway Capacity Manual (HCM) suggests using a lane utilization factor at least a 0.952 with the analyst adjusting the factor upwards toward 1.0 when the demand approaches the capacity. The Synchro software defaults to the 0.97 for dual left turn lanes based on the HCM process. ODOT used the program default as the design is a change from the existing conditions and cannot be directly measured at this location. Also, the future growth and traffic distributions are unknown at this time also making any other adjust just an (educated) guess and open to debate.

10. Westbound Highway 199 Right Lane Configuration

ODOT agrees with the City that the current two-lane configuration of westbound Highway 199 from 6th Street to Redwood Avenue will continue to increase and substantially worsen over time if no improvements are made. All build alternatives address this issue by increasing the capacity of westbound Highway 199 from two lanes to three lanes as well as reducing conflict points along the north side of Highway 199. Conflict points, which are locations where a potential crash can occur, are reduced by consolidating driveways and defining those driveways with curb and sidewalks. Projected traffic volumes indicate that three westbound lanes are needed from 6th Street to just west of Allen Creek Road.

Alternatives A and C provide three westbound lanes from 6th Street to Dowell Road. The configuration of these lanes is designed to allow through traffic to move through the corridor section without any required lane changes. The right lane would handle most of the traffic that makes right turns into properties, side streets, and Redwood Avenue on the north side of the highway. The center and left lanes provide capacity for the through traffic (those vehicles that are traveling to RCC, Cave Junction, the coast, etc.) and traffic turning left at Ringuette Street and Allen Creek Road. This three lane configuration concentrates on improving congestion by giving motorists more space to separate the local trips from the through trips in a straightforward manner that meets driver expectation.

The Working Group Alternative similarly provides three westbound lanes; however, the configuration of the three lanes between Fairgrounds Road and Allen Creek Road focuses primarily on meeting the needs of the traffic exiting Highway 199 to Redwood Avenue. This configuration does not provide as balanced of a solution for local and through trips. Through travelers would need to merge and change lanes in order to travel to points west of Allen Creek Road (see Exhibit 3-10 in the SEA), which is potentially confusing for drivers unfamiliar with the area and therefore is potentially less safe than Alternatives A and C.

11. Westbound Highway 199 Lane Configuration

Please see response to #10.

Congestion on westbound Highway 199 is addressed by multiple improvements: 1) driveway reduction through consolidation and curbing; 2) adding a third lane for additional capacity; 3) removal of signal(s) [two signals removed in Alternatives A and C; one signal removed in the Working Group Alternative].

The Working Group Alternative loses some of the congestion reduction gained in the items stated above by the need to add a through lane just east of Redwood Avenue to compensate for the right lane that is an exit-only lane. This is a key difference between the Working Group Alternative and Alternatives A and C. The Working Group Alternative has trade-offs in its impacts and benefits: it could improve flow from westbound Highway 199 on to Redwood Avenue, but would have confusing lane changes for traffic making left turns onto southbound Allen Creek Road as well as for travelers continuing through to points west of Redwood Avenue.

12. Eastbound Highway 199 Left Turn at Ringuette Street

The traffic modeling analysis projected a volume/capacity (v/c) ratio approaching 1.0, which signifies the intersection is failing and over capacity, when only a single left turn lane was

proposed from eastbound Highway 199 to northbound Ringuette Street. At the advice of FHWA, ODOT could not propose an alternative with a failing v/c ratio when the problem could be corrected with an additional turn lane.

The State Traffic Engineer considers many facets of the intersections operation when approving the design, which in the case of Alternatives A and C and the Working Group includes the dual left turn lanes. This approval is based on engineering study and does not specify a certain volume needed for the dual left turn lanes.

It is difficult to project the destination of vehicles making this movement until Josephine County completes its circulation plan for the fairgrounds and other county-owned properties. ODOT has committed to working with the county to address local circulation once the county completes its plan. ODOT is also committed to coordinating with property owners during the right of way acquisition process and final design process to address specific property access points.

ODOT will provide enough signal time to allow pedestrians to cross safely through the intersection. The additional pedestrian crossing time is a consideration when requesting approval of a dual turn lane that is weighed against the overall benefit to the transportation system. The current design of all three alternatives includes pedestrian refuges in the center median of Highway 199.

13. Improvements at Allen Creek Road Intersection

ODOT agrees with the City that adding a second northbound through lane on Allen Creek Road would likely improve the intersection v/c ratio. However, this additional lane would create an unacceptable weave and lane utilization issue between Highway 199 and Redwood Avenue.

In the Working Group Alternative, the section of Allen Creek Road between Highway 199 and Redwood Avenue is already at capacity in the 20-year design horizon. There would be no additional space for more vehicles beyond what is projected, which further limits the flexibility of this alternative to address future growth and development. Furthermore, the extra lane with associated additional weaving would likely shorten the length of time this improvement would function effectively.

In addition, more right of way acquisition would be required from adjacent private properties on Allen Creek Road for this extra lane.

APPENDIX E

List of Technical Reports Prepared for the Project

The following baseline reports, technical reports, and studies were prepared for the Highway 199 Expressway Upgrade Project. The EA and Supplemental EA were developed based on the information contained in these reports and studies. The reports and studies are available from ODOT's project website (http://www.oregon.gov/ODOT/HWY/REGION3/h199e_index.shtml), or by contacting ODOT directly.

BASELINE REPORTS AND MEMORANDA

Archaeology*	Socioeconomics
Biology	Transportation
Historic Resources	Visual Resources
Land Use	Water Resources
Section 4(f) and 6(f)	Wetlands and Water Resources

US Highway 199 Expressway Upgrade Hazardous Materials Corridor Study

Highway 199 Expressway Upgrade Project Supplemental Historic Resources Baseline Conditions Report: Alternatives A, B, and C

*Due to the sensitive nature of this data this report is not available on the project's website.

TECHNICAL REPORTS AND MEMORANDA

Air Quality	ROW Acquisition and Relocation
Archaeology*	Section 4(f) and 6(f) Resources
Biology	Socioeconomics and Environmental Justice
Hazardous Materials	Traffic and Transportation
Historic Resources	Visual Quality
Land Use	Water Resources
Noise	Wetlands

*Due to the sensitive nature of this data this report is not available on the project's website.

ADDITIONAL REPORTS AND STUDIES

Highway 199 Expressway Upgrade Project Draft Access Management Strategy

Highway 199 Expressway Upgrade Project Stormwater Report

APPENDIX F

List of REA Preparers and Reviewers

The preparers and reviewers listed in the December 2006 EA and November 2007 Supplemental EA are hereby incorporated by reference.

REA Preparers

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REA Supervision and Reviewers

ODOT

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Randleman, Jayne. Project Leader. Masters in Public Administration. Contract law and project management. 23 years of experience.

Shadel, Jason. Roadway Engineering Lead. A.S. and B.S. Civil Engineering Technology; Fundamentals of Engineering (FE). Field engineering and roadway design. 11 years of experience.

Upton, Dorothy. Traffic and Transportation Lead. B.S. Civil Engineering; Oregon PE in Civil and Traffic. Traffic engineering, transportation analysis, and construction and design. 23 years of experience.

FHWA

Fortey, Nick. Region 3 Liaison. Engineer, MSc and BSc in Civil Engineering. Oregon PE. 20 years of experience with highway transportation.

