



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



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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

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). The project management team developed alternatives and evaluated these alternatives to improve the expressway function of Highway 199. If the expressway designation of Highway 199 were to change 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

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).

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. The curvature of the new access road was designed per standards in the ODOT Highway Design Manual with consideration for 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.

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 studied 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 studied 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 studied 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.

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. 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. Fairgrounds traffic that requires left turns into or out of the main fairgrounds entrance would be redirected, whereas 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 left turn fairgrounds traffic would be able to make u-turns at the Ringuette Street intersection.

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 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 minor redirected routes. 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). 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. 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. 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 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. 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.

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.
- 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.

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.

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.

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").

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 3-3-18 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.