



## Responses to Public Comments on the Environmental Assessment

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.

ODOT received 85 comments during the 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. 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 public hearing, 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."

Copies of all comments submitted to ODOT during the 30-day public comment period are provided in Attachment B.

## TOPIC: Alternatives A and C

**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

### **Response:**

Of the 85 comments received, 8 expressed a direct preference for either Alternative A or C. Seven of eight preferred Alternative C; 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. Many comments received were concerned about Alternatives A and C and asked ODOT to consider the alternative proposed by ACCESS. Please see a separate report titled "Analysis of the ACCESS Proposal" for further discussion on that proposal.

Many comments were received that requested clarification on Alternatives A and C, 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). 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 Alternatives A and C are primarily focused on reducing the number of conflict points along Highway 199. 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. Under the No Build Alternative, there are 139 conflict points between Tussey Lane and Allen Creek Road. Alternatives A and C reduces the number of conflict points by 25 percent. The reduction in conflict points is directly linked to reducing the number of rear-end crashes. Data on the number of conflict points will be presented in the Revised EA.

In the west section of the project area, a median would be added as part of Alternatives A and C. This median would be either a raised median curb or a median barrier. Both types of median would limit left turns to Dowell Road, Willow Road, 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**

Both Alternatives A and C provide substantial improvement in traffic congestion on Highway 199 over the No Build Alternative. This improvement was documented in the EA in Exhibit 3-22 Comparison of 2025 V/C Ratios and LOS at Various Intersections (page 3-62) and Exhibit 3-22

Comparison of Measures of Effectiveness (page 3-65). ODOT selected these measures to have a balanced approach that compared the traffic operations for both local users and through users.

Exhibit 3-22 shows that if no improvements are made (No Build Alternative), nine intersections along Highway 199 will exceed applicable mobility standards by the year 2025. In contrast, both Alternatives A and C reduce the congestion by improving five of the nine intersections to meet the applicable mobility standard. These improvements can be seen in terms of the measures shown in Exhibit 3-23, 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, Alternatives A and C also show improved travel times, reduced travel delays, fewer numbers of stops per vehicle, less fuel used, and less carbon monoxide produced. Alternatives A and C slightly increase the amount of travel distance vehicles must travel when compared to the No Build Alternative.

Overall, Alternatives A and C improve travel along Highway 199 and within the greater transportation system. This improves the flow of traffic for both the local and through travelers.

### **Aesthetics/Landscaping**

Alternatives A and C include aesthetic improvements. These improvements include planting low-growing vegetation in the raised curb median from Rogue Community College 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 showing this 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, Alternatives A and C 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. Alternatives A and C both necessitate the relocation of some residences and businesses (see section 3.8 and 3.10 of the EA). ODOT avoided relocating residences and businesses where possible, and will mitigate for these relocations where avoidance was not possible (see section 4.8 and 4.10 of the EA).

Several comments were made about how Alternatives A and C 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 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. 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. Under Alternative A, the remainder parcel would be too small to reconfigure the BMX track while maintaining current functions of the track.

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 6<sup>th</sup> Street (OR 99 southbound), 7<sup>th</sup> 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

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. Alternatives A and C 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. Alternatives A and C propose improvements that add value to the current congestion and safety issues that exist today 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 and C were developed to minimize modifications if the Fourth Bridge project was implemented and selects an alignment along Allen Creek Road/Flower Lane, which is currently where property has been acquired by Josephine County for the project.

The City of Grants Pass has plans to widen Redwood Avenue. Alternatives A and C will both 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 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 Revised EA will be modified to remove 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 included 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). 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 and Alternative C 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.

## 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 suggestion a similar concept that included an underpass below Highway 199 to connect Redwood Avenue to Union Avenue. This concept would function similarly to the overpass concept and result in the same adverse impacts. Furthermore, adverse impacts to Allen Creek would likely result with an underpass.
4. Bypass Highway 199 with corridors on the outskirts of Grants Pass – alternatives this far off the current alignment were not considered due to the high costs and impacts associated with establishing a new corridor.
5. Provide a center turn lane in areas where median barrier is proposed – this concept was studied and called West 2. A discussion of this alternative and why it was withdrawn from detailed study is described on page 2-28 of the EA.
6. Connect West Park to Pansy Lane or Allen Creek Road – this concept was studied and called the West Park Connection. A discussion of this alternative and why it was withdrawn from detailed study is described on page 2-29 of the EA.

7. Provide alternative access to the fairgrounds from Ringuette Street – ODOT and Josephine County considered this option. Upon further study, Josephine County determined this option was not acceptable.

## TOPIC: Environment

**Letters Addressed:** 22, 58, 64, and 70

### **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 Alternatives A and C, 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 and, with Alternative C, it is to four decibels. The increase in noise level is due to increased traffic volume and reconfiguration of roadways.

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

#### **Pedestrian and Bicycle Paths**

Bicycle and pedestrian safety are important components of project design. Alternatives A and C 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 and C – 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 – 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

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

### **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.

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

Many of the comments received during the EA comment period requested that ODOT consider the alternative proposed by ACCESS. The ACCESS Alternative is 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." Results of the ACCESS Alternative evaluation will be shared with the Project Development Team and the Citizen Advisory Committee.

#### **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 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 three open houses, media releases to the local newspaper and radio, and a project website (see Chapter 5 of EA 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 throughout notifying 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 comment period will be incorporated in the Revised EA and closely considered in determination of the preferred alternative.

## **EA Comment Period**

The EA comment period is an opportunity for all interested parties to provide input and comment on the project information presented in the EA. A 30-day comment period was 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 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**

**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

### ***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 Alternatives A and C 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. 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. The loss of left turns can be mitigated by use of alternative accesses 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 Appendix B: Alternative A, Sheet 4, and Alternative C, Sheet 4).

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 Alternatives A and C, some traffic would be redirected onto city streets and include those vehicles heading towards or away from the YMCA and 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 Alternatives A and C.

Another area where traffic could be directed is vehicles traveling on Hubbard Lane and Willow Lane south of Highway 199. Under Alternatives A and C, Hubbard Lane would be reconfigured to connect 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 Alternatives A and C, ODOT will improve Hubbard Lane to an appropriate design standard to meet the projected traffic volumes and comply with the applicable local transportation plans.

All other established traffic corridors would be maintained under Alternative A and C 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 Alternatives A and C (see Appendix A in the EA). The projected traffic volumes accounted for the project growth and development that the City of Grants Pass and Josephine County have projected 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). To

address these concerns and to enhance safety along the corridor, some property acquisitions are required. Alternative A and Alternative C vary in alignment and impact to neighboring property-owners and businesses, including the BMX track (see plan drawings in Appendix A of the EA). Under Alternative A, the BMX track would need to be relocated since the remainder of the parcel would 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 and 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 for impacts that cannot be avoided.

## **TOPIC: Right of Way and Access Management**

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

### **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.

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. ODOT will take necessary steps to develop an Access Management Plan (AMP) that complies with local transportation plans.

## **TOPIC: Safety**

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

### **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, which present the need for roadway improvements.

Comments on the EA 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 both Alternatives A and C. 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 make room for u-turns;
- There would be dedicated, protected left-turn lane(s) to provide a refuge for vehicles to wait to make a u-turn;
- Most u-turns would be at signalized intersections where traffic movement would be controlled and signals would be coordinated to incorporate u-turns while preventing conflicts with other vehicle movements.

## **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 document, or the plan sheets in Appendix A. 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 signal at Ringuette Street to get to Union Avenue instead of having the option to use the signal at Fairgrounds Road. 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 accidents to respond to on the highway due to the increase in overall safety in the corridor.

## **Speed Limit and Signage**

Speed limit reductions, speed enforcement, and increased signage are methods the 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. Alternatives A and C 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.

## **TOPIC: Traffic Analysis**

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

### **Response:**

ODOT received many comments that pertained to the traffic operations associated with Alternatives A and C and how components of these two 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: Alternatives A and C."

### **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). 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).

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

Alternatives A and C were designed to include improvements that reduced congestion and improved safety for all vehicle users. The evaluation that demonstrates Alternatives A and C achieve the transportation purpose of the project was summarized in Exhibit 3-22 (page 3-62 of the EA) and Exhibit 3-23 (page 3-65 of the EA).

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

Improvements that are included in Alternatives A and C to improve congestion and safety of all users:

- Added third travel lane, eastbound and westbound from Dowell Road to 6<sup>th</sup> Street
- Median from Midway Avenue to Tussey Lane: barrier from Midway Avenue to the Rogue Community College, raised median curb with various landscaping (plants) from Rogue Community College to Tussey

- Protected turning lanes
- 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 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. ODOT continually updated the traffic models over the past two years based on recent development and input from the city and county.

**Congestion:**

Congestion at intersections was analyzed by calculating the volume to capacity (v/c) ratio. Exhibit 3-22 in the EA presented the results of this analysis. ODOT has continued to refine the traffic analysis. The v/c ratios presented in the EA have been updated based on further refinements to the traffic analysis (see Table 1 for updated v/c ratios). This updated table will be included in the Revised EA.

The following conclusions are drawn from the data presented in Table 1.

- Most of the congestion along Highway 199 in the project area occurs between 6<sup>th</sup> Street and Dowell Road. There are eight intersections in this congested area where Highway 199 intersects with public roads: 6<sup>th</sup> 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 all eight intersections would fail to meet the v/c ratio standard in 2025. In Table 1, please note all the black-colored cells in the table, under the column labeled “No Build Alternative 2025.”

The improvements associated with Alternatives A and C would reduce the number of failing intersections by half. Although the Ringuette Street intersection would have a v/c ratio of 0.71 (slightly failing) under both Alternatives A and C, this intersection would function better than the No Build Alternative (v/c ratio would be 1.24). Alternative C has a slightly better improvement to the Highway 199 at Allen Creek intersection than the No Build Alternative and Alternative A.

**Traffic Flow:**

Several measures were used to evaluate traffic flow. These were called Measures of Effectiveness (MOEs) and were listed in Exhibit 3-23 in the EA. ODOT has continued to refine the traffic analysis. The MOEs presented in the EA have been updated based on further refinements to the traffic analysis (see Table 2 for updated MOEs). This updated table will be included in the Revised EA.

**Table 1. Comparison of 2025 V/C Ratios and LOS at Study Area Intersections**

Major Road at Minor Road	No Build Alternative 2025		Alternative A 2025		Alternative C 2025		ACCESS Proposal 2025	
	V/C Ratios	LOS	V/C Ratios	LOS	V/C Ratios	LOS	V/C Ratios	LOS
<b>Highway 199 at</b>								
Redwood Avenue (west)*	0.27 NB	--	0.27 NB	--	0.27 NB	--	0.27 NB	--
Midway Avenue*	0.23 WB	--	0.23 WB	--	0.23 WB	--	0.23 WB	--
Arbor Ridge/Dawn Drive*	0.33 WB	--	0.33 WB	--	0.33 WB	--	0.33 WB	--
RCC Entrance*	0.39 NB	--	0.25 WB	--	0.25 WB	--	0.25 WB	--
Hubbard Lane	<b>0.83 SB</b>	--	0.52 SB L <sup>1</sup>	--	0.52 SB L <sup>1</sup>	--	0.52 SB L <sup>1</sup>	--
Willow Lane*	0.38 WB	--	0.38 WB	--	0.38 WB	--	0.38 WB	--
Dowell Road	<b>0.86</b>	--	<b>0.78</b>	--	<b>0.78</b>	--	<b>0.77</b>	--
New North/South Road	N/A	--	N/A	--	N/A	--	0.47	---
Allen Creek Road	<b>0.89</b>	--	<b>0.84</b>	--	<b>0.74<sup>2</sup></b>	--	0.60	---
Redwood Avenue (east)	<b>0.89</b>	--	N/A	--	N/A	--	<b>0.81</b>	---
Fairgrounds Road	<b>1.88</b>	--	0.48 WB*	--	0.48 WB*	--	<b>0.80</b>	---
Ringuette Street	<b>1.24</b>	--	<b>0.71</b>	--	<b>0.71</b>	--	<b>1.02</b>	--
Henderson Lane	<b>1.04 WB T</b>	--	0.64 WB	--	0.64 WB	--	0.64 WB	--
Tussey Lane	<b>1.04 WB</b>	--	0.63 WB	--	0.63 WB	--	0.63 WB	--
Highway 99 (6 <sup>th</sup> Street)	<b>1.72</b>	--	<b>1.72</b>	--	<b>1.72</b>	--	<b>1.72</b>	--
<b>Highway 238 at</b>								
Union Avenue	<b>1.16</b>	--	<b>0.98</b>	--	<b>0.98</b>	--	<b>0.98</b>	--
<b>Redwood Avenue at</b>								
Midway Avenue*	--	A (EB)	--	A (EB)	--	A (EB)	--	A (EB)
Hubbard Lane*	--	C (NB & SB)	--	C (NB & SB)	--	C (NB & SB)	--	C (NB & SB)
Willow Lane*	--	<b>F (SB)</b>	--	<b>F (SB)</b>	--	<b>F (SB)</b>	--	<b>F (SB)</b>
Dowell Road	--	C	--	C	--	C	---	B
New North/South Road	---	N/A	---	N/A	---	N/A	---	C
Allen Creek Road*	--	<b>F (NB)</b>	--	D	--	A	---	-- <sup>3</sup>
<b>Union Avenue at</b>								
Ringuette Street*	--	<b>F</b>	--	<b>F</b>	--	<b>F</b>	--	<b>F</b>
<b>Demaray Drive at</b>								
Hubbard Lane*	--	B (SB)	--	B (SB)	--	B (SB)	--	B (SB)
Willow Lane*	--	C (NB)	--	C (NB)	--	C (NB)	--	C (NB)
NB; WB; SB – northbound; westbound; southbound L – left turn; T – through; R – right turn <b>Black cells</b> – indicates the OHP mobility standard (for the No Build Alternative) or the Highway Design Manual mobility standard (for Alternatives A and C) for Highway 199 (v/c = 0.70) or Highways 99 and 238 (v/c = 0.85) has been exceeded or the mobility standard for local streets (LOS D) has been exceeded. * - unsignalized <sup>1</sup> If the Highway 199/Hubbard Lane intersection was unsignalized the v/c ratio under Alternative C would be 0.46 SB L. <sup>2</sup> Note that the v/c ratio is less than for Alternative A. This is due to providing two northbound through lanes in Alternative C that are not included in Alternative A due to safety reasons. <sup>3</sup> The ACCESS Proposal eliminates the intersection of Redwood Avenue and Allen Creek Road. A driveway is assumed to be constructed near the eliminated Allen Creek Road. LOS is not determined for driveway access points.								

**Table 2. Comparison of Measures of Effectiveness (2025)**

Measure of Effectiveness	No Build Alternative	Alternative A	Alternative C	ACCESS Proposal
<b>Highway 199 Measures</b>				
<b>Travel Time (Minutes per trip: South Y to Midway)</b>				
Eastbound	18.1	12.3 <sup>1</sup>	12.4 <sup>1</sup>	13.0 <sup>1</sup>
Westbound	10.6	7.2	7.2	7.4
<b>Travel Delay (Minutes per vehicle: South Y to Midway)</b>				
Eastbound	12.6 <sup>2</sup>	7.0	6.5	7.5
Westbound	3.1	1.8	1.6	2.2
<b>Average Speed (mph)</b>				
Eastbound	14	21	21	19
Westbound	24	35	35	33
<b>Number of Stopped Vehicles</b>				
Total Vehicle Stops	15,700	5,500	6,400	9,800
<b>Queues &gt; 2 blocks (600 feet)</b>				
Eastbound	<ul style="list-style-type: none"> <li>• Redwood</li> <li>• Fairgrounds</li> <li>• Ringuette</li> <li>• South Y</li> </ul>	<ul style="list-style-type: none"> <li>• South Y interchange (through Ringuette Street)</li> </ul>	<ul style="list-style-type: none"> <li>• South Y interchange (through Ringuette Street)</li> </ul>	<ul style="list-style-type: none"> <li>• South Y interchange (through Ringuette Street)</li> </ul>
Westbound	<ul style="list-style-type: none"> <li>• Ringuette</li> <li>• Redwood</li> </ul>	N/A	N/A	N/A
<b>Transportation Study Area Measures</b>				
Travel Time (vehicle-hours)	2,547	1,882	1,884	1,887
Travel distance (VMT)	17,348	19,055	19,982	20,025
Total delay (vehicle-hours)	2,071	1,339	1,326	1,332
<b>Environmental Measures in the Transportation Study Area</b>				
Number of "stops" per vehicle <sup>3</sup>	3.8	3.1	2.4	2.4
Fuel used (gallons)	2,412	2,260	2,293	2,438
Carbon Monoxide Emissions (kg)	213	186	175	205

**NOTES:**

1. Large traffic backup caused by South Y congestion affects eastbound travel time
2. It takes 18.1 minutes to travel the corridor eastbound, 12.6 minutes is taken up by slowing or being stopped due to traffic congestion (eastbound, mostly approaching the South Y)
3. Measures the number of times an average vehicle must completely stop for queued traffic approaching a traffic signal on its trip in the simulation model.

The following conclusions are drawn from the data presented in Table 2.

- 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 and Alternative C.
- Alternatives A and C provide better traffic flow than the No Build Alternative. For example, if no improvements are made, it would take a vehicle 18.1 minutes to drive from Midway Avenue to the South Y Interchange. Alternative A (12.3 minutes) and Alternative C (12.4 minutes) improve this time by 32% and 31% respectively.

- The time spent waiting in traffic congestion is also reduced by Alternatives A and C when compared to the No Build Alternative. This means that under the No Build Alternative, it would take 18.1 minutes to drive from Midway Avenue to the South Y, and of that time, 12.6 minutes would be spent stopped in traffic congestion. Under Alternative A, the drive would take 12.3 minutes and the time spent stopped is reduced to 7.0 minutes (44% less delay when compared to the No Build Alternative). Alternative C would take 12.4 minutes to drive with 6.5 minutes of delay (48% less delay than the No Build Alternative).
- Overall, the average travel speeds between Midway Avenue and the South Y interchange increases 50% from 14 mph (No Build Alternative) with Alternatives A and C (21 mph). 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 retaining low 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 Redwood Avenue, Fairgrounds Road, Ringuette Street, and 6<sup>th</sup> Street when traveling east. When traveling west, queuing would occur at Ringuette Street and Redwood Avenue. Under Alternatives A and C, the only queuing that would occur would be at 6<sup>th</sup> Street when traveling east.
- When analyzing travel time and travel delays on Highway 199 combined with the local streets (bottom half of Table 2), Alternatives A and C also perform better than the No Build. The one trade-off is that Alternatives A and C cause a 10 to 15% increase in out of direction travel (number of miles traveled).

#### **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 Table 2, the number of stops required under the No Build Alternative within the transportation study area is 3.8 per vehicle. Alternatives A and C reduce the number of stop per vehicle to 3.1 and 2.4, respectively. 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 Revised EA will provide data for travel that occurs solely on Highway 199 (see Table 2 for this data). The total number of vehicle stops on Highway 199 is reduced 65% by Alternative A (5,500 vehicle stops) and 59% by Alternative C (6,400) when compared to the No Build Alternative (15,700 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, Alternatives A and C improve safety on Highway 199 in the east section by reducing the number of stops and the potential for rear-end crashes.

Overall, the traffic analysis demonstrates through a variety of measures that the improvements proposed as part of Alternatives A and C substantially improve the traffic operations of Highway 199 for all users while also considering impacts to the local street network. There are some slight differences between the improvements offered by Alternative A compared to those offered by Alternative C, but both provide substantial improvement over the No Build Alternative.

### **Widening of Highway 199**

Based on the projected traffic volumes, Alternatives A and C include widening Highway 199 from four travel lanes to six travel lanes between 6<sup>th</sup> Street and Dowell 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 that occurs as a result of the number of access points (driveways) particularly on the north side of Highway 199 and the frequent maneuvering of vehicles to make left turns from westbound Highway 199

onto southbound Ringuette Street and southbound Allen Creek Road where many businesses and the hospital are located. 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 as vehicles slow to turn off Highway 199 into business or allow stopped vehicles to exit those businesses and enter Highway 199.

### **Ringuette Street Intersection**

One comment 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**

Alternatives A and C 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. 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**

Several 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.

## **Allen Creek Road Intersection**

ODOT, the Citizen Advisory Committee, and the Project Development Team have spent much of the past two 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.

Alternatives A and C reflect the integration of traffic analysis and design engineering standards to develop two alternatives that best 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. Both Alternatives A and C 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**

Alternatives A and C 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 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. Under Alternatives A and C, the signal timing for all signals on Highway 199 would be adjusted when the Fairgrounds Road and Redwood Avenue 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 Master Transportation Plan and Josephine County Transportation System Plan**

The City of Grants Pass Transportation Management Plan (MTP) 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 MTP; and modifications to county roads (Midway Avenue) must comply with the county's TSP.

Comments were received about the modifications associated with Alternatives A and C 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 meet current and future transportation needs. In some instances, the city or county may indicate a preferred treatment in its MTP 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.

ODOT recognizes that the City of Grants Pass MTP also includes the Fourth Bridge as a planned project. Both Alternatives A and C 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
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

## Attachment B. Copies of Comments

Copies of the comments can be found on the Highway 199 Expressway Upgrade project website:

[http://www.oregon.gov/ODOT/HWY/REGION3/h199e\\_index.shtml](http://www.oregon.gov/ODOT/HWY/REGION3/h199e_index.shtml)