

# CHAPTER 1. PURPOSE AND NEED

## The Problem

The existing OR 212/224 corridor, which forms the main east-west travel route between I-205 and Rock Creek Junction, has severe congestion, safety, and traffic flow problems. Residential and business traffic is unacceptably delayed during peak travel periods, with speeds as low as four miles per hour at several locations along OR 212/224. Planned population and employment growth will worsen existing problems. By 2030, the duration of congestion and the extent of vehicle queuing are expected to more than double. The resulting traffic demand would far exceed the capacity that the current four lanes can be expected to handle safely and efficiently.

## Project Purpose

The purpose of the proposed Sunrise Project is to effectively address the existing congestion and safety problems in the OR 212/224 corridor between its interchange with I-205 and Rock Creek Junction, and to serve the growing demand for regional travel and access to the state highway system.

## Project Need

The project purpose is demonstrated with the following statement of need:

- OR 212/224 between I-205 and Rock Creek Junction is currently experiencing unacceptable levels of congestion and delay during the peak travel periods. In 2030, the projected traffic volume will far exceed the volume that the existing four-lane arterial can be expected to handle at an acceptable level of service.<sup>8</sup>

<sup>8</sup> Based on field observations in 2004/5, segments of OR 212/224 within the Sunrise Project area experienced approximately four hours of daily congestion. In 2030, based on regionally adopted land use and employment projections and Metro's regional travel demand projections, without the proposed Sunrise Project, the same roadway is expected to

### Project Location and Study Area

The general location of the new facility, named the Sunrise Project, is depicted in Figure 1, Project Vicinity. The Sunrise Project will extend approximately five miles between I-205 and Rock Creek Junction. Under **Alternatives 2 and 3**, the west end transition to existing roadways is to SE Johnson Road and under the **Preferred Alternative** is to SE Webster Road. The project will extend to SE 172<sup>nd</sup> Avenue on the east end.

Figure 3 (Alternative 1—No Build) shows an aerial view of the Sunrise Project area. The project is often discussed by subarea. Three subareas are outlined on Figure 2 and cover the following geographic areas:

- The I-205 Interchange area extends from west of I-205 to Camp Withycombe.
- The Midpoint area extends from Camp Withycombe to SE 152<sup>nd</sup> Avenue.
- The Rock Creek Junction area stretches from SE 152<sup>nd</sup> Avenue to SE 172<sup>nd</sup> Avenue.

- By 2030, the numbers of households and jobs in the area served by this section of OR 212/224 are expected to increase by 136 percent and 85 percent, respectively.<sup>9</sup>
- Both the northbound and southbound weave sections of I-205 between SE 82<sup>nd</sup> Avenue and OR 212/224 are approaching capacity, resulting in frequent stop-and-go movements, difficulty in changing lanes, and long queues forming because of minor incidents. By the year 2015, this section of I-205 will exceed its design capacity, and the length of these stop-and-go movements will continue to grow if no action is taken. Traffic traveling on the Milwaukie Expressway (OR 212) heading east on OR 212/224, as well as the reverse direction,

*experience about nine hours of congestion. See Chapter 6 of Sunrise Project Transportation Technical Report.*

<sup>9</sup> Based on growth projections from Metro 2004 data for development of the Purpose and Need. Technical analysis for the Transportation Technical Report used Metro's updated 2005 model to develop projections for 2030. This resulted in predicted jobs growth of 87 percent and household growth of 97 percent.

must either use the above section of I-205 or the currently congested SE 82<sup>nd</sup> Drive.<sup>10</sup>

- OR 212/224 near I-205 is ranked in the top 10 percent of state routes for vehicle crash rate. Over 500 vehicle collisions [between I-205 and Rock Creek Junction] were reported for this area during the five-year period of 1998 through 2002. The high crash rate is attributed to severe congestion and roadway deficiencies. Inadequate bicycle and pedestrian facilities reduce the safety and connectivity for these modes of travel in the project area.<sup>11</sup>

A safety analysis was conducted in September 2010 to reflect more recent crash data provided by the ODOT Crash Analysis and Reporting Unit for years 2005 through 2009. OR 212/224 near I-205 continues to be ranked in the top 10 percent of the State's safety ranking index within the ODOT's safety ranking index (Safety Priority Index System or "SPIS") for 2010.

- OR 212/224 is designated as a statewide and regional freight route, with 12 percent of the traffic on the project section of this highway being trucks. OR 212/224 serves the Clackamas Industrial Area, which is a major freight distribution center for the Northwest. This area is expected to nearly double its employment by the year 2015. Long delays are currently reported for trucks accessing I-205 from the distribution center.<sup>12</sup>

## Proposed Action from the SDEIS

ODOT and Clackamas County proposed to build a new, east-west oriented, limited-access highway

<sup>10</sup> Based on field observations in 2004/5 and analysis of forecast future year travel demand associated with the range of alternatives studied. See Sections 5.6.3 and 6.7.3 of Sunrise Project Transportation Technical Report.

<sup>11</sup> Based on analysis summarized in Section 5.9 of Sunrise Project Transportation Technical Report.

<sup>12</sup> Based on truck counts from 2004/5 at specific locations within the OR 212/224 corridor. See Section 5.7 of Sunrise Project Transportation Technical Report.

between I-205 and Rock Creek Junction (where OR 212 and 224 diverge to the east and south).

## Preferred Alternative

The **Preferred Alternative** will construct a multi-lane, limited-access highway north of and parallel to the existing OR 212/224 between I-205 and Rock Creek Junction. A midpoint interchange will connect the highway to the existing OR 212/224, ensuring access to businesses along that corridor. From I-205 to Rock Creek Junction (where OR 212/224 splits into OR 212 to the east and OR 224 to the south), the highway will have six lanes plus auxiliary lanes. East of Rock Creek Junction, the highway will narrow to six lanes with no auxiliary lanes until SE 172<sup>nd</sup> Avenue, where it will narrow to five lanes. The **Preferred Alternative** is **Alternative 2** with the Tolbert overcrossing from **Design Option A-2**, and incorporates the alignment of **Design Option C-2** and the SPUI interchange of **Design Option D-3**. Additionally, the **Preferred Alternative** includes several modifications based on both stakeholder input and additional design refinement related to analysis of traffic performance and avoidance of environmental resources. See Figures PA-1 through PA-5 in the Executive Summary.

## Project Background and Setting

The northwest urban area of Clackamas County has developed rapidly over the last 40 years, particularly following construction of three major transportation facilities: I-205, Milwaukie Expressway, and OR 212/224. The regional and local land use and transportation plans supported development and the new transportation network. In 1977, the Metro Urban Growth Boundary (UGB) committed most of the land in and near the Sunrise Project area to future urban development. The subsequent adoption of the Clackamas County Comprehensive Plan identified land around I-205, the Milwaukie Expressway, and OR 212/224 for future development as a regional commercial center, an employment/ manufacturing center,

and one of the largest truck distribution centers in the region.

Constructed in the 1970s to serve the planned land uses, I-205 and the Milwaukie Expressway are two key transportation corridors serving this area of Clackamas County. I-205 is one of the most heavily traveled portions of the state highway system and is a major truck route for the region. Milwaukie Expressway (OR 212) is a four-lane expressway that links OR 99E in Milwaukie to I-205 south of the Clackamas Regional Center. OR 212 then joins I-205 and is coincident with I-205 until it travels east from the Clackamas Interchange as OR 212/224. At the Rock Creek Junction, OR 224 turns south to Carver and then travels through rural Clackamas County to Estacada. OR 212 continues east. These highways are the transportation and freight backbone of the regional transportation system in the southeastern portion of the metropolitan area.

In the late 1990s, two small expansions of the Metro UGB to the northeast of the proposed Sunrise Project and a major expansion in 2002 of 12,000 acres in the Damascus/ Boring area further increased the demand for transportation facilities in this area.



*North side of OR 212/224 looking west*

## The Problem in Detail

The problem with the functioning of OR 212/224 has three components: congestion, safety, and traffic flow. Evidence of the severity of the problem components and their existing and future potential impacts are described in more detail in the following paragraphs.

## Congestion

Transportation professionals have established various operating standards for measuring traffic congestion and roadway capacity. Each standard is associated with a particular level of service (LOS). The LOS concept considers factors such as travel speed, delay, frequency of interruptions in traffic flow, relative freedom for traffic maneuvers, driving comfort, convenience, and operating cost. Six standards have been established, ranging from LOS A (where traffic is relatively free flowing) to LOS F (where the street system is totally saturated with traffic and movement is very difficult).

In 2004, LOS at 20 intersections along the Milwaukie Expressway, OR 212/224, and the I-205 ramps were measured during the period between 4:30 and 5:30 PM. Six of those intersections were operating at LOS E and two at LOS F. By 2030, 18 of 20 intersections are predicted to be operating at LOS F for the same period of day.<sup>13</sup> The quality of travel on major roadways follows a predictable weekday cycle building toward, enduring, and recovering from system failure. In the morning, travel that generally flows freely at 6:00 AM changes with increased traffic volumes to isolated system breakdowns by 6:30 AM. This, in turn, triggers a rapid system response in the form of congestion and delay from 7:00 to 9:00 AM. Recovery begins between 8:30 and 9:00 AM, offering fairly reliable midday travel until the afternoon/evening peak congestion cycle begins around 3:30 and lasts until 5:30 PM. Several segments of the OR 212/224 corridor in the study area operate under congested stop-and-go travel for approximately four hours per day. The corridor serves from 16,000 vpd east of Rock Creek to nearly 60,000 vpd near SE 82<sup>nd</sup> Drive. Congestion is most severe where volumes are highest.

In addition, other parts of the road network in the project vicinity are reaching or exceeding capacity. Northbound and southbound traffic on I-205 between SE 82<sup>nd</sup> Avenue and OR 212/224 must slow down in order to “weave” across lanes to

<sup>13</sup> Forecasted congestion is documented in detail in the Transportation Technical Report, for both existing and future conditions.

reach the right exit lane, thereby bunching up traffic and creating long queues in all travel lanes when minor incidents occur. By 2015, this section of I-205 will exceed its design capacity, and the length, duration, and frequency of these stop-and-go movements will continue to grow if no action is taken.

## Safety

ODOT recorded 560 crashes between 1998 and 2002 along OR 212/224 from I-205 to Rock Creek Junction, which ranks this facility in the top 10 percent of State's safety ranking index (Safety Priority Index System—SPIS). The high crash rate is primarily attributed to severe congestion and roadway deficiencies. Over 40 percent of crashes involved injuries, including two fatalities. Beyond the obvious human health impact, each crash involves an interruption in transportation system reliability to respond to and clear the crash scene and get traffic moving again. Over 80 percent of crashes involved a turning or rear-end maneuver consistent with high-volume, multi-lane, signalized roadways. The only intersection with a notably high crash rate is SE 82<sup>nd</sup> Drive at OR 212/224.<sup>14</sup>

In September 2010, a safety analysis was conducted to reflect more recent crash data provided by the ODOT Crash Analysis and Reporting Unit for years 2005 through 2009. ODOT recorded 582 crashes between 2005 and 2009 along OR 212/224 from I-205 to Rock Creek Junction, which continues to place this facility in the top 10 percent of the SPIS ODOT safety ranking index for 2010. This poor safety performance is primarily attributed to severe congestion. Approximately 25 percent of crashes involved injuries, including two fatalities. There has been a moderate reduction since the 1998 through 2002 analysis in injury related crashes throughout the corridor. Approximately 75 percent of crashes were turning or rear-end related, consistent with high-volume, multi-lane, signalized roadways. The intersection of SE 82<sup>nd</sup> Drive at OR 212/224 continues to operate with a high crash rate, but shows a significant improvement in recent years,

<sup>14</sup> Section 5.6 of the Transportation Technical Report documents the safety research for this FEIS.

which is likely a result of intersection modifications that have occurred.

In addition, safety performance from 2007 through 2009 has placed segments of OR 212 east of Rock Creek Junction, I-205 between milepoints 12.0 and 15.0, and Milwaukie Expressway (OR 212) near I-205, in the top 10 percent of the SPIS.

Bicycle facilities in the study area are generally rated from “fair” to “good” in terms of condition and availability. Notable exceptions occur along SE McKinley Avenue, SE Mather Road, SE Jennifer Street, and SE 82<sup>nd</sup> Drive due to difficult intersection navigation, incomplete or narrow bike lanes, or some combination of the two. Pedestrian facilities also generally rate from “fair” to “good.” Poor ratings are due to difficult intersections, incomplete sidewalk segments, sidewalks on alternating sides of the street, or a combination of effects along SE Hubbard Road, SE 135<sup>th</sup> Avenue, SE Jennifer Street, SE Mather Road, and SE Webster Road.

## Traffic Flow

Business representatives and commuters participating in the public outreach efforts have expressed frustration with the unpredictability of travel times and conditions within the corridor. Drivers report that travel times vary widely, causing interruption of freight movement and dispatch times. For example, travel times for commuters along westbound OR 212/224 between the Fred Meyer Distribution Center and I-205 during peak periods can take 3 minutes on a good day and over 15 minutes on a bad day.<sup>15</sup> Many factors probably contribute to reduced reliability: the high volume of traffic, the high proportion of large trucks, steep grades near I-205 and Rock Creek Junction that slow large trucks, an imbalance in the use of available travel lanes based on specific origins and destinations of drivers, and the presence of signalized intersections.

<sup>15</sup> See Chapter 5 of the Transportation Technical Report, Sections 5.5 and 5.6, for a discussion of existing conditions on selected roadways.

## Projected Demand for an Expanded Transportation System

While the region as a whole is expected to accommodate approximately 50 percent more households and up to 72 percent more new jobs between 2005 and 2030,<sup>16</sup> the proposed Sunrise Project would serve an area that is expected to accommodate almost double the number of households and jobs in the same time period. The transportation study area is forecasted to grow from 16,000 to 32,000 households and from 48,000 to 89,000 jobs. Damascus is forecasted to undergo the largest growth of any of the districts that make up the Sunrise Project area, with a greater than 600 percent increase in households and a 1,700 percent increase in employment.<sup>17</sup>

As an example of near-term growth, a large parcel of land in the Rock Creek Industrial Area of Happy Valley is being considered for development of a large medical care complex with the potential to create 6,000 jobs by 2030 (as estimated by the health care provider).

The Clackamas Industrial Area is also expected to add a substantial number of new jobs. This growth drives a strong demand for east-west travel and connection to the surrounding regional transportation system—principally including I-205, SE 82<sup>nd</sup> Avenue, Milwaukie Expressway, and OR 212/224. Additionally, parallel roadways, such as SE Sunnyside Road, SE Sunnybrook Boulevard, and SE Jennifer Street, are not intended to

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<sup>16</sup> The household and jobs forecasts here were provided by Metro in 2005 for the Sunrise Project traffic analysis. In April 2009 Metro published the 20 and 50 year Regional Population and employment range forecasts (April 2009 draft) for the Portland-Beaverton-Vancouver Primary Metropolitan Statistical Area as defined by the federal Office of Management and Budget (the counties of Multnomah, Clackamas, Washington, Yamhill, Columbia, Clark, and Skamania). The 2009 medium and high household projections to 2030 are higher than the projections in 2005, with expected growth of 55 and 63 percent, respectively. Projected job growth rate in the high range is 72 percent, the same as in 2005. The medium range is lower than projected in 2005, with medium growth rate projected at 50 percent to 2030.

<sup>17</sup> See Figures 6-6 and 6-7 of the Transportation Technical Report.

accommodate the amount of traffic and generally long-distance nature of trips created by future growth. Because those parallel roads are fully built out per the adopted regional plan, a new facility is needed.

## Public and Agency Involvement

FHWA is the lead federal agency and ODOT is acting as an agent for FHWA in preparing the NEPA documents. ODOT and Clackamas County are the two main public agencies managing the project. At the beginning of the project in 2004, a Project Management Team was formed to include staff from Clackamas County, Metro, ODOT, FHWA, Happy Valley, and Damascus, and the technical team. The Project Management Team provided the day-to-day management and direction for the variety of work products. The group also formulated draft recommendations and provided analysis that was presented to the Project Advisory Committee and Policy Review Committee for review, input, or recommendations, as appropriate. The Project Management Team met approximately once a month beginning in 2004.

A stakeholder Project Advisory Committee was also formed and was a central focus of the public involvement effort. It comprised 18 representatives of neighborhoods and Citizen Participation Organizations, businesses and business groups, the cities of Happy Valley and Damascus, TriMet, Metro, environmental groups, service providers such as the Clackamas County Fire District and Water Environment Services, the Army National Guard Camp Withycombe, and FHWA (as a non-voting, advisory member). The Project Advisory Committee reviewed the work completed by the Project Management Team and provided input on key milestones. The Project Advisory Committee met twelve times between 2004 and the release of the SDEIS. They met another five times to review the SDEIS, to be presented with a summary of comments, and to develop recommendations on the **Preferred Alternative** to forward to the Policy Review Committee.

Meetings of the Project Advisory Committee were open to the public and an average of 30 people regularly attended. The meetings, dates, locations, and topics were as follows:

**PAC Chartering Session / Meeting #1**

August 17, 2004 4:00 - 8:00 p.m.

Sunnybrook Service Center Auditorium,  
9101 SE Sunnybrook Boulevard

Purpose: Initial meeting to discuss committee charge, develop protocols.

**PAC Meeting #2**

September 20, 2004 4:00 - 6:30 p.m.

Sunnybrook Service Center Auditorium,  
9101 SE Sunnybrook Boulevard in Clackamas

Purpose: refined and made recommendations on Project Goals & Objectives.

**PAC Meeting #3**

November 15, 2004 4:00 - 6:30 p.m.

Sunnybrook Service Center Auditorium,  
9101 SE Sunnybrook Boulevard

Purpose: provided with technical background for the December Design Alternatives Workshop. Heard presentations on modeling, transportation, and environmental constraints.

**PAC Meeting #4 (Part of the Design Workshop)**

December 6, 2004 11:00 a.m. - 3:30 p.m., OIT

Conference Center 7726 SE Harmony Road  
Technical staff review the design ideas (PAC and public may attend)

4:00 - 6:00 p.m. PAC meeting

6:30 - 9:00 p.m. Public meeting with PAC discussion

Purpose: listened to the public discussion and recommended how to move forward with design ideas.

**PAC Meeting #5**

Tuesday, February 8, 2005 4:00 - 6:00 p.m.

Sunnybrook Service Center, 9101 SE Sunnybrook  
Boulevard

Purpose: solicited PAC input on the screening criteria and provided an update on how the themes and discussion from the workshop would be used by the engineers to develop some design concepts.

**PAC Meeting #6**

Thursday, March 31, 2005 4:00 - 6:30 p.m.

Clackamas County Fire District Training Center,  
15990 SE 130<sup>th</sup> Avenue

Purpose: reviewed design option concepts and determined how they met the screening criteria.

**PAC Meeting #7 - Design Refinement Worksession**

Thursday, May 5, 2005 3:00 - 6:30 p.m.

Clackamas County Fire District Training Center,  
15990 SE 130<sup>th</sup> Avenue

Purpose: (informal worksession) discussed progress of the designs.

**PAC Meeting #8**

Monday, September 26, 2005 4:30 - 7:00 p.m.

Clackamas County Fire District Training Center,  
15990 SE 130<sup>th</sup> Avenue

Purpose: reviewed and provided feedback on refinement of design alternatives prior to public open house.

**PAC Meeting #9**

November 7, 2005 4:30 - 7:00 p.m.

Clackamas County Fire District Training Center,  
15990 SE 130<sup>th</sup> Avenue

Purpose: considered public input from the open house and made recommendations on which alternatives would be studied in the EIS.

**PAC Meeting #10**

June 12, 2006 4:00 - 6:00 p.m.

Clackamas County Fire District Training Center,  
15990 SE 130<sup>th</sup> Avenue

Purpose: received an update on refinement of alternatives for the Supplemental Draft EIS and briefings on next steps in the SDEIS process.

**PAC Meeting #11**

Monday, November 5, 2007 5:00 - 7:30 p.m.

Clackamas County Fire District Training Center,  
15990 SE 130<sup>th</sup> Avenue

Purpose: received an update on the SDEIS process, briefing on parallel studies (Phasing of Construction, Pricing/Tolling, Lane Performance), and reviewed initial traffic findings

**PAC Meeting #12**

Tuesday, December 11, 2007 4:30 - 7:00 p.m.  
Clackamas County Fire District Training Center  
15990 SE 130<sup>th</sup> Avenue  
Purpose: continued review of initial findings /  
introduction to SDEIS.

**PAC Meeting #13**

Tuesday, October 14, 2008 4:30 - 6:30 p.m.  
Sunnyside Community Church, 16444 SE Highway  
212  
Purpose: received an overview of the SDEIS and  
preparation for the public hearings and comment  
period.

**PAC Meeting #14**

Tuesday, December 2, 2008 4:30 - 6:30p.m.  
Clackamas County Fire District-Lake Road Station  
(4), 6600 SE Lake Road  
Purpose: discussed management plans for each of  
the Sunrise interchange areas.

**PAC Meeting #15**

Tuesday, February 3, 2009 4:30 - 6:30 p.m.  
Clackamas County Fire District-Lake Road Station  
(4), 6600 SE Lake Road  
Purpose: reviewed public comments on the SDEIS  
and to begin to provide direction on the selection  
of the **Preferred Alternative**.

**PAC Meeting #16**

Wednesday April 22, 2009 4:30 - 7:30pm  
Milwaukie Center, 5440 SE Kellogg Creek Drive  
Purpose: provided initial direction on **Preferred  
Alternative** development.

**PAC Meeting #17**

Tuesday May 19, 2009 5:00 - 8:00pm  
Milwaukie Center, 5440 SE Kellogg Creek Drive  
Purpose: recommended a **Preferred Alternative**

The Policy Review Committee was made up of senior representatives of each of the four partner agencies (Clackamas County, ODOT, Metro, and FHWA [as a non-voting, advisory member]) and elected officials from affected cities and Clackamas County. The Policy Review Committee participated in the development of evaluation criteria for the alternatives, considered public comments, and considered Project Advisory Committee recommendations. The Policy Review Committee's

final task was to recommend a **Preferred Alternative**. See Appendix F for a list of the committee memberships.

In addition to the involvement of state and local agencies in the Policy Review Committee and Project Management Team for the project, Oregon's state and federal transportation and environmental agencies signed the Collaborative Environmental and Transportation Agreement for Streamlining (CETAS) in 2001. This group collaborates to help each participating agency realize its mission through sound environmental stewardship, while providing for a safe and efficient transportation system. In the case of the Sunrise Project, the CETAS members provided concurrence on these four points: (1) purpose and need statement; (2) the range of alternatives; (3) criteria for evaluating alternatives and selecting a **Preferred Alternative**; and (4) selection of the **Preferred Alternative**. See Appendix F, [Public Involvement Materials](#), for a list of CETAS members.

## Public Involvement before 2004

Before 2004, public and agency involvement started with the first work conducted in connection with the Sunrise Corridor project in the late 1980s and early 1990s. For more information on the public involvement program before 2004, contact ODOT at the address provided at the beginning of this document.

## Public Involvement Activities from 2004 to Publication of this FEIS

Public involvement efforts for the proposed Sunrise Project SDEIS began in 2004. In addition, public forums were held for determining the scope of the SDEIS, developing alternatives, and reviewing the range of alternatives. In June 2004, more than 100 people attended the first public open house for the proposed Sunrise Project. Over 100 people also attended the two-day design workshop held in December 2004. An open house to review the range of alternatives was held in October 2005 and attracted nearly 200 people. Combined, the public meetings involved hundreds of area stakeholders. Focused community meetings

were held in the Lawnfield area at the west end of the project, at the east end of the project, as well as specifically around each of the potential interchange areas. An open house held in September 2006 at Sunnyside Community Church drew 200 attendees.

Six newsletters and three postcards were distributed to a project mailing list. The original list had approximately 5,000 addresses in 2004 and grew to more than 9,500 addresses by the end of 2009. Public information and meeting invitations were sent to site addresses and tax record addresses to ensure that people and businesses in the area received information. Distributing flyers door-to-door was used to share project information in areas around potential interchanges, where public concerns were expressed about changes in access, and in manufactured home communities. Project presentations at over 15 community meetings have occurred, including at the North Clackamas, Sunnyside United Neighbors, and other Clackamas Citizen Participation Organizations; Clackamas County Community Action Board; and the Rotary Club. The Project Management Team regularly presented at Clackamas County Board of County Commissioners' meetings, regional Metro Joint Policy Advisory Committee Transportation meetings, and other standing groups that are open to the public.

In addition, the project was featured in *The Oregonian*, *Clackamas Review*, *Damascus Observer*, *Daily Journal of Commerce*, and *Portland Business Journal*. A website and e-mail distribution lists have also kept neighbors and stakeholders informed.

### After Publication of the SDEIS

The SDEIS was distributed to public agencies, tribes, other interested parties, and the public at large beginning October 13, 2008. The SDEIS document was made available online at [www.sunrise-project.org](http://www.sunrise-project.org) and was posted at several locations in and near the project area (see the Notice of Availability [page i], at the front of this document). Appendix F contains copies of newsletters and postcards mailed to the public. The public comment period for the proposed Sunrise Project, I-205 to Rock Creek Junction SDEIS,

was 45 days from its release in October 13, 2008, to November 28, 2008. Written comments were submitted online at the website (see previous paragraph) or sent to the ODOT Environmental Project Manager.

Two public hearings were held on November 12 and 13, 2008, 67 signing in at the first hearing and 104 people signing in at the second hearing. (Some people attended but did not sign in.) The public hearings were advertised through a public notice in *The Oregonian*, as well as display advertisements in *The Oregonian*, *Clackamas Review*, and *Damascus/Boring Observer* during the first week of November. The county distributed a press release and hosted information on its website. The project website ([www.sunrise-project.org](http://www.sunrise-project.org)) hosted the chapters of the SDEIS and advertised the hearing dates, as well as the comment period and instruction on how to submit comments. An email was sent to the interested parties email list inviting people to review the SDEIS, attend a public hearing, and submit comments. Newsletters were sent in October with a reminder postcard in November to the mailing list of 9,687 addresses. The newsletter included a mail-back comment form to easily allow people to submit comments.

The public hearings consisted of an overview open house with opportunities to learn more about the SDEIS findings. There was opportunity to give written or oral testimony during the hearing. Members of the Policy Advisory Committee—elected officials and management staff—attended the hearings to hear comment directly. Eighteen people provided oral testimony. All other comments were submitted during the hearings and comment period on via the provided comment forms, letter, fax, or email.

Ten federal, state, or local agencies, 33 businesses or organizations, and 123 individuals submitted written or oral comments during the public comment period. All comments on the SDEIS were collected, organized, and distributed to and reviewed by the Project Management Team and technical team.

A summary of written comments was shared with the consensus committees for this project and local decision-makers. All comments are part of the

public record. Responses to the comments can be found in Appendix A of this FEIS.

## Public Outreach for Environmental Justice

The Environmental Baseline Report for the Sunrise Project identified potential environmental justice populations prior to the development of project alternatives. This information was used to develop alternatives that avoided areas with potential environmental justice (EJ) populations to the greatest extent practicable. This preliminary assessment of the location of environmental justice populations was based on the 2000 U.S. Census tract information, county assessor records, and Housing Authority data on the location of Section 8 housing units. This analysis was refined during the analysis of the socioeconomic conditions (see the Socioeconomics Technical Report).

Early in the project, project staff met with or offered to meet with the manufactured home park managers during stakeholder interviews. County staff met with three managers of manufactured home parks and collected some of their issues and concerns. Multiple times during the project, county staff distributed project flyers and meeting invitations door-to-door within the potentially impacted manufactured home parks. Clackamas County will continue to provide opportunities for manufactured home park residents to get information and provide input on the project. This is important because displacement issues are more complex for manufactured home owners and residents.

Project staff offered to hold small group meetings at several of the nearest manufactured home parks to share project information that was in the SDEIS and information about the **Preferred Alternative**. Several managers of manufactured home parks attended the public meetings, including some of the committee meetings, but none chose to host a small group meeting. Several managers of manufactured home parks expressed interest in final design and construction issues, rather than selection of a **Preferred Alternative**. One manufactured home park just east of SE 152<sup>nd</sup>

Avenue is located very close to the **Preferred Alternative**. Although no residents are shown as displaced, the land owner and the resident manager of Sunrise Mobile Home Park is very concerned about the proximity of the alignment and any construction impacts. The manufactured home park managers expressed interest in being involved during the final design effort.

One census tract has a higher percentage of minority residents—10 percent (census tract 221.03, Figure 31)—who are predominantly Asian Americans, Hawaiians and Pacific Islanders, and mixed-race individuals. Clackamas County has no information indicating that there are language barriers for this census tract. The public involvement program was set up to offer translation or interpretation services during public outreach efforts. None were requested during the SDEIS process.

At the beginning of the project, a seat on the Project Advisory Committee was specifically designated to help the project consider EJ issues and concerns during scoping, alternatives development, and later selection of a **Preferred Alternative**. The committee member was primarily concerned with any loss to housing, specifically units reserved for low-income people and families. She facilitated connections between project staff and various agency resources. Project staff coordinated directly with the Housing Authority of Clackamas County to collect addresses and create maps of all the scattered site housing authority-owned and Section 8 units in the project area prior to alternatives being selected for analysis in the SDEIS. This information was shared with the Project Management Team and the Project Advisory Committee. During early alternatives development, all of these units were able to be avoided. Project information was shared with the Housing Authority and updates were given to the Clackamas County Community Action Board, a group that advises on programs and services for low-income persons. These agencies receive project newsletters/updates.

With the release of the SDEIS document, additional door-to-door outreach and small group meetings,

where applicable, were completed in areas that may have had potential project impacts.

### Targeted Outreach to Convey Potential Impacts

From January 2008 to April 2008, one large group meeting and five small group meetings were held with neighbors in the Bluff Drive, Hubbard Terrace/Myra Lane, and Diamond Drive/Diamond Court areas. The purpose of the meetings was to brief neighbors on the proposed Sunrise Project, discuss potential noise impacts related to the build alternatives, discuss the mitigation that had been examined, and discuss other ideas for mitigation. Approximately 50 people attended the large group meeting in January, and 31 neighbors in total attended the five small group meetings. The noise increases for the homes in this area directly above the proposed Sunrise Project alignment range from about 8 to 20 A-weighted decibels (dBA), depending on the location of the home. Because of the topography of the area and the nearness of the homes to the project alignment, ODOT and Clackamas County have not found a solution that will cost-effectively mitigate noise impacts. The meetings helped to convey these issues and initiate discussion with neighbors about other types of mitigation that are not typical noise abatement measures. Table D-2 in Appendix D describes all of the 14 measures that were studied. These neighbors continue to have concerns about the project.

Other issues and potential impacts, such as impacts on driveways and displacement, were shared with stakeholders on a property-by-property basis and at area meetings both before and after the release of the SDEIS.

### How to Comment on this FEIS

Written comments on this FEIS can be submitted online at the website or sent to ODOT or FHWA at the addresses below.

Thomas Picco  
Principal Planner/Project Manager  
Oregon Department of Transportation Region 1  
123 NW Flanders Street  
Portland, OR 97209-4012  
Thomas.J.PICCO@odot.state.or.us  
(503) 731-8230

Michelle Eraut  
Environmental Program Manager  
Federal Highway Administration  
530 Center Street NE, Suite 100  
Salem, OR 97301  
(503) 587-4716