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 serious congestion, safety, and traffic flow problems. Residential and business traffic is unacceptably delayed during peak periods, with travel speeds as low as four miles per hour at several locations along OR 212/224. The planned population and employment growth will worsen existing problems. The duration of congestion and the extent of the queuing is expected to more than double. By 2030 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.[7]

Project Location and Study Area

The general location of the new facility, named the proposed Sunrise Project, is depicted in Figure 1, Project Vicinity (p. x). The proposed Sunrise Project would extend approximately five miles between SE Johnson Road on the west end and SE 172nd Avenue on the east end (Figure 2, p. ES-2).

Figure 3 (Alternative 1—No Build, p. ES-7) shows an aerial view of the Sunrise Project area. The project is often discussed by subarea. Three subareas are outlined on Figure 2 (p. ES-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 152nd Avenue.
- The Rock Creek Junction area stretches from SE 152nd Avenue to SE 172nd 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.[8]
- Both the northbound and southbound weave sections of I-205 between 82nd 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

[7] Based on existing 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 experience about nine hours of congestion. See Chapter 6 of Sunrise Project Transportation Technical Report.

[8] Based on initial growth projections developed by Metro in 2005. The predicted increase in jobs and population in the Transportation Technical Report and in the Transportation section is different from this forecast from 2004. Subsequent refinement of the study area, use of 2005 as the base year, and Metro's model numbers in 2005 resulted in predicted jobs and household growth by 2030 of 85 and 100 percent, respectively.

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 224) heading east on OR 212/224, as well as the reverse direction, must either use the above section of I-205 or the currently congested 82nd Drive.[9]

- OR 212/224 near I-205 is ranked in the top 10 percent of state routes for vehicle crash rate. Over 500 hundred vehicle collisions 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.[10]
- 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.[11]

Proposed Action

The Oregon Department of Transportation (ODOT) and Clackamas County propose to build a new, east-west oriented, limited-access highway between Interstate 205 (I-205) and Rock Creek Junction (where OR 212 and 224 diverge to the east and south).

Industrial uses along OR 212/224 near the Clackamas River

The proposed Sunrise Project would connect I-205, the Milwaukie Expressway, SE 82nd Avenue/Drive, and OR 212/224. It would have six through-lanes plus two auxiliary lanes, so it would be as wide as eight lanes across in some locations. The I-205/Clackamas Interchange would be reconfigured with new ramps and access points, and a new interchange would be built at Rock Creek Junction. There would be no direct property or local street access to the proposed Sunrise Project.

Project Background and Setting

The northwest urban area of Clackamas County has developed rapidly over the last 30 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/

[9] *Based on existing 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.*

[10] *Based on analysis summarized in Section 5.9 of Sunrise Project Transportation Technical Report.*

[11] *Based on existing truck counts from 2004/5 at specific locations within the OR 212/224 corridor. See Section 5.7 of Sunrise Project Transportation Technical Report.*

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 224) is a four-lane expressway that links OR 99E in Milwaukie to I-205 south of the Clackamas Regional Center. OR 224 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

As stated at the beginning of this chapter, 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.[12]

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 vehicles per day (vpd) east of Rock Creek to nearly 60,000 vpd

[12] *Forecasted congestion is documented in detail in the Transportation Technical Report, for both existing and future conditions.*

near SE 82nd 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 82nd Avenue and OR 212/224 must slow down in order to "weave" across lanes to 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, a rate that ranks in the top 10 percent of Oregon state highways for vehicle crashes. 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 82nd Drive at OR 212/224.[13]

Bicycle facilities in the study area are generally rated from "fair" to "good" in terms of condition and availability. Notable exceptions occur along McKinley Avenue, Mather Road, Jennifer Street, and SE 82nd 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 Hubbard Road, SE 135th Avenue, Jennifer Street, Mather Road, and 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 claim 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.[14] 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.

Projected Demand for an Expanded Transportation System

While the region as a whole is expected to accommodate approximately 50 percent more households and nearly 70 percent more new jobs between 2005 and 2030, 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.[15]

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[13] *Section 5.6 of the Transportation Technical Report documents the safety research for this SDEIS.*

[14] *See Chapter 5 of the Transportation Technical Report, sections 5.5 and 5.6, for a discussion of existing conditions on selected roadways.*

[15] *See Figures 6-6 and 6-7 of the Transportation Technical Report.*

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 82nd Avenue, Milwaukie Expressway, and OR 212/224. Additionally, parallel roadways, such as Sunnyside Road, Sunnybrook Road, and Jennifer Street, are not intended to 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

The Federal Highway Administration (FHWA) is the lead federal agency and ODOT is acting as an agent for FHWA in preparing the document. 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, and the technical team. The Project Management Team meets approximately once a month.

A stakeholder Project Advisory Committee was also formed. It comprises 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 reviews the work completed by the Project Management Team and provides input on key decision milestones. The Project Advisory Committee met ten times between August 2004 and June 2006. Their next task will be to review the SDEIS and forward their comments to the Policy Review Committee.

The Policy Review Committee is 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 has 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 will be to recommend a Preferred Alternative to the official decision-making bodies: the Board of County Commissioners for Clackamas County, Metro, Damascus City Council, Happy Valley City Council, ODOT, and the FHWA. (See Appendix A for a list of the committee memberships.)

Public Involvement before 2004

Prior to 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 prior to 2004, contact ODOT at the address provided at the beginning of this document.

Public Involvement Activities since 2004

The Project Advisory Committee, composed of citizens representing neighborhoods, business and civic advocacy groups, emergency services, and other stakeholder agencies throughout the corridor area, is the central focus of the public involvement effort. (See Appendix A for a list of the membership.) Its meetings are open to the public, and an average of 30 people regularly attend its meetings.

Public involvement efforts for the proposed Sunrise Project SDEIS began in 2004. In addition, public forums have been 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 have involved hundreds of area stakeholders. Focused community meetings have been 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.

Four newsletters and two postcards have been distributed to a project mailing list. The original list had approximately 5,000 addresses in 2004 and has grown to more than 9,000 addresses in 2008. The project public involvement program distributes public information and meeting invitations via site addresses as well as tax record addresses to ensure that people and businesses in the area receive information. Distributing flyers door-to-door has also been selectively used to share project information. Project presentations at over 15 community meetings have occurred, including at the North Clackamas, Sunnyside United Neighbors, and other Clackamas Citizens' Participation Organizations, Clackamas County Community Action Board, and the Rotary. The Project Management Team regularly presents at Clackamas County Board of County Commissioners' meetings, regional Joint Policy Advisory Committee Transportation meetings, and other standing groups that are open to the public.

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

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 Socioeconomics Technical Report).

Generally the impacts of the proposed Sunrise Project are similar for the population of the study area and for the environmental justice populations that are located in that study area. There are two clusters of housing that will be relocated by build alternatives which appear to be populated by low-income persons. One of these clusters is in the Old Clackamas area. Several residents in this area have attended the open houses at Clackamas Elementary School. The other cluster is a small mobile home park just to the east of 152nd Avenue.

Since individual household income information is unknown for residents of the area's many manufactured home communities, the county has and will continue to provide opportunities for manufactured home park residents to get information and provide input on the project, since displacement issues are more complex for manufactured home owners. Early in the project, county staff met with or offered to meet with the manufactured home park managers during stakeholder interviews. County staff met with three managers and collected some issues and concerns about the manufactured home parks. Multiple times during the project, county staff distributed project flyers and meeting invitations door-to-door within manufactured home parks. Small group meetings at the individual manufactured home communities should be held

just prior to or upon release of this SDEIS document.

There is only one census tract with a high percentage of minority residents, which is predominantly Asian American, Hawaiians and Pacific Islanders, and mixed race individuals. However, this census tract is also higher income. The county has no information indicating that there are language barriers for this census tract. Given the age of the data from the 2000 U.S. Census, the project will be flexible if translation or interpretation service needs become known during public outreach efforts.

The goals and objectives are generated from issues raised by the project development team, advisory groups, and the public. They can be conflicting and the project alternatives may not meet all of them.

At the beginning of the project, a committee seat was specifically designated to help the project consider EJ issues and concerns during scoping and alternatives development and later selection of a preferred alternative. Additional outreach will be conducted to communicate impacts of special importance to EJ and potential EJ populations. Until specific impacts were known, it has been difficult to communicate impacts. With the release of the SDEIS document, additional door-to-door outreach and small group meetings, where applicable, should be completed in areas identified by potential impacts. Some of these residential or business areas may have EJ issues. As potential project benefits and adverse impacts are shared, the project will strive to keep information accessible and understandable.

Because no specific EJ populations have been identified, the project has shared project information with the Housing Authority and given updates to the Clackamas County Community Action Board, a group that advises on programs and services for low-income persons. The project team should continue to work with agency providers to gather issues and find opportunities to share information with any EJ populations that may be scattered within the project area.

Targeted outreach to convey potential impacts

With the release of the SDEIS document, additional door-to-door outreach and small group meetings, where applicable, should be completed in areas identified by potential impacts. This will help the public to better prepare for sharing their concerns during the public comment period for the SDEIS.

From January 2008 to April 2008, a 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 “outside the box” ideas for mitigation. Approximately 50 people attended the large group meeting in January, and 31 neighbors attended the 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 dBA, depending on the location of the home. Because of the topography of the area and the relation of the homes to the project alignment, ODOT and the County are finding it difficult to find a solution that would cost-effectively mitigate noise. The meetings helped to convey these issues and initiate discussion with neighbors about other types of mitigation that might exist outside of traditional measures prior to the release of the SDEIS.

Other issues and potential impacts, such as access and displacement, are being shared with stakeholders on a property-by-property basis prior to and upon the release of the SDEIS.

How People Can Make their Views Known to the Decision-Makers

An important element of the National Environmental Policy Act (NEPA) is the opportunity for citizens and other agencies to review and comment on proposals. Such comments help the process by clarifying information, identifying missing information, or suggesting ideas for different or additional mitigation. The SDEIS document is available online at www.sunrise-project.org.

This SDEIS has been distributed to public agencies, tribes, other interested parties, and the public at large. The public comment period for the proposed Sunrise Project, I-205 to Rock Creek Junction SDEIS, extends 45 days from its release. Comments will be shared with the consensus committees for this project and decision-makers and will become part of the public record. Written comments can be submitted online at the website (see previous paragraph) or sent to the ODOT Environmental Project Manager for the project at the following addresses:

- Emily Moshofsky, ODOT, 123 NW Flanders Street, Portland OR 97209
- emily.a.moshofsky@odot.state.or.us
- Emily Moshofsky, ODOT fax number: 503-731-8259

Oral comments will only be accepted and recorded at the public hearings, which are scheduled on the dates noted on the SDEIS cover sticker. All comments on the SDEIS will be collected and distributed to and reviewed by the Project Management Team and technical team. Depending on the volume of comments received, individual comments may not be responded to, but will be grouped with similar comments and addressed in the FEIS.