



#	Date	Source	Name	Comment
1.	11/19/2025	Letter	Brian Casady, Chief Operating Officer with Meadow Outdoor Advertising	See attached letter.
2.	11/21/2025	Public hearing	Dan Dhruva with Outfront Media, LLC. President of Oregon Outdoor Advertising Association.	Transcribed: We support the rules as proposed in this latest draft. I appreciate the clarity and the concise nature of these revised rules and we're in full support as proposed.
3.	11/21/2025	Public hearing	Christie Lindgren with Outfront Media, LLC	Transcribed: I think Dan covered it all, thank you.



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November 19, 2025

Oregon Department of Transportation
Right of Way Section
Attn: Jill Hendrickson
Outdoor Advertising Sign Program
555 13th St NE
Salem, OR 97301

Re: Comments on Proposed Rulemaking Filed October 29, 2025

Dear Ms. Hendrickson:

Meadow Outdoor Advertising respectfully submits the enclosed memorandum containing our comments on ODOT's proposed rule changes filed October 29, 2025, implementing SB 417. These proposed changes accurately reflect the statutory language and legislative intent, and Meadow supports their adoption as drafted.

We appreciate the Department's continued collaboration with the outdoor advertising industry and welcome continued dialogue regarding interpretation of relocation provisions for digital outdoor advertising signs, including permits under 250 square feet.

Please contact me with any questions or if further discussion would be helpful.

Sincerely,

A handwritten signature in blue ink, appearing to read "BC", with a stylized flourish.

Brian Casady
Chief Operating Officer
Meadow Outdoor Advertising



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MEMORANDUM

To: Oregon Department of Transportation

From: Meadow Outdoor Advertising

Subject: Comments on Proposed Rulemaking Filed 10/29/2025

Date: November 19, 2025

Meadow Outdoor Advertising (“Meadow”) submits these comments regarding ODOT’s proposed rule changes for OAR Chapter 734, filed on October 29, 2025, and received by Meadow on October 30, 2025. The rulemaking implements SB 417 (2025), titled “SB 417 Changes: Digital Outdoor Advertising Signs and Acceptable Lease Documentation.” Meadow supports the proposed changes as drafted, as they accurately reflect both the language and intent of the legislation.

Summary of Substantive Rule Changes

734-060-0000(e)(i) & (ii) – Landowner Consent Documentation

These subsections outline the documentation required to demonstrate landowner consent for an outdoor advertising permit application. Meadow supports this rule change, as it reflects the intent and statutory language enacted in SB 417.

734-060-0000(7)(a) – Delivery of Permit Applications

This change adjusts the address and method of delivery for permit applications. Meadow has no objection to this revision.

734-060-0007 – Exchange of Static and Digital OAS Permits

The proposed revisions reflect adjustments made to ORS 377.831, allowing a one-to-one exchange of a static OAS permit or relocation credit for a digital OAS permit.

Meadow supports the proposed rule, as it aligns with the statutory framework and legislative intent.

Request for Clarification

Meadow respectfully requests clarification regarding ODOT’s interpretation of ORS 377.831(2)(a). Specifically, Meadow seeks confirmation whether ODOT will continue to interpret the statute as precluding relocation of digital OAS permits under 250 square feet. Meadow notes that such an interpretation was not the intent of the original statute and asks whether ODOT will instead apply the existing statute and rule to allow relocation of these permits.

If ODOT is unwilling to modify its interpretation within current rules, Meadow proposes that the sign program and industry stakeholders collaborate to draft an additional rule change that aligns with the intent of the statute—namely, that digital OAS permits, once created, should be treated the same as other OAS permits for purposes of relocation under ORS 377.767.