



# Memo

Date: January 11<sup>th</sup>, 2022  
To: Clackamas County Board of Commissioners  
From: DTD Staff – Dan Johnson – Director of DTD  
CC: Mike Bezner – Assistant Director of DTD, Karen Buehrig – Long Range Planning Manager,  
Jamie Stasny – Regional Transportation and Land Use Policy Advisor  
Subject: I-205 Toll Project RTP and MTIP Amendment Requests

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## **Purpose:**

To provide an overview of the proposed I-205 Toll Project RTP and MTIP Amendment Requests that will soon be brought forward for a vote at MPAC, JPACT and Metro Council.

## **Background:**

The Oregon Department of Transportation has submitted requests to amend both the 2018 Regional Transportation Plan (RTP) and the 2021-24 Metropolitan Transportation Improvement Program (MTIP). The proposed amendments will add a Preliminary Engineering (PE) project phase for the tolling of a portion of I-205 between Clackamas Highway (OR 213) and Stafford Road to both the constrained list of the RTP and to the MTIP project list. The proposed amendment to the RTP will also clarify the intended financial connection of the I-205 Toll Project as required by the Federal Highway Administration (FHWA).

Draft amendment language is included in the attachments of this memo.

The RTP is a long-range transportation plan that guides planning and investments for all forms of travel – motor vehicle, transit, bicycle and walking – and the movement of goods and freight throughout the Portland metropolitan region. The plan was last updated in 2018. The next full update is due by Dec. 2023.

Amendments to the RTP are considered in between scheduled updates when a sponsoring agency requests changes to the funding, phasing, mode, function or general location of a project in the plan.

The Metropolitan Transportation Improvement Program (MTIP) is a federally required process that encourages the cooperative development, evaluation, and adoption of the near-term investments in regional transportation. Its purpose is to promote communication and collaboration by agencies that allocate transportation funds, promote consideration of transportation plans and policies as a part of funding allocation processes, and to ensure fiscal accountability for agencies using federal transportation funds on projects.

Both requests are being coordinated with and taken up at the same meetings. If approved, the RTP amendment action is proposed to occur prior to the MTIP amendment action as inclusion of the project in the RTP is a pre-requisite to its inclusion in the MTIP.

### **What it Means:**

If these amendments are approved ODOT will be authorized and provided with 28\$M to complete the NEPA process for the I-205 Toll Project and complete initial design for toll infrastructure.

If the amendments fails our understanding is that ODOT will have to stop work on the I-205 Toll Project NEPA process until such time that the MTIP and RTP can be amended.

### **Approval Process:**

Ultimately both the RTP and MTIP Amendments must be approved by the Joint Policy Advisory Committee on Transportation (JPACT) and Metro Council. Other committees will be making recommendations to these bodies on the requests including the Metro Policy Advisory Committee (MPAC), Metro Technical Advisory Committee (MTAC) and Transportation Policy Alternatives Committee (TPAC).

### **Current Status:**

Initially ODOT and Metro staff planned to bring the amendments forward for a vote in January of 2022. Commissioner Savas, as Clackamas County JPACT representative, requested a delay in the decision. This delay was requested to allow the Oregon Transportation Commission (OTC) time to consider a request from the Clackamas County Coordinating Committee (C4) and JPACT to allocate some of the federal Bipartisan Infrastructure Law (BIL) dollars to help finance Phase 1A of the I-205 Capital project in order to allow the region the time to develop a comprehensive regional tolling and congestion pricing plan prior to implementing tolling on any one part of the system. This plan is needed to answer critical system wide questions regarding mitigation of diversion and ongoing investment decisions.

Commissioner Savas' request for delay has been granted therefore the JPACT vote will not occur until February or later.

### **Next Steps:**

Staff will return to the Board to provide a status update and seek direction for your MPAC and JPACT representatives prior to the votes.

### **Attachments:**

- 1 - RTP Amendment draft language
- 2 - RTP Amendment Presentation from ODOT with proposed edits to draft language
- 3 - MTIP Amendment Draft Language
- 4 - ClackCo Values on Transportation Funding Solutions for the Interstate System
- 5 - 2021-12-06 C4 Letter to OTC re: IJJA Funding (including previous regional logo letter to federal delegation)



## Exhibit A to Ordinance No. 21-1467

### 2018 REGIONAL TRANSPORTATION PLAN (RTP) AMENDMENT

#### 1. Amend 2018 RTP Chapter 8 (Table 8.3 and Section 8.1.3.8) to add the following information about the I-205 Toll Project as shown in ~~strikethrough~~ and underscore:

**Table 8.3 Completed and Current Major Project Development**

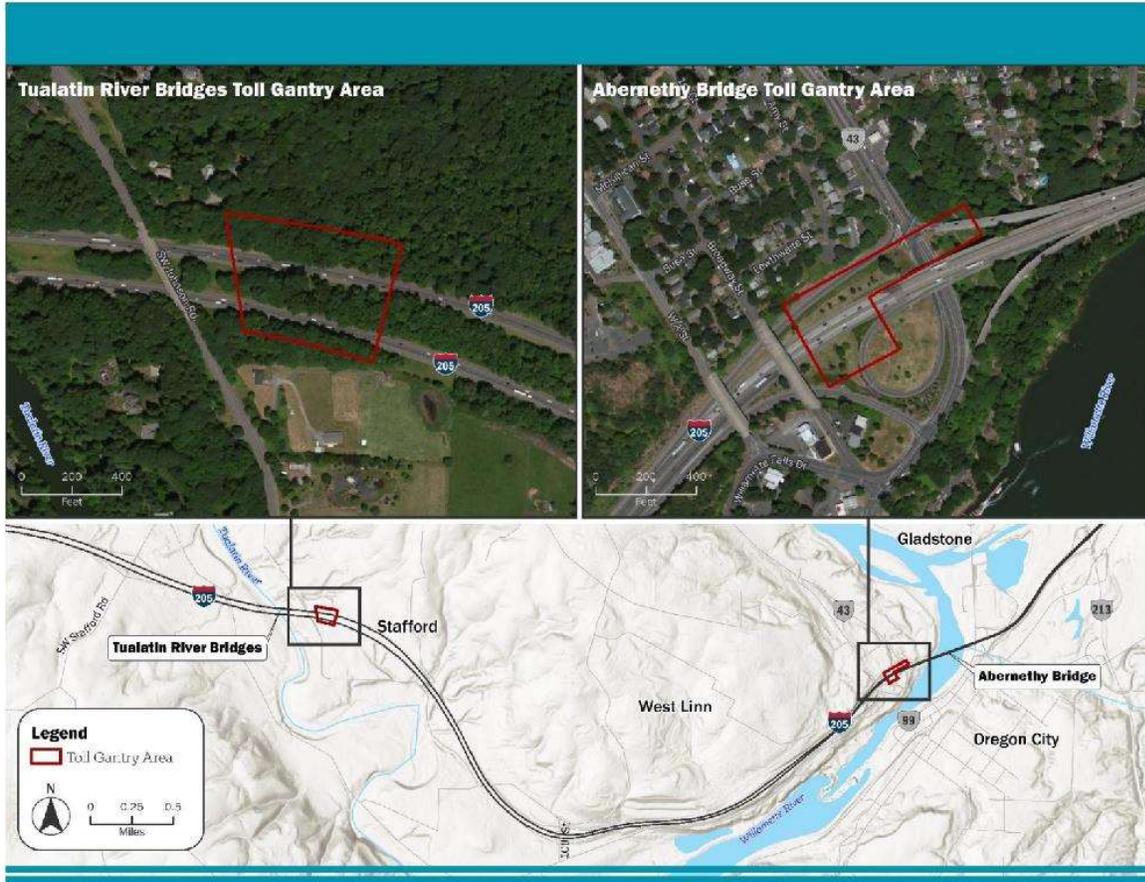
Project	Status
Interstate 5/Columbia River Crossing Project	LPA approved in July 2008. Record of decision signed by FHWA in December 2011.  Project development work discontinued in 2013 in Washington and 2014 in Oregon.  Joint Washington and Oregon Legislative Action Committee discussions begin in 2017.
Sunrise Project and Sunrise Jobs and Transportation Act Project	LPA approved in July 2009. Record of decision for Phase 1, Units 1, 2 and 3 signed by FHWA in February 2011.  Phase 1 related projects were completed in June 2016.  Environmental approval received for improvements on OR 224 at Rusk Road.  Phase 2 and Phase 3 may require future NEPA reevaluation for improvements east of SE 122nd Ave, given changes in the built environment since 2010.
Division Transit Project	LPA approved in June 2017.
Southwest Corridor Project	LPA approved in Nov. 2018.
I-5 Rose Quarter Improvement Project	Environmental Assessment anticipated to be published in 2019. Design anticipated to begin in 2019.
MAX Red Line Improvements Project	LPA approval anticipated in January 2019. Documented Categorical Exclusion approval anticipated in 2019.
OR 217 Project	OR 217 Southbound: <ul style="list-style-type: none"> <li>• Categorical Exclusion anticipated by October 2019.</li> <li>• OR 217 Northbound: Categorical Exclusion anticipated by April 2020.</li> </ul>
I-205 South Corridor Widening and Seismic Improvements Project	Categorical Exclusion approved in December 2018. <u>Toll revenue will be needed to complete construction of this project. A separate Environmental Assessment for the I-205 Toll Project began in August 2020; expected completion in December 2022.</u>
Basalt Creek Parkway	IGA to plan for Basalt Creek signed by partners in 2011.  Basalt Creek Transportation Refinement Study to define alignment completed in 2013 and adopted as an amendment to IGA.  Categorical Exclusion anticipated in 2019.





# Exhibit A to Ordinance No. 21-1467 2018 REGIONAL TRANSPORTATION PLAN (RTP) AMENDMENT

**Figure 8.13b I-205 Toll Project Draft Map**



Source: ODOT



**Exhibit A to Ordinance No. 21-1467**  
**2018 REGIONAL TRANSPORTATION PLAN**  
**(RTP) AMENDMENT**

**2. Amend 2018 RTP Appendix A to add I-205 Toll Project (Preliminary Engineering Phase) as follows:**

RTP ID	Project Name	Start Location	End Location	Description	Estimated Cost (2016 dollars)	Time Period	Financially Constrained project list
<u>12099</u> <u>(new project)</u>	<u>I-205 Tolling Project (PE)</u>	<u>Oswego Hwy (OR 43) Interchange</u>	<u>Stafford Rd Interchange</u>	<u>The Project would toll all lanes of I-205 on or near the Abernethy Bridge and Tualatin River Bridge. The Project's purpose is to raise revenue to fund construction of the I-205 Improvements Project and manage congestion between Stafford Road and Oregon Route 213 (OR 213).</u>	<u>\$23,534,759</u>	<u>2018-2027</u>	<u>Yes</u>

# I-205 Toll Project: Regional Transportation Plan (RTP) and Metropolitan Transportation Improvements Program (MTIP) Amendments

## Joint Policy Advisory Committee on Transportation (JPACT)

### Presenters:

**Mandy Putney** (she/her)

**Brendan Finn** (he/him)

December 16, 2021



# Regional Congestion Management and Mobility Projects

## Currently Funded by HB2017

- System Improvement Project
- Bike/Ped Crossing Project

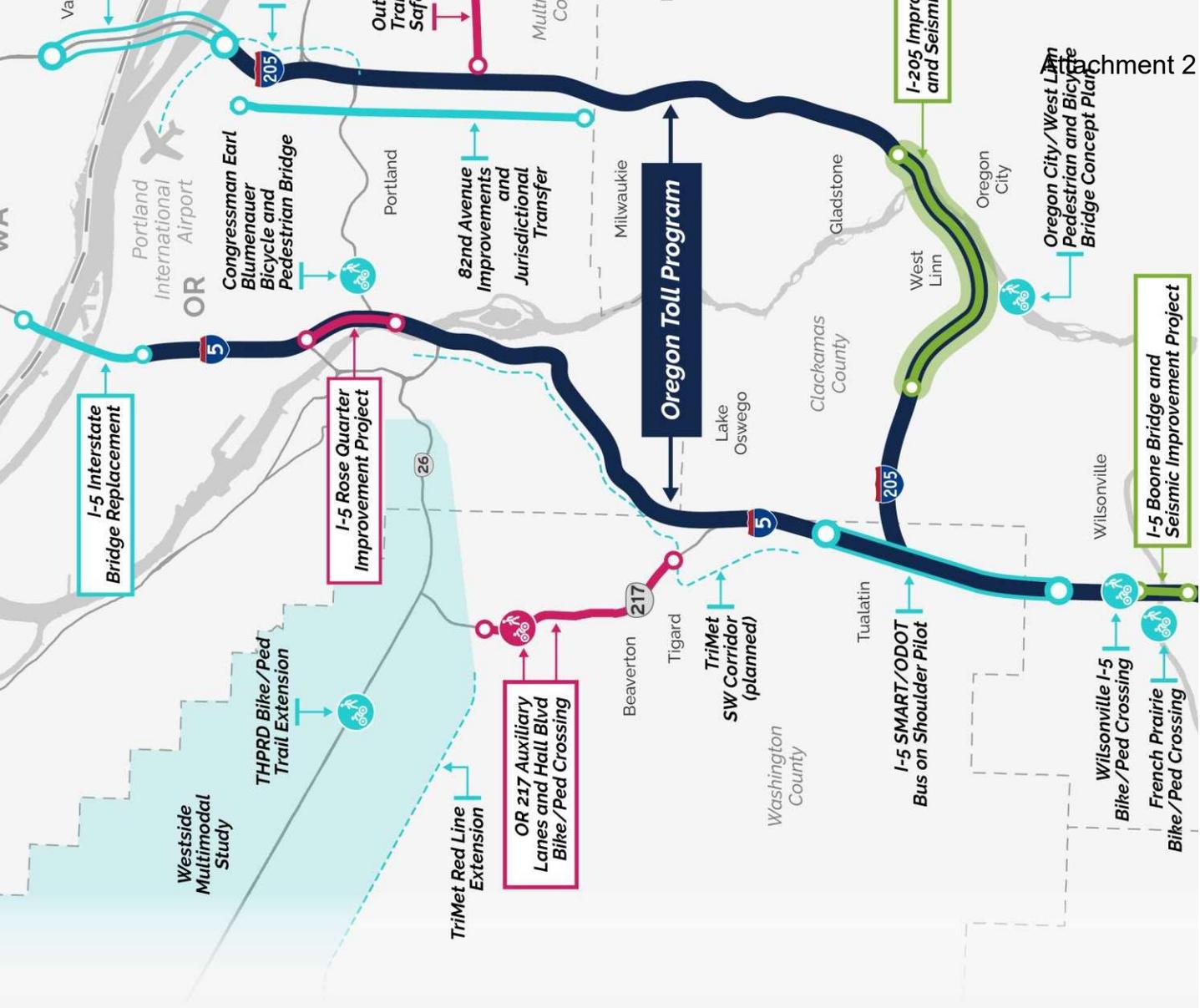
## Made Possible with HB3055

- System Improvement Project
- Regional Mobility Pricing Project
- I-205 Toll Project

## Partner Project with ODOT Support

- System Improvement Project
- Bike/Ped Crossing Project
- Bus on Shoulder Pilot
- TriMet Project
- Multimodal Study

Note: Core project names are boxed



Reliable, emissions-reducing, and competitive transportation options

Climate and equity are connected

Toll-free travel options for people struggling to meet basic needs

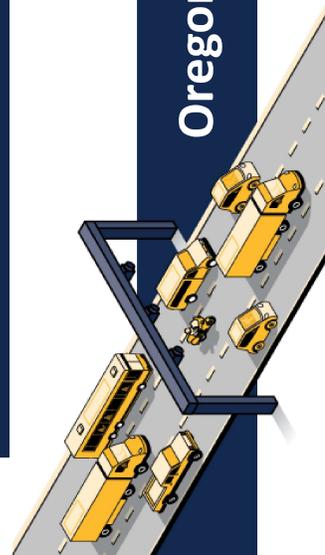
Equity

User-friendly system (language, tech access, and ability)

Benefits extend into SW Washington

State, region, and local communities working together

# FOUNDATIONAL STATEMENT



Oregon Toll Program

[www.OregonTolling.org](http://www.OregonTolling.org)

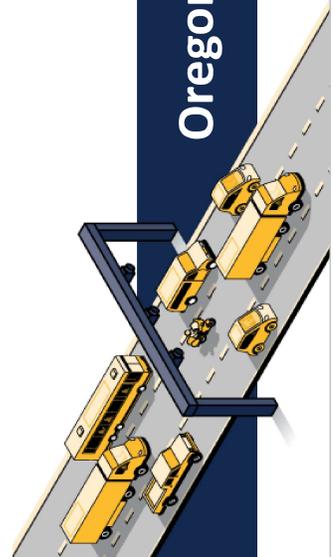
# I-205 & RMPP Timeline

Late 2024

Late 2025



● Comment period for draft document      ◆ Final environmental document



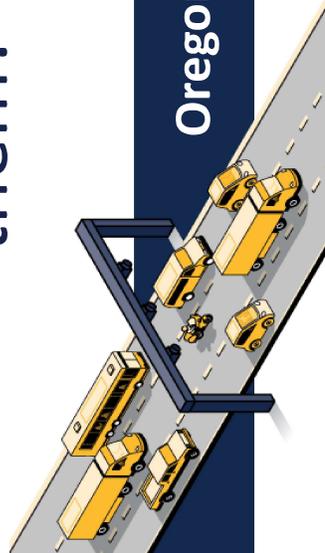
Oregon Toll Program

[www.OregonTolling.org](http://www.OregonTolling.org)

# We need funding to answer key questions

During “PE”/NEPA phase:

1. How will income-based toll rates be established?
2. What are the transit and multimodal investments?
3. Where are diversion impacts located and what will be done to address them?



Oregon Toll Program

[www.OregonTolling.org](http://www.OregonTolling.org)

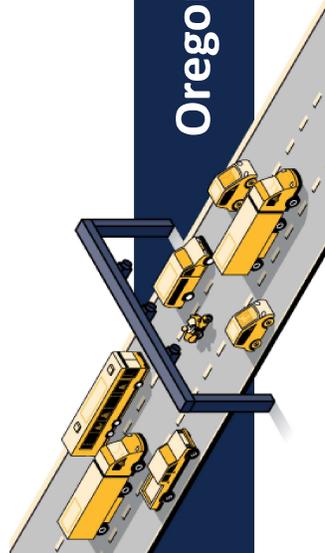
# NEPA Decisions & Preliminary Engineering

## NEPA Environmental Assessment (EA): Benefits, Impacts, Mitigation

Draft Environmental Assessment (EA)	June 2022
Public comment period	June/July 2022
Refinement, Final EA, and Decision Document	July-December

## Preliminary Engineering (PE) for Gantries

Concept engineering, alternative gantry design	June 2022
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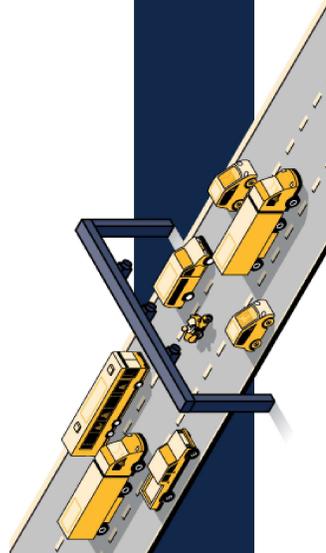
Oregon Toll Program

[www.OregonTolling.org](http://www.OregonTolling.org)

# Diversion: What it is and how we're studying

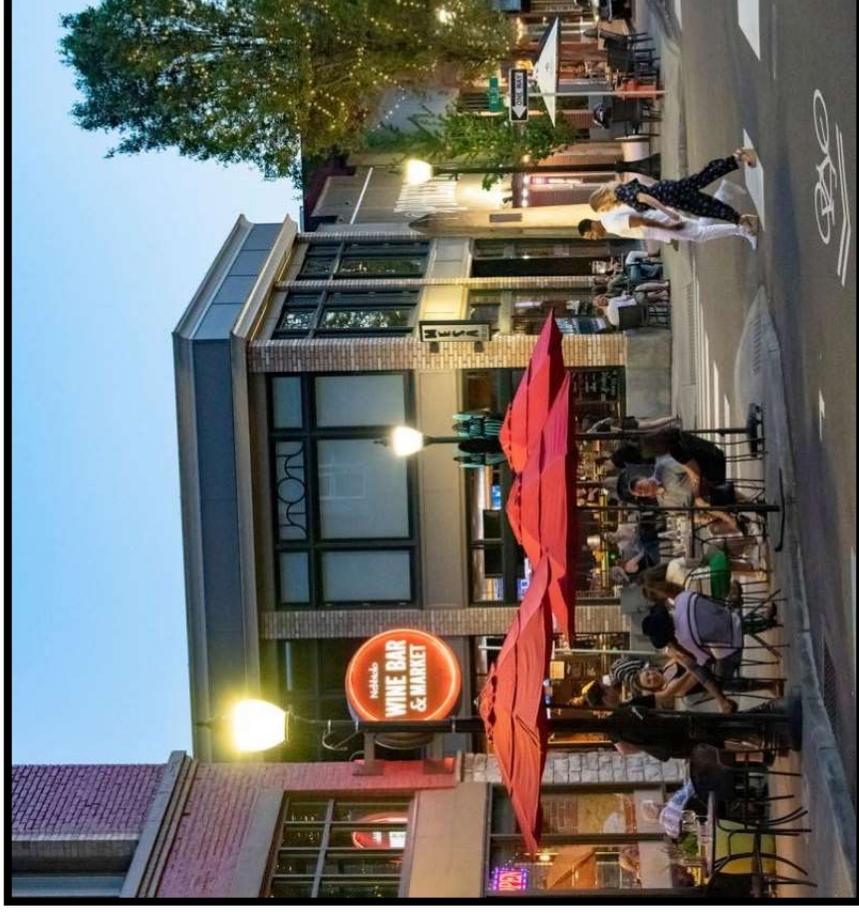
- **Positive:** Changes in timing of trips, destinations, modes or trips not being made (e.g. telework)
- **Regional Travel Demand** Illustrates changes in demand the course of the day
- **Negative:** Changes that result in increased traffic on local roads
- **More detailed modeling** rerouting patterns on the street network during peak

## Intersection-level analysis ready in mid-January 2022



# We care about what happens locally

- Noise
- Air quality
- Access to local businesses, faith centers, health care, schools, and parks
- Seniors, youth, and people living with a disability

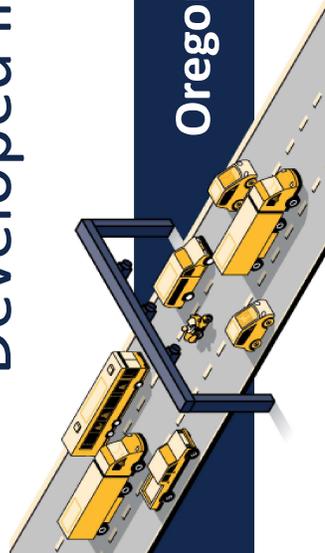


**Downtown Oregon City**  
Source: Molly Johnson, Mt. Hood Territory website

# We know transportation options are limited

## I-205 Toll Project: Transit & Multimodal Strategy

- Builds upon existing transportation plans
- Identifies needs we are hearing about and ideas to address them
- Informs ODOT's commitments to project mitigation
- Developed in coordination with partners



Oregon Toll Program

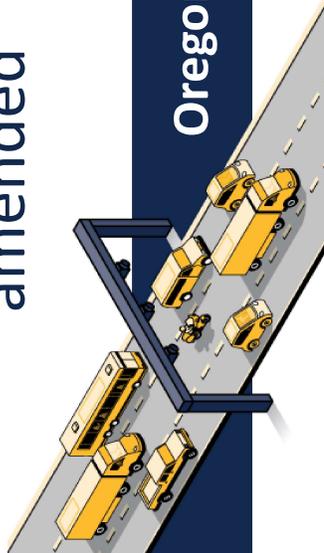
[www.OregonTolling.org](http://www.OregonTolling.org)

# I-205 Toll Project RTP Amendment

October 2021 to February 2022  
TPAC, MTAC, JPACT, MPAC, and Metro Council

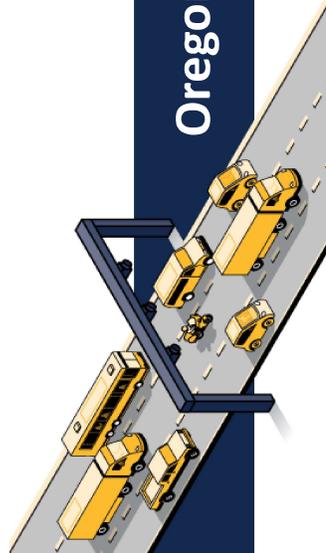
## Why now?

- Align the federal documentation (NEPA analysis) for I-205 Toll Project and I-205 Improvements Project
- FHWA requires NEPA to be completed under a programmed PE phase
- The RTP needs to be updated so that the MTIP can be amended



# Overall RTP Amendment Comments

- October 1 - November 15, 2021 (45 days)
- **348 total** comments, 7 were specific to the amendment
- Expressed **opposition to tolling** in general
- Most respondents identified as **white or preferred not to answer**
- Over half are **over age 45**
- One-third reported an annual income of **\$100,000 or more**
- **The majority** of respondents live in **Clackamas County**



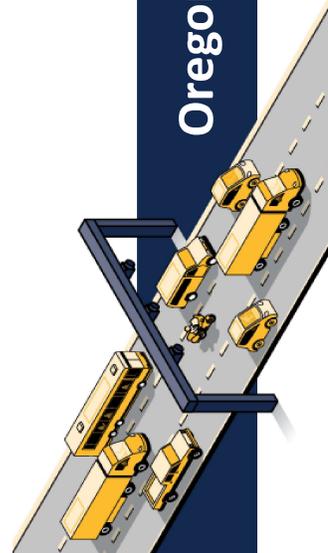
Oregon Toll Program

[www.OregonTolling.org](http://www.OregonTolling.org)

# Comments Specific to RTP Amendment

	Opinion
Support	1
Conditional Support	3
Oppose	2
No Indication	1
<i>Total</i>	7

- Need to meet Greenhouse Gas Emission goals
- Invest in transit and multimodal transportation in addition to highway
- Impacts to low-income diversion on local streets
- Edits to clarify language

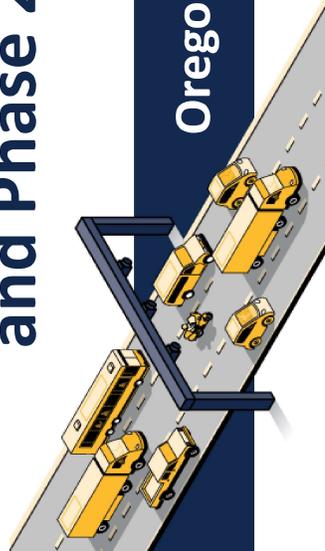


Oregon Toll Program

[www.OregonTolling.org](http://www.OregonTolling.org)

# Proposed edits

Preliminary design work is underway to widen I-205 between Clatsop and Stafford Road and improve the I-205/Abernethy Bridge to ensure it remains functional after a catastrophic earthquake. ~~The design was funded through HB 2017; however, construction funding for the project has not been identified. Construction financing for Phase 1B, including Abernethy Bridge and adjacent intersections is identified in HB 3055 (2021 Session). Variable Rate Tolls priced to manage tolling demand as well as provide revenue are expected to be used to fund Phase 1B, and Phase 2).~~

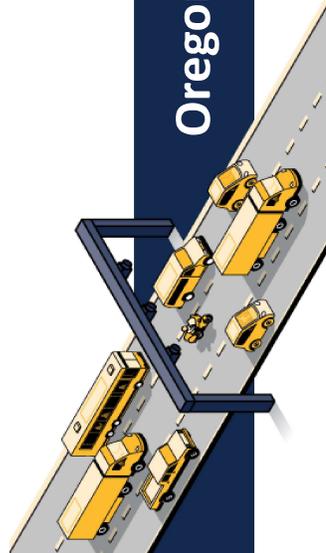


Oregon Toll Program

[www.OregonTolling.org](http://www.OregonTolling.org)

# Proposed edits

The proposed I-205 Toll Project would toll I-205 near the Aberdeen and Tualatin River Bridges (see figure 8.13b) to raise revenue for construction of the planned I-205 Improvements Project and reduce congestion between Stafford Road and Oregon Route 213 to give travelers a better and more reliable trip. Significant impacts caused by tolling will need to be addressed as part of this project through mitigation. More information about the I-205 Toll Project can be found at <https://www.oregon.gov/odot/tolling/Pages/I-205-Tolling>.

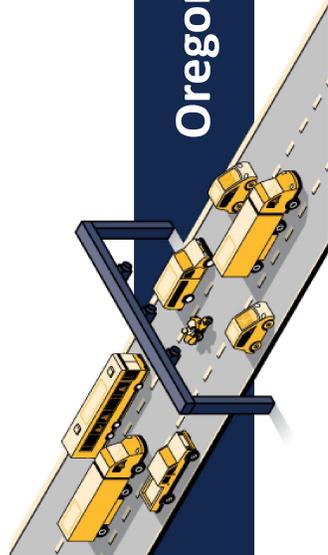


Oregon Toll Program

[www.OregonTolling.org](http://www.OregonTolling.org)

# Proposed edits

“The Project would toll all lanes of I-205 on or near the Abernethy Bridge and Tualatin River Bridge. The Project’s purpose is to raise revenue to fund construction of the I-205 Improvements Project and manage congestion between Stafford Road and Oregon Route 213 (OR 213). The PE phase includes completion of environmental analysis under the National Environmental Policy Act (NEPA) and initial design for toll infrastructure.”

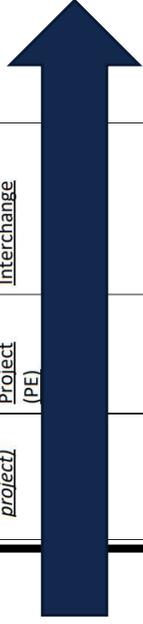


Oregon Toll Program

[www.OregonTolling.org](http://www.OregonTolling.org)

## 2. Amend 2018 RTP Appendix A to add I-205 Toll Project (Preliminary Eng

RTP ID	Project Name	Start Location	End Location	Description	Estimate (2016)
12099 (new project)	I-205 Tolling Project (PE)	Oswego Hwy (OR 43) Interchange	Stafford Rd Interchange	The Project would toll all lanes of I-205 on or near the Abernethy Bridge and Tualatin River Bridge. The Project's purpose is to raise revenue to fund construction of the I-205 Improvements Project and manage congestion between Stafford Road and Oregon Route 213 (OR 213).	\$23



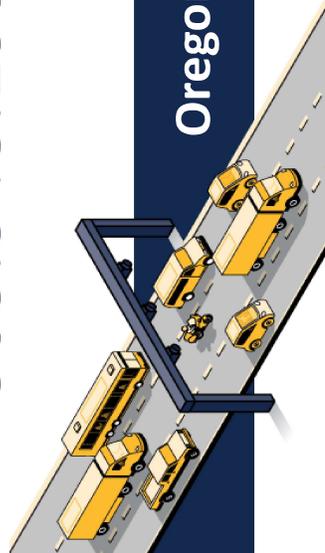
**Please contact us with your questions**

**Mandy Putney, Urban Mobility Office Director of  
Strategic Initiatives**

**Mandy.Putney@odot.Oregon.gov  
503.720.4843**

**Brendan Finn, ODOT Urban Mobility Office Director**

**Brendan.C.FINN@odot.state.or.us  
503.348.1991**



**Oregon Toll Program**

**[www.OregonTolling.org](http://www.OregonTolling.org)**



**Metro is in receipt of the 2021-26 MTIP January #1 2022 (FFY 2022) Formal Amendment for Resolution 21-52XX**

FOR THE PURPOSE OF AMENDING THE 2021-26 METROPOLITAN IMPROVEMENT PROGRAM (MTIP) TO ADD THE PRELIMINARY ENGINEERING PHASE FOR ODOT'S I-205 TOLLING PROJECT ALLOWING NEPA AND DESIGN ACTIVITIES TO BEGIN (JA22-06-JAN1)

**Public Notification Comment Opportunities for the January #1 2022 (FFY 2022) Formal MTIP Amendment for Resolution 21-52XX  
(ODOT New I-205 Tolling Project PE Phase)**

The public review period for this project amendment is **11/30/2021 and concludes on 1/6/2022, at 5:00 pm.**

Requests to submit comments or concerns about this amendment should be submitted to Summer Blackhorse, via email at [summer.blackhorse@oregonmetro.gov](mailto:summer.blackhorse@oregonmetro.gov). Subject to revisions to address comments received during the public comment period, the 2021-24 MTIP as revised by the proposed amendment will be the final program unless amended, and a final notice will not be posted

The Public Notification/Opportunity to Comment period represents the starting point to process and approve a formal MTIP amendment. For the I-205 Tolling PE Phase MTIP Amendment, the MTIP website contains the following materials for review:

1. An overview from Ted Leybold, Metro Resource Development Manager about the I-205 MTIP Amendment and relationship to the RTP Amendment also in progress.
2. The Notification Header and MTIP worksheet (referred to as Exhibit A) reflecting the changes to occur to the MTIP
3. Additional support references to help add clarity to the MTIP amendment.

These materials represent the beginning of the various support documents that will be included as part of the MTIP amendment.

The first Metro approval step will occur on Friday, January 7, 2021 at the Metro Transportation Policy Alternatives Committee (TPAC). TPAC members will receive their notification and overview of the I-205 Tolling PE phase project and be requested to provide an approval recommendation to the Metro Joint Policy advisory Committee on Transportation (JPACT) for the amendment. Additional support materials will be available for review as the MTIP amendment proceeds through the Metro approval process (e.g. at TPAC, JPACT, and Metro Council). The added materials will include a draft resolution for the amendment, the MTIP worksheet/Exhibit A to the Resolution, a detailed staff report about the amendment, and support material attachments to the staff report.

Updated materials concerning the MTIP amendment will be available for download off the Metro website as part of the agenda from the specific Metro Committee or Council meeting. The agenda and meeting packets are normally available for download at least few days ahead of the meeting.

Although the Public Notification/Opportunity to Comment is being set ahead (November 30, 2021 to December 6, 2021) of the Metro committee approval process, public comment can occur past the notification timeframe through TPAC, JPACT, or Metro Council. Public testimony can occur at the two Metro approval committees required for the formal amendment to complete: (1) Transportation Policy Alternatives Committee (TPAC), or (2) at the Joint Policy Advisory Committee on Transportation (JPACT). Public testimony can also occur at the Metro Council where the formal amendment receives final Metro approval. Please check the Metro website for the specific committee or Council meeting to see if the amendment is included on that month's agenda if you desire to provide testimony about the amendment.

About MTIP Formal/Full Amendments:

Formal MTIP amendments represent a significant change to a project from the original funding or scope of improvement activities. The various required process steps are intended to demonstrate that as a result of the required changes, no impact upon air conformity is present, plus fiscal constraint is still maintained, and/or the priorities, policies, and goals established in the approved Regional Transportation Plan (RTP) have not changed. Formal MTIP amendments normally fall into one or more of the following categories: (1) Significantly adds, revises, reduces, or changes the project scope of improvement activities. (2) Requires a significant change to the project limits limit (greater than 0.25 miles). (3) Involves a significant cost change (increase or decrease normally 20% or greater). (4) Adds or cancels a project from the MTIP.



2021-2024 Metropolitan Transportation Improvement Program  
Exhibit A to Resolution 21-52XX

Proposed January #1 2022 (FFY 2022) Formal Transition Amendment Bundle Amendment Type: <b>Formal/Full</b> Amendment #: <b>JA22-06-JAN1</b> Total Number of Projects: 1				
Key Number & MTIP ID	Lead Agency	Project Name	Project Description	Amendment Action
Project #1 Key <b>22507</b>	ODOT	<b>I-205 Tolling Project PE Phase: OR213 – Stafford Rd</b>	Complete design & NEPA activities to toll all I-205 lanes near the Abernethy Bridge and Tualatin River Bridge, raise revenue to fund construction of the I-205 Improvements Project, and manage congestion from Oswego Hwy IC (OR 43) to west of Stafford Rd	<b>ADD NEW PROJECT:</b> The formal MTIP amendment adds only the PE phase for ODOT's I-205 Tolling Project the 2021-26 MTIP



Metro

20121-24 Metropolitan Transportation Improvement Program (MTIP)  
PROJECT AMENDMENT DETAIL WORKSHEET

**Formal Amendment**  
**ADD NEW PROJECT**  
Add the PE phase for the I-205 Tolling Project

<b>Lead Agency:</b> ODOT					<b>ODOT Key:</b> 22507
<b>Project Name:</b> I-205 Tolling Project PE Phase: OR213 – Stafford Rd	<b>1</b>	Project Type: ODOT Type	Planning		<b>MTIP ID:</b> New - TBD
<b>Project Status:</b> 2 = Pre-design/project development activities (pre-NEPA) (ITS = ConOps.)		Performance Meas:	No		<b>Status:</b> 2
		Capacity Enhancing:	No		<b>Comp Date:</b> 9/30/2025
		Conformity Exempt:	Yes	RTP ID:	12099
		On State Hwy Sys:	I-205	RFFA ID:	N/A
		Mile Post Begin:	9.50	RFFA Cycle:	N/A
		Mile Post End:	3.16	UPWP:	No
		Length:	6.34	UPWP Cycle:	No
		Flex Transfer to FTA	No	Transfer Code	N/A
		1st Year Program'd:	2022	Past Amend:	0
		Years Active:	0	OTC Approval:	Yes
		STIP Amend #: 21-24-1432		MTIP Amnd#	JA22-06-JAN1

**Detailed Description:** On I-205 in Clackamas County from approximately MP 9.00 to MP 3.00, complete required Preliminary Engineering (NEPA and design activities) for possible later tolling implementation across all through lanes to manage congestion and to raise revenue to fund construction of the I-205 improvements projects from approximately OR213 to Stafford Rd

**STIP Description:** Project design and environmental review for tolling on I-205 between Stafford Rd and OR 213.

Last Amendment of Modification: None. This amendment reflects the initial programming for the project.

PROJECT FUNDING DETAILS								
Fund Type	Fund Code	Year	Planning	Preliminary Engineering	Right of Way	Other (Utility Relocation)	Construction	Total
<b>Federal Funds</b>								
ADVCON	ACPO	2022		\$ 21,806,312			\$	21,806,312
							\$	-
							<b>Federal Totals:</b>	<b>21,806,312</b>
								Federal Aid ID
<b>Federal Fund Obligations \$:</b>								
<b>EA Number:</b>								
<b>Initial Obligation Date:</b>								
<b>EA End Date:</b>								
<b>Known Expenditures:</b>								
<b>State Funds</b>								
State	Match	2022		\$ 5,451,578			\$	5,451,578
							\$	-
							<b>State Total:</b>	<b>5,451,578</b>
<b>Local Funds</b>								
							<b>Local Total</b>	<b>-</b>
<b>Phase Totals Before Amend:</b>								
				\$ -	\$ -	\$ -	\$ -	\$ -
<b>Phase Totals After Amend:</b>								
				\$ 27,257,890	\$ -	\$ -	\$ -	\$ 27,257,890
Year of Expenditure Cost (PE Phase only): PE Phase = \$23,534,759 Preliminary Full Project Cost Estimate: Unknown currently								
Phase Change Amounts:	\$	-	\$	27,257,890	\$	-	\$	27,257,890
Phase Change Percent:		0.00%		100.00%		0.00%		100.00%

**Project Glossary Notes and Summary of Changes:**

- > Red font = prior amended funding or project details. Blue font = amended changes to funding or project details. Black font indicates no change has occurred.
- > The amendment adds the PE phase based on approved OTC funding
- > Main Support Materials: Submitted RTP Amendment materials
- > Status notes: Since only funding is being added for the project, the MTIP classifies the project as a planning project.

**Amendment Summary:**

The formal amendment to add the new PE phase project to the MTIP will start in January 2022 with the Metro Transportation Policy Alternatives Committee (TPAC). TPAC's January meeting is scheduled for January 7, 2022. Prior to the MTIP action, Metro is completing an amendment to add the PE phase to the constrained approved Regional Transportation Plan. Adding the PE to the MTIP is contingent upon approval of the RTP amendment.

Metro also must complete a 30-day public notification/opportunity to comment period when a new project is added to the MTIP. Early posting of the this MTIP amendment to initiate the public comment period is occurring to have the comment history available for review for TPAC, JPACT, and Metro Council. The 30-day comment period for the MTIP amendment will be open from November 30, 2021 to January 6, 2022. The MTIP amendment approval process will then commence with TPAC at their January 7, 2022 meeting. Approvals from JPACT and Metro Council are required. Upon Metro Council approval, the formal amendment will be sent to ODOT and Federal Highways Administration for their final review and approval as well. Please see the January TPAC agenda for the approval process steps, estimated approval dates, supplemental support materials, and a more detailed staff memo/report concerning the MTIP amendment.

Summary: The above MTIP reflects a starting point for possible PE phase programming. However, there are several details still to work out with ODOT. This includes:

- Project Name
  - Project Description
  - The PE phase programming amount and fund type codes that will be used.
- The final version that proceeds to JPACT and Metro Council may be slightly different depending upon required programming adjustments
- > Will Performance Measurements Apply: No
  - > Will a special RTP Goals Evaluation Assessment be completed? Yes, but limited.

**RTP References:**

- > RTP ID: 12099 (Draft ID)
- > RTP Description: (Draft) The Project would toll all lanes of I-205 on or near the Abernethy Bridge and Tualatin River Bridge. The Project's purpose is to raise revenue to fund construction of the I-205 Improvements Project and manage congestion between Stafford Road and Oregon Route 213 (OR213).
- > Exemption status: (PE phase only) Exempt project per 93 CFR 126, Table 2 - Other - Planning and Technical Studies
- > UPWP amendment: No

- . - .

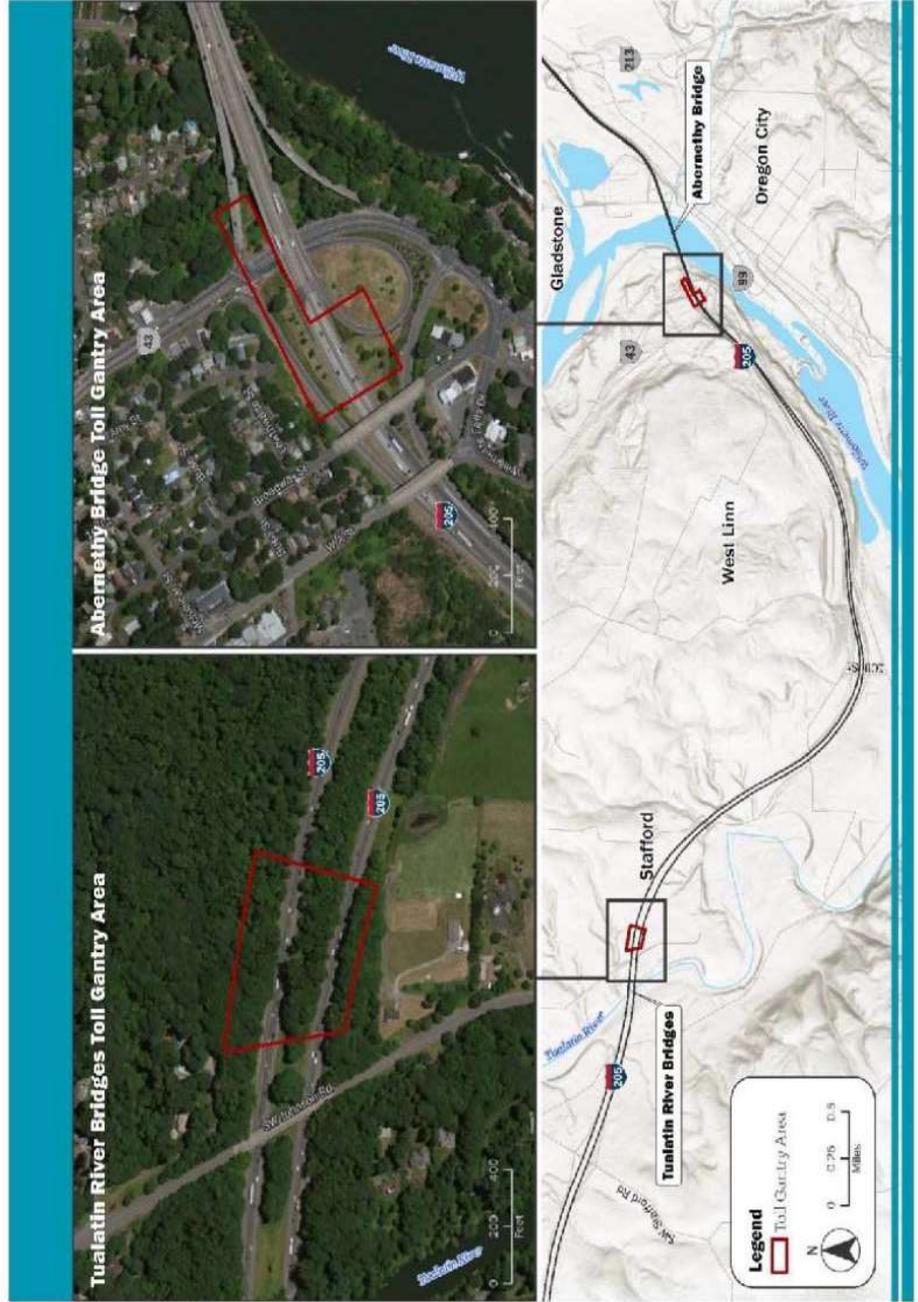
**Fund Codes:**

- > ADVCON = Federal Advance Construction also referred to as "AC funds". AC funds are used by ODOT as a placeholder until the actual federal fund type code is known.
- > State = General state funds provided by the lead agency as part of the required match to the federal funds.

**Other**

- > On NHS: Yes. I-205 is identified as part of the Eisenhower Interstate System on the National Highway System
- > Is the project located on the Metro Modeling Network? - Yes, Motor Vehicle Modeling network
- > Model category and type: I-5 is identified as a "Throughway" in the Motor Vehicle Network
- > TCM project: No
- > Is the route located in the Congestion Management Program (CMP): Yes

**Figure 8.13b I-205 Toll Project Map**



I-205 Toll Project Regional Transportation Plan Amendment

The purpose of the I-205 Toll Project is to use variable-rate tolls on the I-205 Tualatin River Bridges and Abernethy Bridge to raise revenue to complete the I-205 Improvements Project and manage congestion. The full text of the Purpose and Need Statement can be found [here](#).

Table 1 is a schedule of the major milestones for the I-205 Toll Project.

**Table 1. I-205 Toll Project Major NEPA Milestones**

Major NEPA Milestone	2021				2022			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
NEPA Regional Transportation Modeling & DIA Subarea Modeling (2045 & 2027)								
Traffic Analysis (data collection, baseline, no-build and build)								
Environmental Assessment Tech Reports								
Draft Environmental Assessment								
Environmental Assessment Public Comment Period								
Environmental Assessment Comment Response Matrix								
Preferred Alternative Regional Modeling and Traffic Analysis (as Revised Transportation Tech Report								
Prepare Final Environmental Assessment/FONSI								
Final Environmental Assessment/FONSI								

**CLACKAMAS COUNTY VALUES**  
**ON PROPOSED TRANSPORTATION FUNDING SOLUTIONS**  
**FOR THE INTERSTATE SYSTEM IN THE PORTLAND METROPOLITAN AREA**

4.15.2021

Clackamas County supports a functional regional interstate system that prioritizes equity, safety, a vibrant economy, healthy and active communities, climate action, disaster resilience, and the reliable movement of people and goods.

We acknowledge that additional funding is needed to construct these projects and other improvements on the interstate system. Clackamas County has identified the following values that should be reflected in any approved funding solutions.

**To ensure a safe, equitable regional interstate system, funding solutions should...**

- Support timely allocation of funds to construct the projects of statewide significance from HB2017
- Ensure that revenue be reinvested in projects identified by an inclusive public process led by ODOT and coordinated with the local governments
- Elevate engagement with people who have been historically left out of policy discussions, such as low income families and people of color
- Establish viable alternative transportation options that support the functionality of the interstate system, such as an accessible transit system, in areas with inadequate service
- Support necessary improvements to accommodate the region's current and projected growth

**To support a vibrant economy & ensure the reliable movement of people and goods, funding solutions should...**

- Ensure that no tolling or congestion pricing occurs on any one part of the system prior to full system implementation to avoid economic disadvantages or unfair burdens on people (communities, businesses, and the movement of commerce)
- Maintain a transportation system for urban and rural residents that is dependable and predictable to attract new businesses and industry, and provides reliable travel times for commuters and employers
- Enhance opportunities for Disadvantaged Business Enterprise (DBE) in capital projects and incorporate Construction Career Pathways (C2P2) strategies to promote diversity in skilled construction occupations

**To prioritize disaster resiliency and climate action, funding solutions should...**

- Provide safe, efficient evacuation routes during natural disasters, such as wildfires and earthquakes, by upgrading vulnerable bridges and other transportation infrastructure to be earthquake ready
- Balance transportation improvements with the County's goal to be carbon neutral by 2050 by working to improve regional air quality and mitigate impacts of vehicle pollution on public health and the environment

**To support healthy and active communities, funding solutions should...**

- Mitigate impacts on local facilities caused by diversion/rerouting of trips (all modes)
- Embed safety, health and equity into project designs and program policies (all modes)
- Improve connections and travel options to places of work, school, medical care, and recreation

**This document is not an endorsement or acceptance of any proposal to implement tolling or congestion pricing on I-205, as we believe it will have a disproportionate and detrimental effect on Clackamas residents, businesses, and visitors.**



**Public Services Building**  
 2051 Kaen Road  
 Oregon City, OR 97045  
 503-655-8581

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December 06, 2021

Oregon Transportation Commission  
 355 Capitol Street NE, MS #11  
 Salem, OR 97301

**Re: Allocation of Infrastructure Investment and Jobs Act Funding to I-205 Improvements Project**

Dear Chair Van Brocklin and Members of the Commission:

On behalf of the Clackamas County Coordinating Committee (C4), we request the State of Oregon use a portion of the funding from the Infrastructure Investment and Jobs Act (IIJA) to diversify the revenue sources for the I-205 capital improvements bottleneck project between Stafford Rd and OR-213, including the Abernethy Bridge. While we recognize the IIJA is bigger than just one project, it is the priority of this policy group to advocate on behalf of the I-205 project and the communities that will be directly impacted by any diversion stemming from a toll program. ODOT's current proposal to toll I-205 ahead of the rest of the region is not necessary. Tolling and congestion pricing has regional implications and must be implemented in a cohesive and coordinated manner.

In June 2021, ODOT joined C4 and 35 other stakeholders on a letter that explicitly stated new federal investments could "diversify the funds to construct this critical project now, and potentially prevent the need to toll the Abernethy Bridge years ahead of the implementation of a comprehensive regional pricing program." That letter is attached.

Between the \$1.2 billion coming to Oregon directly and the \$100 billion in competitive grants made available through IIJA, we believe there is enough flexibility to change the funding paradigm of this bottleneck project of regional and statewide significance. Combined with the funds made available by HB 3055 in the 2021 State Legislature, ODOT has the opportunity to correct a policy decision that unfairly tolls a roadway that has no meaningful alternative routes and that already experiences diversion into local communities.

IIJA is a gift to Oregon, and can be a resource that brings our communities together. Please take this opportunity to prioritize IIJA funds for the I-205 capital project in order to allow time for a cohesive regional approach to congestion pricing and tolling to be developed and implemented in a thoughtful, regionally supported manner.

Thank you again for your consideration.

Sincerely,

A blue ink signature of Commissioner Paul Savas, consisting of several fluid, overlapping strokes.

Commissioner Paul Savas  
 Clackamas County  
 C4 Co-Chair  
 RIACT Vice Chair

A blue ink signature of Mayor Brian Hodson, featuring a stylized 'B' and 'H' with a horizontal line extending to the right.

Mayor Brian Hodson  
 City of Canby  
 C4 Co-Chair  
 RIACT Member

Attachment: June 2021 Federal Funding Support Letter to Oregon Congressional Delegation



## WE SUPPORT FEDERAL INFRASTRUCTURE INVESTMENTS IN THE I-205 BOTTLENECK PROJECT

June 16, 2021

We are requesting the Oregon Congressional Delegation's full support to prioritize federal funding to seismically retrofit and widen the I-205 Abernethy Bridge over the Willamette River. Acting today ensures Phase 1 of this bottleneck project, one of many projects of regional and national significance in Oregon, can begin construction as early as 2022. Federal contribution will diversify the funds to construct this critical project now, and potentially prevent the need to toll the Abernethy Bridge years ahead of the implementation of a comprehensive regional pricing program.

The Abernethy Bridge is in need of vital seismic repairs and serves as a strategic link for freight transportation on the national interstate system providing a wide array of economic benefits to Clackamas County, the region, the State of Oregon, and the nation as a whole.

The proposed project will widen the I-205 Abernethy Bridge with an additional through-lane in each direction, eliminating a freight bottleneck on the I-205 corridor. Serving both Oregon and Washington residents and businesses, I-205 is predominantly six lanes for most of its 37-mile length. However, its southern-most section, which includes the Abernethy Bridge, reduces to only four lanes, creating bottleneck congestion in peak hours for commuters and freight users.

This project will provide enhanced freight mobility that will benefit the entire northwest. I-205 connects advanced manufacturing, high tech, forestry, agricultural, and distribution/shipping businesses in Clackamas County, Portland, and the Willamette Valley with major import-export facilities such as the Port of Portland, the Portland International Airport, and the Port of Tacoma. Improvements of the bottleneck at the I-205 Abernethy Bridge will benefit the businesses and their employees who depend on reliable movement of products to these freight facilities who do their part to strengthen the economy of Oregon and the Pacific Northwest.

Federal funding today can advance construction on the I-205 Abernethy Bridge and move the project to construction in early 2022. We are counting on your support for a project that will strategically enhance regional seismic stability and provide significant benefits to local and regional commuters, economic development, and West Coast freight mobility. We urge you to support this project, and thank you for your consideration of this request.