



**DAN JOHNSON**  
DIRECTOR

DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT  
DEVELOPMENT SERVICES BUILDING  
150 BEAVERCREEK ROAD OREGON CITY, OR 97045

## MEMORANDUM

TO: Clackamas County Board of County Commissioners (BCC)  
FROM: DTD - Dan Johnson, Director  
RE: I-205 Toll Project EA Update  
DATE: March 14, 2023

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**REQUEST:** Approval of a second letter requesting a 30 day extension to the public comment period for a total of 90 days.

### BACKGROUND:

ODOT has released the Environmental Assessment (EA) for the I-205 Toll Project. The EA consists of over 2,000 pages of analysis and detailed information about the I-205 Toll Project proposal. Details regarding the EA can be found on the Oregon Department of Transportation (ODOT) website at <https://www.oregon.gov/odot/tolling/Pages/I-205-Tolling.aspx>.

ODOT announced last week that they will extend the public comment period by 15 days which results in a 60 day public comment period. While we appreciate the minor extension, staff continues to assert that a 90 day comment period is needed to review the thousands of pages of technical information, draft comments and coordinate through the board and committees. For that reason, staff is seeking Board approval for a second letter to ODOT and Federal Highway Administration (FHWA) requesting an additional 30 days to extend the public comment period to 90 days. See Attachment A.

Assuming no additional extension is granted, staff has developed an updated timeline noting significant dates. See Attachment B.

### Attachments:

Attachment A – 2<sup>nd</sup> Request for Extension – I-205 Toll Project EA Public Comment Period 3.13.23  
Attachment B – 60 Day I-205 EA Review Schedule 3.13.23



BOARD OF COUNTY COMMISSIONERS  
PUBLIC SERVICES BUILDING  
2051 KAEN ROAD | OREGON CITY, OR 97045

March 14, 2023

Mandy Putney  
Oregon Department of Transportation  
Via email  
CC: Keith Lynch, FHWA, Kris Strickler, ODOT

Dear Ms. Putney,

We are aware that the public comment period for the I-205 Toll Project Environmental Assessment (EA) was extended by 15 days to April 21<sup>st</sup>, 2023. While we appreciate the small extension we **do not feel that the 60 day public comment period is sufficient.** The Environmental Assessment includes thousands of pages of information that must be reviewed and analyzed before comments can be developed. The proposed additional 15 days of review time does not provide sufficient time for analysis, material development and coordination through this body.

We also remain concerned about the lack of opportunities for public engagement. Two webinars, one three-hour public hearing, and a survey all set to occur within 45 days will not provide sufficient opportunity for our community members to become informed and have the opportunity to provide feedback. Additionally, the proposal to set up Information Tables at local grocers and libraries during normal working hours will not reach the majority of residents. More time and more accessible opportunities are needed.

You are proposing a major change to how our transportation system (both on and off the highway) will function as evidenced by the extensive analysis presented in the EA. This proposal will cause significant impacts to our communities which we do not take lightly.

Therefore, as a participating agency for the I-205 Toll Project Environmental Assessment, **we reiterate our request that you extend the public comment period to 90 days by adding an additional 30 days.** This extension will allow adequate time for review and public engagement.

Thank you for your consideration.

Sincerely,

**DRAFT: I-205 Toll Program EA – 60 Day Review Schedule**

**3.6.23**

**Week of February 21<sup>st</sup> -**

Tuesday, Feb 21: EA Release

**Week of February 27<sup>th</sup> -**

Wednesday, March 1<sup>st</sup>: County staff EA update to BCC – consider submittal of request for extension to 45 day public comment period

Thursday, March 2<sup>nd</sup>: ODOT Presentation at CTAC

Thursday, March 2<sup>nd</sup>: ODOT Presentation at C4

**Week of March 6<sup>th</sup> -**

Wednesday, March 8<sup>th</sup> ODOT Presentation to BCC – 11 AM

**Week of March 13<sup>th</sup> –**

Tuesday, March 14<sup>th</sup>: Issues update to the board – Schedule update and consideration of 2<sup>nd</sup> letter requesting 90 day comment period

Tuesday March 14<sup>th</sup>: Public Webinar from ODOT [\[webinar link\]](#)

Wednesday, March 15<sup>th</sup>: C4 Metro, Diversion Subcommittee [\[webinar link\]](#)

Thursday, March 16<sup>th</sup>: Public Webinar from ODOT

**Week of March 20<sup>th</sup> –**

**Week of March 27<sup>th</sup> –**

**Week of April 3<sup>rd</sup>–**

Tuesday, April 4<sup>th</sup>: ODOT Public Hearing

Thursday, April 6<sup>th</sup>: C4 – Finalize letter of comment

**Week of April 10<sup>th</sup>–**

Wednesday, April 12<sup>th</sup>: Policy Session – EA Findings and present draft letter of comment at BCC

**Week of April 17<sup>th</sup>–**

Wednesday, April 19<sup>th</sup>: C4 Metro, Diversion Subcommittee

Wednesday, April 19<sup>th</sup>: Policy Session Backup Date to finalize letter of comment at BCC

Friday, April 21<sup>st</sup>: Submit all comments to ODOT/FHWA by 4 PM deadline