



November 15, 2021

Public Comment
c/o Metro Planning
600 NE Grand Ave
Portland, OR 97232

RE: I-205 Toll Project Regional Transportation Plan Amendment – Staff Comments

Thank you for the opportunity to comment on the proposed I-205 Toll Project Regional Transportation Plan (RTP) Amendment.

We offer these comments and questions purely to encourage transparency and to gain clarity of what specifically ODOT is proposing. These comments are **not** an indication of support for the proposed amendment.

First, we would like to know if ODOT anticipates adding additional funds to the PE phase for this project. We also would like to know if ODOT would be required to bring forward future RTP and MTIP amendments for the construction phase of the I-205 Toll Project.

Second, Clackamas County transportation staff offer the following technical edits to clarify the proposed RTP Amendment language.

- Revise language in Table 8.3 as follows –

As identified in HB 3055 (and ORS 383), ~~T~~oll revenue ~~will~~ **is expected** to 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.

- Clarify that Phase 1A includes more than just the Abernethy Bridge and update funding language to match previous recommendation. Also make a stronger connection to HB 3055 language in amendments to 8.3.1.8 by adding a second paragraph that explains the I-205 Toll Project as outlined below.

*Construction financing for Phase 1A (**including** Abernethy Bridge) is identified in HB 3055 (2021 Session). Variable Rate Tolls priced to manage travel demand as well as provide revenue **will-are expected to** be used to fund the rest of the project (Phase 1B, 1C, 1D and Phase 2).*

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

- Remove the draft description on the RTP Project List and replace it with a description that more narrowly identifies what specifically will be accomplished within the PE Phase of the I-205 tolling project. One concept could look something like:

Conduct preliminary engineering and NEPA review for the I-205 Toll Project. The NEPA process for the I-205 Toll Project will analyze the impacts of tolling on I-205 between Stafford Road and Oregon Route 213 (OR 213).

Thank you for your consideration.

Sincerely,

Karen Buehrig

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Clackamas County TPAC Representative