



MEMORANDUM

**TO:** Southwest Washington Regional Transportation Council Board of Directors  
**FROM:** Matt Ransom, Executive Director   
**DATE:** August 25, 2020  
**SUBJECT:** I-205 Toll Project Environmental Assessment (Oregon)

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**AT A GLANCE**

*Oregon Department of Transportation will present a briefing regarding the formal initiation of an Environmental Assessment being carried out in evaluation of the proposed I-205 Toll Project for the I-205 Improvements (Stafford Road to OR 213) within Clackamas County, Oregon.*

**BACKGROUND**

In July 2017, the Oregon State Legislature passed a \$5.3 billion transportation package that included tax increases to fund major interstate expansion projects (ex. the I-5 Rose Quarter project) and authorized a Traffic Congestion Relief Program. The stated purpose of the Traffic Congestion Relief Program (tolling) is to reduce traffic congestion. The legislation directed the Oregon Transportation Commission (OTC) to seek Federal approval to implement Value Pricing (tolling) on Interstate 5 and Interstate 205, from the Washington state line south to where these roadways intersect. Specific study of Value Pricing concepts was completed as part of the Portland Metro Area Value Pricing Feasibility Analysis (Feasibility Analysis).

The Feasibility Analysis was overseen by the [ODOT Policy Advisory Committee \(PAC\), whom made recommendations](#) to the Oregon Transportation Commission to implement a tolling program and proposed specific project concepts for I-5 and I-205. The [Oregon Transportation Commission authorized an application](#) for tolling concept/project review with the Federal Highway Administration (FHWA). [FHWA provided a written response](#) to ODOT with recommendations for further corridor studies, prior to final decision making.

**CURRENT ODOT PROJECT ACTIVITY**

ODOT has formally initiated an [Environmental Assessment](#) process for the I-205 Toll Project, which is being carried out under the procedures of the [National Environmental Policy Act](#) (NEPA). The FHWA is the lead federal decision-making agency, guiding the development of ODOT's work and the engagement of participating government agencies. Per NEPA procedures, ODOT's Environmental Assessment project documents and public processes will be available and accessible for public review and comment.

On August 25, ODOT published a Purpose and Need statement and is soliciting agency and public comments through September 16. Materials and access to an online open house are provided on [ODOT's website](#).

Southwest Washington Regional Transportation Council

ODOT staff will present an update at the September 1 RTC Board of Directors meeting pertaining to ongoing activities of the I-205 Toll Project.

## **RTC PARTICIPATION**

The RTC Board of Directors and RTC staff were engaged in various stages of the ODOT PAC process, which resulted in formal comments transmitted to the Oregon Transportation Commission at the culmination of that process. RTC technical staff are currently involved in a traffic modeling technical committee advising regional travel demand model experts in ODOT's current technical development efforts.

### **Current Activity**

On August 3, 2020 RTC received an invitation from the FHWA to become a Participating Agency with the FHWA in the development of the EA.

As stated in that letter, this is what it means to be a Participating Agency in an EA process:

*Pursuant to 23 U.S.C. Section 139, Participating Agencies are responsible for identifying, as early as practicable, any issues of concern regarding the Project's potential environmental, social, or economic impacts that could substantially delay or prevent an agency from granting a permit or other approval that is needed for the Project. The intent is to ensure that agencies are fully engaged in the development of the Project and that the decisions regarding alternatives are evaluated in detail in the National Environmental Policy Act (NEPA) analysis. We suggest that your agency's role in the development of the Project should include the following as they relate to your area of expertise or environmental issues of concern to your jurisdiction:*

- 1. Provide meaningful and early input on defining the purpose and need, determining the range of alternatives to be considered, and the methodologies and level of detail required in the alternative's analysis.*
- 2. Participate in coordination meetings and joint field reviews as appropriate.*
- 3. Provide timely review and comment on the pre-draft environmental documents to reflect the views and concerns of your agency on the adequacy of the document, alternatives considered, and the anticipated impacts and mitigation.*

Concurrent with the August 3 transmittal were documents circulated for review by Participating Agencies, which include the following:

- 1) DRAFT Agency Coordination Plan
- 2) DRAFT Purpose and Need Statement
- 3) DRAFT Comparison of Screening Alternatives

RTC intends to confirm the agency's intent to become a Participating Agency in the active review of the EA documents. The documents listed will be evaluated by RTC staff, whom will provide relevant comments on these documents by the prescribed comment date. Future EA document review will pertain to the EA technical reports and draft and final EA reports.

The basis for RTC's EA comments will be in RTC's role as a Metropolitan Planning Organization within the WA/OR bi-state metropolitan region, and in alignment with the agency's expertise in subject matter areas including: the metropolitan planning process, system performance analysis, and the development of regional travel demand models.

Further, the RTC Board of Directors provided comments to the ODOT PAC process, and RTC's agency review and comment on technical documents will also reflect RTC's Input to the Oregon Transportation Commission Value Pricing application and Project Development Process as ratified by the Board of Directors on June 5, 2018. (Attachment 1)

### **NEXT STEPS**

RTC staff will confirm the agency's intent to be recognized as a Participating Agency in the FHWA led Environmental Assessment for the I-205 Toll Project, and will prepare technical comments and feedback in response to published documents.

Attachment 1

Southwest Washington Regional Transportation Council (June 5, 2018)

Input to the Oregon Transportation Commission Value Pricing application and Project Development Process



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#### **Member Jurisdictions**

*Clark County*  
*Skamania County*  
*Klickitat County*  
*City of Vancouver*  
*City of Camas*  
*City of Washougal*  
*City of Battle Ground*  
*City of Ridgefield*  
*City of La Center*  
*Town of Yacolt*  
*City of Stevenson*  
*City of North Bonneville*  
*City of White Salmon*  
*City of Bingen*  
*City of Goldendale*  
*C-TRAN*  
*Washington DOT*  
*Port of Vancouver*  
*Port of Camas-Washougal*  
*Port of Ridgefield*  
*Port of Skamania County*  
*Port of Klickitat*  
*Metro*  
*Oregon DOT*  
*14th Legislative District*  
*17th Legislative District*  
*18th Legislative District*  
*20th Legislative District*  
*49th Legislative District*

June 13, 2018

Mr. Sean O'Hollaren  
Mr. Alando Simpson  
Co-Chairs of the Portland Region Value Pricing Policy Advisory Committee  
Oregon Department of Transportation Region 1  
123 NW Flanders Street  
Portland, OR 97209

Ms. Tammy Baney  
Chair, Oregon Transportation Commission  
355 Capital St. NE  
MS 11  
Salem, OR 97301-3871

#### **RE: Portland Metro Area Value Pricing Study and Traffic Congestion Relief Program**

Dear PAC Co-Chairs and Chair of the Oregon Transportation Commission:

The Southwest Washington Regional Transportation Council, which is the federally designated Metropolitan Planning Organization (MPO) for Clark County Washington, is providing the following Input (Attachment I) as you consider the potential locations for implementing Value Pricing through a Traffic Congestion Relief Program as mandated by the Oregon Legislature in HB 2017.

As the MPO serving southwest Washington state constituencies within this bi-state region, we recognize the immense burden that deteriorating highway performance and forecast population growth will impose on this bi-state region. Keeping pace with those pressures will require innovations in how we collectively fund and implement a coherent regional transportation strategy. We need to work together to implement the Regional Transportation Plans which position this region for economic prosperity and creation of a seamless multi-modal bi-state transportation network.

With those goals in mind, we have been monitoring the development of your Value Pricing Feasibility Study. Our observations about toll program implementation, drawn from Washington State, find that tolling highways is a complex technical and political endeavor. We believe that the traveling public will expect funded projects and corridor performance enhancements as a result.

June 13, 2018

We comment that a future Value Pricing program incorporate the following elements: identify and fund specific planned regional system improvements, establish a comprehensive and *bi-state* mitigation program, and define the outcomes you intend to achieve *prior to* program start. We believe incorporating those elements into a program best promotes regional progress, corridor performance, and transparency of strategy along the immensely valuable bi-state transportation corridors.

We request that you notify us regarding your intentions and solicit our feedback. Please contact me and our Executive Director for follow-up. We look forward to hearing from you and providing our insights and perspectives as we pursue regional transportation system improvements.

Sincerely,

SOUTHWEST WASHINGTON  
REGIONAL TRANSPORTATION COUNCIL



Ron Onslow  
Chair of the Board



Matt Ransom  
Executive Director

## Attachment I

### Southwest Washington Regional Transportation Council (June 5, 2018)

#### Input to the Oregon Transportation Commission Value Pricing Application and Project Development Process

**Partnership and Consultation:** Metropolitan area and bi-state planning and project coordination has resulted in many beneficial regional infrastructure improvements over many years. It is expected that continued partnership on projects of mutual bi-state interest will occur and that ODOT will engage in consultation with affected partner agencies. RTC will request consultation as part of future NEPA project evaluation processes in order to assess bi-state and regional transportation system and policy impacts.

**Regionally Significant Project Implementation:** A regionally significant project improvement plan should be prepared identifying the planned regional and bi-state bottleneck removal and corridor projects (e.g., highway, transit, *other* modal) that will be funded from toll proceeds. Implementation of value pricing should financially support construction of those projects. Most notable among the planned bi-state bottleneck removal projects is replacement of the existing I-5 Columbia River bridges. I-5 corridor value pricing strategies should support (financial or otherwise) a future I-5 Columbia River bridge replacement project, thereby advancing the project priority and funding plans of the respective metropolitan area Regional Transportation Plans.

**Regional Mitigation:** Identify and mitigate at the bi-state level, direct and indirect impacts created by a value pricing project. Mitigation responses should be tied to the corridor of impact and should be proportional. Legislative remedies need to be pursued to enable project mitigation actions in Washington State, in order to fairly address bi-state impacts, or avoidance of non-mitigatable impacts should be pursued. *(For example: a mitigation response to an I-5 value pricing project could be expanding bi-state express bus transit services provided by C-TRAN, thereby providing an alternative and improved regional transit for affected Clark County stakeholders.)*

**Regional Systems Monitoring:** Regional corridor outcomes and performance metrics should be defined prior to beginning a value pricing pilot project. Through monitoring, propose corridor specific project mitigations and programs to ameliorate social/economic impacts created by a value pricing project. Corridor monitoring and mitigation towards the outcomes should be continuous for the duration of a pilot project.

**Decision Making:** RTC intends to remain involved in monitoring and providing input into the development and implementation of a value pricing project upon the regional transportation network. Disclosure of future project decision-making milestones and input opportunities should be communicated to regional and bi-state governmental agencies and the public at large.