



# **CITY OF OREGON CITY TRANSPORTATION ADVISORY COMMITTEE (TAC) MEETING AGENDA**

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**Commission Chambers, 625 Center Street, Oregon City  
Tuesday, May 16, 2023 at 6:00 PM**

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**Contact Audrey Meeker, [ameeker@orccity.org](mailto:ameeker@orccity.org) for the link to participate in the meeting**

## **CALL TO ORDER**

## **ROLL CALL**

## **APPROVAL OF THE MINUTES**

1. Approval of minutes from the April 18, 2023 Transportation Advisory Committee Interview and Meeting

## **ADOPTION OF AGENDA (Agenda Analysis)**

Committee members have the opportunity to move items to New Business/Discussion Items from Communications if they are interested in discussion. The Committee may also add an item to the agenda with the consensus of the Committee.

## **PUBLIC COMMENTS**

Citizens are allowed up to 3 minutes to present information relevant to the City but not listed as an item on the agenda, however, the Chair has the discretion to waive limitations. Prior to speaking, citizens shall complete a comment form and deliver it to the Staff Member. When the Chair calls your name, proceed to the speaker table and state your name and city of residence into the microphone. The Transportation Advisory Committee Officers do not generally engage in dialog with those making comments but may refer the issue to the City Manager.

## **NEW BUSINESS / DISCUSSION ITEMS**

### 2. **New Business / Discussion Items**

- Meeting Minutes Audit by the City Recorder's Office
- 2022 Annual Report
- Distracted Driving
- Discuss Summer meetings

### 3. **Public Works Report**

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- I-205 Tolling – The Governor’s Statement
  - Speed Limits Discussion

## COMMUNICATIONS

## ADJOURNMENT

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### PUBLIC COMMENT GUIDELINES

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*Complete a Comment Card prior to the meeting and submit it to the City Recorder. When the Mayor/Chair calls your name, proceed to the speaker table, and state your name and city of residence into the microphone. Each speaker is given three (3) minutes to speak. To assist in tracking your speaking time, refer to the timer on the table.*

*As a general practice, the City Commission does not engage in discussion with those making comments.*

*Electronic presentations are permitted but shall be delivered to the City Recorder 48 hours in advance of the meeting.*

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### ADA NOTICE

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*The location is ADA accessible. Hearing devices may be requested from the City Recorder prior to the meeting. Individuals requiring other assistance must make their request known 48 hours preceding the meeting by contacting the City Recorder’s Office at 503-657-0891.*

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***Agenda Posted at City Hall, Pioneer Community Center, Library, City Website.***

***Video Streaming & Broadcasts: The meeting is streamed live on the Oregon City’s website at [www.orcity.org](http://www.orcity.org) and available on demand following the meeting. The meeting can be viewed on Willamette Falls Television channel 28 for Oregon City area residents as a rebroadcast. Please contact WFMC at 503-650-0275 for a programming schedule.***



# CITY OF OREGON CITY

## Staff Report

625 Center Street  
Oregon City, OR 97045  
503-657-0891

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**To:** Transportation Advisory Committee      **Agenda Date:** 05/16/2023  
**From:** Senior Administrative Assistant, Audrey Meeker

**SUBJECT:**

Approval of minutes from the April 18, 2023 Transportation Advisory Committee Interview and Meeting

**STAFF RECOMMENDATION:**

Approve the minutes

**OPTIONS:**

1. Approve the minutes
2. Disapprove the minutes



## 1. CALL TO ORDER AND ROLL CALL

The Transportation Advisory Committee (TAC) meeting on **Tuesday, April 18, 2023** was called to order by Chair Ben Simmons at 5:45 PM at City Hall, 625 Center Street, Oregon City, OR 97045.

Committee members present included Chair Ben Simmons, Vice Chair Henry Mackenroth, Mr. Cedomir Jesic, Mr. Tim Morgan, Ms. Chris Wadsworth and Mr. Bruce Fries via phone.

Mayor Denyse McGriff was present.

Staff members present included Public Works Director John Lewis, Assistant Public Works Director Vance Walker, and Senior Administrative Assistant Audrey Meeker.

## 2. APPROVAL OF THE MINUTES

- Meeting minutes were not approved during this meeting.

## 3. AGENDA ANALYSIS

- No changes were made to the agenda.

## 4. CITIZEN COMMENTS

- No citizen comments were made.

## 5. NEW BUSINESS/DISCUSSION ITEM

- The Transportation Advisory Committee interviewed Raymond Rendleman as a potential member.

## 6. COMMUNICATION

- No communications were made.

## 7. FUTURE AGENDA ITEM

- Mayor Denyse McGriff will announce the appointment decision at a future City Commission meeting.

**8. ADJOURNMENT**

There being no further business, the meeting adjourned at 5:52 pm.

Respectfully Submitted,

Audrey Meeker  
Senior Administrative Assistant



## 1. CALL TO ORDER AND ROLL CALL

The Transportation Advisory Committee (TAC) meeting on **Tuesday, April 18, 2023** was called to order by Chair Ben Simmons at 6:00 PM at City Hall, 625 Center Street, Oregon City, OR 97045.

Committee members present included Chair Ben Simmons, Vice Chair Henry Mackenroth, Mr. Cedomir Jesic, Mr. Tim Morgan, Ms. Chris Wadsworth and Mr. Bruce Fries via phone.

Staff members present included Public Works Director John Lewis, Assistant Public Works Director Vance Walker, and Senior Administrative Assistant Audrey Meeker.

## 2. APPROVAL OF THE MINUTES

Ms. Chris Wadsworth **moved to approve** the meeting minutes for **March 21, 2023** and was **seconded** by Mr. Henry Mackenroth. It was carried **unanimously** by the following votes: Aye: Mr. Cedomir Jesic and Mr. Tim Morgan and Bruce Fries via phone.

## 3. AGENDA ANALYSIS

- No changes were made to the agenda.

## 4. CITIZEN COMMENTS

- No citizen comments were made.

## 5. NEW BUSINESS/DISCUSSION ITEM

### a. Neighborhood Traffic Fact Sheet

Major points were as follows:

- Ms. Audrey Meeker, Senior Administrative Assistant, Public Works requested any updates provided by TAC members since the previous meeting.
- Ms. Meeker shared the updates made to the Neighborhood Traffic Fact Sheet that were requested at the previous meeting.

## **b. Neighborhood Association Handout**

Major points were as follows:

- Shared updated handout.
- The Transportation Advisory Committee reviewed and discussed the document and QR code.

## **c. Distracted Driving Campaign**

Major points were as follows:

- Hang Up and Drive Campaign – Julie Hernandez shared this document via email prior to the meeting.
- Discussed ways to utilize the opportunity.
- Oregon Impact update – totes and other items will be available soon.

## **d. Announcements and Discussion Items**

Major points were as follows:

- Mr. John Lewis, Public Works Director shared the following:
  - Speed Limits will be discussed at the City Commission Work Session on April 19, 2023
  - The City's response to the ODOT Environmental Assessment will be shared during the City Commission Meeting on April 19, 2023
    - Public comment is open until Friday, April 21, 2023.
    - The City will share links to the ODOT website and how to contact State legislators and comments via social media and an email will be sent to the Transportation Committee Members with the same information to share their comments and to share with friends and family.
- Discussions around tolling continued.
- Request for future topics: Mr. Cedomir Jesic suggested a presentation on a case of why the lower speed limits are beneficial. What is gained and lost by implementing the speed limits?
  - The County has a net zero program.
  - The City of Portland implemented a blanket slower speed limit over the past 2 years. Did it improve the accident rate?

## **6. COMMUNICATION**

- No communications were made.

## **7. FUTURE AGENDA ITEM**

- Distracted Driving Campaign – Hang Up and Drive presentation at National Night Out.
- Speed Limits

**8. ADJOURNMENT**

There being no further business, the meeting adjourned at 6:52 pm.

Respectfully Submitted,

Audrey Meeker  
Senior Administrative Assistant



# CITY OF OREGON CITY

## Staff Report

625 Center Street  
Oregon City, OR 97045  
503-657-0891

**To:** Transportation Advisory Committee      **Agenda Date:** 05/16/2023  
**From:** Senior Administrative Assistant, Audrey Meeker

### SUBJECT:

New Business / Discussion Items

### TOPICS:

1. Meeting Minutes Audit by the City Recorder's office
2. 2022 Annual Report
3. Distracted Driving Campaign Update
4. Discuss Summer Meetings – July / August 2023



# CITY OF OREGON CITY

## Staff Report

625 Center Street  
Oregon City, OR 97045  
503-657-0891

**To:** Transportation Advisory Committee **Agenda Date:** 05/16/2023  
**From:** Public Works Senior Administrative Assistant, Audrey Meeker

### SUBJECT:

Transportation Advisory Committee Meeting Minutes Approval

### STAFF RECOMMENDATION:

Approve meeting minutes from past meetings

### EXECUTIVE SUMMARY:

Below is a list of meeting minutes for review, and to be approved at the next meeting as a single motion. They do not need to be approved individually. Staff understands that previous Transportation Advisory Committee members may not have been on the Committee at the time of the meeting, but we are asking that you review and agree to allow them to stand as written so that they may be published for the public to view as needed.

### BACKGROUND:

The City Recorder's office conducted an audit of all meeting minutes for the City's public meetings. The following Transportation Advisory Committee meeting minutes weren't found:

- December 15, 2020 Interview with potential committee members.
- May 18, 2021 Interview with potential committee member.
- June 29, 2021 ODOT 1-205 Widening and Seismic Updates.

### OPTIONS:

1. At the next meeting, approve of the meeting minutes.
2. At the next meeting, approve the meeting minutes with specific modifications.
3. At the next meeting, deny the meeting minutes. If the Committee chooses to deny the minutes, Staff requests direction on how to proceed.



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**1. CALL TO ORDER AND ROLL CALL**

The Transportation Advisory Committee (TAC) meeting of **Tuesday December 15, 2020** was called to order by Chair Henry Mackenroth at 5:45 PM via a virtual Zoom Meeting.

Committee members present included John Anderson, Ray Atkinson, Cedomir Jesic, Bob LaSalle, Henry Mackenroth, Ben Simmons, and Tim Wuest. Vance Tong was absent.

Staff members present included John Lewis, Public Works Director, Vance Walker, Assistant Public Works Director, Laura Terway, Community Development Director, and Kim Davis, Senior Administrative Assistant.

**2. APPROVAL OF THE MINUTES**

- Meeting minutes were not approved during this meeting.

**3. AGENDA ANALYSIS**

- No changes were made to the agenda.

**4. CITIZEN COMMENTS**

- No citizen comments were made.

**5. NEW BUSINESS/DISCUSSION ITEM**

- The Transportation Advisory Committee interviewed Mr. Tim Morgan as a potential member and Mr. Ben Simmons to be reappointed.

**6. COMMUNICATION**

- No communications were made.

**7. FUTURE AGENDA ITEM**

- Commission President, Rachel Lyles Smith will announce the appointment decision at the January 6, 2021 City Commission meeting.

**8. ADJOURNMENT**

There being no further business, the meeting adjourned around 5:52 pm.

Respectfully Submitted,

Audrey Meeker  
Senior Administrative Assistant



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**1. CALL TO ORDER AND ROLL CALL**

The Transportation Advisory Committee (TAC) meeting of **Tuesday, May 18, 2021** was called to order by Chair Henry Mackenroth at 5:45 PM via a virtual Zoom Meeting.

Committee members present included Ray Atkinson, Bob LaSalle, Henry Mackenroth, Tim Morgan, Ben Simmons, Cedomir Jesic and Tim Wuest.

Staff members present included John Lewis, Public Works Director, Vance Walker, Assistant Public Works Director, and Kim Davis, Senior Administrative Assistant.

**2. APPROVAL OF THE MINUTES**

- Meeting minutes were not approved during this meeting.

**3. AGENDA ANALYSIS**

- No changes were made to the agenda.

**4. CITIZEN COMMENTS**

- No citizen comments were made.

**5. NEW BUSINESS/DISCUSSION ITEM**

- The Transportation Advisory Committee interviewed Ms. Savannah Ovaldia as a potential member.

**6. COMMUNICATION**

- No communications were made.

**7. FUTURE AGENDA ITEM**

- Commission President, Rachel Lyles Smith will announce the appointment decision at the June 2, 2021 City Commission meeting.

**8. ADJOURNMENT**

There being no further business, the meeting adjourned around 5:52 pm.

Respectfully Submitted,

Audrey Meeker  
Senior Administrative Assistant



## 1. CALL TO ORDER AND ROLL CALL

The Transportation Advisory Committee (TAC) meeting on **Tuesday, June 29, 2021** was called to order by Chair Henry Mackenroth at 6:00 PM at virtually via Zoom Meeting.

Committee members present included Chair Henry Mackenroth, Bob LaSalle, Savannah Ovaldia, Tim Wuest, Tim Morgan, Ray Atkinson.

Staff members present included Public Works Director, John Lewis, Assistant Public Works Director, Vance Walker, and Senior Administrative Assistant, Kim Davis

Speaker and Staff Member Assistant City Engineer, Josh Wheeler

## 2. APPROVAL OF THE MINUTES

- No meeting minutes to be reviewed.

## 3. AGENDA ANALYSIS

- No changes were made to the agenda.

## 4. CITIZEN COMMENTS

- No citizen comments were made.

## 5. NEW BUSINESS/DISCUSSION ITEM

### a. ODOT I-205 Widening and Seismic Upgrade

Major points were as follows:

- The Oregon Department of Transportation (ODOT) is planning on widening the road to address capacity issues and including a seismic upgrade from Stafford Road to Highway 213.
- The project is broken up into four (4) phases with Phase 1A impacting the City the most. It will take place between the Spring of 2022 through late 2025.
- The Transportation Advisory Committee is being presented with an overview of the traffic management plan to provide comments that Staff can share with ODOT from a Citizen's perspective.
- Seismic Upgrades:
  - There are four (4) Seismic upgrades to four (4) bridges.

- Widening:
  - Phase 1: Gladstone area. It is funded with the intent to break it into four phases with four different contractors.
  - Phase 1 will impact Oregon City the most, it is outside Main St, not including the Main St Bridge to Arch Bridge in West Linn. Expanding the Abernethy Bridge. Work on the bridge is only allowed during the Summer months due to the limited time to work in the water.
    - Phase 1A – construction 2022 – 2025 – 10<sup>th</sup> Avenue to Hwy 213.
      - Spring Summer 2022 – End of 2025
    - Phase 1B – construction 2023 – 2024 - Main St Bridge to Hwy 213
    - Phase 1C – construction 2025 – 2026 – West Linn – 10<sup>th</sup> St.
    - Phase 1D – construction 2026 – 2027 - West Linn and incorporated area
  - Phase 2: 10<sup>th</sup> Street – Stafford Road (West Linn) is not currently funded.
- Overview of Impacts:
  - Clackamette Drive – at times there will only be one travel lane, with temporary signals.
  - The multi-use path will be shifted to get out of the construction area.
  - Closure of I-205 Southbound ramp – the detour will use Arch Bridge and Washington St to get driver back onto the Hwy 43 to downtown to 99E or Hwy 213. (closure and detou at night)
  - 12<sup>th</sup> thru 15<sup>th</sup> Street – Used for Main St. detours at night when I-205 between 213 and 99E are closed.
  - Main Street – Under Main St Bridge - Cove Apartments, to Clackamette to 99E
- The State will be doing public outreach, posting signage along I-205, I-84 and I-5. All trucks are to use I-5 not I-205.

## 6. COMMUNICATION

- No communications were made.

## 7. FUTURE AGENDA ITEM

- No Future agenda items were added.

## 8. ADJOURNMENT

There being no further business, the meeting adjourned at 6:45 pm.

Respectfully Submitted,

Audrey Meeker  
Senior Administrative Assistant



## CITY OF OREGON CITY

### Staff Report

625 Center Street  
Oregon City, OR 97045  
503-657-0891

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**To:** Transportation Advisory Committee **Agenda Date:** 05/16/2023  
**From:** Public Works Senior Administrative Assistant, Audrey Meeker

#### **SUBJECT:**

2022 Annual Report

#### **STAFF RECOMMENDATION:**

Approve Annual Report to be presented to the City Commission on June 21, 2023

#### **EXECUTIVE SUMMARY:**

Each year the Transportation Advisory Committee is required to present an annual report to the City Commission at a regular Commission meeting one time per year, per the Administrative Policy 2-11.

#### **OPTIONS:**

1. Approve of the 2022 Annual Report.
2. Approve of the 2022 Annual Report with specific modifications.
3. Deny the 2022 Annual Report. If the Committee chooses to deny the 2022 Annual Report, Staff requests direction on how to proceed.



**TO:** City Commission of Oregon City  
**FROM:** Transportation Advisory Committee  
**DATE:** June 20, 2023  
**SUBJECT:** Transportation Advisory Committee Annual Report - 2022

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**2022 TAC Membership**

| Member             | Membership Term               | Chair Term          | Vice Chair Term     |
|--------------------|-------------------------------|---------------------|---------------------|
| Henry Mackenroth   | January 2022 to December 2024 | January to December |                     |
| Cedomir Jesic      | January 2020 to December 2022 |                     | January to December |
| Ben Simmons        | January 2021 to December 2023 |                     |                     |
| Ray Atkinson       | January 2022 to June 2022     |                     |                     |
| Miles Tatch        | January 2022 to December 2022 |                     |                     |
| Bruce Fries        | January 2022 to December 2024 |                     |                     |
| Tim Morgan         | January 2021 to December 2023 |                     |                     |
| Petronella Donovan | May 2022 to December 2024     |                     |                     |

**2022 Meeting Dates (8 meetings were held)**

- January 18
- February 15 (canceled)
- March 15
- April 19
- May 17
- June 21
- July (Summer Break)
- August (Summer Break)
- September 20
- October 18 (Canceled)
- November 15
- December 20

## **2022 Accomplishments**

- Mr. Bruce Fries joined the Transportation Advisory Committee on January 18, 2022.
- Ms. Petronella Donovan joined the Transportation Advisory Committee on June 21, 2022.
- Letter of support for the Oregon City – West Linn Pedestrian and Bicycle Bridge Concept Plan was sent to City Commission on January 28, 2022.
- Letter of support for a grant request to update Holcomb Boulevard between Winston and the Serres Farm Subdivision, Safe Routes to Schools Construction Program and was sent to the City Commission on July 6, 2022.
- National Night Out, August 2, 2022 with a focus on youth bicycle trailer and information on shuttle service.
- The Transportation Advisory Committee and Public Works implemented solutions related to high volumes of traffic, speeding vehicles and pedestrian safety on Gaffney Lane and Berta Drive.
- The Transportation Advisory Committee and Public Works collaborated to address resident concerns relating to increased traffic along Barker Avenue during the South End Road Project by installing temporary speed humps and street signs.
- The Transportation Advisory Committee listened to citizen concerns around inconsistent speed limits along Linn Avenue.
- The Transportation Advisory Committee and the Public Works Engineering Department are investigating the possibility of the City becoming a Designated Authority for Speed Zones.
- Received presentations and updates on the following:
  - 2021 Pavement Maintenance Utility Fee Report (Jayson Thornberg, Transportation Operations Manager)
  - ADA Ramps (Dayna Webb, City Engineer)
  - Capacity Standards for Local Streets (Dirk Schlagenhauser, Chair of Planning Commission and Aquilla Hurd-Ravich, Community Development Director)
  - Clackamas County Connects Shuttle Surveys (Dayna Webb, City Engineer)
  - Frontier Parkway traffic and speed concerns (Vance Walker, Assistant Public Works Director)
  - Holcomb Boulevard Safe Routes to School and developments and Grant (Dayna Webb, City Engineer)
  - Speed Limit Reviews: Hwy 213 & Glen Oak Road (Dayna Webb, City Engineer)
  - Molalla Avenue and Survey (Dayna Webb, City Engineer)
  - Oregon City Shuttle (Dayna Webb, City Engineer)
  - Park Place Urbanization Plan (Dayna Webb, City Engineer)
  - Road and Street Safety for Non-Engineers (Mojie Takallou, Professor of Civil Engineering at the University of Portland)
  - South End Road Landslide Repairs (Joel Howie, Clackamas County Capital Projects Supervisor)
  - Street Standards (Dayna Webb, City Engineer)

- Transportation Modeling 101 (Amanda Deering the Transportation Engineering Assistant at DKS Associates)
- Trillium Park Drive Roadway Project (John Lewis, Public Works Director)

### **2022 TAC Goals**

- The Transportation Advisory Committee moved to make the following subjects priority topics of discussion and analysis for 2022:
  - Remain involved in member participation at the National Night Out, with an emphasis on promoting safety as it relates to transportation.
  - Remain involved in larger developments relating to transportation projects, e.g.:
    - Beaver Creek Road Concept Plan
    - Landfill Development
    - Willamette Falls Legacy Project Future Cove Site – re-development.
    - Park Place (ICON) Development
  - Advise on and provide support for grant opportunities presented to the Transportation Advisory Committee.
  - Continue listening to requests regarding transportation concerns and working with the City of Oregon City Public Works on solutions.

Administrative Policy 2-11  
January 16, 2013  
Page 1 of 2

## ANNUAL REPORTS BY BOARDS, COMMITTEES AND COMMISSIONS TO THE CITY COMMISSION

### PURPOSE

The purpose of this policy is to establish the procedure for annual reports presented by boards, committees and commissions to the City Commission.

### APPLICABILITY

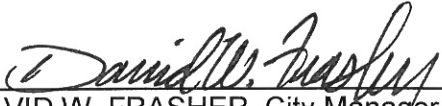
This policy applies to all active and standing City boards, committees, commissions, and the Citizen Involvement Council.

### IN GENERAL

It is the responsibility of the appointed boards, committees and commissions to present an annual report to the City Commission at a regular Commission meeting one time per year.

### PROCEDURES:

1. The annual report is to be scheduled at least two weeks in advance of a City Commission meeting with the City Recorder.
2. The City Recorder shall place the annual report near the beginning of the City Commission meeting under Presentations.
3. The presentation, including questions, shall be approximately 15 minutes.
4. The presenter should be the duly elected chair, president, or other officer of the board or commission. In emergency situations, a City staff person may speak for the board or commission.
5. The following are suggested topics that may be addressed:
  - Adopted work programs
  - A short summary of achievements within the last calendar year
  - Upcoming issues
  - Other general items of interest (awards, member achievements, etc.)
  - Next year goals
6. Whenever possible, written material summarizing the presentation shall be included as part of the City Commission's packet for that meeting.

  
DAVID W. FRASHER, City Manager

1-16-13  
Date



# CITY OF OREGON CITY

## Staff Report

625 Center Street  
Oregon City, OR 97045  
503-657-0891

**To:** Transportation Advisory Committee      **Agenda Date:** 05/16/2023  
**From:** Senior Administrative Assistant, Audrey Meeker

**SUBJECT:**

Public Works Report

**TOPICS:**

1. Speed Limits
2. I-205 Tolling – Governor's Statement



## CITY OF OREGON CITY

### Staff Report

625 Center Street  
Oregon City, OR 97045  
503-657-0891

**To:** Transportation Advisory Committee **Agenda Date:** 05/16/2023  
**From:** Public Works Senior Administrative Assistant, Audrey Meeker

#### **SUBJECT:**

I-205 Tolling – The Governor’s Statement

#### **EXECUTIVE SUMMARY:**

Public Works Director, John Lewis, P.E. will be sharing the Press Release from May 1, 2023 and the Governor’s letter that was sent on May 4, 2023 along with the City’s letter and supporting documents that helped inspire the legislative push and the Governor’s decision to delay the toll collection along I-205 and I-5 until January 1, 2026.

The letter from Governor Tina Kotek shared that a Special Subcommittee on Transportation Planning of the Joint Committee on Transportation is being established to provide a sustainable, safe and robust transportation system that will support the needs of all Oregonians and to oversee and monitor the Oregon Department of Transportation’s (ODOT) plans to mitigate the negative impacts of tolling on vulnerable communities.



Offices of Representatives Annessa Hartman, Courtney Neron, and Jules Walters

## FOR IMMEDIATE RELEASE

May 1, 2023

### Press Contact:

Daniel Moltke, [Daniel.Moltke@oregonlegislature.gov](mailto:Daniel.Moltke@oregonlegislature.gov)

## Clackamas-Area Democrats Score Big Win for Toll-Impacted Communities

*Governor Tina Kotek pauses toll collections until 2026; new subcommittee created to oversee ODOT plans*

**SALEM, Ore** - After months of advocacy, legislative Democrats representing the Clackamas County area scored a major victory for local communities facing the impacts of tolling on I-205.

In a letter today, the Speaker of the House, the Senate President, and the Co-Chairs of the Joint Transportation Committee have announced the creation of a Special Subcommittee on Transportation Planning to oversee and monitor the Oregon Department of Transportation's (ODOT) plans to mitigate the negative impacts of tolling on vulnerable communities. In order to make sure that any tolling program is carefully considered and incorporates the feedback from impacted communities, Governor Kotek is responding to the calls of the legislators and pausing all toll collections until January 2026.

"I know firsthand that our communities have not felt heard by ODOT, and that they feel their deep concerns were being ignored by the agency," says **Rep. Annessa Hartman (D-Gladstone)**, who has been appointed to serve on the newly formed Special Subcommittee on Transportation Planning. "Since being sworn into the legislature, I've advocated fiercely in the Capitol for our voices to be heard and for ODOT to pause, listen to our constituents and get this right. There is a lot of trust that needs to be rebuilt and I am proud to serve on this committee to give our districts a seat at the table."

The Subcommittee will meet through the interim to oversee ODOT's plans to ensure safety, mitigate congestion, support our economy, reduce pollution, and ensure that the needs of local communities are being heard and incorporated into planning.

"Families and local leaders in our communities have been justifiably frustrated with ODOT's behavior," says **Rep. Jules Walters (D-West Linn)**. "This committee will give a voice to those frustrations, and the pause will give us time to ensure the agency hears them."

"Our communities should not disproportionately shoulder the cost of interstate infrastructure. A flawed tolling program would harm working families, individuals on fixed incomes, and

businesses in my community. I don't believe a toll should divide someone from their own town.” **said Rep. Courtney Neron (D-Wilsonville)** “We have an obligation to ensure community voices are heard, legislative sideboards are in place, and that ODOT cannot proceed without truly taking our needs into consideration.”

Last week, Reps. Hartman, Walters, and Neron introduced [HB 3614](#), which would pause tolling until January 2026 and establish a committee to oversee ODOT's tolling program. The bill was co-sponsored by a bipartisan, bicameral group of 31 legislators.

“Today, we are grateful that our voices are finally being heard loud and clear.” **said Rep. Annessa Hartman (D-Gladstone)**

###



TINA KOTEK  
GOVERNOR

May 4, 2023

President Rob Wagner  
900 Court Street NE, S-201  
Salem, Oregon 97301

Speaker Dan Rayfield  
900 Court Street NE, H-271  
Salem, Oregon 97301

Co-Chair Lew Frederick  
900 Court Street NE, S-419  
Salem, Oregon 97301

Co-Chair Susan McLain  
900 Court Street NE, H-493  
Salem, Oregon 97301

Dear President Wagner, Speaker Rayfield, Co-Chair Frederick, and Co-Chair McLain,

Thank you for sharing your plans to establish a Special Subcommittee on Transportation Planning of the Joint Committee on Transportation. I appreciate your partnership in providing a sustainable, safe, and robust transportation system that supports the needs of all Oregonians.

Since taking office, I have heard consistently from stakeholders and residents that they need to understand more of the impacts and tradeoffs of tolling I-205 and I-5 before these tolls take effect. While tolling must remain a critical component of how our state moves forward with funding transportation infrastructure, I see value in taking the time necessary to ensure we are doing it right. To that end, I have directed the Oregon Department of Transportation to delay all toll collection until January 1, 2026.

This revised start date will allow time for my office, the Oregon Transportation Commission, and the legislative Subcommittee on Transportation Planning to receive more information on the agency's plans to mitigate diversion and address equity concerns. Specifically, I have asked for implementation reports to be delivered to my office for review by December 15, 2023.

House Bill 2017 (2017) and House Bill 3055 (2021) affirmed tolling as a critical funding source for many of the state's largest projects. Therefore, today's announcement will impact the overall financing plan for the state's Urban Mobility Strategy, and major projects will need to immediately adjust their schedules to align with the availability of resources. To inform next steps, I have asked Director Strickler to provide me with updated finance plans for projects within ODOT's Urban Mobility Strategy by July 1, 2023.

254 STATE CAPITOL, SALEM OR 97301-4047 (503) 378-3111 FAX (503) 378-8970

[WWW.GOVERNOR.OREGON.GOV](http://WWW.GOVERNOR.OREGON.GOV)

President Rob Wagner, Speaker Dan Rayfield  
Co-Chair Lew Frederick, Co-Chair Susan McLain  
May 4, 2023  
Page 2

In closing, I want to recognize the many state employees who have been working tirelessly to meet the project expectations set forth by legislature in 2017. We will need their focus, commitment, and passion to meet the collective challenges ahead more than ever before.

Sincerely,

A handwritten signature in black ink, appearing to read "Tina Kotek". The signature is fluid and cursive, with the first name "Tina" and last name "Kotek" clearly distinguishable.

Governor Tina Kotek



April 20, 2023

***Sent Via Electronic Mail***

Mandy Putney  
ODOT Urban Mobility Office  
18277 SW Boones Ferry Road  
Tualatin, OR 97224

**RE: City of Oregon City Comments on I-205 Toll Project Environmental Assessment**

Dear Ms. Putney:

Thank you for the opportunity to comment on the draft Environmental Assessment (“EA”) of the I-205 Toll Project (the “Toll Project”). Please accept these comments from the City of Oregon City (“Oregon City”), as well as the attached Technical Memorandum from Carl Springer and Kevin Chewuk at DKS Associates (the “DKS Technical Memorandum”), the Staff Comment Log (EA, Appendix K and Q), and the Comments on the I-205 Project Environmental Assessment prepared by Clackamas County Department of Transportation dated April 12, 2023. All these documents make up the City of Oregon City’s EA written comments.

For the reasons explained further below, Oregon City believes that the EA performed by ODOT is inadequate, unsupported by substantial evidence, and cannot support a finding of no significant impact (“FONSI”). Instead, we urge ODOT to undertake a full Environmental Impact Statement (“EIS”) or otherwise alter the project to one that can be supported by the law and evidence.

Oregon City has been a long-time partner of ODOT and has worked with the agency on numerous projects and facilities within or adjacent to Oregon City. Oregon City values its relationship with ODOT but cannot accept the analysis regarding the Toll Project or the impact that the Toll Project will have on Oregon City. As explained further below and in the attached comment log and studies, Oregon City is uniquely positioned to suffer significant adverse impacts that have not been acknowledged or mitigated. The diversion that will be caused by the Toll Project will cause untold impacts on the neighborhoods and businesses in Oregon City. There simply is no justification for having Oregon City suffer the brunt of the consequences for this project to make life easier for other citizens of the region or the state of Oregon.

In addition to the unique impacts on Oregon City, we join in the objections filed by our neighbors and regional partners including Clackamas County, and the cities of West Linn, Canby, Gladstone, Lake Oswego, and the overall Oregon City residential and business communities. Each of these communities will also suffer significant impacts that have not been adequately studied or mitigated.

Further we must reemphasize Oregon City's request for 30 days of additional EA review time. This letter and attachments encompass our best efforts to review the EA report and Appendix K and Q. While we are mindful of the over 2,000 pages of EA appendixes, Oregon City did not have the time or resources to review or hire experts to provide EA comments on the other appendixes. We are in receipt of your decision to deny our request for additional review time. We want to add that while the timeline for the EA review is consistent with 23 CFR 771.111(h) and was approved by the Federal Highway Administration, we ask you to revisit this decision as ODOT has elected to also pursue a similarly aggressive Regional Mobility Pricing Project schedule, and has released a long list of I-205 project documents that have not been available until recently. With this, combined with the work that is also underway to complete the Metro Regional Transportation Plan Update, cities like Oregon City just do not have the bandwidth to provide you with the detailed comments needed to get this decision right.

In short, and as explained further below and in the memorandum from DKS Associates, the EA cannot support a FONSI, and Oregon City urges ODOT to do the necessary work to perform a full EIS.

#### **1. There Is No Authority for the Project as Proposed by ODOT**

Before turning to the main issues regarding the EA, it is worth pausing to note that the project itself is not authorized by law. As described in Section 1.1 of the EA, the project is to use "variable rate tolls" on only a portion of I-205 – that portion "between Stafford Road and Oregon Route (OR) 213" as shown in Figure 1.1 of the EA. The authorization for the use of variable rate tolling is described in Section 1.3 of the EA as coming from HB 2017; however, HB 2017 is very specific in its grant of authority for tolling. Section 120(3) of HB 2017 (2017) provides as follows:

- "The commission shall implement value pricing in the following locations:
- (a) **On Interstate 205, beginning at the Washington state line and ending where it intersects with Interstate 5** in this state.
  - (b) On Interstate 5, beginning at the Washington state line and ending where it intersects with Interstate 205.
  - (4) In addition to areas listed in subsection (3) of this section, the commission may implement value pricing in other areas of this state."

Those sections require that, if tolling is implemented on I-205, it "shall" be from the Washington state line to the intersection with Interstate 5. There is no authority for the "half-a-loaf" project analyzed by ODOT in the EA and, therefore, the project itself lacks authorization from the legislature.

## **2. The Draft EA Does Not Adequately Assess Project Alternatives**

The alternatives analyzed in Section 2 of the Draft EA consist of only two alternatives – a “no-build” alternative and the Toll Project itself. At no point does the EA analyze the option that was actually authorized in HB 2017 (2017) (i.e., value pricing “beginning at the Washington state line and ending where it intersects with Interstate 5”), nor does it analyze the reasonably foreseeable future action, which consists of the Regional Mobility Pricing Project (“RMPP”), which proposes congestion pricing along the same corridor, as well as additional corridors throughout the region. The RMPP is a reasonably foreseeable future action because its environmental review is already underway, with a scoping comment period having already been held from November 18, 2022, through January 6, 2023. The RMPP anticipates a draft EA in late 2023. <https://www.oregon.gov/odot/tolling/Pages/I-5-Tolling.aspx>. Given the additional tolling activity on Oregon roads in the foreseeable future, the Draft EA is inadequate in not assessing the impacts of the RMPP.

## **3. The Project Goals and Objectives Outlined in the EA in Several Instances Miss the Desired Outcomes**

While we support the process, work, and engagement that went into the project goals and objectives, the I-205 Toll Project misses many of the key goals. The ODOT decision to place the toll gantries where proposed does little to nothing to limit diversion. The reported build alternatives analysis suggesting that pedestrians trying to use alternate modes of travel will be less safe is contrary to the goal of supporting safe travel regardless of mode of transportation. Our review of the EA finds little to suggest tolling alone supports multimodal transportation choices, nor is it clear if the financial analysis (not part of the EA) will generate funding to further support multimodal transportation. To suggest that Oregon City businesses will thrive because Main Street will be so congested that drivers will park and go use Oregon City businesses is at best a misinterpretation.

## **4. The Modeling Relied on by the EA is Insufficient to Establish the Full Impact of the I-205 Diversion and the Effects of Any Proposed Mitigation**

The entire purpose of the EA is to assess the potential environmental effects of the use of “variable-rate” tolling on a portion of I-205. EA 1-1. One of the stated primary goals of the Toll Project is to “limit additional traffic diversion from tolls on I-205 to adjacent roads and neighborhoods.” EA 1-7. This goal is critical to Oregon City and to other local jurisdictions adjacent to and nearby the location of the Project who lack infrastructure to accommodate any more I 205 diversion. As identified in a variety of correspondence from Oregon City and other jurisdictions, the Project will have significant detrimental impacts to neighborhoods throughout Oregon City, most prominently in Downtown Oregon City, which is located at the receiving end of the Highway 43 Bridge, which would then be the City’s only non-tolled bridge crossing over the Willamette River. The EA acknowledges these impacts, but as explained in the DKS Technical Memorandum, the modeling done by ODOT in the EA is insufficient to establish the

full impact of the diversion caused by the Toll Project. Moreover, the modeling also is insufficient to determine the effect of ODOT's proposed mitigation.

**5. The Mitigation Proposed for the Toll Project Is Insufficient, Inaccurate, and Unrelated to the Impacts of the Toll Project**

As noted above and discussed in the DKS Technical Memorandum, in addition to the inaccurate modeling of the impacts, the identified mitigation is insufficient. For example, the EA modeling indicates that traffic volumes in the City of Gladstone decrease, yet the proposed mitigation includes medians, trees, and other improvements in Gladstone. While these improvements may well be warranted and be a good thing, they do not serve to mitigate the impacts of the Toll Project and should not be identified as such. As another example, the EA proposes mitigation at Main Street and 7<sup>th</sup> Street in Oregon City, yet geometric constraints make installation of the proposed mitigation impossible. There are a whole series of similar concerns with the proposed mitigation contained in the DKS Technical Memorandum that makes clear that the mitigation for the proposed Toll Project, even if it had been properly modeled, is inadequate.

**6. Even with the Identified Mitigation, the "Build Alternative" Will Decimate Oregon City's Transportation System**

All Oregon City intersections included in the EA study have worse traffic operations under the Build Alternative compared to the No Build Alternative. Some of those intersections will fail to satisfy the currently adopted intersection mobility standard. Oregon City is a metro area with significant development potential including three approved concept plan areas yet to be developed and the only yet to be developed Regional Center. With Oregon City's long-range planning for the eventual realization of these undeveloped or underdeveloped areas, Oregon City has invested years of funding to be prepared to comply with the Transportation Planning Rule by implementing a long list of right-sized transportation projects. The I-205 Toll Project and the associated diversion changes most of Oregon City's key transportation projection assumptions and drives the trip numbers to problem levels much sooner than planned. ODOT provides no guidance on how Oregon City will manage its transportation system as necessary to comply with the Transportation Planning Rule (OAR 660-012-0060). In addition to the specific intersections studied in the EA, there are a host of other intersections in Oregon City that were not studied, yet they, too, will fail. Again, the EA is flawed and lacks the more detailed micro-simulation modeling needed to understand the full impacts on Oregon City.

**7. The Proposed I-205 Tolling Timeline puts Tolls Before Project Completion, and the EA Provides No Answers to How the Impacts of Tolling Before the Benefits are Achieved Will Affect Oregon City**

The I-205 Improvements Project includes 7 miles of a third lane, improvements, updates or replacement of 9 bridges, and improvements to 2 interchanges. The balance of the schedule beyond Phase I is still under evaluation, but original estimates had the projects being completed in 2027. Phase I will include an additional lane across the Abernethy Bridge with the current 2-

lane configurations between Hwy 213 and Stafford Road. The ODOT proposal for 2024-2027 pre-completion tolling is going to exacerbate the community frustration with tolling and the propensity for diversion. The EA acknowledges that the traffic volumes would generally be higher on segments of SW Borland Road, SW Stafford Road, OR 99E, OR 213 and OR 43 if both bridges are tolled during the pre-completion period. The EA only states that any mitigation proposed to address near-term impacts that is determined to also help alleviate pre-completion tolling impacts could be implemented before tolling begins. Asking Oregon City residents to take on the impacts of pre-completion tolling, with no benefits of a complete project, is unacceptable. In accordance with Section 120(3) of HB 2017, tolling on I-205 “shall” be from the Washington state line to the intersection with Interstate 5. It’s also our understanding that the legislature never intended for tolling to be in place before the beneficial improvements were complete, and then only along the entire corridor.

**8. I-205 Tolling Will Hurt the Local Economy and Will Devastate Oregon City’s Award-Winning Main Street**

Due to the I-205 Toll Project, the entire downtown district would be adversely impacted in various ways. Congestion downtown will increase dramatically. Downtown Oregon City is a very small geographic area constrained by I-205, Hwy 99E, the Willamette River, the Clackamas River, and the Railroad. Therefore, dramatic increases in diversion traffic will only clog the downtown area. This will create a negative shopping and dining experience in Downtown Oregon City. The I-205 Toll Project will make it more difficult for retail merchants and restaurateurs to attract customers and workers, and access to limited parking along our already fragile network of one- and two-way streets will at times be impossible.

Tourism is an important economic sector for Oregon City. The tolling of I-205 will be harmful to the local tourism economy in the downtown area and will make it difficult for this burgeoning industry to grow.

**9. The EA is Flawed in Relying on Assuming Reasonably Foreseeable Future Actions that Are Not Reasonably Foreseeable**

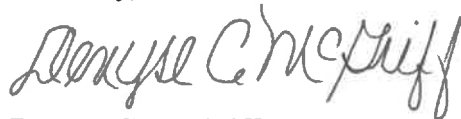
The EA identifies a project as Reasonably Foreseeable Future Actions (RFFA) that should not be considered as part of the No Build Alternative. The project is TriMet’s Southwest Corridor Project – the proposed light rail line from downtown Portland to Tualatin. The project is unfunded and has no reasonable expectation of being funded in the near future. A funding measure was proposed in November 2020 but rejected by the voters of the region. Including this project skews the results of the No Build and cumulative impacts of the Build Alternative. The analysis states “For example, the Southwest Corridor Light Rail Project and the Willamette Falls Drive Multimodal Improvements would provide alternative transportation options in the event of a road closure due to wildfire or flooding.” TriMet’s Southwest Corridor Project should not be included in the EA’s analysis as a reasonably foreseeable future action.

### **Conclusion**

This letter contains only a high-level summary of the flaws in the EA. Most critically, the EA downplays the impacts that the Toll Project will have through diversion of traffic from I-205 onto the streets of Oregon City and its neighbors. There is limited transit availability, and any diversion off I-205 will have a 1:1 impact of increased traffic on city streets. Those impacts will have a devastating effect on Oregon City's economic vitality, as the traffic will cause bottlenecks throughout Downtown Oregon City – the economic heart of the city. It will also have additional impacts throughout the neighborhoods of Oregon City, as people search for alternative routes to avoid Downtown. This will cause additional stress for pedestrians and cyclists, not to mention the impact on the livability and quality of life in Oregon City. In short, while the Toll Project may result in an improvement to throughput on I-205, the cost of that improvement will be borne by Oregon City. The EA does not acknowledge those impacts.

As noted previously, the EA for the Toll Project is inadequate, flawed, and cannot support a Finding of No Significant Impact. A toll proposal in the Metro area should be done as a regional mobility pricing strategy, and ODOT should start over and proceed with an Environmental Impact Statement that truly grapples with the real and significant impact that Oregon City, and its neighbors, will bear should the Toll Project proceed.

Sincerely,



Denyse C. McGriff  
Mayor

cc: Keith Lynch, FHWA  
Kris Strickler, ODOT  
Brendan Finn, ODOT

## Staff Comment Log (EA, Appendix K and Q)

Updated: April 11, 2023

| Document/Appendix | Section | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Page |
|-------------------|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|
| EA                | 1.2     | The legislation on value pricing in Oregon (HB-2017) (Section 120) regarding the authority to “pursue and implement” tolling for “traffic congestion” (not seismic and capacity). Moreover, the direction was for the entirety of 205 and 5, not limited stretches (I205 to Stafford). The EA legislation directed the OTC to <u>pursue and implement</u> value pricing on I-5 and I-205.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 1-2  |
| EA                | 1.2     | In 2018 FHWA determined the I-205 Improvements Project qualified as a categorical exclusion because it would not involve significant environmental impacts. This exclusion designation determination (EA vs EIS) was before tolling was suggested as part of the I205 project. ODOT should renew its request for a categorical exclusion including any associated public hearings or public comments efforts to ensure the project definition is accurate by including the proposed I205 tolling plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 1-3  |
| EA                | 1.5     | <p>Goals and Objectives – Arguably at least five of the ten project goals have not been met by this project as proposed in the EA. There is plenty of evidence in the project to establish that the following goals were missed:</p> <p><b>Limit additional traffic diversion from tolls on I-205 to adjacent roads and neighborhoods</b> – Oregon City, West Linn, and Canby will be most negatively impacted diversion associated with I-205 tolling. ODOT and the EA reports provides little in the way of a solution to I-205 diversion mitigation to resolve the 3-8 minutes travel delays in our downtown due to I-205 tolling diversion. Areas of Oregon City and Unincorporated Clackamas County near I-205 and portions of 99E near Canby would have the largest numbers of intersections with worse operations under the Build Alternative as compared to the No Build alternative in 2027 and 2045.</p> <p><b>Support safe travel regardless of mode of transportation</b> – the project proposes little in the way of support of multimodal improvements and some of the proposed driving mitigation further reduces safety for alternate modes. The project and proposed mitigation ignore that most crashes involving pedestrians and bicyclists occurred on OR 99E. On 99E from 11<sup>th</sup> to Main Street in the downtown, Oregon City would experience worse pedestrian level of service under the Build Alternative. At 99E and the I-205 on ramps the accident rate increases under the Build Alternative.</p> <p><b>Contribute to regional improvements to air quality</b> – the build alternative(s) project includes proposed diversion mitigation as it relates to analysis of the air quality impacts due to diversion through local neighborhoods will be negatively impacted. The EA analysis looks at the project results for the Portland/Vancouver region rather than the local Area of Impact. The analysis also focusses on the vehicle hours traveled on I205 and discounts the added congestion on the local network.</p> <p><b>Support multimodal transportation Choices</b> – ODOT has not proposed any meaningful new multimodal choices, nor have they proposed any real improvements that might mitigate I-205 diversion.</p> | 1-7  |

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|    |                        | <b>Support Economic Growth.</b> Oregon City and West Linn's Main Street's will not see improvements and in most cases worse conditions for movement of goods and people.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Item #3. |
| EA | 2.1.2                  | ODOT modelling is insufficient to establish 1) the full impact of I-205 tolling diversion, and 2) the effect of the proposed "mitigation" projects. The analysis necessary to analyze the full cause and impact of I-205 tolling requires micro-simulation modeling and ODOT has not been able to complete this work, analyze the results and propose meaningful solutions and instead suggesting they may do it later.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 2-7      |
| EA |                        | <b>NOTE: The work of the I205 EA project team was a tabletop exercise with little field time validating the feasibility of the projects. Based on the Oregon City Mitigation workshops, it was our conclusion that the project team was not familiar with Oregon City and the constraints around each of the project areas. Considerations for existing historic buildings, sight obstructions, limited ROW, and existing but recent improvements were not considered in the development of the proposed mitigation. With years of history working through successful design and construction projects in ODOT ROW, we have the concern that meaningful mitigation proposals would not ever obtain the design exceptions required of the office of State Traffic Engineer. This EA should include a memo from the State Traffic Engineer that new design exceptions would be required and approved in any I205 mitigation projects proposed.</b> |          |
| EA | 3.1<br>(table<br>3-12) | <b>99E/Gladstone/Oregon City Area</b> – According to the EA traffic volumes in Gladstone go down. If that were correct why propose mitigation in Gladstone? On the Gladstone side of the Clackamas River Bridge, proposed mitigation includes medians, trees, and yellow reflective sheeting. These measures are not mitigating the diversion resulting from I-205 and the proposed safety measures should be ODOT maintenance commitments rather than considered project mitigation.                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 3-33     |
| EA | 3.1<br>(table -<br>12) | <b>OR 99E between W Arlington Street and Main Street</b> – the mitigation on the Gladstone side of the Clackamas River is too short to include a median or a midblock crosswalk. The mitigation proposed on the Oregon City side of the Clackamas River is in an improved area completed years ago so the median, the lighting, and the sidewalks are in place already. There are no pedestrian crossing warrants or destination and this segment is not a responsible place to include a midblock crossing.                                                                                                                                                                                                                                                                                                                                                                                                                                     | 3-34     |
| EA | 3.1<br>(table -<br>12) | <b>OR 99E North of Dunes Drive</b> – Widening for a transit stop may fit within the existing travel lanes. This occurs today in the travel lanes as stripped, so this is not diversion mitigation. Anything more impactful will affect the sidewalk and plaza build with the recently completed McLoughlin Blvd enhancement project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 3-34     |
| EA | 3.1<br>(table -<br>12) | <b>OR99E/ I-205 Southbound Ramps</b> – Adding reflective sheeting to signal backplates is not mitigation but instead overdue maintenance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 3-34     |
| EA | 3.1<br>(table -<br>12) | <b>OR99E/ I-205 Northbound Ramps</b> – This is an existing Oregon City Transportation System Plan project and something that should have been completed as part of the Phase 1A project. This project also complicates pedestrian crossings.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 3-35     |

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| EA | 3.1<br>(table - 12) | <b>OR 99E/15<sup>th</sup> St</b> - This project warrants the micro-simulation modelling and sufficient geometric design to confirm the project will work. The project also complicates pedestrian crossings. A challenging project that may not work. This project, assuming it mitigates I205 tolling traffic diversion should be accomplished in the 2027-year analysis period rather than 2045.                                                                                                                                                                                                                            | 3-   | Item #3. |
| EA | 3.1<br>(table - 12) | <b>OR99E/10<sup>th</sup> Street</b> – This mitigation description should be revised to state: commit to building the Willamette Falls path/OR 99E Enhance (10 <sup>th</sup> Street to Railroad Avenue) project concept plan outcome. This project should be accomplished in the 2027-year analysis period rather than 2045.                                                                                                                                                                                                                                                                                                   | 3-35 |          |
| EA | 3.1<br>(table - 12) | <b>OR99E from 10<sup>th</sup> Street to Railroad Ave.</b> – This project should be accomplished in the 2027-year analysis period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 3-36 |          |
| EA | 3.1<br>(table - 12) | <b>Main Street / 7<sup>th</sup> Street</b> – The mitigation listed in the EA does not apply to the impact location. The intersection is one of those locations that does not lend itself to mitigation and as a result, this is one location that has the potential to impact the efficiency of Hwy 43, and the I205 Hwy 43 interchange. The EA needs to acknowledge that there is no project proposed for this location due to geometric constraints.                                                                                                                                                                        | 3-36 |          |
| EA | 3.1<br>(table - 12) | <b>Main Street/ 10<sup>th</sup> Street</b> – This project mitigation is being proposed without sufficient model analysis and may not provide any benefit. While pedestrian safety may be improved with a signal, this 4-way stop is efficient and moves all modes of travel very well.                                                                                                                                                                                                                                                                                                                                        | 3-36 |          |
| EA | 3.1<br>(table - 12) | <b>SE 82<sup>nd</sup> Dr and I-205 northbound ramps</b> – It's not clear what this project entails and based on the footnote ODOT is unsure if the project provides any benefit.                                                                                                                                                                                                                                                                                                                                                                                                                                              | 3-36 |          |
| EA | 3.1<br>(table - 12) | <b>OR99E and South End Road</b> - This intersection already has constrained lanes, and the site provides little room for expanded footprint. ODOT needs to better articulate the full intention of this project before taking credit for this being mitigation.                                                                                                                                                                                                                                                                                                                                                               | 3-37 |          |
| EA | 3.1<br>(table - 12) | <b>OR 99E and Haines/New Era Road</b> – The project proposes a RRFB to facilitate crossing of OR 99E and extending sidewalks. This is not a location that entails much for the pedestrian generation. There is a bus stop but without an intersection project this seems like a mitigation project that is not likely to be supported by the ODOT /County.                                                                                                                                                                                                                                                                    | 3-37 |          |
| EA | 3.7.2               | All Oregon City intersections included in the study have worse traffic operations under the Build Alternative compared to the No Build Alternative. Some intersections will fail the currently adopted intersection mobility standard and ODOT provides little guidance on how local agencies can manage this constraint while navigating the Oregon land use system. Many Oregon City Intersections not included in the study area are also going to fail. The more detailed micro-simulation modelling needed to understand the full impacts on Oregon City has yet to be completed and ODOT may never get to do this work. | 3-79 |          |
| K  | 4.3                 | Area of Potential Impact- the transportation system beyond the API boundary will be impacted by diversion, the API should use Main Street from the northern boundary south to 7 <sup>th</sup> Street at the area to analyze                                                                                                                                                                                                                                                                                                                                                                                                   | 6    |          |
| K  | 5                   | The API contains one park in Oregon City Jon Storm and one recreational area Sportcraft Landing. Both of these areas are in the Willamette River Green Way Overlay which implements Statewide Goal 15: Willamette River Green Way; however, this goal was not analyzed in this land use review, and it should be included.                                                                                                                                                                                                                                                                                                    | 9    |          |

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| K | 6.4 | Again, the study identified Statewide Land Use Goal 12 – Transportation for analysis but it should have also included Goal 15- Willamette River Greenway                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 15 | Item #3. |
| K | 6.2 | Goal 12 Transportation: Section (2) states <i>Plans for new or for the improvement of major transportation facilities should identify the positive and negative impacts on (1) local land use patterns...(4) existing transportation systems... in a manner that sufficient to enable local governments to rationally consider the issues posed by the construction and operation of such facilities.</i> Findings in subsequent sections (as described in comments related to 660-012-0000 (1)(h) and (l) conclude there will be negative impacts to the existing transportation system in Oregon City.                                                                                                                           | 17 |          |
| K | 6.2 | TPR 660-012-0000 (1)(h)- the analysis found the Build Alternative to be Consistent with this portion of the goal; however for travel and freight corridors in the API that are not I-205 the travel times were found to be 26% shorter under the No Build Alternative and “some portions of 99E would experience up to 31% longer travel times in Oregon City under the Build Alternative”. This finding is not consistent with the purpose statement: <i>Facilitate the safe flow of freight, goods, and services within regions and throughout the state through a variety of modes including road, air, rail, and marine transportation.</i>                                                                                    | 18 |          |
| K | 6.2 | TPR 660-012-0000 (1)(l)- the analysis found the Build Alternative to be Consistent with this portion of the goal; however, transportation facilities in the API are negatively impacted by the Build Alternative. “Travel times would be similar or slightly longer under the Build Alternative than the No Build Alternative on roadway segments near downtown Oregon City (e.g., portions of OR 43, Main Street, and OR 99E) depending on direction of travel and time of day, because of additional rerouting related to vehicles avoiding the tolled bridges”. This finding is not consistent with the purpose statement: <i>Protect the functions of existing and planned transportation facilities, corridors, and sites</i> | 19 |          |
| K | 6.2 | Oregon Transportation Plan Policy 3.1, Strategy 3.1.1: The analysis found consistency with the Build Alternative and this Policy and Strategy. The findings conclude that “Some portions of southbound 99E would experience up to 31% (about 3 minutes) longer travel times in Oregon City under the Build Alternative than the No Build Alternative. ODOT is proposing mitigation measures designed to improve traffic flow in downtown Oregon City....” Creating longer travel times for freight moving through Oregon City does not address future needs of freight mobility and therefore the Build Alternative is not consistent with this policy of the OTP                                                                  | 23 |          |
| K | 6.2 | Oregon Highway Plan Policy 1C, Action 1C.4: The analysis found consistency with the Build Alternative and this Policy and Strategy. The findings conclude that “Some portions of southbound 99E would experience up to 31% (about 3 minutes) longer travel times in Oregon City under the Build Alternative than the No Build Alternative. ODOT is proposing mitigation measures designed to improve traffic flow in downtown Oregon City....” Creating longer travel times for freight moving through Oregon City does not support improved timeliness in truck freight movements in the API therefore the Build Alternative is not consistent with this policy of the OHP                                                        | 24 |          |
| K | 6.2 | 2022 Oregon City Comprehensive Plan Chapter 3, Goal 1: The analysis found that “Six intersections near downtown Oregon City would                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 26 |          |

|   |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |               |
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|   |       | experience higher traffic volumes, longer delays, and greater congestion levels, and some of those intersections would have higher numbers of predicted crashes in 2027 and/or 2045 under the Build Alternative compared to the No Build Alternative. In addition, peak period travel times on Main Street and OR 99E in Oregon City are projected to be longer under the Build Alternative than No Build Alternative in 2045". These negative impacts to Oregon City's transportation system under the Build Alternative are not consistent with our Comprehensive Plan Goal to <i>Provide a safe, comfortable, and accessible transportation network that serves all modes of travel, including nonmotorized modes.</i>                                                                                                                                                                                                                                                                      | Item #3.      |
| K | 6.2   | 2013 Oregon City Transportation System Plan Volume 1, Goal 8, Objectives A and C: Four intersections were studied in the EA (OR 99E and I-205 ramp (NB), OR 99E and I-205 ramp (SB), McLoughlin Blvd and 14 <sup>th</sup> St, and 7 <sup>th</sup> Street and Main). The TTR shows that only one intersection at Main and 7 <sup>th</sup> will meet mobility standards in 2045 while the remaining three will not meet the standards. The claim is that these intersections will not meet standards in the No Build Alternative either meaning the deficiency can't be attributed to the Build Alternative. However, it is reasonable to assume that mitigating the deficiency will be more difficult under the Build Alternative given the amount of traffic rerouting around the bridges.                                                                                                                                                                                                     | 27            |
| Q | 4.4.1 | Reasonably Foreseeable Future Actions: two projects are repeatedly cited through the document as Reasonably Foreseeable Future Actions (RFFA) that should not be considered in the No Build Alternative. One project is Tualatin-Sherwood Road widening between Langer Farms Parkway (in Sherwood, OR) and Teton Avenue (in Tualatin, OR). The second project is TriMet's Southwest Corridor Project which is a proposed light rail line from downtown Portland to Tualatin. The project is accurately described as being on hold until funding is identified. A funding measure was proposed in November 2020 but ultimately rejected by the voters. It is unclear how either of these projects meets the criteria of Section 4.4 or has the potential to have an impact on the same resources as the Build Alternative. A third project is mentioned in the analysis, Willamette Falls Legacy Project Internal Roadways which is no longer proposed in the private developers revised plans. | P14, B-2, B-3 |
| Q | 4.4.1 | Figure 4-1: Project numbers 10568 Tualatin-Sherwood Rd widening, 10907 HCT Southwest Corridor, and 12089 Willamette Falls Internal Roadways should all be removed from this figure, the No Build Analysis, and should not be considered as RFFAs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | p16           |
| Q | 6.1.2 | Climate- Including the three projects mentioned in previous comments skews the results of the No Build and cumulative impacts of the Build Alternative. The analysis states "For example, the Southwest Corridor Light Rail Project and the Willamette Falls Drive Multimodal Improvements would provide alternative transportation options in the event of a road closure due to wildfire or flooding." There is no timeframe associated with the development of the Southwest Corridor because there is no funding identified for the project and therefore it should not be considered a viable alternative transportation option.                                                                                                                                                                                                                                                                                                                                                          | p26           |
| Q | 6.1.2 | Climate- Again the analysis and conclusions are skewed by including the Tualatin-Sherwood Road widening project when discussing stormwater infrastructure. "Other projects such as the Tualatin-Sherwood Road Improvements, include improvements to stormwater facilities in the API, which would improve the resiliency of the stormwater infrastructure."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | p26           |

|   |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |     |
|---|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
|   |       | While this statement may be true it should be noted that stormwater from this particular project will drain to a different basin than stormwater infrastructure east of I-5. The standards may vary as well given that different jurisdictions have their own MS4 permits and stormwater in Washington County is overseen by Clean Water Services as opposed to stormwater management in Clackamas County which is overseen by Water Environmental Services.                                                                |     |
| Q | 6.1.3 | Economics- "Some of the RFFAs, such as the Willamette Falls Legacy Project Internal Roadways project, directly support larger economic development activities that would increase jobs and services within the API." This project is no longer going forward as the private development plans have been revised and therefore should be included with No Build/ Build cumulative effect analysis.                                                                                                                           | p26 |
| Q | 6.1.4 | Rerouting Traffic to Local Streets- Acknowledging the impacts of tolls on Environmental Justice Populations, the analysis describes "some traffic would reroute to local streets in order to avoid tolls, resulting in potential impacts on ...environmental justice populations traveling to hubs of social resources in Oregon City."                                                                                                                                                                                     | p29 |
| Q | 6.1.4 | Technological Barriers- Diversion, increased vehicle traffic on Oregon City's roads as a result of avoiding toll, could increase as a result of technological barriers to using the toll system. "The lack of a cash payment option may make it difficult for the unbanked or other people experiencing low-income to purchase a transponder or to pay invoices and could discourage them from using the tolled segment of I-205".                                                                                          | p30 |
| Q | 6.1.4 | Technological Barriers- The Southwest Corridor was considered as one of the only RFFAs that could contribute to technological barriers facing low-income and minority populations. However, due to unknown funding timing or sources this project should not be considered as an RFFA which means that the Toll Project is the sole project that will contribute negatively to Environmental Justice Populations by creating technological barriers, and these barriers could increase diversion onto Oregon City roadways. | p31 |

## MEMORANDUM

DATE: April 3rd, 2023

TO: Dayna Webb, City of Oregon City

FROM: Carl Springer and Kevin Chewuk | DKS Associates

SUBJECT: Oregon City Regional Mobility Pricing Project Support  
I-205 Tolling Project Environmental Assessment Review Memorandum

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As requested, we have reviewed the I-205 Tolling Project Environmental Assessment (EA) and associated technical appendices<sup>1</sup>. The following memorandum summarizes our review, including reported impacts identified within Oregon City, and other relevant issues and potential impacts of concern to the City of Oregon City that were not addressed within the I-205 Tolling EA.

### INTERSECTIONS ANALYZED IN OREGON CITY

The I-205 Tolling EA included 12 intersections within Oregon City as part of its transportation area of potential impact (API) analysis (see Figure 1). The intersections are noted below, included six along OR 99E between Dunes Drive and 10<sup>th</sup> Street, three along OR 213, two along Washington Street and one along Main Street in Downtown Oregon City.

- 7th St and Main St (ID #18)
- OR 99E and I-205 NB Ramps (ID #19)
- OR 99E and I-205 SB Ramps (ID #20)
- OR 99E and 15th St (ID #21)
- 15th St and Washington St (ID #22)
- OR 99E and 10th St (ID #23)
- Abernethy Rd and Washington St (ID #24)
- OR 213 and I-205 NB Ramps (ID #28)
- OR 213 and I-205 SB Ramps (ID #29)
- OR 213 and Washington St (ID #30)
- OR 99E and Dunes Dr (ID #40)
- OR 99E and 14th St (ID #41)

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<sup>1</sup> I-205 Tolling EA, February 2023, Oregon Department of Transportation.

### Findings for Oregon City:

While 12 intersections were analyzed in Oregon City, many were not included, especially along Main Street and other streets in Downtown Oregon City. These intersections will likely be impacted by the added traffic in the Build scenario, and particularly those on Main Street impacted by queuing and the potential spill back from the adjacent OR 99E intersections. The I-205 Tolling EA states that "Implementation of mitigation strategies may cause secondary impacts at adjacent intersections or roadways. Secondary impacts from implementing mitigation measures may require additional avoidance, minimization, or mitigation measures. An assessment of the effects associated with mitigation will be included in the Revised EA." Additional intersections that were not analyzed in the I-205 Tolling EA that may see impacts include: OR 99E and 12<sup>th</sup> Street, OR 99E and Main Street, OR 99E and S 2<sup>nd</sup> Street, Main Street and 10<sup>th</sup> Street, Main Street and 12<sup>th</sup> Street, Main Street and 14<sup>th</sup> Street, Main Street and 15<sup>th</sup> Street, and 7<sup>th</sup> Street and Railroad Avenue.

**FIGURE 1. OREGON CITY STUDY INTERSECTIONS INCLUDED IN THE I-205 TOLLING TRANSPORTATION API**



## TRAFFIC DIVERSION WITH I-205 TOLLING

Introducing tolling on I-205 will cause some highway users to change their routes away from I-205 onto OR 99E and other roadways in Oregon City to avoid tolling. This is referred to as diverted traffic in the technical reporting. The nearest toll gantry to Oregon City is planned for the Abernethy Bridge immediately west of the OR 99E interchange, which is the regional gateway for the downtown area.

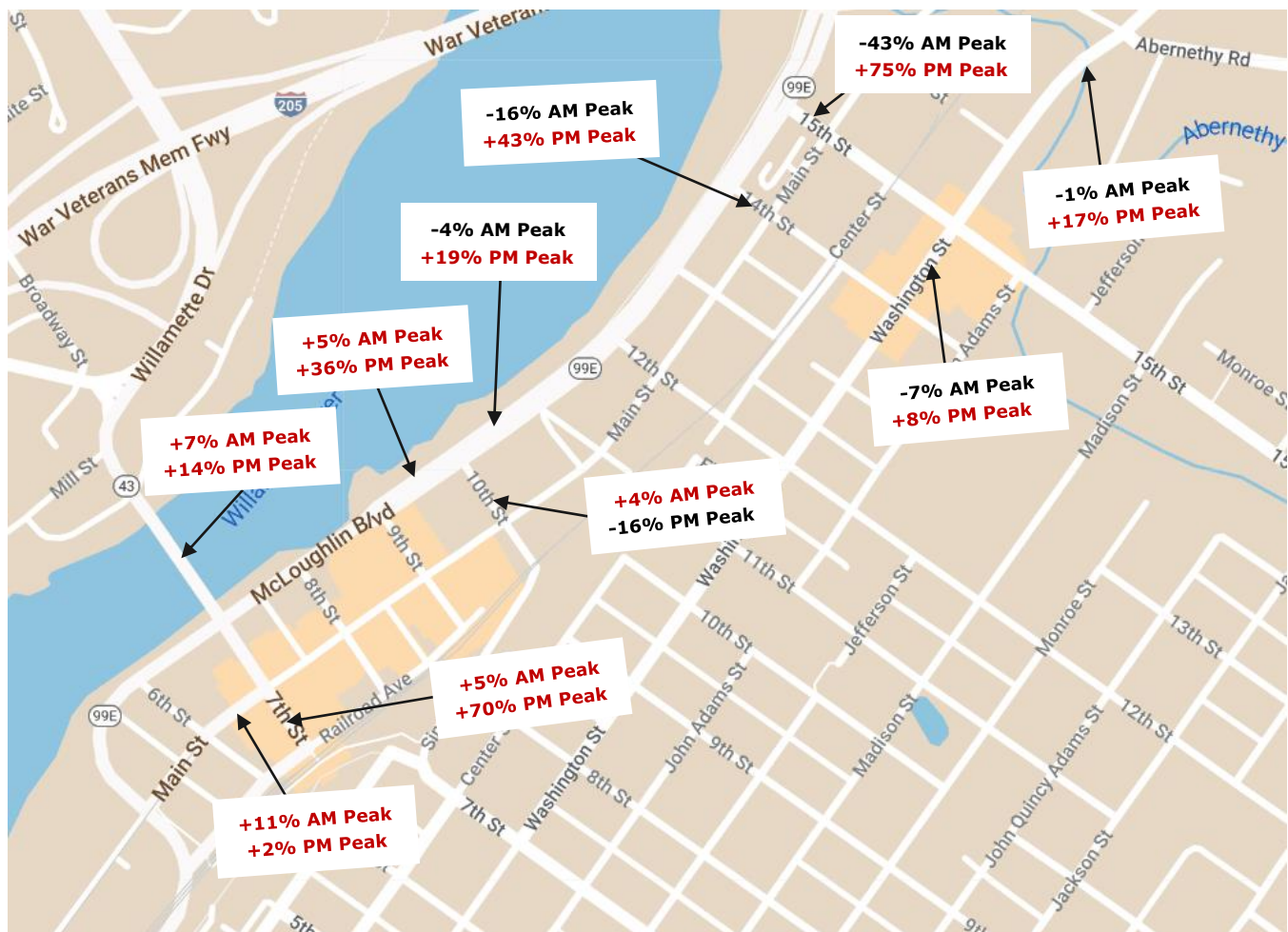
The range and scale of the expected traffic diversion onto Oregon City streets and highways was presented in the I-205 Tolling EA Transportation Technical Report. Significant diversion impacts are expected along OR 99E, across the Arch Bridge (OR 43), along Main Street and its connecting streets to OR 99E, and other major streets connecting to areas at the top of the bluff, such as Singer Hill, Washington Street and S 2<sup>nd</sup> Street.

## 2027 TRAFFIC DIVERSION WITH I-205 TOLLING

The I-205 Tolling EA Transportation Technical Report provides traffic volume forecasts with and without tolling operations on OR 99E and OR 213 in Oregon City. We compared the average weekday volumes in the 2027 Pre-Tolling and Build Scenarios to those in the 2027 No-Build Scenario to report the net changes. We found that major tolling diversions are expected along OR 99E through Downtown Oregon City, up to 27 percent higher in the northbound direction and up to 34 percent higher in the southbound direction, while the daily volume increases along OR 213 near Washington Street are more modest, up to 4 percent in the northbound direction and up to 6 percent in the southbound direction.

Figure 2 shows the projected 2027 peak hour volume increases along studied roadway segments in Oregon City with I-205 tolling. As shown, the a.m. peak hour generally has minor changes, less than 10 percent, except for 14<sup>th</sup> and 15<sup>th</sup> Street which drops by 16 and 43 percent respectively. During the p.m. peak hour, volume changes are much more significant on many routes, most notably increasing 43 and 75 percent along 14<sup>th</sup> and 15<sup>th</sup> Street respectively, and 36 percent along OR 99E south of 10<sup>th</sup> Street.

**FIGURE 2. 2027 PEAK HOUR TRAFFIC VOLUME CHANGES WITH I-205 TOLLING COMPARED TO NO TOLLS**



## 2045 TRAFFIC DIVERSION WITH I-205 TOLLING

Figure 3 shows forecasted changes in daily volumes between the 2045 Build Scenario and the 2045 No-build Scenario. As shown, daily volumes are expected to increase in 2045 from tolling diversion up to 10 percent along OR 99E, up to 50 percent along the Arch Bridge (OR 43), up to 40 percent along streets in Downtown Oregon City, and up to 10 percent along Washington Street and Abernethy Road between Downtown Oregon City and OR 213.

**FIGURE 3. 2045 DAILY VOLUME CHANGES WITH I-205 TOLLING COMPARED TO NO TOLLS**

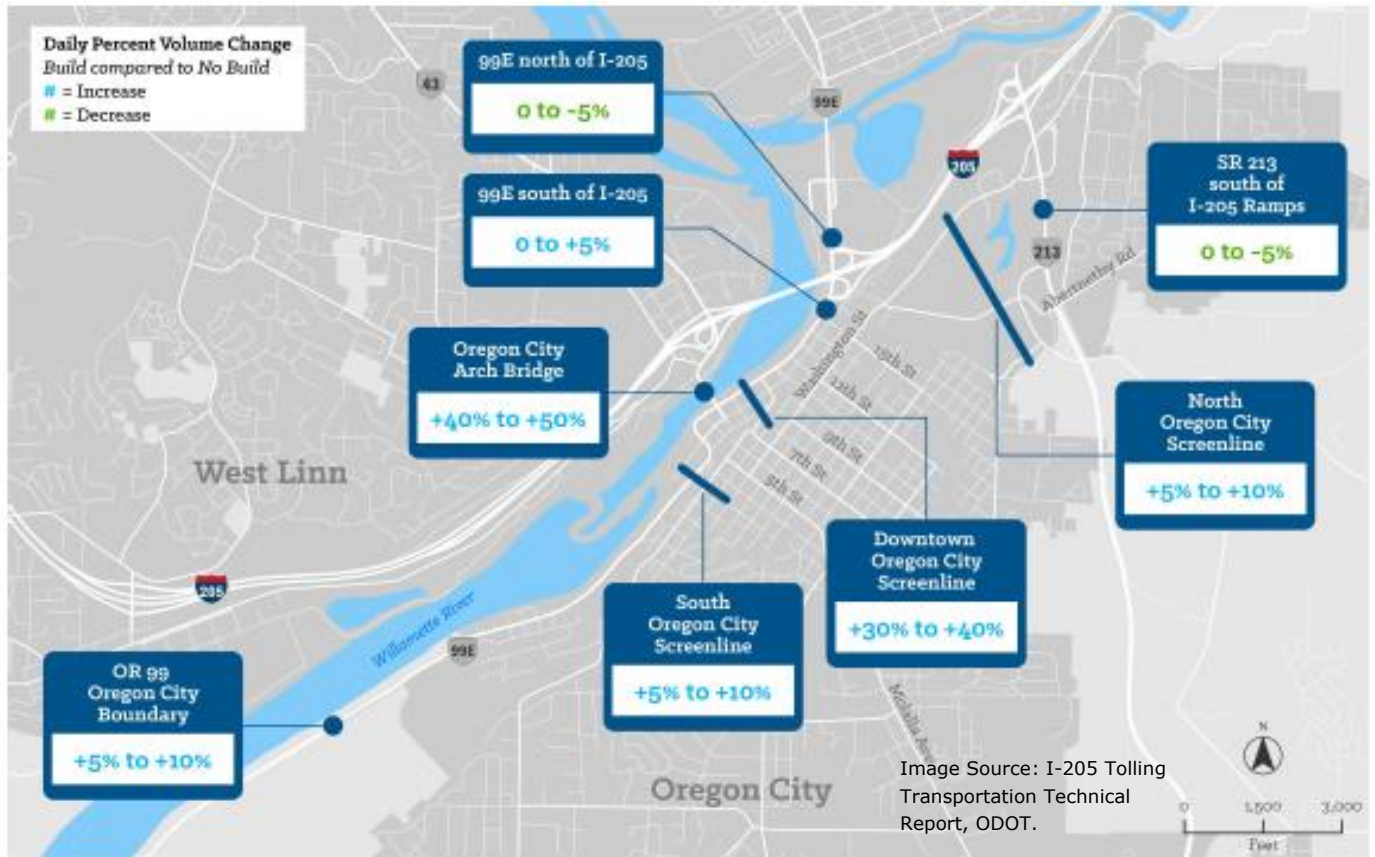
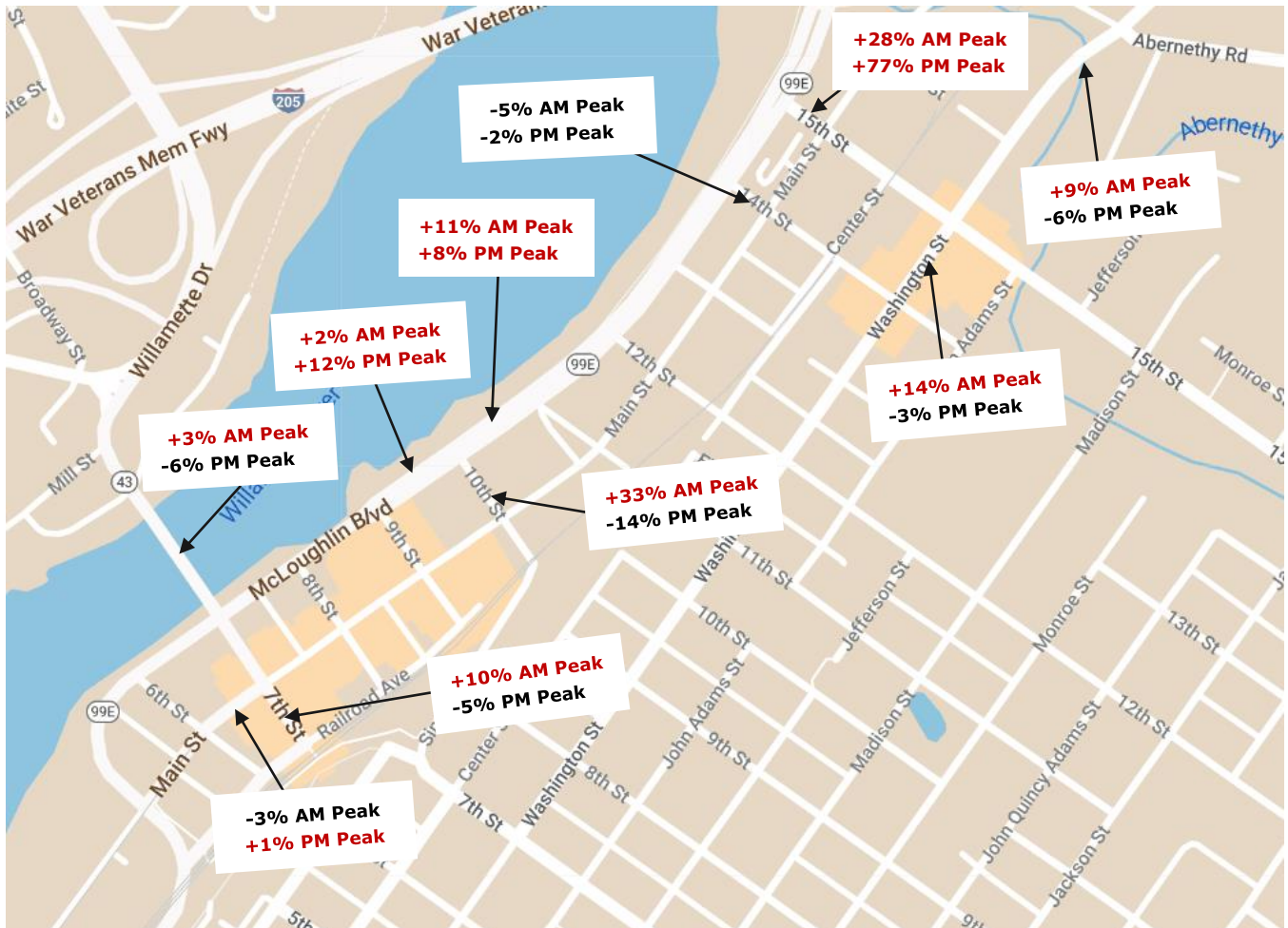


Figure 4 shows the projected 2045 peak hour volume changes with I-205 tolling. The 15<sup>th</sup> street connection between OR 99E and Main Street shows major increases in both peak hours, while five blocks south at 10<sup>th</sup> Street, the same connection serves 33 percent higher in the a.m. peak and decreases by 14 percent in the p.m. peak hour. The other changes shown in Figure 4 are relatively minor.

We also compared the relative changes reported for daily volumes (Figure 3) versus the peak hour volumes (Figure 4). The most striking difference is on the Arch Bridge, where a 40 to 50 percent increase is expected daily versus the peak hour totals of 3 to 6 percent, an order of magnitude less. One possible explanation for this outcome is an extension of the duration of severe congestion. The existing conditions analysis, as reported in previous technical reports, showed that the Arch Bridge is operating at or near capacity today. Adding more trips across the bridge due to

toll diversion will increase the number of congested hours on a typical weekday, which increases the daily volume total but not a given peak hour volume total. The system impact of a longer duration of congested peak period should be addressed in the revised EA Technical Report.

**FIGURE 4. 2045 PEAK HOUR VOLUME CHANGES WITH I-205 TOLLING COMPARED TO NO TOLLS**



### Findings for Oregon City:

While the roadway segments and intersections included in the I-205 Tolling EA Report do not reflect the complete picture, they do provide some insight into the projected highway user diversion impact to surface streets in Oregon City, indicating that I-205 tolling will increase daily and peak hour traffic on the Arch Bridge and OR 99E, through Downtown Oregon City along 7<sup>th</sup> Street, Main Street, Railroad Avenue, 14<sup>th</sup> Street and 15<sup>th</sup> Street, and Washington Street. This includes adding more peak hour traffic on critically congested links along OR 99E through the downtown, up to 36 percent more in 2027 and up to 12 percent more in 2045.

Tolling will also significantly increase traffic along Main Street and its connecting streets to OR 99E in Downtown Oregon City, with up to 75 percent more peak hour traffic in 2027 and up to 77 percent more in 2045. It is difficult to assess the impact of these significant peak hour volume increases at intersections along Main Street and other Downtown streets since the I-205 Tolling EA Report only included analysis at the Main Street/ 7<sup>th</sup> Street intersection.

## ROADWAY IMPACTS IDENTIFIED IN THE I-205 TOLLING EA

The forecasted analysis results from the I-205 Tolling EA for the 12 study intersections in Oregon City are shown in Table 1 and Table 2. The 2027 results indicate that four intersections are impacted by the Build Alternative when compared to the No-Build Alternative, including the following:

- 7th St and Main St (ID #18)
- OR 99E and I-205 NB Ramps (ID #19)
- OR 99E and I-205 SB Ramps (ID #20)
- OR 99E and 14th St (ID #41)

The 2045 results indicate that five intersections are impacted by the Build Alternative when compared to the No-Build Alternative, including three intersections that were also impacted in 2027 analysis. The five intersections include the following:

- OR 99E and I-205 NB Ramps (ID #19) – also impacted in the 2027 analysis.
- OR 99E and I-205 SB Ramps (ID #20) – also impacted in the 2027 analysis.
- OR 99E and 15th St (ID #21)
- OR 99E and 10th St (ID #23)
- OR 99E and 14th St (ID #41) – also impacted in the 2027 analysis.

Queuing results were only provided for the 2045 Build scenario. The results show vehicle queues extending from over 950 feet from the Main Street/ 7<sup>th</sup> Street intersection across the Arch Bridge into West Linn, and nearly 900 feet along Main Street from the 7<sup>th</sup> Street intersection. Significant queuing is also reported from intersections along OR 99E during the peak hours.

### Findings for Oregon City:

Impacts were identified at six of the 12 Oregon City intersections analyzed in the I-205 Tolling EA, including five along OR 99E (at the I-205 NB Ramps, I-205 SB Ramps, 15<sup>th</sup> St, 14<sup>th</sup> St, and 10<sup>th</sup> St intersections), and at the 7<sup>th</sup> St/ Main St intersection.

Tolling I-205 will cause many highway users to shift their trips to roadways in the City. These trips would result in significant new congestion along roadways and at intersections, and increased delay and travel times for people in the City, particularly along OR 99E and its connecting side streets through the City. Additionally, queue spill back from OR 99E intersections to the adjacent Main Street intersections are major concerns. The I-205 Tolling EA notes that additional traffic in the Build scenario rerouting through Oregon City and across the Arch Bridge “is causing congestion that would back up onto OR 99E and lead to additional delay”. These impacts to streets in Downtown Oregon City were not assessed in the I-205 Tolling EA. Queuing results were only provided for the 2045 Build scenario but show significant queuing at the analyzed intersections along OR 99E and at Main Street/7<sup>th</sup> Street.

TABLE 1: 2027 NO BUILD AND BUILD PEAK HOUR INTERSECTION OPERATIONS

| INTERSECTION (ID #)                     | MOBILITY STANDARD | 2027 NO BUILD (AM PEAK) |                |          | 2027 BUILD (AM PEAK) |                |          |
|-----------------------------------------|-------------------|-------------------------|----------------|----------|----------------------|----------------|----------|
|                                         |                   | V/C                     | DELAY          | LOS      | V/C                  | DELAY          | LOS      |
| 7TH ST AND MAIN ST (ID #18)             | v/c 1.1           | 0.53                    | 11             | B        | 0.56                 | 12             | B        |
| OR 99E AND I-205 NB RAMPS (ID #19)      | v/c 0.85 (0.75)   | <b>0.92</b>             | <b>79</b>      | <b>E</b> | <b>0.87</b>          | <b>64</b>      | <b>E</b> |
| OR 99E AND I-205 SB RAMPS (ID #20)      | v/c 0.85 (0.75)   | <b>0.92</b>             | <b>30</b>      | <b>C</b> | <b>1.17</b>          | <b>35</b>      | <b>D</b> |
| OR 99E AND 15TH ST (ID #21)             | v/c 1.1           | 1.10                    | 128            | F        | 0.49                 | 27             | D        |
| 15TH ST AND WASHINGTON ST (ID #22)      | LOS D             | 0.29                    | 21             | C        | 0.29                 | 21             | C        |
| OR 99E AND 10TH ST (ID #23)             | v/c 1.1           | 0.85                    | 16             | B        | 0.79                 | 36             | D        |
| ABERNETHY RD AND WASHINGTON ST (ID #24) | LOS D             | 0.42                    | 12             | B        | 0.42                 | 12             | B        |
| OR 213 AND I-205 NB RAMPS (ID #28)      | v/c 0.85 (0.75)   | NR                      | NR             | NR       | NR                   | NR             | NR       |
| OR 213 AND I-205 SB RAMPS (ID #29)      | v/c 0.85 (0.75)   | <b>&gt;2</b>            | <b>&gt;300</b> | <b>F</b> | <b>&gt;2</b>         | <b>&gt;300</b> | <b>F</b> |
| OR 213 AND WASHINGTON ST (ID #30)       | v/c 0.99          | 0.75                    | 14             | B        | 0.75                 | 14             | B        |
| OR 99E AND DUNES DR (ID #40)            | v/c 1.1           | 0.70                    | 18             | B        | 0.74                 | 22             | C        |
| OR 99E AND 14TH ST (ID #41)             | v/c 1.1           | <b>1.16</b>             | <b>40</b>      | <b>D</b> | 1.08                 | 17             | B        |
| INTERSECTION (ID #)                     | MOBILITY STANDARD | 2027 NO BUILD (PM PEAK) |                |          | 2027 BUILD (PM PEAK) |                |          |
|                                         |                   | V/C                     | DELAY          | LOS      | V/C                  | DELAY          | LOS      |
| 7TH ST AND MAIN ST (ID #18)             | v/c 1.1           | 1.08                    | 90             | F        | <b>1.18</b>          | <b>54</b>      | <b>D</b> |
| OR 99E AND I-205 NB RAMPS (ID #19)      | v/c 0.85 (0.75)   | <b>0.91</b>             | <b>37</b>      | <b>D</b> | <b>1.13</b>          | <b>38</b>      | <b>D</b> |
| OR 99E AND I-205 SB RAMPS (ID #20)      | v/c 0.85 (0.75)   | <b>1.12</b>             | <b>54</b>      | <b>D</b> | <b>1.42</b>          | <b>121</b>     | <b>F</b> |
| OR 99E AND 15TH ST (ID #21)             | v/c 1.1           | 1.05                    | 116            | F        | 1.05                 | 116            | F        |
| 15TH ST AND WASHINGTON ST (ID #22)      | LOS D             | 0.95                    | 31             | C        | 0.59                 | 52             | D        |
| OR 99E AND 10TH ST (ID #23)             | v/c 1.1           | 1.00                    | 53             | D        | 1.10                 | 31             | C        |
| ABERNETHY RD AND WASHINGTON ST (ID #24) | LOS D             | 0.50                    | 16             | B        | 0.50                 | 26             | C        |
| OR 213 AND I-205 NB RAMPS (ID #28)      | v/c 0.85 (0.75)   | NR                      | NR             | NR       | NR                   | NR             | NR       |
| OR 213 AND I-205 SB RAMPS (ID #29)      | v/c 0.85 (0.75)   | <b>&gt;2</b>            | <b>&gt;300</b> | <b>F</b> | <b>&gt;2</b>         | <b>&gt;300</b> | <b>F</b> |
| OR 213 AND WASHINGTON ST (ID #30)       | v/c 0.99          | 0.90                    | 18             | B        | 0.83                 | 16             | B        |
| OR 99E AND DUNES DR (ID #40)            | v/c 1.1           | 0.93                    | 38             | D        | 1.05                 | 56             | E        |
| OR 99E AND 14TH ST (ID #41)             | v/c 1.1           | <b>1.36</b>             | <b>46</b>      | <b>D</b> | <b>1.92</b>          | <b>128</b>     | <b>F</b> |

TABLE 2: 2045 NO BUILD AND BUILD PEAK HOUR INTERSECTION OPERATIONS

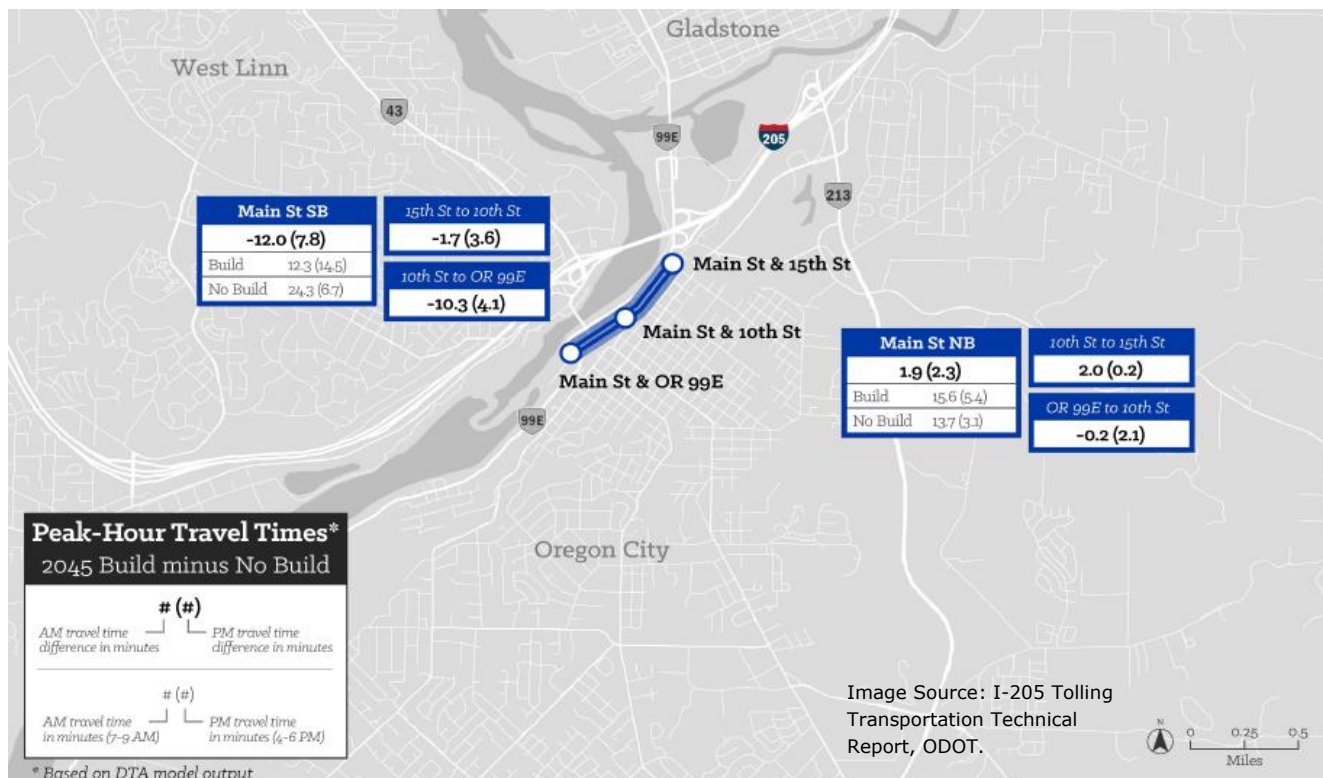
| INTERSECTION (ID #)                     | MOBILITY STANDARD | 2045 NO BUILD (AM PEAK) |                |          | 2045 BUILD (AM PEAK) |                |          |
|-----------------------------------------|-------------------|-------------------------|----------------|----------|----------------------|----------------|----------|
|                                         |                   | V/C                     | DELAY          | LOS      | V/C                  | DELAY          | LOS      |
| 7TH ST AND MAIN ST (ID #18)             | v/c 1.1           | 0.54                    | 11             | B        | 0.56                 | 12             | B        |
| OR 99E AND I-205 NB RAMPS (ID #19)      | v/c 0.85 (0.75)   | <b>0.89</b>             | <b>60</b>      | <b>E</b> | <b>0.99</b>          | <b>85</b>      | <b>F</b> |
| OR 99E AND I-205 SB RAMPS (ID #20)      | v/c 0.85 (0.75)   | <b>1.05</b>             | <b>38</b>      | <b>D</b> | <b>1.07</b>          | <b>39</b>      | <b>D</b> |
| OR 99E AND 15TH ST (ID #21)             | v/c 1.1           | 1.01                    | 97             | F        | <b>1.47</b>          | <b>269</b>     | <b>F</b> |
| 15TH ST AND WASHINGTON ST (ID #22)      | LOS D             | 0.31                    | 22             | C        | 0.30                 | 20             | B        |
| OR 99E AND 10TH ST (ID #23)             | v/c 1.1           | 0.74                    | 24             | C        | 0.93                 | 45             | D        |
| ABERNETHY RD AND WASHINGTON ST (ID #24) | LOS D             | 0.42                    | 12             | B        | 0.49                 | 13             | B        |
| OR 213 AND I-205 NB RAMPS (ID #28)      | v/c 0.85 (0.75)   | NR                      | NR             | NR       | NR                   | NR             | NR       |
| OR 213 AND I-205 SB RAMPS (ID #29)      | v/c 0.85 (0.75)   | <b>&gt;2</b>            | <b>&gt;300</b> | <b>F</b> | <b>&gt;2</b>         | <b>&gt;300</b> | <b>F</b> |
| OR 213 AND WASHINGTON ST (ID #30)       | v/c 0.99          | 0.75                    | 16             | B        | 0.78                 | 16             | B        |
| OR 99E AND DUNES DR (ID #40)            | v/c 1.1           | 0.80                    | 19             | B        | 0.80                 | 20             | B        |
| OR 99E AND 14TH ST (ID #41)             | v/c 1.1           | <b>1.21</b>             | <b>33</b>      | <b>C</b> | <b>1.27</b>          | <b>53</b>      | <b>D</b> |
| INTERSECTION (ID #)                     | MOBILITY STANDARD | 2045 NO BUILD (PM PEAK) |                |          | 2045 BUILD (PM PEAK) |                |          |
|                                         |                   | V/C                     | DELAY          | LOS      | V/C                  | DELAY          | LOS      |
| 7TH ST AND MAIN ST (ID #18)             | v/c 1.1           | 1.02                    | 64             | E        | 0.98                 | 31             | C        |
| OR 99E AND I-205 NB RAMPS (ID #19)      | v/c 0.85 (0.75)   | <b>1.05</b>             | <b>56</b>      | <b>E</b> | <b>1.11</b>          | <b>60</b>      | <b>E</b> |
| OR 99E AND I-205 SB RAMPS (ID #20)      | v/c 0.85 (0.75)   | <b>1.32</b>             | <b>83</b>      | <b>F</b> | <b>1.32</b>          | <b>80</b>      | <b>F</b> |
| OR 99E AND 15TH ST (ID #21)             | v/c 1.1           | <b>1.38</b>             | <b>252</b>     | <b>F</b> | <b>1.96</b>          | <b>&gt;300</b> | <b>F</b> |
| 15TH ST AND WASHINGTON ST (ID #22)      | LOS D             | 0.60                    | 38             | D        | 0.65                 | 45             | D        |
| OR 99E AND 10TH ST (ID #23)             | v/c 1.1           | 1.09                    | 65             | E        | <b>1.16</b>          | <b>67</b>      | <b>E</b> |
| ABERNETHY RD AND WASHINGTON ST (ID #24) | LOS D             | 0.58                    | 18             | B        | 0.56                 | 16             | B        |
| OR 213 AND I-205 NB RAMPS (ID #28)      | v/c 0.85 (0.75)   | NR                      | NR             | NR       | NR                   | NR             | NR       |
| OR 213 AND I-205 SB RAMPS (ID #29)      | v/c 0.85 (0.75)   | <b>&gt;2</b>            | <b>&gt;300</b> | <b>F</b> | <b>&gt;2</b>         | <b>&gt;300</b> | <b>F</b> |
| OR 213 AND WASHINGTON ST (ID #30)       | v/c 0.99          | 0.95                    | 22             | C        | 0.99                 | 36             | D        |
| OR 99E AND DUNES DR (ID #40)            | v/c 1.1           | 1.04                    | 30             | C        | 1.00                 | 53             | D        |
| OR 99E AND 14TH ST (ID #41)             | v/c 1.1           | <b>1.66</b>             | <b>87</b>      | <b>F</b> | <b>1.65</b>          | <b>87</b>      | <b>F</b> |

Travel times were estimated for the 2045 No-Build and Build Alternatives along three corridors in Oregon City, including across the Arch Bridge from McKillican Street to Main Street, along Main Street from OR 99E to 15<sup>th</sup> Street, and along OR 99E from W Arlington Street to S 2<sup>nd</sup> Street.

The results show that the southbound travel times across the Arch Bridge into Oregon City are expected to be longer during the peak hours, increasing over three minutes during the p.m. peak hour in the 2045 Build scenario when compared to the 2045 No-Build scenario. The I-205 Tolling EA notes that backups from greater congestion in Downtown Oregon City are causing these increased travel times across the Arch Bridge.

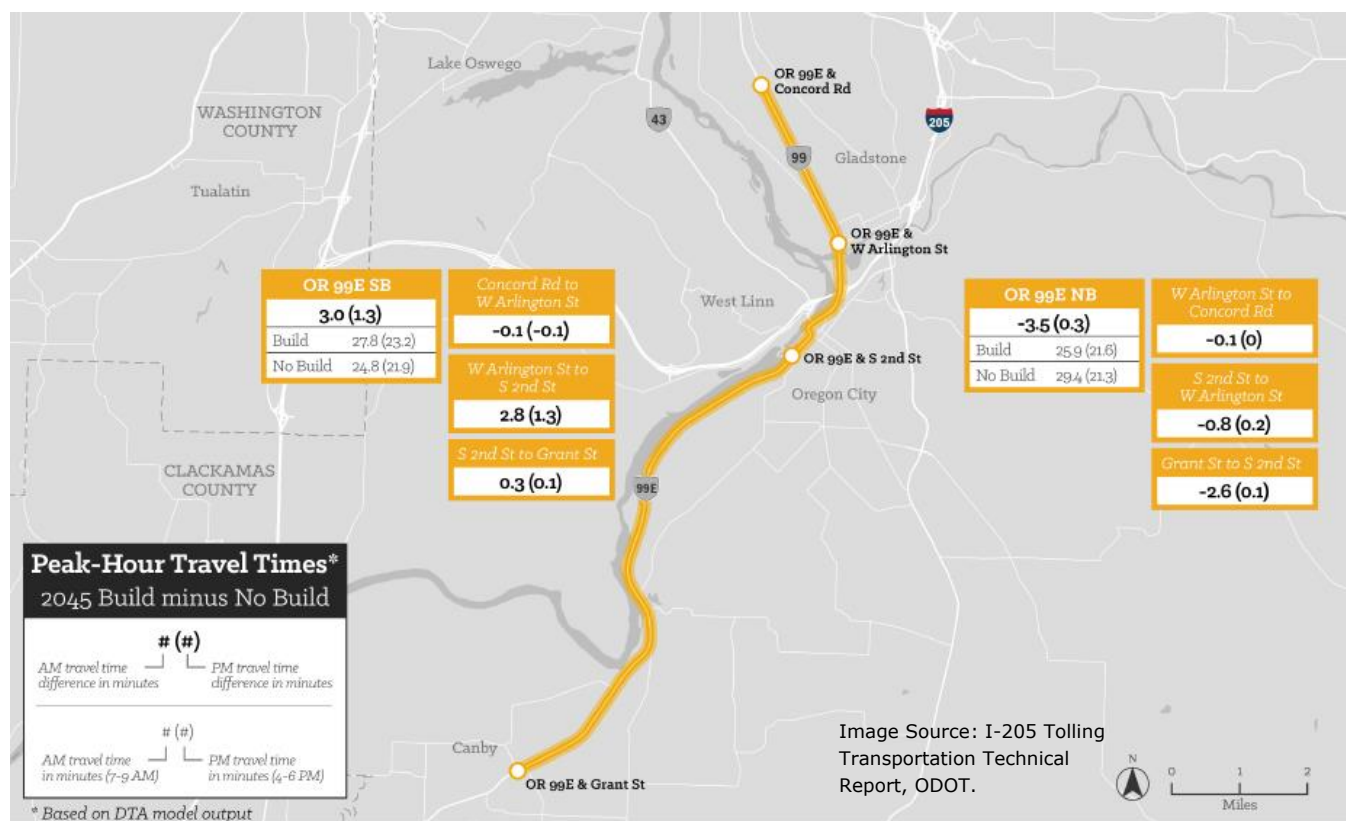
The results along Main Street in Downtown Oregon City, shown in Figure 5, indicate that travel times are expected to increase in the p.m. peak hour by nearly 8 minutes traveling southbound from 15<sup>th</sup> Street to OR 99E. The total p.m. peak hour travel time along this approximately one-half mile segment is estimated at nearly 15 minutes in the 2045 Build scenario, up from just under 7 minutes in the 2045 No-Build scenario. The southbound travel times along this same segment are projected to decrease in the a.m. peak hour, from 24 minutes in the 2045 No-Build scenario to 12 minutes in the 2045 Build scenario. The northbound Main Street travel times from OR 99E to 15<sup>th</sup> Street are estimated to increase by over 2 minutes during both the a.m. and p.m. peak hours, with this trip taking nearly 16 minutes during the a.m. peak hour in the 2045 Build scenario. It is worth noting that a typical trip taken today along this Main Street segment during the peak hour takes around 4 to 6 minutes in either direction, indicating that the estimated travel times in the 2045 Build and even No-Build scenarios are expected to be well above what they are today.

**FIGURE 5: 2045 NO BUILD AND BUILD PEAK HOUR TRAVEL TIMES ALONG MAIN STREET**



A typical trip taken today along the 2-mile OR 99E segment from W Arlington Street to S 2<sup>nd</sup> Street during the peak hour takes around 5 to 10 minutes in either direction. The 2045 Build scenario is estimated to add up to 3 minutes to the travel time along this segment when compared to the 2045 No-Build scenario, with the travel times in the southbound direction estimated to increase more than those in the northbound direction. While the total estimated corridor travel time reported in the I-205 Tolling EA along OR 99E is reported beyond Oregon City, from Gladstone to Canby, the overall increase in travel time is largely estimated to occur within the segment through Oregon City. The I-205 Tolling EA notes that additional traffic in the Build scenario rerouting through Oregon City and across the Arch Bridge "is causing congestion that would back up onto OR 99E and lead to additional delay".

**FIGURE 6: 2045 NO BUILD AND BUILD PEAK HOUR TRAVEL TIMES ALONG OR 99E**



## TRANSIT IMPACTS IDENTIFIED IN THE I-205 TOLLING EA

Transit travel times were estimated for the 2045 No-Build and Build Alternatives along three corridors in Oregon City, including Main Street from OR 99E to 15<sup>th</sup> Street, OR 99E from Dune Drive to S 2<sup>nd</sup> Street, and OR 213 from Beaver Creek Road to I-205. The results, shown in Table 3, indicate that transit travel times along Main Street in Downtown Oregon City are expected to increase by over 6 minutes traveling southbound in the p.m. peak from 14<sup>th</sup> Street to OR 99E and by over 2 minutes traveling northbound in the a.m. peak from 11<sup>th</sup> Street to 15<sup>th</sup> Street.

Along OR 99E, transit travel times are expected to increase by nearly 2 minutes traveling northbound in the a.m. peak between Main Street and S 2<sup>nd</sup> Street and by up to 3 minutes traveling southbound in the a.m. and p.m. peak between 11<sup>th</sup> Street and Main Street. The increased transit travel times along these OR 99E segments correlate to the decline in the estimated transit multimodal level of service between the 2045 No-Build and Build scenarios, with the former declining from C to D and the later declining from D to E. While transit multimodal level of service was not analyzed along Main Street in the I-205 Tolling EA, a similar decline would likely occur given the increased transit travel times.

### Findings for Oregon City:

Transit impacts were identified along four Oregon City roadway segments analyzed in the I-205 Tolling EA, including along OR 99E from 11th Street to Main Street (southbound), OR 99E from Railroad Avenue to MP 12.74 (northbound), Main Street from 11th Street to 15th Street (northbound) and Main Street from 14th Street to OR 99E (southbound). This will impact some existing TriMet routes and the Canby Area Transit 99X route.

It is also unclear if the proposed mitigations were included in the transit travel time assessment for the Build scenario. This is particularly true along OR 99E where intersection operations become significantly worse in the Build scenario when compared to the No-Build scenario, yet no change or even an improvement in transit travel times are projected along most segments.

**TABLE 3: 2045 NO BUILD AND BUILD TRANSIT TRAVEL TIMES**

| CORRIDOR                        | 2045 AM PEAK (7-9 AM)<br>TRAVEL TIME- MINUTES |       |            | 2045 PM PEAK (4-6 PM)<br>TRAVEL TIME- MINUTES |       |            |
|---------------------------------|-----------------------------------------------|-------|------------|-----------------------------------------------|-------|------------|
|                                 | NO<br>BUILD                                   | BUILD | CHANGE     | NO<br>BUILD                                   | BUILD | CHANGE     |
| <b>Main Street (Northbound)</b> |                                               |       |            |                                               |       |            |
| OR 99E TO 10TH ST               | 11.1                                          | 10.9  | -0.2       | 2.0                                           | 4.2   | <b>2.2</b> |
| 10TH ST TO 11TH ST              | 0.5                                           | 0.5   | -0.1       | 0.2                                           | 0.2   | 0.0        |
| 11TH ST TO 14TH ST              | 1.3                                           | 2.8   | <b>1.5</b> | 0.6                                           | 0.7   | 0.1        |
| 14TH ST TO 15TH ST              | 0.7                                           | 1.3   | <b>0.6</b> | 0.2                                           | 0.3   | 0.1        |
| <b>Main Street (Southbound)</b> |                                               |       |            |                                               |       |            |
| OR 99E TO 10TH ST               | 21.2                                          | 11.0  | -10.2      | 6.1                                           | 9.1   | <b>2.9</b> |
| 10TH ST TO 11TH ST              | 1.8                                           | 0.3   | -1.5       | 0.7                                           | 2.4   | <b>1.7</b> |
| 11TH ST TO 14TH ST              | 0.8                                           | 0.6   | -0.2       | 0.7                                           | 3.0   | <b>2.2</b> |
| 14TH ST TO 15TH ST              | 0.5                                           | 0.4   | -0.1       | 0.4                                           | 0.4   | 0.0        |
| <b>OR 99E (Northbound)</b>      |                                               |       |            |                                               |       |            |
| DUNES DR TO 15TH ST             | 2.3                                           | 1.6   | -0.7       | 1.2                                           | 1.3   | 0.1        |

| CORRIDOR                                | 2045 AM PEAK (7-9 AM)<br>TRAVEL TIME- MINUTES |       |            | 2045 PM PEAK (4-6 PM)<br>TRAVEL TIME- MINUTES |       |            |
|-----------------------------------------|-----------------------------------------------|-------|------------|-----------------------------------------------|-------|------------|
|                                         | NO<br>BUILD                                   | BUILD | CHANGE     | NO<br>BUILD                                   | BUILD | CHANGE     |
| 15TH ST TO 11TH ST                      | 2.5                                           | 1.4   | -1.1       | 1.0                                           | 0.9   | -0.1       |
| 11TH ST TO MAIN ST                      | 2.1                                           | 1.1   | -0.9       | 1.2                                           | 1.2   | -0.1       |
| MAIN ST TO MP 12.74                     | 1.9                                           | 3.5   | <b>1.7</b> | 0.7                                           | 1.0   | 0.3        |
| MP 12.74 TO S 2 <sup>ND</sup> ST        | 0.2                                           | 0.2   | 0.0        | 0.2                                           | 0.2   | 0.0        |
| <b>OR 99E (Southbound)</b>              |                                               |       |            |                                               |       |            |
| DUNES DR TO 15TH ST                     | 1.1                                           | 1.2   | 0.0        | 1.0                                           | 0.9   | -0.1       |
| 15TH ST TO 11TH ST                      | 0.6                                           | 0.6   | 0.0        | 0.9                                           | 0.9   | 0.0        |
| 11TH ST TO MAIN ST                      | 2.0                                           | 5.4   | <b>3.4</b> | 1.5                                           | 3.3   | <b>1.8</b> |
| MAIN ST TO MP 12.74                     | 0.6                                           | 0.6   | 0.0        | 0.6                                           | 0.6   | 0.0        |
| MP 12.74 TO S 2 <sup>ND</sup> ST        | 0.3                                           | 0.2   | 0.0        | 0.3                                           | 0.2   | 0.0        |
| <b>OR 213 (Beavercreek Rd to I-205)</b> |                                               |       |            |                                               |       |            |
| NORTHBOUND                              | 7.3                                           | 5.9   | -1.5       | 3.5                                           | 3.5   | 0.0        |
| SOUTHBOUND                              | 3.7                                           | 3.7   | 0.0        | 3.9                                           | 3.9   | 0.0        |

## PEDESTRIAN AND BICYCLE IMPACTS IDENTIFIED IN THE I-205 TOLLING EA

Bicycle level of traffic stress was estimated for the 2045 No-Build and Build Alternatives along three corridors in Oregon City, including OR 43 across the Arch Bridge, OR 99E, and OR 213. The results indicate moderate stress for bicyclists across the Arch Bridge (Bike Level of Traffic Stress 3), high stress for bicyclists along OR 213 (Bike Level of Traffic Stress 4), and stress levels ranging from low to high along OR 99E (Bike Level of Traffic Stress 1 to 4). The results also indicate no change in the expected level of stress for bicyclists along each of these corridors between the 2045 No-Build and Build scenarios, although the analysis assumes future planned projects along segments of OR 99E that would add bicycle facilities and bring those segments to Bike Level of Traffic Stress 1. Bicycle level of traffic stress was not analyzed along Main Street or at any of its intersections in the I-205 Tolling EA, although bicyclist will likely experience increased stress levels along it given the significant increase in traffic expected in Downtown Oregon City in the Build scenarios when compared to the No-Build.

A pedestrian corridor multimodal level of service analysis was also completed for the 2045 No-Build and Build Alternatives along the same corridors in Oregon City as the bicycle level of stress analysis, including OR 43 across the Arch Bridge, OR 99E, and OR 213. The results indicate a pedestrian level of service B across the Arch Bridge, pedestrian level of service E and F along OR 213, and ranging from C to F along OR 99E. Again, the results indicate no change in the expected pedestrian level of service along most of these corridors between the 2045 No-Build and Build scenarios, with the exception of the southbound segment of OR 99E from 11th Street to Main

Street, which will worsen from pedestrian level of service C to E under Build conditions. Again, pedestrian analysis was not analyzed along Main Street or at any of its intersections in the I-205 Tolling EA, although pedestrians will likely experience increased stress levels, particularly at intersections, given the significant increase in traffic expected in Downtown Oregon City in the Build scenarios when compared to the No-Build.

### Findings for Oregon City:

No bicycle impacts were identified in Oregon City in the I-205 Tolling EA, although several of the analyzed roadway segments include high levels of traffic stress for bicyclists in both the 2045 No-Build and Build scenarios. The analysis assumes completion of a planned shared-use path adjacent to southbound OR 99E between 10<sup>th</sup> Street to the Canemah neighborhood, which reduces the stress levels for bicyclists to low (Bike Level of Traffic Stress 1). OR 99E lacks bike facilities through much of Oregon City, with the only facility being a street adjacent multiuse path north of 14<sup>th</sup> Street. The bikeway gap along OR 99E south of this intersection is one of the most critical in the City, with high levels of traffic stress experienced by these users. The increased traffic along OR 99E with the Build scenario will further exacerbate the high bicycle level of traffic stress along this corridor and could deter people from biking.

A pedestrian impact was identified in the I-205 Tolling EA for the southbound segment of OR 99E from 11th Street to Main Street, which will worsen from pedestrian level of service C in No-Build conditions to E under Build conditions. Again, the analysis assumes completion of a planned shared-use path adjacent to southbound OR 99E to improve the pedestrian level of service, but only between Main Street and the Canemah neighborhood (the bike analysis also assumed the shared-use path between 10<sup>th</sup> Street and Main Street). Without the planned improvement, the southbound OR 99E segment between Main Street and the Canemah neighborhood would likely see a similar pedestrian impact as the segment between 11th Street to Main Street. Existing sidewalks along OR 99E are narrow and often directly adjacent to the travel lane, with no buffer provided. Additionally, segments of OR 99E exist with no sidewalk coverage. Adding additional traffic with the Build scenario to these already heavily traveled lanes, coupled with the high travel speeds, will negatively impact those walking along OR 99E and between the nearby neighborhoods. This will lead to uncomfortable walking conditions and a high level of stress, and difficult street crossings for some of the most vulnerable users in the City.

Although not analyzed in the I-205 Tolling EA, additional streets in the City could see increases in the level of traffic stress experienced for bicyclists and worsening pedestrian level of service as the level of traffic increases in the Build scenario, especially along Main Street and other streets in Downtown Oregon City.

## TRUCK FREIGHT IMPACTS IDENTIFIED IN THE I-205 TOLLING EA

The I-205 Tolling EA does not include a metric for identifying an impact to truck freight. Freight corridor travel times were estimated for the 2045 No-Build and Build Alternatives along OR 99E through Oregon City. The results, shown in Table 4, indicate that freight corridor travel times along OR 99E during the peak period are expected to increase up to 31 percent in the southbound direction (or nearly 3 minutes) and up to four percent in the southbound direction (or less than 30 seconds).

### Findings for Oregon City:

The I-205 Tolling EA does not include a metric for identifying an impact to truck freight. The added vehicle traffic along OR 99E under the Build scenario will lead to increased freight corridor travel times during the peak periods of up to 3 minutes through Oregon City. Additionally, the added traffic in Downtown Oregon City will make it more difficult to access area businesses and will affect how local businesses conduct their day-to-day operations.

**TABLE 4: 2045 NO BUILD AND BUILD FREIGHT CORRIDOR TRAVEL TIMES**

| CORRIDOR                                                              | 2045 AM PEAK (7-9 AM)<br>TRAVEL TIME- MINUTES |       |               | 2045 PM PEAK (4-6 PM)<br>TRAVEL TIME- MINUTES |       |               |
|-----------------------------------------------------------------------|-----------------------------------------------|-------|---------------|-----------------------------------------------|-------|---------------|
|                                                                       | NO<br>BUILD                                   | BUILD | CHANGE        | NO<br>BUILD                                   | BUILD | CHANGE        |
| OR 99E NORTHBOUND<br>(FROM S 2 <sup>ND</sup> ST TO W<br>ARLINGTON ST) | 10.7                                          | 9.9   | -0.8<br>(-7%) | 5.3                                           | 5.5   | 0.2<br>(+4%)  |
| OR 99E SOUTHBOUND<br>(FROM W ARLINGTON ST<br>TO S 2 <sup>ND</sup> ST) | 8.9                                           | 11.7  | 2.8<br>(+31%) | 6.1                                           | 7.4   | 1.3<br>(+21%) |

## TRANSPORTATION SAFETY IMPACTS IDENTIFIED IN THE I-205 TOLLING EA

A transportation safety impact was identified along the OR 99E segment from W Arlington Street to Main Street through Oregon City. This segment is estimated in the I-205 Tolling EA to see an increase in the predicted number of fatality/severe injury crashes per year in the Build scenario when compared to the No-Build scenario.

Although not characterized as a transportation safety impact in the I-205 Tolling EA, the increased traffic along streets in the City will have additional negative impacts on the safety of all transportation users. Peak-hour traffic volumes affect the safety of residents walking and biking between neighborhoods and those attempting to cross streets. The higher traffic volumes and increased congestion is estimated in the I-205 Tolling EA to lead to an increase in the predictive number of crashes at intersections and roadway segments in Oregon City. They also create an

increase in the predicted number of pedestrian and bicycle collisions in the I-205 Tolling EA with more potential conflicts between people walking and biking and those driving in the City.

Additionally, vehicle queues from OR 99E intersections extending back to the adjacent Main Street intersections will negatively impact the safety of users attempting to cross these intersections.

### Findings for Oregon City:

A transportation safety impact was identified along the OR 99E segment from W Arlington Street to Main Street through Oregon City.

Although not characterized as a transportation safety impact in the I-205 Tolling EA, the increased traffic along streets in the City will have additional negative impacts on the safety of all transportation users, including vehicle queues from OR 99E intersections extending back to the adjacent Main Street intersections negatively impacting the safety of users attempting to cross these intersections.

## MITIGATIONS FOR IMPACTS IDENTIFIED IN THE I-205 TOLLING EA

The following sections provide a summary of the mitigations recommended in the I-205 Tolling EA to address the Build scenario impacts identified in Oregon City. These identified impacts are summarized below:

- Roadway impacts were identified at six intersections, including:
  - 7th St/ Main St
  - OR 99E at 15<sup>th</sup> St
  - OR 99E at the I-205 SB Ramps
  - OR 99E at 14<sup>th</sup> St
  - OR 99E at the I-205 NB Ramps
  - OR 99E at 10th St
- Transit impacts were identified along four Oregon City roadway segments, including:
  - OR 99E from 11th Street to Main Street (southbound)
  - OR 99E from Railroad Avenue to MP 12.74 (northbound)
  - Main Street from 11th Street to 15th Street (northbound)
  - Main Street from 14th Street to OR 99E (southbound)
- A pedestrian impact was identified for the southbound segment of OR 99E from 11th Street to Main Street.
- A transportation safety impact was identified along the OR 99E segment from W Arlington Street to Main Street through Oregon City.

Figure 7 summarizes the proposed mitigations in Oregon City for these identified impacts.

FIGURE 7: PROPOSED MITIGATIONS IN OREGON CITY FOR IMPACTS IDENTIFIED IN THE I-205 TOLLING EA

## OR 99E OREGON CITY

**Ramp Meter Transit Bypass**  
Lane: SB on-ramp

**Convert to One-way:** 15th St  
from Main St to OR 99E

**Sidewalk Widening:** OR 99E SB  
between 10th St and Main St

**Safety Improvements**



**Proposed New Traffic Signal**  
(pending signal warrant)



**Transit Signal Priority**  
(pending agreement on technology)



**Queue Bypass and Advance Green Signal for Transit**



**Bike/Ped Improvements:** improve access from bike lane to sidewalk across Clackamas River Bridge



**Intersection Improvements**

**OR 99E/I-205 NB Ramps**

- Add Second left-turn lane to off-ramp
- Add second SB left-turn lane to on-ramp
- Add second NB right-turn lane to on-ramp
- Widen on-ramp to 2 receiving lanes, which taper down to 1

**OR 99E/14th St**

- Prohibit WB left-turns
- Begin 3rd NB lane on OR 99E

**OR 99E/10th St**

- Extend SB left-turn lane to 12th St

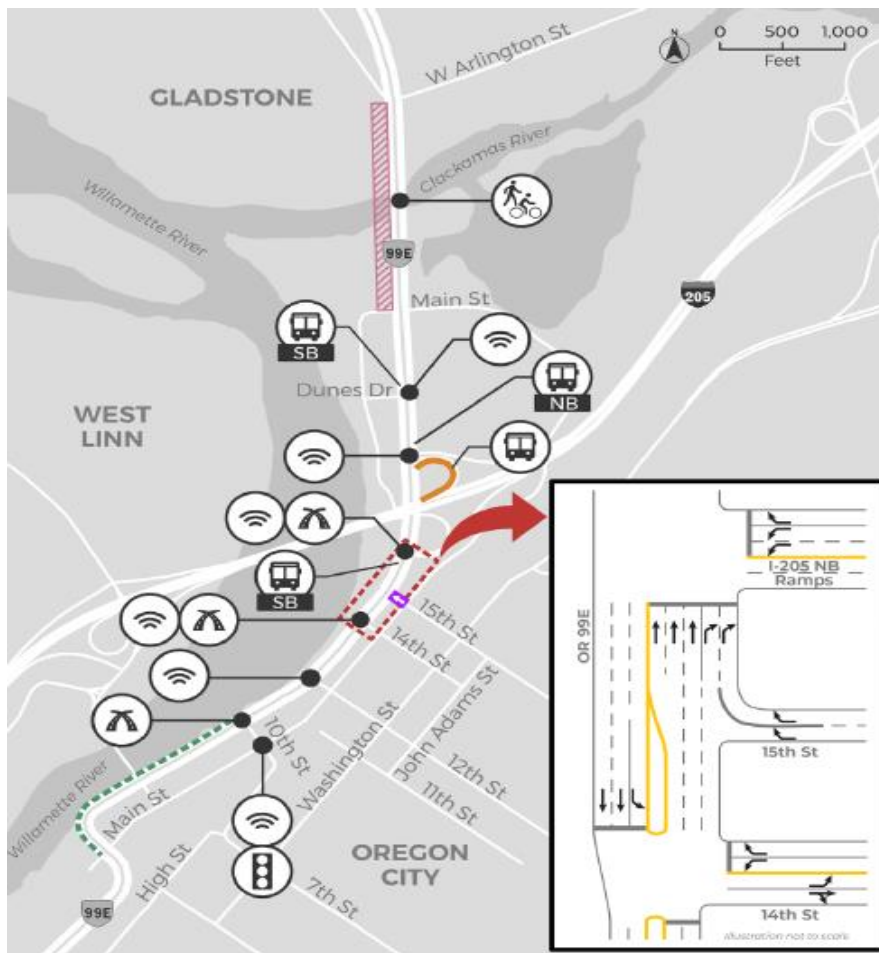


Image Source: I-205 Tolling Transportation Technical Report, ODOT.

## 7TH ST AND MAIN ST (ID #18)

The 7<sup>th</sup> Street/ Main Street intersection is projected to see significant increases in daily and peak hour traffic in the 2027 Build Scenario compared to the No-Build scenario, both along Main Street and the Arch Bridge/7<sup>th</sup> Street. The increased traffic causes the intersection to exceed the mobility standard in the peak hour of the 2027 Build scenario. Additionally, transit travel times along Main Street are impacted by the increased traffic. No mitigation is recommended in the I-205 Tolling EA at this intersection (see Table 5), outside of a note to implement pedestrian improvements along OR 99E. The intersection also includes a note stating, "Due to uncertainty regarding the projected traffic volumes, ODOT proposes to monitor this location and only implement the proposed mitigation if the actual conditions warrant it."

**TABLE 5: PROPOSED MITIGATIONS AT 7<sup>TH</sup> ST/ MAIN ST INTERSECTION IN THE I-205 TOLLING EA**

| MITIGATION TYPE       | IMPACTS IDENTIFIED IN THE I-205 TOLLING EA           | PROPOSED MITIGATION IN THE I-205 TOLLING EA                                                                                   |
|-----------------------|------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| ROADWAY               | Intersection operations exceed the mobility standard | None                                                                                                                          |
| TRANSIT               | Increased transit travel times                       | None                                                                                                                          |
| PEDESTRIAN            | Not analyzed                                         | Implement pedestrian improvements, as noted for OR 99E from 10th St to Railroad Ave, to improve overall mobility in the area. |
| BICYCLE               | Not analyzed                                         |                                                                                                                               |
| TRANSPORTATION SAFETY | None                                                 | None                                                                                                                          |

### Findings for Oregon City:

While the OR 99E improvements are supported by Oregon City to help mitigate identified Build scenario impacts along that roadway segment, it does not adequately address the impacts at this intersection and along this segment of Main Street. The distribution of the added Build scenario traffic through Downtown Oregon City streets is unclear given the lack of intersection analysis in the I-205 Tolling EA beyond the three adjacent highway intersections and 7<sup>th</sup> Street/ Main Street intersection. Peak hour volume data from those intersections indicate significant increases are expected with the Build scenarios and the impact that is projected to have along adjacent roadway segments and at intersections is not documented in the I-205 Tolling EA. Many of these streets in Downtown Oregon City are narrow with on-street parking, and the impact of adding up to 70 percent more peak trips to some of these segments should be studied.

Additionally, the note to monitor the intersection is unclear, and any process recommended in the I-205 Tolling EA for identifying and implementing an unknown mitigation should be clarified.

### OR 99E AND I-205 SB RAMPS (ID #20)

The OR 99E/ I-205 SB Ramps intersection is projected to exceed the mobility standard in the peak hours of both the 2027 and 2045 No-Build scenarios and this mobility standard exceedance is expected to worsen under the Build scenarios. Additionally, this segment of OR 99E is estimated to see an increase in the predicted number of fatality/severe injury crashes per year due to the increased traffic. No mitigation is recommended in the I-205 Tolling EA at this intersection for the identified roadway impact as shown in Table 6, outside of some transit enhancements.

**TABLE 6: PROPOSED MITIGATIONS AT OR 99E/ I-205 SB RAMPS INTERSECTION IN THE I-205 TOLLING EA**

| MITIGATION TYPE       | IMPACTS IDENTIFIED IN THE I-205 TOLLING EA                              | PROPOSED MITIGATION IN THE I-205 TOLLING EA                                                                                                                                   |
|-----------------------|-------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ROADWAY               | Intersection operations exceed the mobility standard                    | None                                                                                                                                                                          |
| TRANSIT               | None                                                                    | Transit signal priority; Provide northbound bus pocket at intersection and implement advance green light; Provide transit lane bypass of on-ramp meter on southbound on-ramp. |
| PEDESTRIAN            | None                                                                    | None                                                                                                                                                                          |
| BICYCLE               | None                                                                    | None                                                                                                                                                                          |
| TRANSPORTATION SAFETY | Increase in predicted number of fatality/severe injury crashes per year | Add 3-inch yellow reflective sheeting to signal backplates.                                                                                                                   |

#### Findings for Oregon City:

No mitigation is recommended in the I-205 Tolling EA at this intersection for the identified roadway impact, outside of transit enhancements. It is also unclear how travel time improvements were identified along this segment when peak hour congestion at this intersection is expected to significantly increase the Build scenarios and reported 95<sup>th</sup> percentile queues exceeding the available storage in the 2045 Build scenario, yet no improvements were identified for the roadway impact at the intersection.

### OR 99E AND I-205 NB RAMPS (ID #19)

The OR 99E/ I-205 NB Ramps intersection is projected to exceed the mobility standard in the peak hours of both the 2027 and 2045 No-Build scenarios and this mobility standard exceedance is expected to worsen under the Build scenarios. Additionally, this segment of OR 99E is estimated to see an increase in the predicted number of fatality/severe injury crashes per year due to the increased traffic. Recommended mitigations are shown in Table 7 and include widening to provide a second turn lane for the southbound left, westbound left and northbound right movements, in addition some transit and safety enhancements.

**TABLE 7: PROPOSED MITIGATIONS AT OR 99E/ I-205 NB RAMPS INTERSECTION IN THE I-205 TOLLING EA**

| MITIGATION TYPE              | IMPACTS IDENTIFIED IN THE I-205 TOLLING EA                              | PROPOSED MITIGATION IN THE I-205 TOLLING EA                                                                                      |
|------------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| <b>ROADWAY</b>               | Intersection operations exceed the mobility standard                    | Provide southbound dual left-turn lanes; westbound dual left-turn lanes; northbound dual right-turn lanes (starting at 15th St). |
| <b>TRANSIT</b>               | None                                                                    | Transit signal priority, advance green for southbound transit.                                                                   |
| <b>PEDESTRIAN</b>            | None                                                                    | None                                                                                                                             |
| <b>BICYCLE</b>               | None                                                                    | None                                                                                                                             |
| <b>TRANSPORTATION SAFETY</b> | Increase in predicted number of fatality/severe injury crashes per year | Add 3-inch yellow reflective sheeting to signal backplates.                                                                      |

### Findings for Oregon City:

It is unclear how the proposed mitigations at this intersection impact operations since mitigated results were not reported in the I-205 Tolling EA or provided in the appendices. The reported results for the peak hours of the Build scenarios show significant congestion and 95<sup>th</sup> percentile queues exceeding the available storage. Pedestrian travel across the east leg of the intersection will also be significantly impacted by the added crossing width, and dual right-turn lanes with an overlap phase.

### OR 99E AND 15TH ST (ID #21)

The OR 99E/ 15<sup>th</sup> Street intersection is projected to exceed the mobility standard in the peak hours of both the 2045 Build scenario. Additionally, this segment of OR 99E is estimated to see an increase in the predicted number of fatality/severe injury crashes per year due to the increased traffic. Recommended mitigations shown in Table 8 include making 15<sup>th</sup> Street one-way westbound between Main St and OR 99E and creating a second westbound right-turn lane and widening OR 99E to include a fourth northbound lane through the intersection.

### Findings for Oregon City:

It is unclear how the proposed mitigations at this intersection impact operations since mitigated results were not reported in the I-205 Tolling EA or provided in the appendices. The reported results for the peak hours of the Build scenarios show significant congestion and 95<sup>th</sup> percentile queues exceeding the available storage and extending to the nearby Main Street intersection.

Sight distance issues have also been previously identified at this intersection for the westbound approach to the intersection given grade changes, and adding a second westbound right-turn lane may enhance that deficiency. A pedestrian refuge island is also proposed between the two right-turn lanes on 15<sup>th</sup> Street with a rectangular rapid-flashing beacon (RRFB). The I-205 Tolling EA does not make note of it, but previous discussions have suggested making the northern-most right-turn lane on 15<sup>th</sup> Street a free movement onto OR 99E. This might create a confusing crossing for pedestrians, and it is unclear how the configuration might impact bike travel through the intersection.

**TABLE 8: PROPOSED MITIGATIONS AT OR 99E/ 15<sup>TH</sup> ST INTERSECTION IN THE I-205 TOLLING EA**

| MITIGATION TYPE       | IMPACTS IDENTIFIED IN THE I-205 TOLLING EA                              | PROPOSED MITIGATION IN THE I-205 TOLLING EA                                                                                                                                                                                             |
|-----------------------|-------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ROADWAY               | Intersection operations exceed the mobility standard                    | Convert 15th St to one-way westbound between Main St and OR 99E; start a fourth northbound lane on OR 99E north of 15th St that becomes the second northbound right-turn lane at the intersection of OR 99E and I-205 northbound ramps. |
| TRANSIT               | None                                                                    | None                                                                                                                                                                                                                                    |
| PEDESTRIAN            | None                                                                    | Provide pedestrian refuge island between the 2 right-turn lanes on 15th St, include RRFB for pedestrian crossing safety.                                                                                                                |
| BICYCLE               | None                                                                    | None                                                                                                                                                                                                                                    |
| TRANSPORTATION SAFETY | Increase in predicted number of fatality/severe injury crashes per year | None                                                                                                                                                                                                                                    |

### OR 99E AND 14TH AVE (ID #41)

The OR 99E/ 14<sup>th</sup> Street intersection is projected to exceed the mobility standard in the peak hours of both the 2027 and 2045 No-Build scenarios and this mobility standard exceedance is expected to worsen under the Build scenarios. Additionally, this segment of OR 99E is estimated to see an increase in the predicted number of fatality/severe injury crashes per year due to the increased traffic. No mitigation is recommended in the I-205 Tolling EA at this intersection for the identified roadway or transportation safety impact as shown in Table 9, outside of some transit enhancements.

### Findings for Oregon City:

No mitigation is recommended in the I-205 Tolling EA at this intersection for the identified roadway or transportation safety impact, outside of transit enhancements. The reported results for the peak hours of the Build scenarios show significant congestion and 95<sup>th</sup> percentile queues exceeding the available storage and extending to the nearby Main Street intersection.

The image from the I-205 Tolling EA includes text that suggests prohibiting the westbound left-turn at this intersection (see Figure 7), although the corresponding image still includes it. The removal of this movement would impact the movement of trucks and will have a greater impact on travel patterns through Downtown Oregon City. This recommendation should be clarified, and regardless it is not supported by Oregon City without further analysis demonstrating potential impacts to these adjacent streets and intersections.

**TABLE 9: PROPOSED MITIGATIONS AT OR 99E/ 14<sup>TH</sup> ST INTERSECTION IN THE I-205 TOLLING EA**

| MITIGATION TYPE       | IMPACTS IDENTIFIED IN THE I-205 TOLLING EA                              | PROPOSED MITIGATION IN THE I-205 TOLLING EA |
|-----------------------|-------------------------------------------------------------------------|---------------------------------------------|
| ROADWAY               | Intersection operations exceed the mobility standard                    | None                                        |
| TRANSIT               | None                                                                    | Transit signal priority.                    |
| PEDESTRIAN            | None                                                                    | None                                        |
| BICYCLE               | None                                                                    | None                                        |
| TRANSPORTATION SAFETY | Increase in predicted number of fatality/severe injury crashes per year | None                                        |

### OR 99E AND 10TH ST (ID #23)

The OR 99E/ 10<sup>th</sup> Street intersection is projected to exceed the mobility standard in the p.m. peak hour of the 2045 Build scenario. Additionally, this segment of OR 99E is expected to see a decline in pedestrian level of service, and an increase in the predicted number of fatality/severe injury crashes per year due to the increased traffic. Recommended mitigations include extending the southbound turn lane onto 10<sup>th</sup> Street and enhancing the sidewalk on the north side of OR 99E west of this intersection. The intersection also includes a note stating, "monitor to assess the effects of the improvement over time and determine if additional long-term mitigation would be required."

### Findings for Oregon City:

The recommended improvements do not appear to adequately address the roadway impact at the intersection as the mitigated results were not reported in the I-205 Tolling EA or provided in the appendices. The reported results show significant congestion and 95<sup>th</sup> percentile queues exceeding the available storage and extending to the nearby Main Street intersection and the proposed mitigations would not be expected to mitigate those conditions. I-205 Tolling EA also includes a recommended project to add a traffic signal at the nearby Main Street/10<sup>th</sup> Street intersection, but it is pending completion of additional analysis since it was not analyzed.

Additionally, the note to monitor the intersection is unclear, and any process recommended in the I-205 Tolling EA for identifying and implementing an unknown mitigation should be clarified.

The I-205 Tolling EA includes a note to "Coordinate with the City of Oregon City to implement the OR 99E Bike and Pedestrian Improvements Project, which would improve active transportation facilities on the southbound side of OR 99E." The OR 99E pedestrian improvements are supported by Oregon City to help mitigate identified Build scenario pedestrian and safety impacts along the deficient roadway segment, but the intent of this note should be clarified. It is also unclear why the analysis assumes completion of a planned shared-use path adjacent to southbound OR 99E to improve the pedestrian level of service along the segment between Main Street and the Canemah neighborhood, while the bike analysis assumes completion of the same shared-use path between 10<sup>th</sup> Street and Main Street. While the improvement is supported by Oregon City, without its assumed completion additional impacts may have been identified given the expected traffic growth under the Build scenarios and the lack of existing pedestrian and bicycle facilities along that segment.

**TABLE 10: PROPOSED MITIGATIONS AT OR 99E/ 10<sup>TH</sup> ST INTERSECTION IN THE I-205 TOLLING EA**

| MITIGATION TYPE       | IMPACTS IDENTIFIED IN THE I-205 TOLLING EA                              | PROPOSED MITIGATION IN THE I-205 TOLLING EA                                                                                                                                 |
|-----------------------|-------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ROADWAY               | Intersection operations exceed the mobility standard                    | Extend southbound left-turn lane to 12th St; monitor to assess the effects of the improvement over time and determine if additional long-term mitigation would be required. |
| TRANSIT               | None                                                                    | None                                                                                                                                                                        |
| PEDESTRIAN            | Decline in pedestrian level of service                                  | Widen/Improve southbound sidewalk on OR 99E between 10th Street and Railroad Avenue                                                                                         |
| BICYCLE               | None                                                                    | None                                                                                                                                                                        |
| TRANSPORTATION SAFETY | Increase in predicted number of fatality/severe injury crashes per year | Sidewalk improvements between 10th St and Railroad Ave are expected to improve pedestrian safety.                                                                           |