

Memo



Metro

600 NE Grand Ave.
Portland, OR 97232-2736

Date: May 17, 2022
To: JPACT and Metro Council
From: Ken Lobeck, Ted Leybold: Metro
Subject: May 2022 Formal MTIP Amendments Summary Log – I-205

SUMMARY

The May 2022 Formal Amendment includes the following project:

Resolution Number	Amendment Number	Summary Name
22-5265	MY22-11-MAY1	I-205 Abernethy Bridge

Project Complete Name: I-205: I-5-or 213, Phase IA Project

Project Description:

On I-205 from MP 8.30 to 11.09, complete the Abernethy Bridge improvement segment which includes constructing ground improvements, new foundations, sub-structure and superstructure and adding a lane in both directions of I-205. The I-205 NB and OR 43 IC will be reconstructed and include a roundabout. The OR 99 IC will be reconstructed to accommodate the bridge widening. Additional scope elements include a sound walls in the vicinity of SB I-205 at Exit 9, stormwater mitigation, landscaping, paving, striping, signing and lighting improvements.

MTIP Amendment Purpose Statement:

FOR THE PURPOSE OF AMENDING THE 2021-26 METROPOLITAN TRANSPORTATION IMPROVEMENT PROGRAM (MTIP) TO INCREASE THE CONSTRUCTION PHASE FOR THE I-205: I-5-or 213, PHASE IA PROJECT ALLOWING THE CONSTRUCTION PHASE TO MOVE FORWARD AND BE IMPLEMENTED (MY22-11-MAY1)

Summary:

- The 30-day Public Comment period spanned April 15, 2022 to May16, 2022
- Three formal comments were received via email.
- All are opposed to the I-205 Abernethy project and overall planned tolling to I-205
- The comments are similar to comments made in opposition to the I-205 PE phase Tolling Project

The email comments log is provided and shown below.

November 2021 Formal MTIP Amendments Comments Log				
Date	Name	Project	Comment	Added Notes
4/15/22 (1)	Garlynn Woodsong garlynn@gmail.com	I-205 Abernethy Widening	<p>Dear Metro,</p> <p>Please reject this proposed amendment to the MTIP (per https://www.oregonmetro.gov/news/public-notice-opportunity-comment-pending-amendment-metropolitan-transportation-improvement-50?utm_source=Metro+contacts&utm_campaign=46b9d55616-EMAIL_DIGEST_CAMPAIGN&utm_medium=email&utm_term=0_e7c2405cf5-46b9d55616-278256174&mc_cid=46b9d55616&mc_eid=24f9b54c65)</p> <p>This freeway expansion project is over budget, and taking resources away from necessary improvements to our regional bicycle, pedestrian, transit, open space, and housing systems, either implicitly or explicitly.</p> <p>We're in a climate crisis, and need to act accordingly. We must stop expending our precious resources on making it easier for automobiles to emit carbon dioxide and other global warming gases. We must instead invest in providing safe, comfortable, effective systems that eliminate dependency on the automobile. We must do so now, THIS decade.</p> <p>We can always come back and make adjustments to the freeway system, if needed, after 2050, once we have moved our automobile fleet off of fossil fuels.</p> <p>Right now, we must express our sense of urgency by halting all expenditures on the freeway system, so we can instead use those funds to make investments in our regional bicycle, pedestrian, and transit networks.</p> <p>Anything else would be gross negligence and a clear violation of the public trust doctrine during this time of a climate emergency.</p> <p>Thank you for rejecting this proposed MTIP amendment. Sincerely yours, ~Garlynn Garlynn Woodsong</p>	Opposes the Abernethy Bridge project
5/5/2022 (2)	Paul Edgar	I-205 Abernethy Widening and Proposed Tolling	<p>Pamplin Media "Opinion Piece by Paul Edgar", ODOT's proposed Pedestrian Bridge between Oregon City and West Linn is a Consolation Prize that will be paid for by Tolling Revenue from the I-205 Corridor and I-205 Abernethy Bridge. Printed in the Oregon City News 03/28/2022, submitted to Metro TPAC meeting, May 6, 2022.</p> <p>Note: see full comment submitted at the end of the comment log</p>	Opposes the Abernethy Bridge becoming a toll facility
5/16/202 (3)	Joseph Cortright jcortright@gmail.com	I-205 Abernethy Widening	<p>Please enter this comment into the record for the consideration of the MTIP amendment for the I-205 Abernethy Bridge Project</p> <p>In December 2018, FHWA approved a categorical exclusion for the I-205 Abernethy Bridge. The scope of this project was limited to widening the bridge structure and seismic improvements, and contained no provision for tolling. Now, subsequently, ODOT has advanced a much expanded project, widening several miles of I-</p>	Opposes the Abernethy Bridge project

			<p>205 on either side of the bridge. It is now the case that tolling is integral to funding the entire project.</p> <p>FHWA's December 2018 categorical exclusion determination is no longer valid for this project, inasmuch as its scope has changed. Therefore under its own regulations, FHWA must undertake a full environmental review of the entire project.</p> <p>Also, given that tolling of the expanded roadways on either side of the bridge itself is integral to the project budget for all elements of the project and for traffic management and determination of environmental impacts, a new analysis needs to be undertaken that covers the new expanded project. Neither project has any independent viability or utility without the other, and consequently they should be the subject of a single environmental analysis. In addition, ODOT and FHWA's staff reports on the Abernethy Bridge project falsely claimed that tolling was "not reasonably foreseeable" when in fact it had been authorized by the Legislature a full year before the CE determination.</p> <p>Metro should not approve a budget for this project until a re-evaluation of the Categorical Exclusion is completed, and until a new environmental review of the entire project is completed.</p> <p>The proposed budget for this project is now roughly double the estimated amount contained in the "Cost to Complete" report that was the basis for inclusion of this project in the RTP in 2018. At that time, the cost for the Abernethy Bridge (Package A) was estimated at \$248 million. Bids opened by ODOT show the actual cost of the bridge portion of the project to be approximately \$500 million. http://www.i205corridor.org/files/library/2018-01-05-k19786-i-205cw-pd-ctc-report-final-reduced.pdf</p> <p>Joe Cortright No More Freeways Portland</p>	
--	--	--	---	--

Paul Edgar full comment as published by Pamplin Media "Opinion Piece by Paul Edgar", ODOT's proposed Pedestrian Bridge between Oregon City and West Linn is a Consolation Prize, that will be paid for by Tolling Revenue from the I-205 Corridor and I-205 Abernethy Bridge. Printed in the Oregon City News 03/28/2022. Submitted to Metro TPAC meeting, May 6, 2022.

Paul Edgar: How many of the more than 100,000 daily crossings of the Willamette River will choose to reroute their trips?

ODOT's proposed bike/pedestrian bridge between Oregon City and West Linn is another example of its non-essential priorities.

What's more important? Having the ability to use the I-205 Abernethy Bridge without paying a toll, or having the ability to walk and/or ride a bike across a new pedestrian bridge? ODOT is studying having a \$2 toll just to cross the I-205 bridge in peak hours. If you had a choice to get across the Willamette River and not pay a toll, would you choose to reroute to the old Oregon City-West Linn Arch Bridge, or get on a bike or walk and use a new pedestrian bridge? How

many of the approximately 105,000 to 110,000 average daily crossings of the Willamette River on the I-205 bridge will choose to reroute their trips?

If you need to use more of the I-205 corridor out to the Stafford interchange, the proposed toll would be an additional \$4. Would you reroute to other roads just to stay away all of these proposed tolls? What is called the Toll Diversion Factor is made up of those who will reroute attempting to find a less costly way, which is estimated to be close to 40% -- those who would drive between 10 to 15 miles out of their way to avoid paying a toll.

A non-essential bike/ped bridge could be bonded with a local vote of the people, who would determine if it is important and worth it. We in Clackamas County could play hardball like people in Portland, where they get everything for free, like moving a whole school and capping the I-5 Corridor at the Rose Quarter.

U.S. Sen. Ron Wyden said that it is not fair to toll this section of the I-205 Corridor, but the governor and the Legislature voted to toll us, and it is like they want to give us a consolation prize in a non-essential pedestrian bridge paid for from tolling us to use the I-205 Abernethy Bridge. I hope no one who reads this has a business in and around Clackamas County, as this proposed tolling will hit the economy hard and the brick-and-mortar retail businesses the hardest.

There is not a lot of toll revenue that even can be reinvested. ODOT plans to hire an out-of-state company to administer tolling collection, and they historically get about 30% of the gross revenue off of the top. ODOT and Metro will take between 10% and 15% in new staffing hires, and then the next 10% to 15% will fund investments into non-road, highway or bridge needs; it is to go to things like an Equity and Mobility Advisory Committee for projects to level the playing field for a percentage of the population that has been found to have been inequitably treated in their lives. This also funds bike paths, trails, and yes, the new bike and ped bridges.

ODOT has a team of people determining who are low-income and plans to give them a paid pass to use the toll roads. TriMet proposes building a new Southwest Corridor Light Rail Transit Line and needs local money from our paying these tolls, and that could take between 5% and 10% of the gross toll revenue. We might even see some new bus routes coming into West Linn and Oregon City, so that we don't have to use our cars. Historically all of these things have increases in cost and that drive toll rates up and up. Seattle's toll bridge has shown this ability to squeeze more money out to pay for all of these non-essential, feel-good projects. Whatever is left over from the toll revenue will go to pay for the I-205 Improvement Project and bond interest. However, people who are just citizens like you and I are planning an initiative petition that would require a vote of the people in the immediate area to approve or disapprove of any proposed tolling. So, watch for information on notoll.army.

Paul Edgar is an Oregon City resident.

.