

## Appendix K

## I-205 Toll Project Land Use Technical Memorandum

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# Land Use Technical Memorandum

<b>Date</b>	February 2023
<b>To</b>	Carol Snead (ODOT)
<b>From</b>	HDR and WSP
<b>CC</b>	Mandy Putney (ODOT), Heather Wills (WSP), Nicole McDermott (WSP)
<b>Subject</b>	Land Use Technical Memorandum

## 1 Introduction

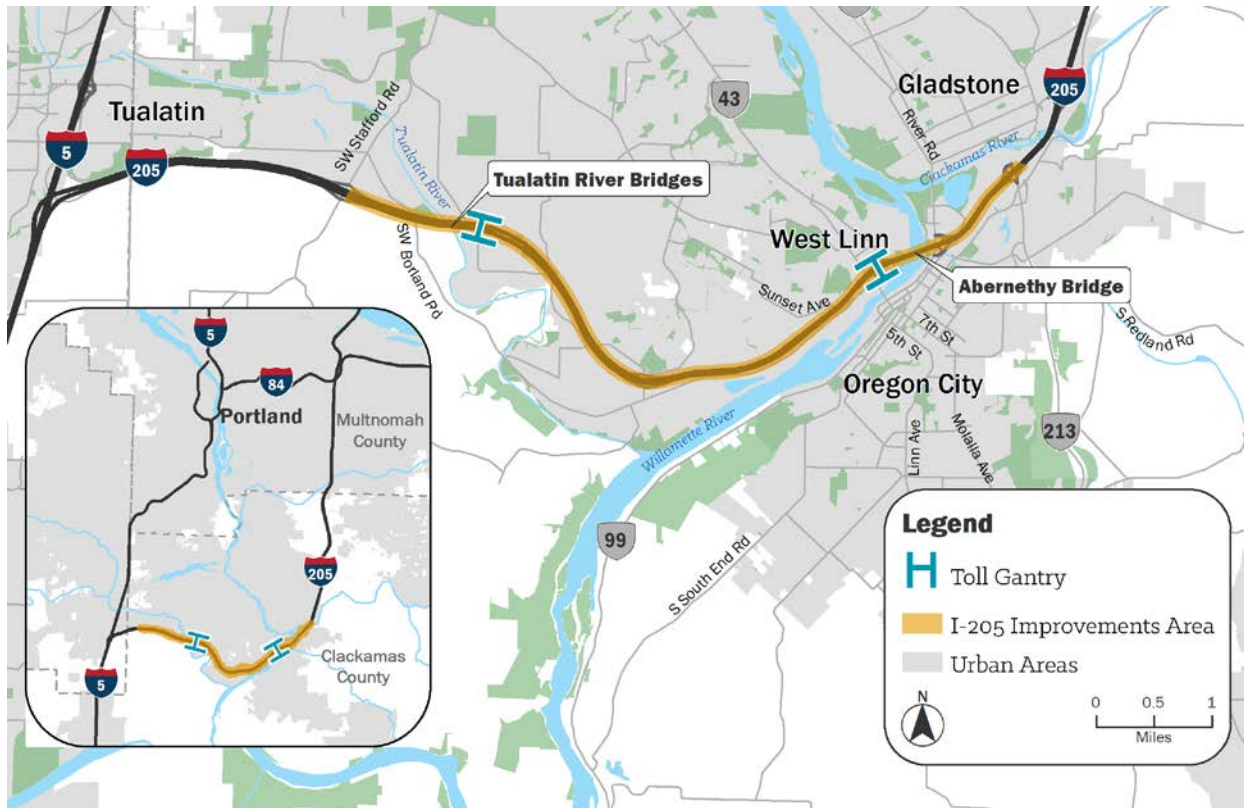
This technical memorandum supports the I-205 Toll Project Environmental Assessment developed by the Oregon Department of Transportation (ODOT) in partnership with the Federal Highway Administration (FHWA). ODOT proposes to use variable-rate tolls<sup>1</sup> on the Interstate 205 (I-205) Abernethy Bridge and Tualatin River Bridges to raise revenue for construction of planned improvements to I-205 from Stafford Road to Oregon Route (OR) 213, including seismic upgrades and widening, and to manage congestion. The environmental assessment presents an evaluation of the effects of variable rate tolls and the toll-funded I-205 improvements (together, the “Project”) on the human and natural environment in accordance with the National Environmental Policy Act (NEPA). The Project area is illustrated in Figure 1-1.

This technical memorandum describes the existing conditions for land use and discusses the impacts and benefits the Project would have on those conditions, including measures to avoid, minimize, and/or mitigate adverse effects. This technical memorandum also analyzes the compliance or compatibility of each alternative with state, regional, and local transportation and land use laws, plans, and policies applicable to the Project.

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<sup>1</sup> Variable-rate tolls are fees charged to use a road or bridge that vary based on time of day and that can be used as a strategy to shift demand to less congested times of day.

Figure 1-1. I-205 Toll Project Area



## 2 Project Alternatives

ODOT evaluated two alternatives in the I-205 Toll Project Environmental Assessment and this technical memorandum:

- No Build Alternative
- Build Alternative

Figure 2-1 depicts the existing condition and the proposed lane configuration of I-205 through the Project area for the No Build Alternative and Build Alternative.

### 2.1 No Build Alternative

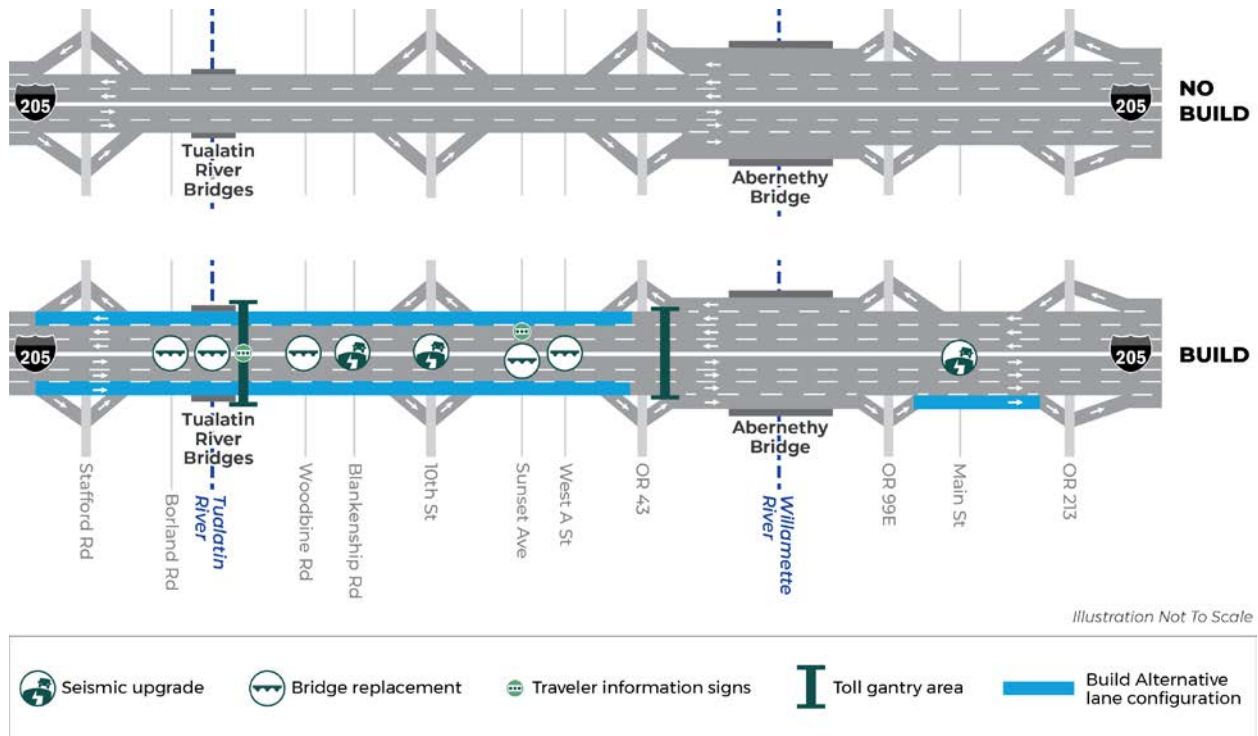
NEPA regulations require an evaluation of a No Build Alternative to provide a baseline to compare with the potential effects of a Build Alternative. The No Build Alternative consists of existing transportation infrastructure and any planned improvements that would occur regardless of the Project. The No Build Alternative includes the I-205: Phase 1A Project (reconstruction of the Abernethy Bridge with added auxiliary lanes and improvements to the adjacent interchanges at OR 43 and OR 99E) as a previously approved project that would be constructed by 2025. Under the No Build Alternative, tolling would not be

implemented and the toll-funded widening and seismic improvements on I-205 between Stafford Road and OR 213 would not be constructed.

## 2.2 Build Alternative

Under the Build Alternative, drivers of vehicles on I-205 would be assessed a toll for crossing the Abernethy Bridge (between OR 43 and OR 99E) and for crossing the Tualatin River Bridges (between Stafford Road and 10th Street). The Build Alternative includes construction of a third through lane in each direction of I-205 between the Stafford Road interchange and the OR 43 interchange, a northbound auxiliary lane between OR 99E and OR 213, toll gantries and supporting infrastructure, as well as replacement of or seismic upgrades to multiple bridges along I-205 (shown schematically in Figure 2-1).

Figure 2-1. Schematic Diagrams of No Build and Build Alternatives



The following sections provide a more detailed description of the Build Alternative.

### 2.2.1 Bridge Tolls: Abernethy and Tualatin River Bridges

Under the Build Alternative, ODOT could begin tolling as early as December 2024, before the completion of construction of Project improvements to I-205. Two areas have been identified for placement of the toll gantries and supporting infrastructure. The toll gantries and supporting infrastructure would be located entirely within the existing I-205 right-of-way. Tolling would consist of an all-electronic system that would automatically collect tolls from vehicles traveling on the highway. Toll gantries would consist of vertical columns on the outside of the travel lanes and a horizontal structure that spans the travel lanes; electronic tolling equipment would be attached to the horizontal structure.

## **2.2.2 Improvements to I-205**

Under the Build Alternative, a 7-mile portion of I-205 would be widened between Stafford Road and OR 213, with added through lanes between Stafford Road and OR 43, and a northbound auxiliary lane from OR 99E to OR 213. Eight bridges between Stafford Road and OR 213 would be replaced or reconstructed to withstand a major seismic event. New drainage facilities would be installed in both directions of I-205.

### **2.2.2.1 Bridge Reconstructions and Replacements**

The following bridges would be reconstructed with foundation improvements and substructure upgrades for seismic resiliency but would not be replaced:

- Northbound I-205 bridge over Blankenship Road – Mile Post (MP) 5.84
- Southbound I-205 bridge over Blankenship Road – MP 5.90
- Northbound I-205 bridge over 10th Street (West Linn) – MP 6.40
- Southbound I-205 bridge over 10th Street (West Linn) – MP 6.42
- I-205 bridge over Main Street (Oregon City) – MP 9.51

The following bridges would be replaced to meet seismic design standards and to facilitate the widening of I-205:

- Northbound I-205 bridge over SW Borland Road – MP 3.82
- Southbound I-205 bridge over SW Borland Road – MP 3.81
- Northbound I-205 bridge over the Tualatin River – MP 4.1
- Southbound I-205 bridge over the Tualatin River – MP 4.08
- Northbound I-205 bridge over Woodbine Road – MP 5.14
- Southbound I-205 bridge over Woodbine Road – MP 5.19
- Sunset Avenue (West Linn) bridge over I-205 – MP 8.28
- West A Street (West Linn) bridge over I-205 – MP 8.64

The I-205 bridges over 10th Street and Blankenship Road would be widened and raised to meet the proposed new highway grade. The I-205 bridges over the Tualatin River and SW Borland Road would be replaced on a new alignment between the existing northbound and southbound directions to accommodate construction. The I-205 bridges over Woodbine Road would be replaced on the existing alignment and raised to meet the proposed new highway grade. The Broadway Street Bridge over I-205 would be removed to enhance the function of the OR 43 interchange.

## **2.2.3 Construction**

Construction of the Build Alternative is expected to last approximately 4 years, beginning in late 2023 with construction of toll gantries and toll-related infrastructure and continuing from 2024 through 2027 with construction of I-205 widening and seismic improvements. Most toll-related construction would be conducted alongside I-205 within the existing right-of-way. For highway widening, it is anticipated that construction would be sequenced to widen one direction of I-205 at a time, enabling traffic to be moved to a temporary alignment while the remaining widening work is completed. Construction activities would include adding temporary crossover lanes to enable access to the temporary traffic configurations during

roadway widening. Staging areas for construction equipment and supplies for the Build Alternative would be located primarily in the median of I-205 in ODOT right-of-way.

### 3 Regulatory Framework

The following federal, state, regional and local laws, regulations, plans, policies, and guidance documents informed the assessment of land use:

- Federal
  - National Environmental Policy Act of 1969
  - Council on Environmental Quality regulations (40 C.F.R. Parts 1500–1508)
  - Federal Highway Administration NEPA-implementing regulations, Environmental Impact and Related Procedures (23 Code of Federal Regulation [C.F.R.] Part 771)
  - Section 4(f) of the Department of Transportation Act of 1966
  - 23 CFR Part 774 – Parks, Recreation Areas, Wildlife and Waterfowl Refuges, and Historic Sites
  - Section 6(f) of the Land and Water Conservation Fund Act of 1965
- State
  - Applicable provisions of Oregon’s Statewide Planning Program
  - Statewide Land Use Planning Goal 12: Transportation Planning Rule
  - Oregon Transportation Plan (ODOT 2006)
  - Oregon Highway Plan (ODOT 1999)
- Regional and Local
  - Metropolitan Planning Organization for the Portland area (“Metro”) 2018 Regional Transportation Plan (Metro 2018a)
  - Metro 2018 Urban Growth Management Functional Plan (Metro 2018b)
  - 2022 Oregon City Comprehensive Plan (City of Oregon City 2022)
  - 2013 Oregon City Transportation System Plan (City of Oregon City 2013)
  - 2016 West Linn Comprehensive Plan (City of West Linn 2016a)
  - 2016 West Linn Transportation System Plan (City of West Linn 2016b)
  - 2022 Clackamas County Transportation System Plan (Clackamas County 2022)
  - Stafford Hamlet Community Vision Plan (Stafford Hamlet 2020)

## 4 Methodology

### 4.1 Oregon Toll Program

Pursuant to legislative direction in House Bills 2017 and 3055,<sup>2</sup> ODOT is establishing a statewide tolling program (“Oregon Toll Program”) to implement and manage toll projects throughout the state. The I-205 Toll Project is the first toll project within the Oregon Toll Program to advance into the NEPA process.

ODOT intends to issue a determination that its statewide tolling program is not a “program affecting land use” and therefore does not fall within the agency’s state agency coordination duties under ORS 197.180, OAR 660, division 030 and OAR 731, division 015. Therefore, the components of the Build Alternative that implement the statewide tolling program – namely the implementation of variable-rate tolls on the I-205 Abernethy Bridge and Tualatin River Bridges to raise revenue and manage congestion – are not subject to these state land use law requirements. The land use effects and compatibility analyses in this memorandum do not apply to or address the components of the Build Alternative that implement the statewide tolling program.

The remaining components of the Build Alternative, or the physical infrastructure components including tolling infrastructure (gantries and roadside technology), toll-funded improvements to I-205 (as described in Section 2 above), and mitigation projects identified in Chapter 3 of the *I-205 Toll Project Environmental Assessment*, are subject to state land use law requirements and are analyzed herein.

### 4.2 General Approach

The Project Team evaluated the affected environment (existing conditions), potential effects under the No Build and Build Alternatives, and mitigation measures for land use. The Project Team also analyzed the compliance or compatibility of each alternative with state, regional, and local transportation and land use laws, plans, and policies applicable to the Project.

### 4.3 Area of Potential Impact

The Area of Potential Impact (API) for land use is within 100 feet of the edge of existing I-205 right-of-way between the Stafford Road and OR 213 interchanges, as shown in Figure 5-1.

### 4.4 Describing the Affected Environment

The Project Team used jurisdictional comprehensive plans and zoning maps as the primary data sources to describe existing and planned land uses and patterns, including the following:

- Clackamas County North Urban Area Land Use Plan Map (2017) and Zoning Map (2019)
- West Linn Comprehensive Plan Map (2009) and City Zoning Map (2015)
- West Linn Neighborhood Associations Map (2009)
- City of Oregon City Comprehensive Plan Map (2009) and Zoning Map (2009)

<sup>2</sup> Codified in the Oregon Revised Statutes under Chapter 383 – Tollways.



In addition, the Project Team considered information about proposed temporary and permanent right-of-way acquisitions for improvements based on preliminary design. No field surveys were conducted for the land use analysis.

## **4.5 Effect Assessment Methods**

The impacts analysis evaluates short-term (construction) direct effects, long-term direct effects, and cumulative effects for land use as described in the following sections. No indirect effects on land use were identified from the No Build Alternative and Build Alternative.

### **4.5.1 Direct Effects Assessment Methods**

The analysis of direct short-term land use effects that would occur during Project construction considered the following factors:

- The construction footprint, including permanent improvements as well as staging and access areas for vehicles, equipment, and materials
- How construction activities would affect access to existing land uses
- Whether temporary construction easements would be needed and the effect they could have on existing land uses

The analysis of direct long-term land use effects considered the following factors associated with the long-term operation and maintenance of the Project:

- The amount of land area by type (vacant, open space, right-of-way) converted from non-transportation uses to transportation improvements
- A qualitative assessment of whether the land use character of the API would be changed as a result of the Project (e.g., a change of character within the same land use category such as vegetated road shoulder to travel lanes or toll gantries)
- Any changes in access as a result of the Project

### **4.5.2 Cumulative Effects Assessment Methods**

The *I-205 Toll Project Cumulative Impacts Technical Report* includes an analysis of the Project's potential to contribute to cumulative effects on land use. Therefore, cumulative effects are not discussed in this technical memorandum.

### **4.5.3 Compatibility Analysis**

This technical memorandum analyzes compliance or compatibility with state, regional, and local transportation and land use laws, plans, and policies applicable to the Project.

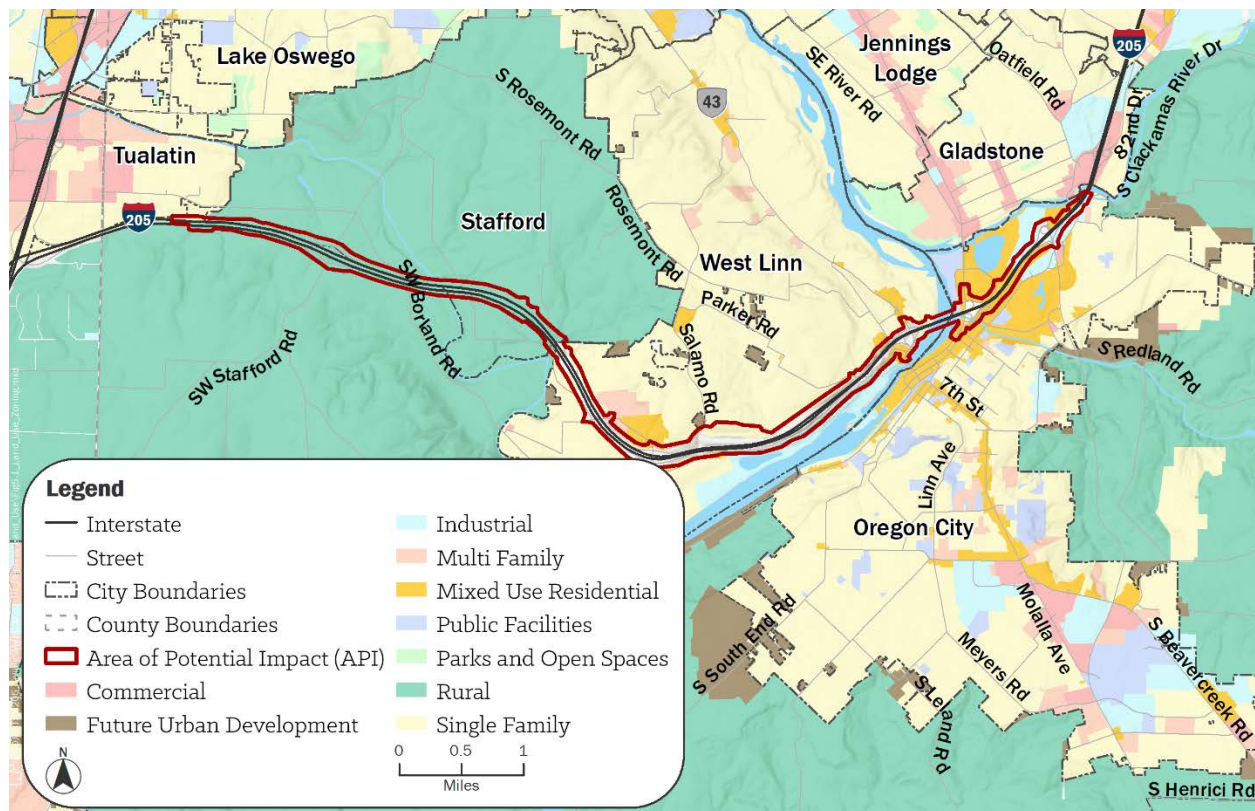
## **4.6 Mitigation Approach**

The Project would avoid and/or mitigate most anticipated impacts. Mitigation measures, if required, were developed using applicable agency-based regulations and guidance for those agencies with jurisdiction.

## 5 Affected Environment

The land use API includes areas within the limits of the City of West Linn, the City of Oregon City, and Clackamas County. Most of the land within the API has been developed with I-205 infrastructure that includes travel lanes, shoulders, on- and off-ramps, and vegetated medians. The API within Oregon City contains land zoned mixed-use, industrial, and road. In West Linn, the right-of-way does not have a zoning designation. Outside of the right-of-way within the API in West Linn, there is a mix of residential, commercial, mixed-use, and industrial zones. In Clackamas County, the API has a rural zoning designation. Figure 5-1 shows the existing zoning designations within and surrounding the land use API. Zoning generally reflects existing land uses.

**Figure 5-1. Existing Zoning within and Near the Land Use Area of Potential Impact**



Source: Metro Regional Land Information System

Section 4(f) of the Department of Transportation Act of 1966 requires that when federal funds are used on a transportation project, the agency must consider the effect on Section 4(f) resources. Section 4(f) properties include significant publicly owned parks, recreation areas, and wildlife or waterfowl refuges, or any publicly or privately owned historic site that is listed or eligible for listing on the National Register of Historic Places (FHWA n.d.-a).

Section 6(f) of the Land and Water Conservation Fund (LWCF) Act of 1965 requires that the conversion of lands or facilities acquired with LWCF Act funds under the State Assistance program to other than public outdoor recreation uses must be coordinated with the National Park Service (FHWA n.d.-b).

The API contains three parks, two school lands, one recreational area, two water trails, and three land-based trails (Metro 2022) (Figure 5-2). The three parks (West Bridge Park, McLean Park and House, and Jon Storm Park), recreational area (Sportcraft Landing), two of the land-based trails (sections of the Willamette River Greenway trail system in Oregon City and West Linn),<sup>3</sup> and two water trails (Willamette River Water Trail and Tualatin River Water Trail)<sup>4</sup> have been designated as Section 4(f) properties. McLean Park and House and Sportcraft Landing are also Section 6(f) properties (Figure 5-3). McLean Park and House is also a historic site that is individually eligible for listing on the National Register of Historic Places. In addition, there are four historic properties in the API that are Section 4(f) resources as they are eligible for listing on the National Register of Historic Places: the Historic West Linn City Hall and the Lynn View Apartments, which are eligible individually; and the Burnham-Derr House and Hallowell-Robinson House, which are eligible as part of a historic district.

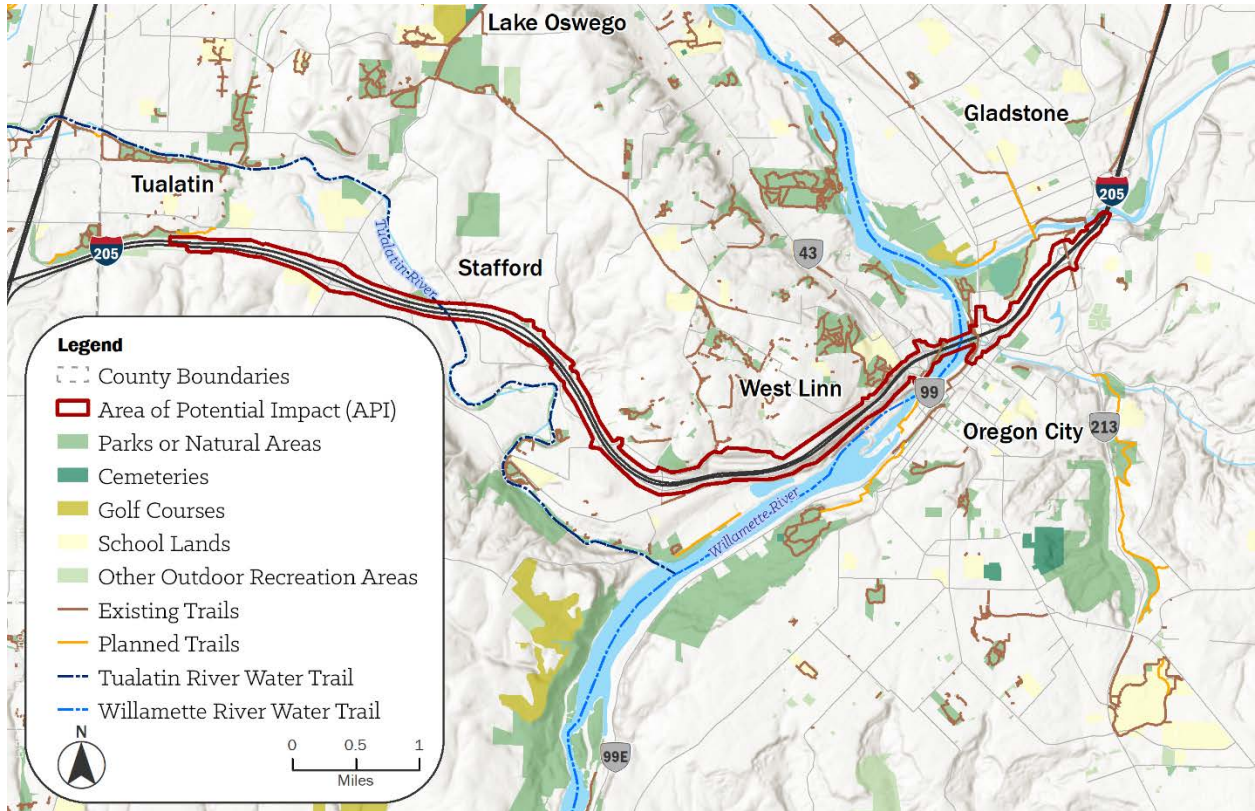
The API includes various environmentally sensitive areas, including wetlands, streams, rivers, and riparian areas. Under Title 13 of Metro's Urban Growth Management Functional Plan, local jurisdictions are required to designate Habitat Conservation Areas, which generally include rivers, streams, wetlands, and adjacent resource areas, as well as upland wildlife habitat patches and habitats of concern (City of Portland 2020). In addition, as part of its compliance with Goal 5 of the Oregon Statewide Land Use Planning Goals (Natural Resources, Scenic and Historic Areas, and Open Spaces), West Linn has collectively designated streams, wetlands, and significant riparian corridors as Water Resource Areas (City of West Linn 2014). Local jurisdictions regulate development within Habitat Conservation Areas as well as development within wetlands, streams, and rivers along with state and federal agencies. See the *I-205 Toll Project Wetlands and Water Resources Technical Memorandum* and *I-205 Toll Project Vegetation and Wildlife Technical Memorandum* for information on the location of these environmentally sensitive areas within the API.

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<sup>3</sup> Section 4(f) applies to publicly owned, shared use paths or trails (or portions thereof) designated or functioning primarily for recreation, unless the official with jurisdiction determines that it is not significant for such purpose (FHWA n.d.-c). The primary purpose of the Willamette River greenway trails is recreation; therefore, the greenway trails in the API are considered Section 4(f) resources.

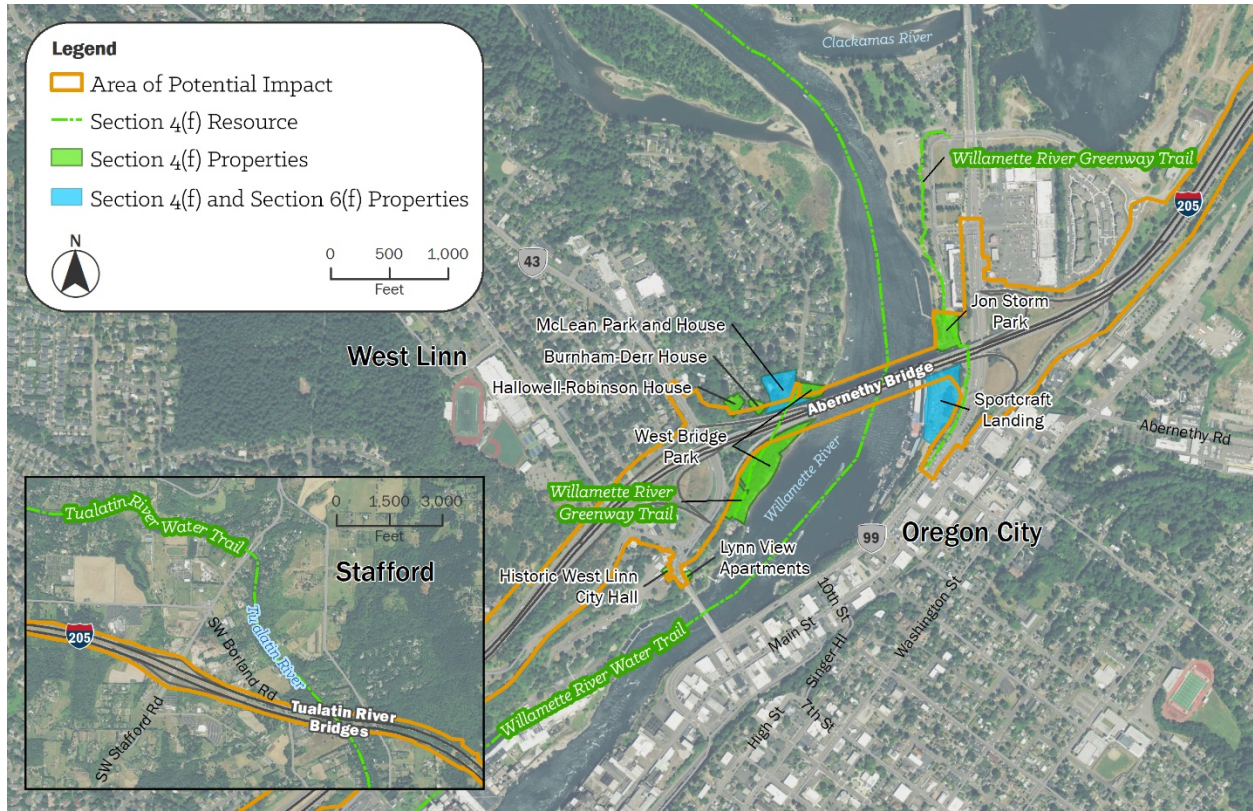
<sup>4</sup> The U.S. Department of Interior designated the Willamette River as a National Water Trail in 2007 and the Tualatin River as a National Water Trail in 2020 (U.S. Department of the Interior 2007; City of Tualatin 2020). National Water Trails have been established to protect and restore rivers, waterways and shorelines, as well as increase access to outdoor recreation on rivers, waterways, and shorelines (National Park Service 2020). Public rivers which are designated as recreational trails are subject to the requirements of Section 4(f) (FHWA n.d.-c).

Figure 5-2. Parks and Recreational Facilities Within and Near the Land Use Area of Potential Impact



Source: Metro Regional Land Information System

**Figure 5-3. Section 4(f) and Section 6(f) Resources and Properties in the Land Use Area of Potential Impact**



## 6 Environmental Consequences

### 6.1 No Build Alternative

Under the No Build Alternative, no activities would occur that would affect land use. The No Build Alternative would generally not be consistent with applicable state, regional, and local transportation and land use laws, plans, and policies, as described in more detail in Section 6.4.

### 6.2 Build Alternative

#### 6.2.1 Short-Term Effects

During construction of the Build Alternative, land located outside of I-205 right-of-way would be used temporarily for construction staging, access, and other activities associated with widening and bridge replacement. Temporary construction easements totaling 4,515 square feet would be needed for the replacement of the West A Street Bridge and removal of the Broadway Street Bridge on four privately owned parcels located in West Linn that are zoned general commercial and residential, as shown in Figure 6-1. Temporary construction easements would not constitute a conversion of land to transportation use because the land would be used temporarily for construction purposes, restored after construction is

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complete, and not permanently converted to right-of-way. Construction activities for the toll gantries and supporting infrastructure would occur entirely within I-205 right-of-way and would not result in a conversion of land to transportation use.

Use of a Section 4(f) property occurs when: (1) land is permanently incorporated into a transportation project; (2) there is a temporary occupancy of land that is adverse in terms of the statute's preservation purpose; or (3) there is a constructive use (a project's proximity impacts are so severe that the protected activities, features, or attributes of a property are substantially impaired) (FHWA n.d.-a).

There would be no adverse temporary occupancy or constructive use of any of the Section 4(f) resources located in the API during construction.

During construction, an approximately 0.1-mile portion of the Tualatin River Water Trail, a Section 4(f) resource, would be temporarily affected during the removal and replacement of the two existing northbound and southbound I-205 bridges over the Tualatin River. Construction activities for the replacement bridges would require installation of temporary work bridges, including pilings occupying a total of about 3,000 square feet in the Tualatin River. During construction, a minimum width of 30 feet of the river would remain open to recreational users except for intermittent short-term full closures of the river in the construction area. The overall duration of work in the Tualatin River would be approximately 2.5 years. During that time, there would be a total of approximately 20 weeks of full river closures, with each closure lasting 1 to 2 weeks. Compared to the full Project construction time of approximately 4 years, the cumulative river closure time of approximately 20 weeks is of short duration. Additionally, the closures would be limited to the area directly beneath and adjacent to the existing Tualatin River Bridges and would be small compared to the remaining undisturbed length of the Tualatin River Water Trail (about 38.5 miles). Upon completion of construction, any temporary changes to the physical condition of the trail resulting from construction activities would be restored.

The construction activities in the Tualatin River Water Trail would meet the criteria for a Section 4(f) *de minimis* impacts under Section 23 Code of Federal Regulations (CFR) 774.17. *De minimis* impacts for public parks, recreation areas, and wildlife and waterfowl refuges are defined as those that do not "adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f)." A *de minimis* impact determination is based on the degree or level of impact on a Section 4(f) property, including any avoidance, minimization, mitigation, or enhancement efforts that are included in a project to address the Section 4(f) use. The determination of a *de minimis* impact on the Tualatin River Water Trail requires concurrence from the Tualatin Riverkeepers, the official with jurisdiction. ODOT will work with the Tualatin Riverkeepers to obtain this concurrence.

With the exception of the Tualatin River Water Trail, access to all parks, school lands, recreational areas, land-based trails, and water trails within and near the API would be maintained during construction of the Build Alternative. No other Section 4(f) resources would be affected by construction. In addition, the Build Alternative would also not result in any conversion of a Section 6(f) property. No construction staging would occur on a Section 4(f) or Section 6(f) property.

The Oregon State Historic Preservation Office concurred with ODOT's finding of No Adverse Effect on historic properties for the Project on December 23, 2022 (see the *I-205 Toll Project Historic and Archeological Resources Technical Memorandum* for more information).

The Build Alternative would have impacts on Goal 5 resources in the API, such as wetlands, streams, rivers, and riparian areas. Impacts would be regulated through local land use processes (as well as state and federal processes for impacts on wetlands, streams, and rivers) and would be mitigated as required by the jurisdiction. Therefore, no goal exception would be required as the Project would meet jurisdictional permitting requirements which allow impacts on Goal 5 resources with mitigation. See the *I-205 Toll Project Wetlands and Water Resources Technical Memorandum* and *I-205 Toll Project Vegetation and Wildlife Technical Memorandum* for more information on these impacts and mitigation. The City of West Linn has permitted impacts on Water Resource Areas and Habitat Conservation Areas from the I-205 widening associated with Phase 1A between the area just east of OR 43 to the 10th Street intersection. Additional impacts on Water Resource Areas and Habitat Conservation Areas west of the 10th Street intersection from the widening as well as the toll gantries and supporting infrastructure would be avoided to the extent practicable and, if determined to be unavoidable as the Project design progresses, would be permitted through separate land use processes.

### **6.2.2 Long-Term Effects**

As shown in Figure 6-1, the Build Alternative would require the permanent conversion of 415 square feet of land to transportation use for the replacement of the West A Street Bridge and to facilitate the I-205 widening from portions of two privately owned parcels. Both parcels are currently zoned general commercial. The land that would be converted to right-of-way is currently vacant. One 107-square-foot permanent easement would also be required from a portion of a privately owned residential parcel. The toll gantries and supporting infrastructure would be located entirely within I-205 right-of-way; therefore, no long-term effects on land use resulting from conversion to transportation use would occur from this infrastructure.

Because the conversion of land would be relatively small and there is a sufficient amount of land in the area to absorb the small reduction in commercially zoned land, no significant long-term effects on land use would occur as a result of conversion to transportation use. All right-of-way acquisitions would be done in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and Chapter 35 of the Oregon Administrative Rules – Eminent Domain; Public Acquisition of Property.

Figure 6-1. Land Use Effects



The physical components of the Build Alternative are generally consistent with applicable state, regional, and local transportation and land use laws, plans, and policies, as described in more detail in Section 6.4.

Under the Build Alternative, there would be no permanent incorporation or constructive use of a Section 4(f) property or a conversion of a Section 6(f) property to a transportation use; therefore, no long-term impacts on Section 4(f) and Section 6(f) properties would occur. FHWA guidance notes that a constructive use does not occur “when noise resulting from the project does not approach or exceed the FHWA noise abatement criteria or when it is considered a barely perceptible increase over existing levels” (FHWA n.d.-a). As documented in the *I-205 Toll Project Noise Technical Report*, noise levels in 2045 would exceed ODOT noise criteria at Jon Storm Park, a Section 4(f) resource; however, existing noise levels also exceed impact criteria, and the Project would not result in a perceptible noise increase compared to existing conditions. A noise wall was evaluated to mitigate noise levels at and near Jon Storm Park and the Section 4(f) resources on the west side of the Willamette River but did not meet ODOT’s criteria for a feasible and reasonable noise wall. Similarly, modeled noise levels would approach or exceed noise criteria at some areas within 250 feet of I-205 near Stafford Road and the Tualatin River. Noise walls at these locations were also found to be infeasible due to their proximity to I-205 and lack of



other nearby noise-sensitive land uses. Modeled noise levels in 2045 at the three Section 4(f) historic sites on the west side of the Willamette River were below impact criteria.

At the Tualatin River Water Trail crossing under I-205, removal of the existing columns for the I-205 Tualatin River Bridges would open up more space closer to the banks of the river, and the new bridge piers would be located closer to the middle of the river. However, because the piers would occupy the same overall amount of space as the existing bridges, there would be no permanent changes in the amount of space in the river available for recreational uses, and the physical condition of the trail would be similar to how it was prior to construction. Trail users would benefit from having access to a single channel that is approximately 50 feet wider, depending on water levels, than existing conditions. Therefore, there would be long-term physical improvements and no adverse long-term physical impacts on the water trail.

### 6.3 Summary of Effects

Table 6-1 provides a comparison of anticipated effects on land use by alternative.

**Table 6-1. Summary of Land Use Effects by Alternative**

Effects	No Build Alternative	Build Alternative
Short-Term	<ul style="list-style-type: none"> <li>▪ None</li> </ul>	<ul style="list-style-type: none"> <li>▪ 4,515 square feet of temporary construction easements</li> <li>▪ <i>De minimis</i> impacts on the Tualatin River Water Trail</li> </ul>
Long-Term	<ul style="list-style-type: none"> <li>▪ None</li> </ul>	<ul style="list-style-type: none"> <li>▪ Conversion of 415 square feet of private property to right-of-way</li> <li>▪ 107-square-foot permanent easement on private property</li> </ul>

### 6.4 Compliance with Applicable State, Regional, and Local Transportation and Land Use Laws, Plans, and Policies

Analysts evaluated compliance of the No Build Alternative and Build Alternative with the following applicable state, regional, and local transportation and land use laws, plans, and policies, as presented in Table 6-2:

- Statewide Land Use Planning Goals (Goal 12: Transportation Planning Rule)
- Oregon Transportation Plan (OTP)
- Oregon Highway Plan (OHP)
- Metro 2018 Regional Transportation Plan (RTP)
- Oregon City Comprehensive Plan
- Oregon City Transportation System Plan
- West Linn Comprehensive Plan
- West Linn Transportation System Plan
- Clackamas County Transportation Plan (part of the Clackamas County Comprehensive Plan)
- Stafford Hamlet Community Vision Plan

#### **6.4.1 No Build Alternative**

The analysis in Table 6-2 demonstrates that the No Build Alternative would generally not be consistent with applicable state, regional, and local transportation and land use laws, plans, and policies.

#### **6.4.2 Build Alternative**

The analysis in Table 6-2 demonstrates that the physical components of the Build Alternative are consistent with applicable state, regional, and local transportation and land use laws, plans, and policies.

Table 6-2. Consistency Analysis of No Build and Build Alternatives

Applicable Law or Plan	Relevant Policies	Consistency Analysis – No Build Alternative	Consistency Analysis – Build Alternative
Statewide Land Use Planning Goals	The State of Oregon has established 19 statewide planning goals to guide local and regional land use planning. The goals express the state's policies on land use and related topics.	<b>Inconsistent.</b> No exceptions to statewide planning goals are needed under the No Build Alternative. However, the No Build Alternative would not be consistent with Comprehensive Plans of the affected jurisdictions in the API that identify the need for the improvements included in the Build Alternative, as well as the Build Alternative objectives, including reduced congestion, increased safety, and seismic resiliency. The Oregon Department of Land Conservation and Development has acknowledged that these Plans (listed under Section 6.4 above) are in compliance with statewide planning goals; because the No Build Alternative would generally not be consistent with them (as discussed in this table), the No Build Alternative would not be consistent with the statewide planning goals.	<b>Consistent.</b> The Oregon Department of Land Conservation and Development has acknowledged that the Comprehensive Plans of the affected jurisdictions in the API (City of West Linn, City of Oregon City, Stafford Hamlet, and Clackamas County) are in compliance with the statewide planning goals. Because the Build Alternative is generally consistent with these city and county comprehensive plans (as discussed in this table), it is thus consistent with the statewide planning goals. No exceptions to statewide planning goals are needed.
Statewide Land Use Planning Goals. Goal 12: Transportation Planning Rule (TPR) 660-012-0000	Guidelines A. Planning <i>2. Transportation systems, to the fullest extent possible, should be planned to utilize existing facilities and rights-of-way within the state provided that such use is not inconsistent with the environmental, energy, land-use, economic or social policies of the state.</i>	<b>Not applicable.</b> The No Build Alternative would not construct additional planned physical improvements to I-205.	<b>Consistent.</b> Under the Build Alternative, the proposed transportation system improvements would utilize existing facilities and be constructed within the existing ODOT right-of-way (except for a less than half-acre area, as described in Section 6.2.2).
	Guidelines B. Implementation <i>2. Plans for new or for the improvement of major transportation facilities should identify the positive and negative impacts on (1) local land use patterns, (2) environmental quality, (3) energy use and resources, (4) existing transportation systems and (5) fiscal resources in a manner sufficient to enable local governments to rationally consider the issues posed by the construction and operation of such facilities.</i>	<b>Not applicable.</b> The No Build Alternative does not include a new or improved transportation facility.	<b>Consistent.</b> The positive and negative impacts of the physical improvements to I-205 under the Build Alternative were evaluated in the I-205 Toll Project Environmental Assessment (EA) and supporting documents. <i>The I-205 Toll Project Land Use Technical Memorandum (LUTM), I-205 Toll Project Energy and Greenhouse Gases Technical Report, I-205 Toll Project Transportation Technical Report (TTR), I-205 Toll Project Economics Technical Report (ETR) and EA identify positive and negative impacts on local land use patterns, environmental quality, energy use and resources, existing transportation systems, and fiscal resources for the physical improvements to I-205.</i>
	Purpose (1)(b) <i>Promote the development of transportation systems adequate to serve statewide, regional, and local transportation needs.</i>	<b>Inconsistent.</b> The No Build Alternative would not promote the development of transportation systems adequate to serve statewide, regional, and local transportation needs because all planned physical improvements to I-205 would not occur. I-205 under the No Build Alternative would not adequately serve statewide, regional, and local transportation needs for several reasons, including: <ul style="list-style-type: none"> <li>▪ Congested conditions would continue, affecting mobility of people and freight, because new capacity would not be built and congestion management through tolling would not occur. TTR Section 5.3.3, Table 5-12 indicates the No Build Alternative would not result in reduced hours of daily congestion along I-205.</li> <li>▪ Eight bridges on I-205 in the Project area would continue not meeting seismic design criteria, and this statewide north-south lifeline route would remain vulnerable to serious damage or destruction in a major seismic event.</li> </ul> ODOT, Metro, Oregon City, and West Linn have identified I-205 improvements as priorities to address the transportation bottleneck between Oregon City and the I-205/Stafford Road interchange.	<b>Consistent.</b> The Build Alternative would provide the full extent of planned physical improvements to I-205 that would promote the development of transportation systems adequate to serve statewide, regional, and local transportation needs. I-205 under the Build Alternative would adequately serve statewide, regional, and local transportation needs for several reasons, including: <ul style="list-style-type: none"> <li>▪ The Build Alternative would result in reduced daily hours of congestion along I-205 compared to the No Build Alternative, with up to 2 hours of moderate congestion in limited locations on I-205 (as described in TTR Section 5.3.3, Table 5-12).</li> <li>▪ Eight bridges on I-205 in the Project area would be upgraded or rebuilt to withstand a major seismic event, which would help to facilitate effective movement of supplies and services on this statewide north-south lifeline route after a major natural disaster.</li> </ul> The Build Alternative would be consistent with the I-205 improvements identified as priorities by ODOT, Metro, Oregon City, and West Linn to address the transportation bottleneck between Oregon City and the I-205/Stafford Road interchange.

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Applicable Law or Plan	Relevant Policies	Consistency Analysis – No Build Alternative	Consistency Analysis – Build Alternative
	<p>Purpose (1)(e)  <i>Reduce pollution from transportation to meet statewide statutory and executive goals to reduce climate pollution</i></p>	<p><b>Inconsistent.</b> Air pollutant and greenhouse gas emissions would be lower than existing conditions under both the No Build and Build Alternatives primarily because of improvements in vehicle technology, turnover of less efficient vehicles from roadways, and implementation of fuel and engine regulations. However, the No Build Alternative would not be consistent with the statewide goals of reducing pollution <i>from transportation</i> because it would have 5% to 8% higher projected regional vehicle miles traveled (VMT) than the Build Alternative in 2045 and 2027, respectively. This higher VMT would result in 3% to 10% higher levels of air pollutants and 4% to 6% higher regional greenhouse gas emissions under the No Build Alternative compared to the Build Alternative in 2045 and 2027, respectively. The <i>I-205 Toll Project Air Quality Technical Report</i> and the <i>I-205 Toll Project Energy and Greenhouse Gas Emissions Technical Report</i> provide more details on air quality and climate effects under the No Build Alternative.</p>	<p><b>Consistent.</b> The Build Alternative would result in lower air pollutant and greenhouse gas emissions as compared with the No Build Alternative. In 2027, net mobile source air toxic (MSAT) emissions would range from 3% to 9% lower than the No Build Alternative. Estimated modeled criteria pollutant emissions would be 0.3% to 7% lower than the No Build Alternative. In 2045, net MSAT emissions would range from 7% to 10% lower than the No Build Alternative. Estimated modeled criteria pollutant emissions would be 0.3% to 12% lower than the No Build Alternative. Therefore, the Build Alternative would be consistent with the goal of reducing pollution from transportation.                      The <i>I-205 Toll Project Air Quality Technical Report</i> and the <i>I-205 Toll Project Energy and Greenhouse Gas Emissions Technical Report</i> provide more details on air quality and climate effects under the Build Alternative.</p>
	<p>Purpose (1)(h)  <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></p>	<p><b>Inconsistent.</b> The No Build Alternative would generally not facilitate the safe flow of truck freight, goods, and services within the area of potential impact (API) along I-205 and other truck freight corridors.                      Section 5.3.6 and Table 5-36 of the TTR indicates that most truck freight corridors in the API (including I-205, OR 213, and I-5) would have longer travel times under the No Build Alternative compared to the Build Alternative. For example, northbound I-205 AM and PM peak-hour travel times between the I-5 ramps and SE 82nd Drive would be 28% (4.2 minutes) and 53% (14.5 minutes) longer, respectively, under the No Build Alternative compared to the Build Alternative in 2045. Southbound I-205 AM and PM peak-hour travel times in the same area would be 26% (3.8 and 3.7 minutes) longer, respectively, under the No Build Alternative compared to the Build Alternative in 2045. Other truck freight corridors in the API, including portions of OR 213, I-5, and OR 99E, would experience up to 26% longer travel times under the No Build Alternative compared to the Build Alternative.                      In addition, as described in Section 5.3.7 of the TTR, there would be about 26% more crashes (representing about 144 crashes) on I-205 under the No Build Alternative compared to the Build Alternative in 2045 because of higher I-205 traffic volumes.</p>	<p><b>Consistent.</b> The Build Alternative would generally facilitate the safe flow of truck freight, goods, and services within the API along I-205 and other truck freight corridors.                      TTR Section 5.3.6, Table 5-36 indicates that that most truck freight corridors in the API (including I-205, OR 213, and I-5) would have shorter travel times under the Build Alternative compared to the No Build Alternative. Northbound I-205 AM and PM peak-hour travel times would be 28% (4.2 minutes) and 53% (14.5 minutes) shorter, respectively in 2045. Southbound I-205 AM and PM peak-hour travel times would be 26% (3.8 and 3.7 minutes) shorter, respectively in 2045. Other truck freight corridors in the API, including portions of OR 213, I-5, and OR 99E, would experience up to 26% shorter travel times under the No Build Alternative compared to the Build Alternative. Some portions of southbound OR 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, as described in TTR Section 6.1.                      In addition, as described in Section 5.3.7 of the TTR, there would be about 26% fewer crashes (representing about 144 crashes) on I-205 under the Build Alternative compared to the No Build Alternative in 2045 because of lower I-205 traffic volumes.</p>

Applicable Law or Plan	Relevant Policies	Consistency Analysis – No Build Alternative	Consistency Analysis – Build Alternative
	<p>Purpose (1)(i)  <i>Protect the functions of existing and planned transportation facilities, corridors, and sites</i></p>	<p><b>Inconsistent.</b> Overall, the No Build Alternative would not help to protect the functions of existing and planned transportation facilities, corridors, and sites. As indicated in the TTR and EA, the No Build Alternative would have worse congestion levels, travel reliability, freight mobility, capacity, and seismic resiliency than the Build Alternative and therefore would not protect the functions of I-205, as discussed in the points below.</p> <ul style="list-style-type: none"> <li>▪ Congestion levels (TTR Section 5.3.3, Table 5-12)                             <ul style="list-style-type: none"> <li>○ Up to 14 hours of heavy or moderate congestion per day depending on location</li> </ul> </li> <li>▪ Travel Reliability (TTR Section 5.3.3, Figures 5-19 through 5-22)                             <ul style="list-style-type: none"> <li>○ Greater variation in travel times, ranging from 1 to 25 minutes higher during the AM and PM peak hours for northbound and southbound I-205 travel compared to under the Build Alternative.</li> </ul> </li> <li>▪ Freight travel times (TTR Section 5.3.6, Table 5-36) would be longer than the Build Alternative on I-205 and other freight corridors in the API, such as portions of I-5, OR 213, and OR 99E, in 2045.</li> <li>▪ Capacity                             <ul style="list-style-type: none"> <li>○ A continuous third travel lane in each direction of I-205 between Stafford Road and OR 213 would not be completed and bottlenecks would remain.</li> <li>○ A new auxiliary lane between OR 99E and OR 213 would not be provided.</li> </ul> </li> <li>▪ Seismic resiliency (EA Section 2.1.2)                             <ul style="list-style-type: none"> <li>○ Eight additional bridges on I-205 in the API that do not meet current seismic design criteria would not receive upgrades or replacements.</li> </ul> </li> </ul> <p>The functions of local transportation facilities would vary by location under the No Build Alternative. In general, travel times on roadways used to access I-205 that are farther from the tolled bridges (e.g., SW Borland Road, SW Stafford Road, and Willamette Falls Drive) would be longer under the No Build Alternative than the Build Alternative because of ongoing I-205 congestion, which would result in a continuation of the rerouting to local roads that occurs under existing conditions, as described in TTR Section 4.2.3 and 5.3.3. Most of the 50 study intersections in the API would meet local mobility standards under both alternatives in 2027 and 2045, as described in TTR Section 5.3.3.</p> <p>Similar to the Build Alternative, the No Build Alternative would result in some impacts on local roads and intersections within the API. However, the mitigation measures identified under the Build Alternative would not be implemented; therefore, the No Build Alternative would not be consistent with the TPR.</p>	<p><b>Consistent.</b> Overall, the Build Alternative would help to protect the functions of existing and planned transportation facilities, corridors, and sites. As indicated in the TTR and EA, the Build Alternative would have improved congestion, travel reliability, freight travel times, capacity, and seismic resiliency and therefore would protect the functions of I-205 as compared with the No Build Alternative, as discussed in the points below.</p> <ul style="list-style-type: none"> <li>▪ Congestion levels (TTR Section 5.3.3., Table 5-12)                             <ul style="list-style-type: none"> <li>○ Up to 2 hours of moderate congestion per day depending on location</li> </ul> </li> <li>▪ Travel Reliability (TTR Section 5.3.3, Figures 5-19 through 5-22.)                             <ul style="list-style-type: none"> <li>○ More stability in travel times during AM and PM peak hours for northbound and southbound I-205 travel.</li> </ul> </li> <li>▪ Freight travel times (TTR Section 5.3.6, Table 5-36) would generally be shorter on I-205 and other freight corridors in the API, such as portions of I-5, OR 213, and OR 99E, ranging from 3.7 to 14.5 minutes less during the AM and PM peak hours for northbound and southbound travel.</li> <li>▪ Capacity                             <ul style="list-style-type: none"> <li>○ A continuous third travel lane in each direction of I-205 between Stafford Road and OR 213 would be provided in the last remaining two-lane section of I-205.</li> </ul> </li> <li>▪ Seismic resiliency (EA Section 2.1.2)                             <ul style="list-style-type: none"> <li>○ Eight additional bridges on I-205 in the API would receive seismic upgrades or replacements.</li> </ul> </li> </ul> <p>The functions of local transportation facilities would vary by location under the Build Alternative. In general, travel times on roadways used to access I-205 that are farther from the tolled bridges (e.g., SW Borland Road, SW Stafford Road, and Willamette Falls Drive) would be shorter under the Build Alternative than the Build Alternative because added capacity and congestion pricing would improve I-205 operations, as described in TTR Section 5.3.3. 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, as described in TTR Section 5.3.2. Most of the 50 study intersections in the API would meet local mobility standards under both alternatives in 2027 and 2045, as described in TTR Section 5.3.3.</p> <p>The Build Alternative would result in some impacts on local roads and intersections within the API. The Build Alternative would include traffic, transit, pedestrian, and/or bike improvements as mitigation measures (TTR Sections 6.1, 6.2, and 6.3) to address potential impacts and protect the function of the transportation facilities, allowing for consistency with the TPR.</p>

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Applicable Law or Plan	Relevant Policies	Consistency Analysis – No Build Alternative	Consistency Analysis – Build Alternative
	<p>Purpose (1)(j)  <i>Provide for the construction and implementation of transportation facilities, improvements, and services necessary to support acknowledged comprehensive plans.</i></p>	<p><b>Inconsistent.</b> The No Build Alternative would not provide for the construction and implementation of planned physical improvements to I-205 necessary to support the acknowledged comprehensive plans of Clackamas County, the City of West Linn, the City of Oregon City, and Stafford Hamlet. In general, these acknowledged comprehensive plans share common goals and policies to serve existing and projected travel demand; reduce congestion; provide freight truck access and reliability; reduce transportation-related fatalities and injuries; improve access to jobs, schools, and healthcare. Physical improvements to I-205 are needed to achieve these goals and would not occur under the No Build Alternative, which would lead to inconsistency with the TPR.</p> <p>Please see the discussions below in this table for a discussion of the No Build Alternative's inconsistency with relevant goals and policies of the Clackamas County Transportation System Plan, West Linn Comprehensive Plan, West Linn Transportation System Plan, Oregon City Comprehensive Plan, Oregon City Transportation System Plan, and Stafford Hamlet Community Vision Plan.</p>	<p><b>Consistent.</b> The Build Alternative would provide for the construction and implementation of physical improvements to I-205 necessary to support the acknowledged comprehensive plans of Clackamas County, the City of West Linn, the City of Oregon City, and Stafford Hamlet. These acknowledged comprehensive plans share common goals and policies to serve existing and projected travel demand; reduce congestion; provide freight truck access and reliability; reduce transportation-related fatalities and injuries; improve access to jobs, schools, and healthcare. The physical improvements to I-205, including widening and seismic improvements, would support achievement of these goals, as described in the EA, TTR, and <i>I-205 Toll Project Social Resources and Communities Technical Report</i>.</p> <p>Please see the discussions below in this table for the applicable goals and policies of the Clackamas County Transportation System Plan, West Linn Comprehensive Plan, West Linn Transportation System Plan, Oregon City Comprehensive Plan, Oregon City Transportation System Plan, and Stafford Hamlet Community Vision Plan.</p>

Applicable Law or Plan	Relevant Policies	Consistency Analysis – No Build Alternative	Consistency Analysis – Build Alternative
	<p>Purpose (1)(m)  <i>Require coordination among affected local governments and transportation service providers and consistency between state, regional, and local transportation plans.</i></p>	<p><b>Inconsistent.</b> Although coordination among affected local governments and transportation service providers would continue under the No Build Alternative, implementation of the No Build Alternative would not support consistency between state, regional, and local transportation plans. The physical improvements to I-205 under the Build Alternative are part of identified planned projects and/or are needed to meet the policies in all transportation plans within the API.</p>	<p><b>Consistent.</b> The Build Alternative would support consistency between state, regional, and local transportation plans because the physical improvements to I-205 project are identified in all transportation plans within the API. ODOT has been engaging in extensive coordination with all affected local governments and transportation service providers throughout development of the Build Alternative. As part of the environmental review process, ODOT has invited input from 25 participating agencies, which include local governments and transportation service providers:</p> <ul style="list-style-type: none"> <li>▪ Oregon Department of Environmental Quality</li> <li>▪ Oregon State Historic Preservation Office</li> <li>▪ Washington State Department of Transportation</li> <li>▪ C-Tran</li> <li>▪ Metro</li> <li>▪ Port of Portland</li> <li>▪ Port of Vancouver</li> <li>▪ Southwest Washington Regional Transportation Council</li> <li>▪ TriMet</li> <li>▪ Clackamas County</li> <li>▪ Clark County, WA</li> <li>▪ Multnomah County</li> <li>▪ Washington County</li> <li>▪ City of Gladstone</li> <li>▪ City of Gresham</li> <li>▪ City of Happy Valley</li> <li>▪ City of Lake Oswego</li> <li>▪ City of Milwaukie</li> <li>▪ City of Oregon City</li> <li>▪ City of Portland</li> <li>▪ City of Rivergrove</li> <li>▪ City of Tualatin</li> <li>▪ City of Vancouver</li> <li>▪ City of West Linn</li> <li>▪ City of Wilsonville</li> </ul> <p>ODOT and FHWA also convened a series of workshops and meetings with local jurisdictions in August and September 2022 to discuss proposed mitigation measures related to the effects of the Build Alternative. Participants included representatives from the Cities of Canby, Gladstone, Lake Oswego, Oregon City, Rivergrove, Tualatin, and West Linn; Clackamas and Washington Counties; Canby Area Transit; South Metro Area Regional Transit; and TriMet.</p> <p>Chapter 4 of the EA provides more details on the interagency coordination that has occurred as part of the environmental review process.</p>

Applicable Law or Plan	Relevant Policies	Consistency Analysis – No Build Alternative	Consistency Analysis – Build Alternative
<p>Oregon Transportation Plan (OTP)</p>	<p>Policy 1.3, Strategy 1.3.1 <i>Use a regional planning approach and inter-regional coordination to address problems that extend across urban growth boundaries.</i></p>	<p><b>Inconsistent.</b> I-205 in the project area has identified problems, including congestion, freight mobility, safety, and seismic resilience, that extend across urban growth boundaries. The No Build Alternative would be inconsistent with ongoing regional planning and inter-regional coordination efforts to address these identified problems.</p>	<p><b>Consistent.</b> I-205 in the project area has identified problems, including congestion, freight mobility, safety, and seismic resilience, that extend across urban growth boundaries.</p> <p>The Build Alternative would address the identified problems consistent with ongoing regional planning and inter-regional coordination efforts. ODOT convened three working groups for development of the I-205 Toll Project:</p> <ul style="list-style-type: none"> <li>▪ Regional Partner Agency Staff: This group is composed of agency staff representing the R1ACT, Metro Joint Policy Advisory Committee on Transportation, and Southwest Washington Regional Transportation Commission. R1ACT is an advisory body composed of 31 voting members, including private industry, transit agencies, stakeholders, and elected officials, who collaborate on transportation issues affecting ODOT Region 1 (serving all of Clackamas, Multnomah, and Hood River Counties and eastern Washington County). This group met in advance of R1ACT meetings to hear Project updates and to provide input on information that the R1ACT requested.</li> <li>▪ Regional Modeling Group: This group is composed of agency staff members who have a technical understanding of transportation modeling to provide input on the modeling approach for the Project.</li> <li>▪ Transit and Multimodal Working Group: This group is composed of agency staff members with knowledge of the local transit, pedestrian, and bicycle systems to provide input on how these elements could be affected by or incorporated into the Project.</li> </ul> <p>ODOT has met regularly with each of these working groups during the development of this Environmental Assessment to provide Project updates, answer questions, and encourage agencies to submit comments during the public comment period. Chapter 4 of the EA provides more details on coordination that has occurred as part of the project development and environmental review process.</p>



Applicable Law or Plan	Relevant Policies	Consistency Analysis – No Build Alternative	Consistency Analysis – Build Alternative
	<p>Policy 2.1, Strategy 2.1.4  <i>Enhance efficiency and reduce conflicts among transportation users, for example, by reducing bottlenecks and geometric constraints, and improving or removing modal crossings. Provide for a network of arterials and highways to efficiently move goods and services while enhancing safety and community movements on local streets.</i></p>	<p><b>Inconsistent.</b> The No Build Alternative would not enhance efficiency and reduce conflicts among transportation users because no additional capacity would be added to I-205, and bottlenecks would remain. For most of its 26.5-mile length, I-205 is six lanes (three through lanes in each direction). The only remaining four-lane section is from Stafford Road to OR 99E. The transition from a four-lane to a six-lane section results in recurring bottlenecks, congestion, and crashes, as described in EA Section 1.2.3. In addition, the number of crashes on I-205 would be higher under the No Build Alternative than the Build Alternative because of recurring congestion and higher traffic volumes, as described in TTR Section 5.3.7.</p> <p>TTR Section 5.3.6, Table 5-36 indicates that the movement of goods and services on I-205 and most other studied corridor roadway segments under the No Build Alternative would have less efficiencies than the Build Alternative. I-205 and portions of OR 213, I-5, and OR 99E in the API would have longer AM and PM peak-hour travel times under the No Build Alternative than the Build Alternative.</p> <p>The No Build Alternative would have mixed effects on safety and community movements on local streets depending on location. As described in TTR Section 5.3.7, the number of vehicular crashes on API roadway segments (SW Borland Rd, OR 213, OR 43, OR 99E, SW Stafford Rd, Willamette Falls Dr) and at local street intersections would be generally similar to the Build Alternative under the No Build Alternative in 2027 and 2045, depending on location. In general, travel times on the roadways used to access I-205 that are farther from the tolled bridges (e.g., SW Borland Road, SW Stafford Road, and Willamette Falls Drive) would be longer under the No Build Alternative than the Build Alternative because of ongoing I-205 congestion, which would result in a continuation of the rerouting to local roads that occurs under existing conditions, as described in TTR Section 4.2.3 and 5.3.3.</p> <p>The No Build Alternative would result in some impacts on local roads and intersections within the API at similar locations to the Build Alternative. However, the mitigation measures identified under the Build Alternative would not be implemented; therefore, the No Build Alternative would not be consistent with the TPR.</p>	<p><b>Consistent.</b> The Build Alternative would enhance efficiency and reduce conflicts among transportation users by constructing a third lane in each direction of I-205, which would reduce existing bottlenecks and daily hours of congestion on I-205, as described in TTR Section 5.3.3. There would be about 26% fewer crashes on I-205 under the Build Alternative compared to the No Build Alternative because of the additional capacity and lower traffic volumes, as described in TTR Section 5.3.7.</p> <p>TTR Section 5.3.6, Table 5-36 indicates that the movement of goods and services on I-205 and most other studied corridor roadway segments under the Build Alternative would have greater efficiencies than the No Build Alternative. I-205 and portions of OR 213, I-5, and OR 99E in the API would have longer AM and PM peak-hour travel times under the No Build Alternative than the Build Alternative.</p> <p>The Build Alternative would have mixed effects on safety and community movements on local streets depending on location. As described in TTR Section 5.3.7, the number of vehicular crashes on API roadway segments (SW Borland Rd, OR 213, OR 43, OR 99E, SW Stafford Rd, Willamette Falls Dr) and at local street intersections, would be generally similar to the Build Alternative under the No Build Alternative in 2027 and 2045, depending on location. In general, travel times on the roadways used to access I-205 that are farther from the tolled bridges (e.g., SW Borland Road, SW Stafford Road, and Willamette Falls Drive) would be longer under the No Build Alternative than the Build Alternative because of ongoing I-205 congestion, which would result in a continuation of the rerouting to local roads that occurs under existing conditions, as described in TTR Section 4.2.3 and 5.3.3.</p> <p>The Build Alternative would result in some impacts on local roads and intersections within the API. The Build Alternative would include traffic, transit, pedestrian, and/or bike improvements as mitigation measures (TTR Sections 6.1, 6.2, and 6.3) to address potential impacts and protect the function of the transportation facilities, allowing for consistency with the TPR.</p>
	<p>Policy 3.1, Strategy 3.1.1  <i>Develop coordinated state, regional, and local transportation plans and master plans that address current future freight needs, issues and economic strategies. Co-locate economic activities and appropriate transportation facilities with convenient and reliable access to freight transportation options.</i></p>	<p><b>Inconsistent.</b> The No Build Alternative would not be consistent with the development of coordinated state, regional, and local transportation plans that address current and future freight needs and issues for I-205 and other freight corridors in the API.</p> <p>As discussed in TTR Section 5.3.6, truck freight mobility along I-205 would generally be worse under the No Build Alternative than the Build Alternative and would not accommodate future freight movement needs across the API. Northbound I-205 AM and PM peak-hour travel times between the I-5 ramps and SE 82nd Drive would be 28% (4.2 minutes) and 53% (14.5 minutes) longer respectively under the No Build Alternative compared to the Build Alternative in 2045. Southbound I-205 AM and PM peak-hour travel times in that same area would be 26% (3.8 and 3.7 minutes) longer respectively under the No Build Alternative compared to the Build Alternative in 2045. Other truck freight corridors in the API, including portions of OR 213, I-5, and OR 99E, would experience up to 26% longer travel times under the No Build Alternative compared to the Build Alternative.</p>	<p><b>Consistent.</b> The Build Alternative would be consistent with the development of coordinated state, regional, and local transportation plans that address current and future freight needs and issues for I-205 and other freight corridors in the API.</p> <p>As discussed in TTR Section 5.3.6, truck freight mobility would generally be better under the Build Alternative than the No Build Alternative and would better accommodate current and future freight needs across the API. Northbound AM and PM peak-hour travel times would be 28% (4.2 minutes) and 53% (14.5 minutes) shorter, respectively, along I-205 than the No Build Alternative in 2045. Southbound AM and PM peak-hour travel times would be 26% (3.8 and 3.7 minutes) shorter, respectively, along I-205 in 2045. Other truck freight corridors in the API, including portions of OR 213, I-5, and OR 99E, would experience up to 26% shorter travel times under the No Build Alternative compared to the Build Alternative. Some portions of southbound OR 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, as described in TTR Section 6.1.</p>

Applicable Law or Plan	Relevant Policies	Consistency Analysis – No Build Alternative	Consistency Analysis – Build Alternative
	<p>Policy 4.1, Strategy 4.1.3</p> <p><i>Evaluate the impact of geological hazards and natural disasters including earthquakes, floods, landslides and rockfalls, on the efficiency and sustainability of the location and design of new or improved transportation facilities as appropriate.</i></p>	<p><b>Consistent.</b> The effects of geologic hazards and seismic upgrades were evaluated for the No Build Alternative as part of the Environmental Assessment. Because proposed improvements to eight additional bridges in the API would not be constructed, the No Build Alternative would not support the identified Project need in EA Section 1.4.6 and would not provide for an efficient or sustainable transportation system during and after a seismic event.</p>	<p><b>Consistent.</b> The effects of geologic hazards and seismic upgrades were evaluated for the Build Alternative as part of the Environmental Assessment. The Build Alternative would construct seismic upgrades to and replacements of eight additional bridges, which would support the identified Project need in in EA Section 1.4.6 and provide for an efficient or sustainable system during and after a seismic event.</p>
<p>Oregon Highway Plan (OHP)</p>	<p>Policy 1C, Action 1C.4</p> <p><i>Consider the importance of timeliness in freight movements in developing and implementing plans and projects on freight routes.</i></p> <p><i>Figure 10b</i></p> <p><i>I-205 is a designated freight route.</i></p>	<p><b>Inconsistent.</b> The No Build Alternative would not support improved timeliness in truck freight movements on I-205 and other truck freight routes in the API.</p> <p>TTR Section 5.3.6, Table 5-36 shows that, under the No Build Alternative, truck freight travel times would be longer on I-205 and other truck freight corridors in the API than the Build Alternative. Northbound I-205 AM and PM peak-hour travel times between the I-5 ramps and SE 82nd Drive would be 28% (4.2 minutes) and 53% (14.5 minutes) longer respectively under the No Build Alternative compared to the Build Alternative in 2045. Southbound I-205 AM and PM peak-hour travel times in that same area would be 26% (3.8 and 3.7 minutes) longer respectively under the No Build Alternative compared to the Build Alternative in 2045. Other truck freight corridors in the API, including portions of OR 213, I-5, and OR 99E, would experience up to 26% longer travel times under the No Build Alternative compared to the Build Alternative.</p>	<p><b>Consistent.</b> The Build Alternative would support improved timeliness in truck freight movements on I-205 and other truck freight routes in the API.</p> <p>TTR Section 5.3.6, Table 5-36 shows that the Build Alternative would generally have shorter travel times for truck freight on I-205 and other truck freight corridors in the API as compared to the No Build Alternative. Northbound AM and PM peak-hour travel times would be 28% (4.2 minutes) and 53% (14.5 minutes) shorter, respectively, along I-205 than the No Build Alternative in 2045. Southbound AM and PM peak-hour travel times would be 26% (3.8 and 3.7 minutes) shorter, respectively, along I-205 in 2045.</p> <p>Other truck freight corridors in the API, including portions of OR 213, I-5, and OR 99E, would experience up to 26% shorter travel times under the No Build Alternative compared to the Build Alternative. Some portions of southbound OR 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, as described in TTR Section 6.1.</p>
	<p>Policy 1F: Highway Mobility Policy</p> <p><i>It is the policy of the State of Oregon to maintain acceptable and reliable levels of mobility on the state highway system, consistent with the expectations for each facility type, location and functional objectives. Highway mobility targets will be the initial tool to identify deficiencies and consider solutions for vehicular mobility on the state system.</i></p> <p><i>Table 7: Volume to Capacity Ratio Targets Inside Metro I-205 has a 0.99 v/c target.</i></p>	<p><b>Consistent.</b> Under the No Build Alternative in 2045, all northbound and southbound segments of I-205 would meet the OHP mobility standard of 0.99 v/c for state highways (see TTR Section 5.3.3, Tables 5-10 and 5-11). It should be noted that v/c targets in the OHP are used in the planning phase to identify future system deficiencies. At a v/c ratio of 1.0, the capacity of a facility is considered to be fully utilized as the v/c of a facility approaches 1.0, congestion increases and performance is reduced.</p> <p>LOS is another way to measure performance and congestion levels and, therefore, the mobility of roadways. In the No Build Alternative, all segments of northbound and southbound I-205 between Stafford Road and OR 43 and the segment between OR 213 and SE 82nd Drive are projected to operate at LOS F in 2045, indicating very high delays. In addition, during the PM peak hour, all segments of northbound and southbound I-205 between Stafford Road and SE 82nd Drive are projected to operate at LOS F. (see TTR Section 5.3.3, Tables 5-10 and 5-11)</p>	<p><b>Consistent.</b> Under the Build Alternative, all northbound and southbound segments of I-205 would meet the OHP mobility standard of 0.99 v/c for state highways. However, OHP Policy 1F does not apply to highway design. Separate design mobility standards are contained in ODOT’s Highway Design Manual (HDM); HDM design standards are applicable to project development/design, including the improvements in the Build Alternative. The HDM v/c design standard is 0.75. Where I-205 would not meet the HDM v/c design standard of 0.75 (see TTR Section 5.3.3, Tables 5-10 and 5-11), ODOT will seek an exception to the design standard (i.e. a design exception) from the State Traffic-Roadway Engineer.</p> <p>As described in TTR Section 5.3.3, overall, under the Build Alternative in 2045, there would be less congestion on northbound I-205 during the AM peak period and substantially less congestion during the PM peak period compared to the No Build Alternative. Similarly, the additional capacity and the congestion pricing strategy proposed as part of the Build Alternative would provide better operating conditions with improved travel times on southbound I-205.</p>

Applicable Law or Plan	Relevant Policies	Consistency Analysis – No Build Alternative	Consistency Analysis – Build Alternative
	<p>Policy 1G, Action 1G.1</p> <p><i>Use the following priorities for developing corridor plans, transportation system plans, the Statewide Transportation Improvement Program, and project plans to respond to highway needs. Implement higher priority measures first unless a lower priority measure is clearly more cost-effective or unless it clearly better supports safety, growth management, or other livability and economic viability considerations.</i></p> <ol style="list-style-type: none"> <li>1. <i>Protect the existing system.</i></li> <li>2. <i>Improve efficiency and capacity of existing highway facilities.</i></li> <li>3. <i>Add capacity to the existing system.</i></li> <li>4. <i>Add new facilities to the system.</i></li> </ol>	<p><b>Inconsistent.</b> The No Build Alternative would not respond to highway needs as identified in the Statewide Transportation Improvement Program and regional, and local plans because additional improvements to I-205 would not be constructed. Furthermore, the No Build Alternative would not be consistent with the priorities identified in Policy 1G, Action 1G.1. The No Build Alternative would not protect the existing system because congestion pricing, traveler information signs, and additional mitigation measures related to transit and active transportation would not be provided. The efficiency and capacity of the existing I-205 system would not be improved because seismic upgrades, bridge replacements, and the planned auxiliary lane between OR 99E and OR 213 would not be constructed. The No Build Alternative would not add capacity to the existing system as prioritized in state, regional, and local plans because planned widening (the third lane between Stafford Road and OR 213) would not be completed.</p>	<p><b>Consistent.</b> The Build Alternative would respond to highway needs as identified in the Statewide Transportation Improvement Program and regional, and local plans because additional improvements to I-205 would be constructed. The Build Alternative would be consistent with the priorities identified in Policy 1G, Action 1G.1.</p> <p>The Build Alternative would protect the existing system by implementing congestion pricing, traveler information signs, and additional mitigation measures related to transit and active transportation. The Build Alternative would also improve the efficiency of the existing system by constructing seismic upgrades, bridge replacements, and an auxiliary lane between OR 99E and OR 213.</p> <p>The Build Alternative would add capacity through a third lane in each direction to a 7-mile stretch of I-205. Policy 1G identifies adding capacity to the existing system as a lower priority category than protecting and improving the efficiency and capacity of the existing system. Even so, the added capacity on I-205 is consistent with Policy 1G because actions to protect and improve the efficiency and capacity of the existing system would not complete the system by bringing the freeway up to three through lanes in each direction as called for by state and regional plans, nor would it resolve the congestion and crashes caused by the missing third lane (i.e. the transition from a six-lane to a four-lane section on I-205).</p>
<p>Metro 2018 Regional Transportation Plan (RTP)</p>	<p>Chapter 8, 8.3.1.8</p> <p><i>I-205 South Corridor Widening and Seismic Improvements Projects</i></p> <p><i>“The I-205 South project widens I-205 to add a third lane in each direction between Stafford Road and OR 213 and an auxiliary lane across the Abernethy Bridge in each direction. The I-205 Abernethy Bridge project provides for seismic upgrades of the Abernethy Bridge and includes seismic retrofit or replacement of eight additional bridges in the corridor. The project also adds Active Traffic Management System improvements, such as Traveler Information Signs, throughout the corridor and a new parallel multi-use path as designated in the Chapter 3 RTP bicycle and pedestrian system maps.”</i></p>	<p><b>Inconsistent.</b> Not constructing the project under the No Build Alternative would not be consistent with Metro’s 2018 RTP, which identifies the need for the improvements included in the Build Alternative and calls for completing the system by bringing the freeway up to three through lanes in each direction in the southern section from Oregon City to I-5.</p>	<p><b>Consistent.</b> The Build Alternative is fully consistent with the RTP because it would complete the additional third lane in each direction between Stafford Road and OR 213, the seismic retrofit or replacement of eight additional bridges in the corridor, and additional Traveler Information Signs.</p>

Applicable Law or Plan	Relevant Policies	Consistency Analysis – No Build Alternative	Consistency Analysis – Build Alternative
2022 Oregon City Comprehensive Plan	Chapter 3, Goal 1, <i>Provide a safe, comfortable, and accessible transportation network that serves all modes of travel, including nonmotorized modes.</i>	<p><b>Inconsistent.</b> The No Build Alternative would not be consistent with this goal. No additional capacity would be added to I-205, resulting in ongoing bottlenecks, congestion, and crashes, as described in EA Section 1.2.3. In addition, the number of crashes on I-205 in the API would be higher under the No Build Alternative than the Build Alternative because of recurring congestion and higher traffic volumes, as described in TTR Section 5.3.7.</p> <p>The No Build Alternative would result in some impacts on local roads and intersections within the API at similar locations to the Build Alternative. However, the safety, traffic, transit, pedestrian and/or bike improvements identified as mitigation measures under the Build Alternative would not be implemented (TTR Section 6.1, Table 6-1).</p>	<p><b>Consistent.</b> The Build Alternative would be consistent with this goal. TTR Section 5.3 indicates that I-205 near Oregon City would have faster travel times and less congestion (2 hours or less of daily congestion) under the Build Alternative in 2045. In addition, the number of crashes on I-205 in the API would be lower under the Build Alternative than the No Build Alternative because of lower traffic volumes, as described in TTR Section 5.3.7.</p> <p>Six intersections near downtown Oregon City would 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 portions of OR 99E in Oregon City are projected to be longer under the Build Alternative than the No Build Alternative in 2045. ODOT is proposing safety, traffic, transit, pedestrian and/or bike improvements as mitigation measures (TTR Section 6.1, Table 6-1) to offset these potential impacts and support a transportation network that serves all modes of travel, including nonmotorized modes.</p>
2013 Oregon City Transportation System Plan	Volume I, Goal 7, Objective A <i>Freight access and truck travel reliability.</i>	<p><b>Inconsistent.</b> The No Build Alternative would generally have worse conditions for freight access and truck travel reliability than the Build Alternative within the API and in Oregon City.</p> <p>TTR Section 5.3.6, Table 5-36 indicates that freight travel times under the No Build Alternative would be substantially worse on I-205 (ranging from 26% to 53% longer) than for the Build Alternative. Northbound OR 99E between South 2nd Street and West Arlington Street would have slightly longer freight travel times in the AM peak period (by about 1 minute) and similar travel times in the PM peak period. Southbound traffic would experience slightly shorter travel times (by about 3 minutes) along OR 99E between South 2nd Street and West Arlington Street.</p> <p>Because freight travel times would be longer on I-205 through Oregon City with slight changes on OR 99E, the No Build Alternative is inconsistent with Goal 7, Objective A.</p>	<p><b>Consistent.</b> The Build Alternative would improve freight access and truck travel reliability along I-205 and truck freight corridors the API and in Oregon City.</p> <p>TTR Section 5.3.6, Table 5-36 indicates that freight travel times under the Build Alternative would be substantially better on I-205 (ranging from 26% to 53% shorter) than the No Build Alternative. Northbound OR 99E between South 2nd Street and West Arlington Street in Oregon City would have slightly shorter freight travel times in the AM peak period (by about 1 minute) and similar travel times in the PM peak period. Southbound traffic would experience slightly longer travel times (by about 3 minutes) along OR 99E between South 2nd Street and West Arlington Street. ODOT is proposing mitigation to offset impacts on local roadways, as described in TTR Section 6.1).</p> <p>Because freight travel times would be shorter on I-205 through Oregon City with slight changes on OR 99E that would be offset by mitigation, the Build Alternative is consistent with Goal 7, Objective A.</p>

Applicable Law or Plan	Relevant Policies	Consistency Analysis – No Build Alternative	Consistency Analysis – Build Alternative
	<p>Volume I, Goal 8, Objectives A and C.</p> <p><i>Meet the mobility standards for state highways, or develop and propose alternative standards, consistent with Oregon Highway Plan provisions.</i></p> <p><i>Consider regional needs identified in the Metro RTP, including those identified with the mobility corridors.</i></p>	<p><b>Inconsistent.</b> Under the No Build Alternative, I-205 would meet OHP mobility standards in 2045. The No Build Alternative would not support regional mobility corridor needs identified in the Metro RTP, which include corridor widening and seismic upgrades to bridges along I-205, as indicated in the I-205 South Corridor Widening and Seismic Improvements Project description.</p> <p>Four of the TTR study intersections are on state highways in Oregon City:</p> <ul style="list-style-type: none"> <li>▪ OR 99E and I-205 ramp (NB)</li> <li>▪ OR 99E and I-205 ramp (SB)</li> <li>▪ McLoughlin Blvd and 14th St.</li> <li>▪ 7th St. and Main St.</li> </ul> <p>As shown in TTR Section 5.3.3, Tables 5-14, 5-15, 5-17 and 5-18, only the 7th St. and Main St. intersection would meet the mobility standard in the No Build Alternative – the remaining three intersections would not meet the mobility standard in the No Build Alternative in the AM and PM Peak Hours in both 2027 and 2045. Therefore, the No Build Alternative would not be consistent with Goal 8 of the Oregon City TSP.</p>	<p><b>Consistent.</b> Under the Build Alternative, all northbound and southbound segments of I-205 would meet the OHP mobility standard of 0.99 v/c for state highways. However, a separate HDM v/c design standard of 0.75 would apply to the Build Alternative as discussed above (under OHP Policy 1F). Where I-205 would not meet the HDM v/c design standard of 0.75 (see TTR Section 5.3.3, Tables 5-10 and 5-11), ODOT will seek an exception to the design standard (i.e. a design exception) from the State Traffic-Roadway Engineer. The Build Alternative would be consistent with regional mobility corridor needs identified in the Metro RTP, which include corridor widening and seismic upgrades to bridges along I-205, as indicated in the I-205 South Corridor Widening and Seismic Improvements Project description.</p> <p>Four of the TTR study intersections are on state highways in Oregon City:</p> <ul style="list-style-type: none"> <li>▪ OR 99E and I-205 ramp (NB)</li> <li>▪ OR 99E and I-205 ramp (SB)</li> <li>▪ McLoughlin Blvd and 14th St.</li> <li>▪ 7th St. and Main St.</li> </ul> <p>As shown in TTR Section 5.3.3, Tables 5-14 and 5-15, only the 7th St. and Main St. intersection would meet the mobility standard in the Build Alternative in the AM and PM Peak Hours in 2045 – the remaining three intersections would not meet the mobility standard in the Build Alternative. However, these intersections would also not meet the mobility standard in the No Build, meaning that the deficient intersection conditions cannot be attributed solely to the Build Alternative.</p> <p>As shown in TTR Section 5.3.3, Table 5-17, both the McLoughlin Blvd and 14th St. intersection and the 7th St. and Main St. intersection would meet the mobility standard in the Build Alternative during the AM Peak Hour in 2027. None of the intersections would meet the mobility standard in the PM Peak Hour in 2027 (Table 5-18). While most of these intersections would also exceed the mobility standard in the No Build during these times, the 7th St. and Main St. intersection is the exception – it would meet the mobility standard in the No Build Alternative but not in the Build Alternative.</p> <p>ODOT is proposing traffic, transit, pedestrian and/or bike improvements as mitigation measures (TTR Section 6.1, Table 6-1) to offset potential impacts on this intersection, as well as the other intersections where the Build Alternatives makes conditions worse than in the No Build. Mitigation commitments will be finalized in coordination with ODOT and partner agencies and will be included in the Revised Environmental Assessment. Mitigation commitments included in the Build Alternative will demonstrate that state highways meet mobility standards consistent with this policy or ODOT will, as applicable, obtain exceptions to ODOT’s Highway Design Manual (HDM) v/c design standard (i.e. design exception) and/or develop and propose alternative mobility standards, consistent with Oregon Highway Plan provisions.</p>

Applicable Law or Plan	Relevant Policies	Consistency Analysis – No Build Alternative	Consistency Analysis – Build Alternative
2016 West Linn Comprehensive Plan	<p>Goal 9, Goal 3, Policy 3</p> <p><i>Ensure the City has adequate public facilities and infrastructure to support economic activities, especially transportation. Maximize the use of regional, state, and federal funding for infrastructure planning and development. Work with ODOT to realize the full potential of the I-205 maintenance parcel.</i></p>	<p><b>Inconsistent.</b> The No Build Alternative would not contribute to ensuring West Linn has adequate transportation infrastructure to support the city’s economic activities. The I-205 Toll Project Economics Technical Report (ETR) Section 6.3, Table 6-12 summarizes economic impacts with comparisons between the No Build Alternative and the Build Alternative. The No Build Alternative would incur large costs from traffic and freight impacts onto users, society, and freight services. These include short-term, long-term, and indirect costs.</p>	<p><b>Consistent.</b> The proposed I-205 improvements under the Build Alternative would help to ensure the City of West Linn has adequate transportation infrastructure to support the city’s economic activities. ETR Section 6.3, Table 6-12 provides a summary of the Build Alternative benefits, including short-term, long-term, and indirect benefits. Overall, the Build Alternative would have a positive economic impact to users, society, and freight services.</p>
	<p>Goal 12, General Policies and Action Measures, Policy 5</p> <p><i>The City shall take a more aggressive and pro-active role in assuring federal, state, and regional decision-makers consider West Linn’s needs for improvements to I-205. Issues of concern that need to be part of future discussions include:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Existing peak hour congestion.</i></li> <li>▪ <i>Diversion effects onto local City streets to “bypass” freeway congestion.</i></li> <li>▪ <i>20-year forecasts expected to increase freeway volumes by 70% over 2005 levels.</i></li> <li>▪ <i>Need for additional capacity crossing the Willamette River.</i></li> </ul> <p><i>Further corridor study may be needed to target ODOT’s project budget to its most effective use.</i></p>	<p><b>Inconsistent.</b> The No Build Alternative would not fully address the issues of concern identified in Goal 12, General Policies and Action Measures, Policy 5 because the additional planned improvements to I-205 capacity would not be constructed. TTR Section 5.3, Table 5-12 indicates that I-205 between OR 43 and 10th Street in West Linn would have 8 to 13 hours of daily congestion in 2045 under the No Build Alternative because capacity improvements would be limited to the Abernethy Bridge area. TTR Section 5.3, Figures 5-9 and 5-10 indicate that some local streets connecting to I-205 in West Linn would experience higher daily traffic volumes under the No Build Alternative than the Build Alternative because vehicles would continue using local streets to bypass heavy I-205 congestion.</p>	<p><b>Consistent.</b> The Build Alternative would address the issues of concern identified in Goal 12, General Policies and Action Measures, Policy 5 related to peak hour congestion and diversion effects onto local City streets by completing an additional lane of capacity in both directions of I-205 and by proposing mitigation for project impacts on local roads. TTR Section 5.3, Table 5-12 indicates that I-205 between OR 43 and 10th Street in West Linn would have 0 hours of daily congestion in 2045 for both northbound and southbound segments under the Build Alternative with the added highway capacity. TTR Section 5.3, Figures 5-9 and 5-10 indicate that streets between 10th Street and OR 43 in West Linn would experience slightly lower daily traffic volumes under the Build Alternative as compared to the No Build Alternative because I-205 would likely attract traffic away from local streets due to the expected improvements in I-205 traffic performance through the additional capacity. However, some West Linn streets used as alternative routes to I-205, including Willamette Falls Drive, would experience higher traffic volumes under the Build Alternative because some drivers would choose to reroute to avoid the tolls on the bridges. To address potential impacts from the Build Alternative, ODOT is proposing traffic, bike, and pedestrian improvements as mitigation measures in West Linn, as indicated in the TTR Section 6.1, Table 6-3.</p>

Applicable Law or Plan	Relevant Policies	Consistency Analysis – No Build Alternative	Consistency Analysis – Build Alternative
	<p>Goal 12, Streets, Action 4 <i>Reduce congestion where possible.</i></p>	<p><b>Inconsistent.</b> The No Build Alternative would have more daily hours of congestion on I-205 in the West Linn area compared to the Build Alternative. TTR Section 5.3, Table 5-12 indicates under the No Build Alternative, the 10th Street to OR 43 segment of I-205 in West Linn would have between 8 and 13 hours of daily congestion in both directions in year 2045.</p> <p>As described in TTR Section 5.3.3., on SW Borland Road/Willamette Falls Drive, projected travel-time differences between the No Build and Build Alternatives would be relatively minor in 2045, except for during PM peak hour in the eastbound direction from SW Stafford Road to 10th Street. Travel times in this segment would be nearly 9 minutes longer under the No Build Alternative than the Build Alternative because of the added I-205 capacity under the Build Alternative. On Willamette Falls Drive between OR 43 and 10th Street, travel times for the No Build Alternative in the east and westbound directions for the AM and PM peak hours would be similar to the Build Alternative.</p> <p>On OR 43, projected travel-times for the northbound direction would be similar under both alternatives in 2045. In the southbound direction, however, AM peak-hour travel times would be 2.5 minutes shorter under the No Build Alternative between Hidden Springs Road and McKillican Street. PM peak-hour travel times on this same segment would be 7 minutes longer under the No Build Alternative because of congestion on I-205.</p>	<p><b>Consistent.</b> The Build Alternative would result in fewer hours of congestion on I-205 in the West Linn area compared to the No Build Alternative. TTR Section 5.3, Table 5-12 indicates that under the Build Alternative, the 10th Street to OR 43 segment of I-205 in West Linn would have 0 hours of daily congestion in both directions.</p> <p>As described in TTR Section 5.3.3., on SW Borland Road/Willamette Falls Drive, projected travel-time differences between the No Build and Build Alternatives would be relatively minor in 2045, except for during the PM peak hour in the eastbound direction from SW Stafford Road to 10th Street. Travel times in this segment would be nearly 9 minutes shorter under the Build Alternative than the No Build Alternative because the added I-205 capacity under the Build Alternative would result in less rerouting to SW Borland Road and Willamette Falls Drive.</p> <p>On OR 43, projected travel-times for the northbound direction would be similar under both alternatives in 2045. In the southbound direction, however, AM peak-hour travel times would be 2.5 minutes longer under the Build Alternative between Hidden Springs Road and McKillican Street. PM peak-hour travel time on this same segment would be 7 minutes shorter under the Build Alternative than the No Build Alternative.</p> <p>In addition, two West Linn intersections (the OR 43 and I-205 southbound ramps intersection in 2027 and the Hidden Springs Road and Santa Anita Drive intersection in 2045) would have better operations and shorter delays under the Build Alternative than the No Build Alternative. One West Linn intersection (12th Street and Willamette Falls Drive) would not meet mobility standards under both alternatives and would have worse operations under the Build Alternative in 2045. To address potential impacts from the Build Alternative, ODOT is proposing mitigation measures in West Linn, as indicated in the TTR Section 6.1, Table 6-3.</p>
	<p>Goal 12, Freight and Goods Movement, Policy 1 <i>Promote improvements to I-205 that will allow for the continued movement of freight and goods through and to West Linn.</i></p>	<p><b>Inconsistent.</b> The No Build Alternative would not promote improvements to I-205 that will allow for the continued movement of freight and through and to West Linn. TTR Section 5.3.6, Table 5-36 indicates that I-205 segments during the AM and PM peak-hours would have greater travel times under the No Build Alternative, which would reduce the efficiency of freight and goods movement. Northbound I-205 AM and PM peak-hour travel times between the I-5 ramps and SE 82nd Drive would be 28% (4.2 minutes) and 53% (14.5 minutes) longer respectively under the No Build Alternative compared to the Build Alternative in 2045. Southbound I-205 AM and PM peak-hour travel times in that same area would be 26% (3.8 and 3.7 minutes) longer respectively under the No Build Alternative compared to the Build Alternative in 2045.</p>	<p><b>Consistent.</b> The Build Alternative would promote physical improvements to I-205 that would promote the movement of freight and goods through and to West Linn. TTR Section 5.3.6, Table 5-36 indicate a general trend of improved truck and freight mobility. Northbound AM and PM peak-hour travel times would be 28% (4.2 minutes) and 53% (14.5 minutes) shorter, respectively, along I-205 than the No Build Alternative in 2045. Southbound AM and PM peak-hour travel times would be 26% (3.8 and 3.7 minutes) shorter, respectively, along I-205 in 2045.</p>

Applicable Law or Plan	Relevant Policies	Consistency Analysis – No Build Alternative	Consistency Analysis – Build Alternative
<p>2016 West Linn Transportation System Plan</p>	<p>Chapter 2, Goal 1, Targets 1A and 1B  <i>Reduce transportation related fatalities and injuries for all transportation modes.</i>  <i>Vision Zero – No fatal injury collisions by mode and reduce the total number of severe injury collisions by mode.</i></p> <ul style="list-style-type: none"> <li>• <i>Reduce the total number of high collision locations by 2040.</i></li> </ul>	<p><b>Inconsistent.</b> The No Build Alternative would have about 21% more crashes on I-205, including higher numbers of fatal and injury crashes, in 2045, as described in TTR Section 5.3.7 and Table 5-41. There would be about the same number of fatality/injury crashes under both alternatives in 2027 and 2045 at most local street intersections studied in West Linn, as described in TTR Section 5.3.7 and Tables 5-37 through 5-40. There would be a slightly higher number of predictive fatality/injury crashes at the OR 43 and Hidden Springs Road, OR 43 and I-205 northbound ramps, OR 43 and I-205 southbound ramps, OR 43 and McKillican Street under the No Build Alternative compared to the Build Alternative in 2045. In addition, I-205 highway and ramp segments under the No Build Alternative would have greater numbers of vehicular crashes than the Build Alternative.</p>	<p><b>Consistent.</b> The Build Alternative would have about 21% fewer crashes on I-205 than the No Build Alternative in 2045, including lower numbers of fatal and injury crashes, as described in TTR Section 5.3.7 and Table 5-41. There would be about the same number of fatality/injury crashes under both alternatives in 2027 and 2045 at most local street intersections studied in West Linn, as described in TTR Section 5.3.7 and Tables 5-37 through 5-40. There would be about 2 more fatality/injury crashes on Willamette Falls Drive in the API in 2045 and about 1 more fatality/injury crash at the 10th Street and I-205 southbound ramps intersection under the Build Alternative compared to the No Build Alternative. No intersections or roadway segments in West Linn would meet the criteria for adverse safety-related effects in 2045 and therefore would not require consideration of mitigation, as described in TTR Section 5.4.4.</p>



Applicable Law or Plan	Relevant Policies	Consistency Analysis – No Build Alternative	Consistency Analysis – Build Alternative
	<p>Chapter 2, Goal 2, Target 2C</p> <p><i>Improve peoples' access to jobs, schools, health care and other regular needs in ways that improve health, reduce pollution, and retain money in the local economy.</i></p> <p><i>Improve freight travel time reliability.</i></p>	<p><b>Inconsistent.</b> The No Build Alternative would generally result in access to similar or lower numbers of jobs, community places, and medical facilities in 2045 compared to the Build Alternative, as described in the <i>I-205 Social Resources and Communities Technical Report</i> and EA Section 3.7.2.</p> <p>The No Build Alternative would result in higher levels of air pollutants and greenhouse gas emissions in the API than the Build Alternative because of higher regional vehicle miles traveled (VMT) under the No Build Alternative. The <i>I-205 Toll Project Air Quality Technical Report</i> and the <i>I-205 Toll Project Energy and Greenhouse Gas Emissions Technical Report</i> provide more details on air quality and climate effects under the No Build Alternative.</p> <p>The No Build Alternative would result in increasingly longer travel times and increased congestion for travelers on this segment of I-205 compared with current conditions. Over time, projected increases in vehicle trips, traffic congestion, and deteriorating system performance would accrue as additional costs, including longer travel times, additional vehicle operating and maintenance costs and vehicle emissions, lower truck travel-time reliability, and increases in crashes between roadway vehicles, as described in ETR Section 6.3, Table 6-12.</p> <p>TTR Section 5.3.6, Table 5-36 indicates the No Build Alternative would have worse truck freight travel times than the Build Alternative on I-205, including through West Linn. Northbound AM and PM peak-hour travel times would be 28% (4.2 minutes) and 53% (14.5 minutes) longer, respectively, along I-205 than the Build Alternative in 2045. Southbound AM and PM peak-hour travel times would be 26% (3.8 and 3.7 minutes) longer, respectively, along I-205 in 2045.</p>	<p><b>Consistent.</b> The Build Alternative would generally result in access to similar or higher numbers of jobs, community places, and medical facilities in 2045 compared to the No Build Alternative, as described in the <i>I-205 Toll Project Social Resources and Communities Technical Report</i> and EA Section 3.7.2. In addition, two West Linn intersections (the OR 43 and I-205 southbound ramps intersection in 2027 and the Hidden Springs Road and Santa Anita Drive intersection in 2045) would have better operations and shorter delays under the Build Alternative than the No Build Alternative, which would provide benefits to people traveling to nearby social resources, such as parks, schools, religious organizations, shopping centers, and a fire station. One West Linn intersection (12th Street and Willamette Falls Drive) would not meet mobility standards under both alternatives and would have worse operations under the Build Alternative in 2045. To address potential impacts from the Build Alternative, ODOT is proposing traffic, pedestrian, and bike improvements as mitigation measures in West Linn, as described in TTR Section 6.1, Table 6-3.</p> <p>The Build Alternative would be consistent with the goal of reducing pollution, resulting in lower levels of air pollutants and greenhouse gas emissions in the API than the No Build Alternative because of lower regional vehicle miles traveled (VMT) under the Build Alternative. In 2027, net mobile source air toxic (MSAT) emissions would range from 3% to 9% lower than the No Build Alternative. Estimated modeled criteria pollutant emissions would be 0.3% to 7% lower than the No Build Alternative. In 2045, net MSAT emissions would range from 7% to 10% lower than the No Build Alternative. Estimated modeled criteria pollutant emissions would be 0.3% to 12% lower than the No Build Alternative.</p> <p>Changes in regional travel behavior under the Build Alternative would result in user and social benefits, including reduced emissions, shorter travel times, improved truck on-time reliability, vehicle operating cost savings, fewer crashes, and prevention of pavement damage, as described in ETR Section 6.3, Table 6-12. There would also be higher levels of opportunity (traffic exposure-oriented) consumer spending in the commercial district on Willamette Falls Drive because of higher traffic volumes compared to the No Build Alternative, which would help to retain money in the local economy. This additional consumer spending would translate into increased employment, labor income, and economic output in these areas under the Build Alternative compared to the No Build Alternative.</p> <p>TTR Section 5.3.6 and Table 5-36 indicate a general trend of improved truck freight travel times on I-205, including through West Linn. Northbound AM and PM peak-hour travel times would be 28% (4.2 minutes) and 53% (14.5 minutes) shorter, respectively, along I-205 than the No Build Alternative in 2045. Southbound AM and PM peak-hour travel times would be 26 percent (3.8 and 3.7 minutes) shorter, respectively, along I-205 in 2045.</p>

Applicable Law or Plan	Relevant Policies	Consistency Analysis – No Build Alternative	Consistency Analysis – Build Alternative
	<p>Chapter 2, Goal 4 <i>Maintain, protect and improve the existing transportation system.</i></p>	<p><b>Inconsistent.</b> The No Build Alternative would not maintain, protect and improve the existing transportation system, specifically the section of I-205 and study roadways in West Linn.</p> <p>TTR Section 5.3 identifies a general trend of a system that would not support existing and projected travel demand on I-205 and would not provide additional seismic upgrades and bridge replacements needed to protect the resiliency of I-205 during a major seismic event.</p> <p>The No Build Alternative would have more daily hours of congestion on I-205 in the West Linn area compared to the Build Alternative. TTR Section 5.3, Table 5-12 indicates under the No Build Alternative, the 10th Street to OR 43 segment of I-205 in West Linn would have between 8 and 13 hours of daily congestion in both directions in year 2045.</p> <p>As described in TTR Section 5.3.3, on SW Borland Road/Willamette Falls Drive, projected travel-time differences between the No Build and Build Alternatives would be relatively minor in 2045, except for during PM peak hour in the eastbound direction from SW Stafford Road to 10th Street. Travel times in this segment would be nearly 9 minutes longer under the No Build Alternative than the Build Alternative because of the added I-205 capacity under the Build Alternative. On Willamette Falls Drive between OR 43 and 10th Street, travel times for the No Build Alternative in the east and westbound directions for the AM and PM peak hours would be similar to the Build Alternative.</p> <p>On OR 43, projected travel-times for the northbound direction would be similar under both alternatives in 2045. In the southbound direction, however, AM peak-hour travel times would be 2.5 minutes shorter under the No Build Alternative between Hidden Springs Road and McKillican Street. PM peak-hour travel times on this same segment would be 7 minutes longer under the No Build Alternative because of congestion on I-205.</p> <p>The No Build Alternative would not include the additional traffic, pedestrian, and bike improvements identified as mitigation measures under the Build Alternative (as described in TTR Section 6.1, Table 6-3).</p>	<p><b>Consistent.</b> The Build Alternative would help to maintain, protect and improve the existing transportation system by constructing physical improvements to I-205 that would help to reduce congestion and improve seismic resiliency in the West Linn area.</p> <p>The Build Alternative would result in fewer hours of congestion on I-205 in the West Linn area compared to the No Build Alternative. TTR Section 5.3.3, Table 5-12 indicates that under the Build Alternative, the 10th Street to OR 43 segment of I-205 in West Linn would have 0 hours of daily congestion in both directions.</p> <p>As described in TTR Section 5.3.3, On SW Borland Road/Willamette Falls Drive, projected travel-time differences between the No Build and Build Alternatives would be relatively minor in 2045, except for during the PM peak hour in the eastbound direction from SW Stafford Road to 10th Street, where there would be benefits for travelers. Travel times in this segment would be nearly 9 minutes shorter under the Build Alternative than the No Build Alternative because the added I-205 capacity under the Build Alternative would result in less rerouting to SW Borland Road and Willamette Falls Drive.</p> <p>On OR 43, projected travel-times for the northbound direction would be similar under both alternatives in 2045. In the southbound direction, however, AM peak-hour travel times would be 2.5 minutes longer under the Build Alternative between Hidden Springs Road and McKillican Street. PM peak-hour travel time on this same segment would be 7 minutes shorter under the Build Alternative than the No Build Alternative.</p> <p>In addition, two West Linn intersections (the OR 43 and I-205 southbound ramps intersection in 2027 and the Hidden Springs Road and Santa Anita Drive intersection in 2045) would have better operations and shorter delays under the Build Alternative than the No Build Alternative. One West Linn intersection (12th Street and Willamette Falls Drive) would not meet mobility standards under both alternatives and would have worse operations under the Build Alternative in 2045.</p> <p>To address potential impacts from the Build Alternative, ODOT is proposing mitigation measures in West Linn, as indicated in the TTR Section 6.1, Table 6-3.</p>

Applicable Law or Plan	Relevant Policies	Consistency Analysis – No Build Alternative	Consistency Analysis – Build Alternative
<p>Clackamas County Transportation System Plan (Chapter 5 of the Clackamas County Comprehensive Plan)</p>	<p>Policies 5.U.1 <i>Coordinate the planning, development, maintenance and operation of a safe and efficient freight system for all freight modes in Clackamas County with the private sector, ODOT, Metro, the Port of Portland and the cities of Clackamas County.</i></p>	<p><b>Inconsistent.</b> The No Build Alternative would not help to support the maintenance and operation of a safe and efficient truck freight system in Clackamas County. TTR Section 5.3.6, Table 5-36 indicates that the Clackamas County roadways studied in the API would generally have similar or longer truck freight travel times under the No Build Alternative compared to the Build Alternative:</p> <ul style="list-style-type: none"> <li>▪ I-205 (I-5 Ramps to Gladstone)                             <ul style="list-style-type: none"> <li>○ 28% to 53% longer northbound AM and PM peak-hour travel times</li> <li>○ 26% longer southbound AM and PM peak-hour travel times</li> </ul> </li> <li>▪ OR 213 (Glen Oak Road to I-205 Interchange)                             <ul style="list-style-type: none"> <li>○ 18% longer northbound AM and similar PM peak-hour travel times</li> <li>○ Similar southbound AM and PM peak-hour travel times</li> </ul> </li> <li>▪ I-5 (Willamette River Bridge to OR 217 Interchange)                             <ul style="list-style-type: none"> <li>○ Up to 17% longer northbound AM and PM peak-hour travel times</li> <li>○ Up to 8% shorter southbound AM and 14% to 26% greater PM peak-hour travel times</li> </ul> </li> <li>▪ OR 99E (Grant Street [Canby] to Concord Rd [Gladstone])                             <ul style="list-style-type: none"> <li>○ Up to 12% longer northbound AM and similar PM peak-hour travel times</li> <li>○ 6% to 12% shorter southbound AM and PM peak-hour travel times</li> </ul> </li> </ul>	<p><b>Consistent.</b> The Build Alternative would help to support the maintenance and operation of a safe and truck freight system in Clackamas County. TTR Section 5.3.6, Table 5-36 indicates that the Build Alternative would generally result in shorter travel times and improved freight system efficiency on roadways studied in Clackamas County compared to the No Build Alternative:</p> <ul style="list-style-type: none"> <li>▪ I-205 (I-5 Ramps to Gladstone)                             <ul style="list-style-type: none"> <li>○ 28 to 53% shorter northbound AM and PM peak-hour travel time</li> <li>○ 26% shorter southbound AM and PM peak-hour travel time</li> </ul> </li> <li>▪ OR 213 (Glen Oak Road to I-205 Interchange)                             <ul style="list-style-type: none"> <li>○ 18% shorter northbound AM and similar PM peak-hour travel times</li> <li>○ Similar southbound AM and PM peak-hour travel times</li> </ul> </li> <li>▪ I-5 (Willamette River Bridge to OR 217 Interchange)                             <ul style="list-style-type: none"> <li>○ Up to 17% shorter northbound AM and PM peak-hour travel times</li> <li>○ Up to 8% longer southbound AM and less PM peak-hour travel time</li> </ul> </li> <li>▪ OR 99E (Grant Street [Canby] to Concord Rd [Gladstone])                             <ul style="list-style-type: none"> <li>○ Up to 12% shorter northbound AM and similar PM peak-hour travel time</li> <li>○ 6% to 12% longer southbound AM and PM peak-hour travel time times</li> </ul> </li> </ul>
	<p>Policy 5.CC.3 <i>Support the construction of prioritized, major transportation improvements in the County as identified by other jurisdictions including the Oregon Department of Transportation, Metro, cities, transit agencies and park providers. The list of needed transportation projects to be built by other jurisdictions is located in Table 5-3d. The project locations are shown on Maps 5-11a through 5-11f.</i></p>	<p><b>Inconsistent.</b> The No Build Alternative would not support the construction of the I-205 Improvements project from Stafford Rd to OR 99E, which is identified in Table 5-3d as a prioritized, major transportation improvement.</p>	<p><b>Consistent.</b> The Build Alternative would provide for the construction of the I-205 Improvements project from Stafford Rd to OR 99E, which is identified in Table 5-3d as a prioritized, major transportation improvement.</p>
	<p>Policies 5.DD.2.7 <i>Work with ODOT, Metro, Oregon City, West Linn and any other affected jurisdiction to analyze and develop a solution to the transportation bottleneck on I-205 between Oregon City and the I-205 / Stafford Road Interchange. This process may include undertaking an Environmental Impact Statement to identify a preferred alternative that addresses the transportation congestion and facility operations issues on this portion of the I-205 corridor.</i></p>	<p><b>Consistent.</b> ODOT is undertaking an environmental review process for the proposed project that includes opportunities for comment and coordination with Clackamas County and all affected jurisdictions and a review of potential effects under a No Build and Build Alternative.  The No Build Alternative would not be consistent with the I-205 improvements identified by ODOT, Metro, Oregon City, and West Linn to address the transportation bottleneck between Oregon City and the I-205/Stafford Road interchange.  TTR Section 5.3.3, Table 5-12 indicates the No Build Alternative would not reduce hours of daily congestion along I-205, including unincorporated Clackamas County. The I-205 segment from Stafford Road to 10th Street would have up to 8 hours of heavy congestion and 14 hours of moderate congestion.</p>	<p><b>Consistent.</b> ODOT is undertaking an environmental review process for the proposed project that includes opportunities for comment and coordination with Clackamas County and all affected jurisdictions and a review of potential effects under a No Build and Build Alternative.  TTR Section 5.3.3, Table 5-12 indicates that the Build Alternative would result in reduced daily hours of congestion along I-205 compared to the No Build Alternative, with up to 2 hours of moderate congestion in limited locations on I-205.</p>

Applicable Law or Plan	Relevant Policies	Consistency Analysis – No Build Alternative	Consistency Analysis – Build Alternative
Stafford Hamlet Community Vision Plan	<p>Goals</p> <p><i>Minimize additional traffic and infrastructure impacts.</i></p>	<p><b>Inconsistent.</b> The No Build Alternative would not minimize additional traffic and infrastructure impacts in the Stafford Hamlet area. As indicated in the TTR and EA, I-205 under the No Build Alternative would have worse congestion, travel reliability, freight mobility, capacity, and seismic resiliency than the Build Alternative.</p> <p>TTR Section 5.3.3, Table 5-12 indicates the No Build Alternative would not reduce hours of daily congestion along I-205, including unincorporated Clackamas County. The I-205 segment from Stafford Rd to 10th Street would have up to 8 hours of heavy congestion and 14 hours of moderate congestion.</p> <p>Local intersections in Stafford Hamlet would generally have similar operations under the No Build and Build Alternatives in 2027 and 2045. One intersection, SW Stafford Road and SW Childs Road, would meet local mobility standards under the No Build Alternative but would not meet standards under the Build Alternative in 2027. However, by 2045, this intersection and the SW Stafford Road and SW Rosemont Road intersection would not meet standards under either alternative. The No Build Alternative would not include the additional traffic, pedestrian, and bike improvements identified as mitigation measures under the Build Alternative (as described in TTR Section 6.1, Table 6-4).</p>	<p><b>Consistent.</b> The Build Alternative would minimize additional traffic and infrastructure impacts in the Stafford Hamlet area through the construction of planned physical improvements to I-205, which would provide benefits such as fewer hours of daily I-205 traffic congestion and shorter travel times. TTR Section 5.3.3, Table 5-12 indicates that the Build Alternative would result in reduced daily hours of congestion along I-205 compared to the No Build Alternative, with up to 2 hours of moderate congestion in limited locations on I-205.</p> <p>Local intersections in Stafford Hamlet would generally have similar operations under the No Build and Build Alternatives in 2027 and 2045. Two intersections in Stafford Hamlet (SW Stafford Road and SW Childs Road, and SW Stafford Road and SW Rosemont Road) would not meet standards under either alternative and would get comparatively worse under the Build Alternative compared to the No Build Alternative in 2045. To address these potential impacts from the Build Alternative, ODOT is proposing traffic, pedestrian, and bike mitigation measures in Stafford Hamlet, as described in TTR Section 6.1, Table 6-4.</p>

API = Area of Potential Impact; EA = I-205 Toll Project Environmental Assessment; ETR = I-205 Toll Project Economics Technical Report ; ETR = I-205 Toll Project Economics Technical Report; HDM = ODOT Highway Design Manual; I- = Interstate; LOS = level of service; LUTM = I-205 Toll Project Land Use Technical Memorandum; MSAT; MSAT = mobile source air toxic; NB = northbound; ODOT = Oregon Department of Transportation; OHP = Oregon Highway Plan; OR = Oregon Route; RTP = Metro 2018 Regional Transportation Plan; SB = southbound; TPR = Transportation Planning Rule; TTR= I-205 Toll Project Transportation Technical Report; VMT = vehicle miles traveled

## 7 Avoidance, Minimization, and/or Mitigation Commitments

No substantial short-term or long-term impacts on land use would occur under the Build Alternative; therefore, no avoidance, minimization, and/or mitigation measures are proposed.

## 8 References

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