

OREGON FREIGHT PLAN UPDATE

Federal Compliance and Funding Analysis

FINAL

February 2026

Prepared by:



Contents

1	Introduction	1
2	Updating Oregon Freight Plan Citations Regarding Federal Statute and Regulations	2
3	Updating the Oregon Freight Plan to Ensure Federal Compliance	6
4	Oregon Freight Plan References to Federal Funding Programs for Freight	7
5	New Federal Funding Programs – Potential Funding Sources for Oregon Freight Projects.....	9

1 Introduction

This memorandum includes the assessment of updated federal policies and plans relevant to the Oregon Freight Plan (OFP), which was last updated in 2023. It identifies areas where changes are needed to address new federal information.

In preparing the memo, all citations of federal statute, regulations, and sources in the existing OFP were reviewed. Citations were verified to determine whether they are still applicable and if they need to be updated. Where appropriate, the memo highlights recommended OFP revisions with respect to citations in the 2023 Plan.

This memo also examines whether there have been any changes to the federal requirements for a State Freight Plan and identifies any corresponding updates needed to ensure the OFP remains compliant.

In addition, federal funding programs described within the current OFP were assessed to determine whether they are still applicable. Finally, the memo identifies additional federal programs available as potential funding sources for freight projects within the State.

It is important to note that this memorandum evaluates OFP's compliance with the Infrastructure Investment and Jobs Act (IIJA), which expires September 30, 2026. In a future surface transportation reauthorization, funding programs and requirements may be changed, added, or removed, which the Oregon Department of Transportation will need to address in future updates to the OFP.

2 Updating Oregon Freight Plan Citations Regarding Federal Statute and Regulations

A matrix of all federal citations within the existing OFP has been included in an appendix to this memo. The citations in the matrix refer to federal policies, federal funding, federal regulations, federal statistics, and other federal sources. The matrix indicates which citations are still applicable and which require an update in the next OFP to ensure accuracy of information provided.

Recommended changes to OFP citations related to federal statutes and regulations are based on a thorough evaluation and review. The major changes include:

- Update to be made to the paragraph referencing national-level Transportation Infrastructure Finance and Innovation Act (TIFIA) program accomplishments. See original and proposed updated text below highlighting updated figures for total program credit assistance.
 - **Original Text:** Since 1998, the TIFIA program has provided \$32 billion to 74 projects with a total cost of nearly \$117 billion (in fiscal year [FY] 2018 inflation-adjusted dollars). The average TIFIA-supported project cost is \$1.5 billion, and the average TIFIA loan is \$430 million (both in FY 2018 dollars). About two-thirds of TIFIA loans have gone to highway and highway bridge projects, with a quarter going toward public transportation. TIFIA has supported at least one project in 21 states, the District of Columbia, and Puerto Rico. The top 10 states account for about 80 percent of all projects supported.¹
 - **Proposed Update:** Since 1998, the TIFIA program has provided 117 capital expenditure (capex) loans for more than \$38 billion for projects with a total cost of nearly \$135 billion (in FY 2023 inflation-adjusted dollars). The average TIFIA-supported project cost is \$1.26 billion, and the average TIFIA loan is \$326 million, ranging from \$8.4 million to \$1.8 billion (all in FY 2023 dollars). During the COVID-19 pandemic’s low reinvestment rate environment, TIFIA helped borrowers avoid negative carrying costs and saved them up to 4 percent of the loan amount by reducing reliance on capital markets debt.² Moreover, as of a 2025 update, TIFIA now allows all types of transportation infrastructure projects to finance up to 49% of eligible costs, as authorized under TIFIA legislation.³
- Update FAST and IIJA reference to National Freight Strategic Plan (NFSP) in Section 8.4.1 to highlight the updates related to 2025 NFSP. Continue monitoring the 2025 NFSP and update the text as necessary once the plan is finalized.
 - **Original Text:** The FAST Act also required the USDOT to develop a National Freight Strategic Plan that identifies and assesses the demands on, and the condition and performance of, the nation’s

¹ Oregon Freight Plan 2023 - Citation 112, p.155

² https://www.transportation.gov/sites/buildamerica.dot.gov/files/2024-06/FINAL_2024_TIFIA_Biennial_Report.pdf

³ <https://www.transportation.gov/briefing-room/us-transportation-secretary-sean-p-duffy-removes-financing-policy-roadblock-get-0>

multimodal freight system. The plan, released in September 2020, identifies barriers and opportunities as well as best practices for improving multimodal freight network performance. It also contains strategies for mitigating the impacts of freight on communities and for improving multistate and multimodal connectivity.⁴

- **Proposed Update:** The FAST Act also required the USDOT to develop a National Freight Strategic Plan that identifies and assesses the demands on, and the condition and performance of, the nation’s multimodal freight system. The plan, released in September 2020, identifies barriers and opportunities as well as best practices for improving multimodal freight network performance. It also contains strategies for mitigating the impacts of freight on communities and for improving multistate and multimodal connectivity. The 2025 update to the NFSP is underway and will address emerging trends and challenges since the last plan update, introduce a new Draft National Multimodal Freight Network, and reassess social, geopolitical, economic, and business factors influencing goods movement.⁵
- Update the reference to ODOT comments on National Multimodal Freight Network (NMFN). Incorporate the latest NMFN information into the Oregon Freight Plan, modifying the proposed text as appropriate, once it becomes available.
 - Original Text: In May 2016, USDOT released an interim NMFN for comment. ODOT provided comments and asked that a number of facilities be added.
 - Proposed update: In January 2025, USDOT released the new draft NMFN for comment⁶. ODOT provided comments requesting modification of the draft highways in the state of Oregon. A total of 11 additions were provided, including U.S. 30 from St. Johns Bridge and St Helens Rd in Portland, U.S. 26 from OR 47 to I-405, and OR 217. Three segments were requested to be removed, namely U.S. 95, U.S. 101 from Florence to Astoria, and U.S. 101 from OR 42 to California State Line.⁷
- ODOT to update Table 8.2 (p. 215) of Section 8.6 detailing Oregon’s Freight Investment Plan to include references and figures related to Oregon’s IIJA Formula Fund allocations as laid out by USDOT.
- Update text in OFP Section 6.6.4 regarding description of the National Highway Freight Program (NHFP) formula funds (p. 156).
 - **Original Text:** Under the FAST Act, the Federal Highway Administration (FHWA) to provide formula funds over federal FY 2016 to 2020 for states to invest in freight projects on the National Highway Freight Network. This program has been renewed through IIJA, providing formula funds over federal FY 2022 to 2026 totaling over \$7.1 billion in dedicated funding to be apportioned to

⁴ Oregon Freight Plan 2023 - Citation 158, p.191

⁵ <https://www.transportation.gov/freight/NFSP>

⁶ <https://www.transportation.gov/freight-infrastructure-and-policy/NMFN>

⁷ [Regulations.gov](https://www.transportation.gov/regulations)

all states including Oregon. Oregon is expected to receive around \$17.3 million in National Highway Freight Program funding for FY 2022.⁸

- **Proposed Update:** Under the FAST Act, the Federal Highway Administration (FHWA) is to provide formula funds over federal FY 2016 to 2020 for states to invest in freight projects on the National Highway Freight Network. This program was renewed through IIJA, providing formula funds over federal FY 2022 to 2026 totaling over \$7.1 billion in dedicated funding to be apportioned to all states including Oregon. Oregon is expected to receive around \$18.8 million in National Highway Freight Program funding for FY 2026.⁹
- Remove the program funding for FY 2016 through 2020 for the total National Highway Performance Program funds as that information is outdated.
 - **Original Text:** The National Highway Performance Program, authorized under MAP-21 and first renewed under the FAST Act, has been reauthorized under IIJA. The program provides aid for the condition and performance of the NHS, to construct new facilities on the NHS, and to ensure that investments of federal funds in highway construction are directed to support achievement of performance targets established in a state’s asset management plan for the NHS. Total program funding for FY 2016 through 2020 was roughly \$116 billion, with specific apportionment allotted to each state.

The IIJA has increased total funding for FY 2022 through 2026 to \$148 billion while modifying program goals to include climate change and resiliency-focused provisions for activities to increase the resiliency of the NHS to mitigate the cost of damages from sea level rise, extreme weather events, flooding, wildfires, or other natural disasters.¹⁰
 - **Proposed Update:** The National Highway Performance Program, authorized under MAP-21 and first renewed under the FAST Act, has been reauthorized under IIJA. The program provides aid for the condition and performance of the NHS, to construct new facilities on the NHS, and to ensure that investments of federal funds in highway construction are directed to support achievement of performance targets established in a state’s asset management plan for the NHS. Total program funding for FY 2022 through 2026 is \$148 billion, with specific apportionment allotted to each state. The IIJA has increased the overall program funding to include climate change and resiliency-focused provisions for activities to increase the resilience of the NHS to mitigate the cost of damages from sea level rise, extreme weather events, flooding, wildfires, or other natural disasters. Oregon is expected to receive around \$396 million in National Highway Performance Program funding for FY 2026.¹¹
- Update the name of the RAISE grant to BUILD grant and update the total funding dedicated until FY 2025.

⁸ Oregon Freight Plan 2023 - Citation 115, p.156

⁹ <https://www.fhwa.dot.gov/infrastructure-investment-and-jobs-act/funding.cfm>

¹⁰ Oregon Freight Plan 2023 - Citation 117, p.156

¹¹ <https://www.fhwa.dot.gov/infrastructure-investment-and-jobs-act/funding.cfm>

- Original Text: Rebuilding American Infrastructure with Sustainability and Equity grants—previously known as Better Utilizing Investments to Leverage Development and Transportation Investing Generating Economic Recovery grants—provide an opportunity for U.S. DOT support for port and freight rail projects of local and/or regional significance. Projects may seek funding through an annual competitive, merit-based application process, with nearly \$10 billion dedicated since inception in 2009. The program has been expanded under IIJA to include a total of \$15 billion in eligible funds.¹²
 - Proposed Update: Better Utilizing Investments to Leverage Development (BUILD) – previously known as Rebuilding American Infrastructure with Sustainability and Equity (RAISE) grants and Transportation Investing Generating Economic Recovery grants—provide an opportunity for U.S. DOT support for port and freight rail projects of local and/or regional significance. Projects may seek funding through an annual competitive, merit-based application process, with over \$18 billion dedicated since inception in 2009¹³. The program was expanded under IIJA to include a total of \$15 billion in eligible funds from FY 2022-2026, with \$1.5 billion dedicated for FY 2026.¹⁴
- Revise references to IIJA grant programs (including the Mega, Bridge Formula, NEVI, BIP, Rural, SMART, and Railroad Crossing Elimination programs) in Section 6.6.4 to remove the term “new” and instead describe these programs in the present tense, reflecting their current, established status.

For example, for Bridge Investment Program:

- Original Text: Bridge Investment Program: This new competitive grant program will assist state, local, federal, and tribal entities in rehabilitating or replacing bridges to improve safety, efficiency, and reliability of people and freight movement. Large projects and bundling of smaller bridge projects will be eligible for funding, with nearly \$16 billion in total program funding.
- Proposed Update: Bridge Investment Program: This competitive grant program assists state, local, federal, and tribal entities in rehabilitating or replacing bridges to improve safety, efficiency, and reliability of people and freight movement. Large projects and bundling of smaller bridge projects are eligible for funding, with nearly \$16 billion in total program funding through FY 2026.

¹² Oregon Freight Plan 2023 - Citation 118, p.157

¹³ <https://www.transportation.gov/BUILDgrants>

¹⁴ https://www.transportation.gov/sites/dot.gov/files/2025-12/FY_2026_BUILD_NOFO_Final.pdf

3 Updating the Oregon Freight Plan to Ensure Federal Compliance

The 2023 OFP complies with the IIJA, FAST Act, and MAP-21 freight planning requirements. In 2021, the IIJA added several new required elements and updated procedures for State Freight Plans. In January 2023, the USDOT released the *Guidance on Multimodal State Freight Plans and State Freight Advisory*¹⁵ that replaced the prior 2016 guidance on State Freight Plans and State Freight Advisory Committees. The revised guidance provides the minimum required elements that Freight Plans must meet (updated per the IIJA) that States may include in their State Freight Plans.

There are seventeen minimum requirements for State Freight Plans as listed in the revised Guidance. Appendix J of 2023 OFP demonstrates how the plan met all federal requirements for state freight plans.

Recommendation: *Update the Appendix J as per the new content of the Oregon Freight Plan (provide new chapter numbers and section references).*

Federal surface transportation programs authorized under the IIJA are set to expire in September 2026. While no new federal guidance for State Freight Plans has been issued to date, future reauthorization legislation may include additional requirements to encourage States to make freight system investments that protect strategic supply chains, decrease exposure to natural hazards, leverage digitalization and AI technology, and address cargo theft risks.

¹⁵ https://www.transportation.gov/sites/dot.gov/files/2023-01/State%20Freight%20Plan%20and%20State%20Freight%20Advisory%20Committee%20Guidance_signed.pdf

4 Oregon Freight Plan References to Federal Funding Programs for Freight

Federal funding programs referred to in Section 6.6 of the most recent OFP include CFR Title 23, Section 129 loans, TIFIA credit assistance, Grant Anticipation Revenue Vehicles (GARVEE) bonds, Infrastructure Investment and Jobs Act (IIJA) and Surface Transportation Reauthorization related to the National Highway Freight Program (NHFP).

Under IIJA, several programs and grants have been renewed and are already mentioned in the OFP 2023. These include:

- National Highway Performance Program
- Rebuilding American Infrastructure with Sustainability and Equity grants- renamed back to Better Utilizing Investments to Leverage Development (BUILD)
- Infrastructure for Rebuilding America (INFRA) grants
- Mega Program
- Rural Surface Transportation Grant Program
- Port Infrastructure Development Program
- Consolidated Rail Infrastructure and Safety Improvements Program
- FHWA Bridge Formula Program
- National Electric Vehicle Infrastructure Program
- Bridge Investment Program
- Promoting Resilient Operations for Transformative, Efficient, and Cost-saving Transportation (PROTECT) Program
- Charging and Fueling Infrastructure Grant Program
- Strengthening Mobility and Revolutionizing Transportation Grant Program
- Railroad Crossing Elimination Program

All of the listed funding programs above are still applicable sources for federal funding.

In review of Chapter 7 and, more specifically, Section 7.4 which lists out the OFP Issues and Strategies, Freight Issue 14 may need rewording to reflect changes in the federal freight funding landscape since the last update of this document. While Freight Issue 14 currently notes a lack of a continuous federal freight funding source, federal actions – including the establishment and expansion of dedicated FHWA freight formula funding under IIJA – have since provided an ongoing federal funding mechanism.

However, funding levels may remain insufficient to fully address statewide and regional freight needs. As such, Freight Issue 14 would be more accurately framed to reflect concerns related to the adequacy, scale, and long-term sufficiency of available federal freight funding rather than the absence of a continuous funding source. It would be most appropriate to reflect the evolving federal freight funding

environment in Chapter 6 (Funding) – acknowledging the establishment of dedicated freight formula programs, while stating that current funding levels remain insufficient for Oregon’s needs.

5 New Federal Funding Programs – Potential Funding Sources for Oregon Freight Projects

The OFP 2023 already provides a lengthy list of potential funding sources. However, there are two additional funding sources that Oregon could leverage for its freight projects:

- **The United States Marine Highway Program (USMHP):** This grant program, administered by the U.S. Maritime Administration (MARAD), supports projects that provide a coordinated and capable alternative to landside transportation or promote marine highway transportation, with the goal of relieving landside congestion and generating public benefits by improving the efficiency of the surface transportation system. Since its inception, the USMHP has awarded about \$108 million in competitive grants by 2024.¹⁶
- **Reduction of Truck Emissions at Port Facilities Program:** Established under the IIJA, this program provides grants to reduce idling at port facilities, including the electrification of port operations. This program provides \$400M over 5 years (FY 2022 – FY 2026) which includes \$250M in authorization and \$150M in advance appropriations.¹⁷

¹⁶ <https://www.maritime.dot.gov/grants/marine-highways/marine-highway>

¹⁷ <https://www.fhwa.dot.gov/infrastructure-investment-and-jobs-act/rtep.cfm>