

Attachment D Comments Received

D.4 FORMAL LETTERS CONTAINING COMMENTS



September 15, 2020

Lucinda Broussard, Toll Program Director

Oregon Department of Transportation
355 Capitol Street NE, MS 11
Salem, OR 97301-3871

RE: I-205 NEPA Alternatives Comment Period

Dear Director Broussard:

On behalf of the Clackamas County Board of Commissioners, we respectfully submit our comments on the identified Purpose and Need of ODOT's I-205 Toll Project and the alternatives that will be advanced through the project's National Environmental Policy Act (NEPA) analysis.

Before doing so, the Clackamas County Board of Commissioners would like to be clear that this letter is not an endorsement or acceptance of any proposal to implement tolling on I-205.

First, the desired outcome(s) of this study remains unclear. Is the goal to toll for the purpose of generating revenue to construct the I-205 Widening and Seismic Improvements Project, or is the intention to implement value pricing for the purpose of managing congestion? We respectfully request clarity on the desired outcome(s) of this study and the potential implementation of tolling.

Second, the financial necessity and the benefits of tolling this section of I-205 have not been clearly articulated. After years of improving the highway system of Oregon without the use of tolling, many residents and businesses in Clackamas County question why it is necessary that this project be tolled. We request that a financial analysis of the I-205 Widening and Seismic Improvements project be released that justifies tolling and demonstrates that it cannot be completed without toll funding.

Third, should tolling be implemented in the future, we reject the idea that tolling could be implemented on I-205 before system-wide tolling or congestion pricing is applied.

Clackamas County should not be forced to bear the burden of tolling or congestion pricing, with all of the potential associated impacts, before a system wide approach is applied. It is unfair and unacceptable. We request the OTC clarify its policy for funding of major highway improvements and assure stakeholders that tolling will be applied equitably to major highway

improvements in the region, including these I-205 improvements as well as other proposed improvements on I-5, I-84, I-405, and OR 217.

Fourth, we are concerned about a lack of clarity around the intentions and policies regarding toll revenue allocation. At the August 13th OTC meeting, ODOT Urban Mobility Office staff asked the OTC to consider a revenue policy. We support tolling staff's request that revenue generated in tolling project areas remain in those tolling project areas to help fund capital projects and diversion mitigations.

We also ask for clarification on the definition of project area vs. corridor. Should tolling be implemented, the Clackamas County Board supports the concept that revenue generated from tolling on I-205 be used to fund capital projects on I-205 and mitigations on the adjacent facilities to accommodate the diversion anticipated by the implementation of tolling. Please clarify the definition of corridor or project area relating to the revenue discussion – where, specifically, will the revenue generated be allowed to be spent?

Finally, we are concerned that this study assumes that the current level of diversion off I-205 onto the surrounding street network is the baseline that will be maintained. The current level of diversion is not acceptable, our local networks are over capacity, and we believe that much of the traffic is actually existing diversion from a heavily congested I-205. The proposed environmental analysis does not include an analysis of the current level of diversion. To better understand the current level of traffic diversion from I-205 we request that ODOT undertake two additional model runs. The first model run should be an untolled 2018 build scenario that includes the increased capacity proposed for the I-205 project (an additional lane in each direction on I-205 between OR99E and the Stafford Road interchange). The second model run should be an untolled 2018 base scenario model run that does not include the proposed capacity increases proposed for the I-205 project. A comparison of these two model runs will show the amount of diversion that occurred in 2018 and the locations that were impacted in the surrounding communities. Once the level of existing diversion has been analyzed, it will be possible to better analyze the traffic impacts of the future year alternatives, and better understand the additional diversion that will be experienced due to tolling.

The Board of Commissioners supports C4's comments and requests as listed below -

1. The 2027 travel demand modeling used to select alternatives fails to adequately account for the long-term impacts of tolling on the surrounding communities. We request that ODOT use Metro's 2040 travel demand model to assess the long-term re-routing of traffic that will result from the implementation of tolling on this segment of I-205 and impact our communities.

2. We request that ODOT seek to understand both the difference between the increase of vehicles created by diversion and the impact of those increases on local roads where diversion and delays already occur. To achieve this, apply traffic simulation to determine the impacts of traffic congestion and delay on the arterial roads and signalized intersections that will be impacted by traffic re-routing from I-205 as a result of the implementation of tolling. This analysis should include state highways – and the roads that feed them – that serve as major

arterials in surrounding communities, including but not limited to OR 99E, OR 212, OR 43, and OR 213.

3. We request that ODOT analyze the following alternatives in the Environmental Assessment:

- A. The No-Build alternative should be identified as the full 6-lane improvement to I-205 without tolling. This alternative provides the best baseline to determine the impacts of the tolling alternatives.
- B. The following alternatives from the "I-205 Toll Project Comparison of Screening Alternatives": Alternative #3, Alternative #4, and Alternative #5.
- C. An alternative in which the OR 43 Arch Bridge is restricted to bike/ped modes only.
- D. An alternative in which the existing OR 43 Arch Bridge is restricted to bike/ped modes only and a new vehicle bridge across the Willamette River between Oregon City and West Linn is added with sufficient capacity for forecasted 2050 traffic volumes.
- E. An alternative in which the tolled area of I-205 extends eastward from a location west of the Stafford Rd interchange to a location north of the OR 212 interchange.
- F. For each of the above, we request that a version of the alternative be modeled in which equivalent tolls are implemented on I-5 in Portland and I-205 in Clackamas County as was recommended in the 2018 Value Pricing Feasibility Study, and also a version in which only I-205 is modeled.

4. We request that ODOT quantify the impacts of traffic re-routing on state highways and major city and county roads throughout the full extent of Clackamas, Multnomah, and Washington Counties, rather than focusing solely on highways and roads in Clackamas County. We believe that this project will have region-wide impacts and that to meet the intent of NEPA it is necessary that those impacts be analyzed.

5. We request more detailed analysis of how each alternative will meet project objectives by adding a peak hour performance measure analysis on all major roads. While an initial evaluation has been provided, we believe each alternative should receive a full analysis to allow a comparison of all the alternatives.

6. We request that ODOT assess the health and equity impacts of each alternative in the Environmental Assessment. We recognize the Equity and Mobility Advisory Committee (EMAC) will provide a more robust analysis of this need, but we highlight this as an opportunity to incorporate health and equity criteria into the performance measures analysis, perform an equity analysis by analyzing the performance measures for subareas with a high percentage of marginalized and vulnerable populations, and partner with Oregon Health Authority (OHA) Environmental Health to explore modeling options of health outcomes.

7. We request ODOT use this NEPA process to additionally assess the original intent of HB 2017 to toll the entirety of I-5 and I-205, between the Columbia River and their intersection north of Wilsonville. Value pricing as a means of congestion relief cannot be achieved as a pilot program where select communities bear the burden of discovery. If value pricing is to have a true impact in our region, ODOT and the region at large will benefit by studying those impacts now, and potentially pursuing those methods of value pricing if they truly model congestion

relief. This approach not only favors a system-wide approach to congestion relief, but also removes the already observable and unfair model of penalizing several small communities to fund a project of statewide significance.

Finally, we feel obliged to reinforce our concerns for the impacts of diversion to communities immediately surrounding this project, as well as those peripheral to the project. Diversion already exists on local roads due to bottleneck congestion on I-205. Increased diversion to roads already accommodating diversion is likely to eliminate community support. Hence why Comment 3-A is so important. The I-205 Widening and Seismic Improvements Project must be considered completed for any of this to resonate with our local communities.

We also expect the NEPA analysis to inform how ODOT plans to remedy the impacts of tolling diversion where transportation gaps exist in this area, including a need for improved transit alternatives such as bus on shoulder access and connection routes around the project, improved pedestrian accommodation on projects where diversion will increase, and additional river crossings to accommodate diversion.

Thank you for considering our comments, and we look forward to your response as part of the NEPA process.

Sincerely,

CLACKAMAS COUNTY BOARD OF COMMISSIONERS

A handwritten signature in blue ink that reads "Jim Bernard". The signature is written in a cursive style with a large, looped initial "J".

Jim Bernard, Chair
On Behalf of the Clackamas County Board of Commissioners

August 13, 2020

Lucinda Broussard, Toll Program Director
Oregon Department of Transportation
355 Capitol Street NE, MS 11
Salem, OR 97301-3871

RE: I-205 NEPA Alternatives Comment Period, August 3 to September 16, 2020

Dear Director Broussard:

On behalf of the Clackamas County Coordinating Committee (C4), we respectfully submit our comments on the identified Purpose and Need of ODOT's I-205 Toll Project and the alternatives that will be advanced through the project's National Environmental Policy Act (NEPA) analysis.

To begin, thank you for your inclusive involvement with local stakeholders since the inception of the newly formed ODOT Toll Program office. As you have likely discerned from your numerous meetings with C4 and a variety of cities and stakeholders, our communities recognize the importance of I-205 for Clackamas County and all of northern Oregon and are passionately concerned about the impacts anticipated from the proposed tolling of I-205 through Clackamas County.

As ODOT begins the process of developing this toll project on I-205 we have three overarching concerns regarding this project.

First, the financial necessity and the benefits of tolling this section of I-205 have not been clearly articulated. After years of improving the highway system of Oregon without the use of tolling, many residents and businesses in Clackamas County question why it is necessary that this project be tolled. The communities of Clackamas County request that a financial analysis of the I-205 Widening and Seismic Improvements project be released that justifies tolling and demonstrates that it cannot be completed without toll funding.

Second, we request the OTC clarify its policy for funding of major highway improvements and assure stakeholders that tolling will be applied equitably to major highway improvements in the region, including this I-205 improvement as well as other proposed improvements on I-5, I-84, I-405, and OR 217. Our hope is for this analysis to either clarify or alleviate the growing concern that tolls will not be imposed to pay for other major highway improvements elsewhere in the Portland region and in Oregon, leaving Clackamas County businesses and residents to shoulder a major share of the cost of this improvement to the state highway system.

Third, we are concerned about a lack of clarity around the intentions and policies regarding toll revenue allocation, and urge that toll revenue generated in a project area should remain in that project area. Based on recent comments from ODOT tolling staff we understand that their intent at the August 13th OTC meeting is to seek policy direction to ensure that toll revenue collected in the corridor remains in the corridor. We strongly support ODOT staff's intention and the concept that the toll revenue collected in a corridor should remain in that corridor.

Despite our expressed concerns with tolling as a policy for funding major transportation improvements, we recognize that ODOT is mandated to advance this project. Therefore, it is our intention to provide comments that will reduce the impacts and result in maximum benefit for Clackamas County, the Portland region, and the State of Oregon. What follows is a list of comments that we believe will improve the alternatives ODOT advances for consideration under a NEPA analysis. As a coordinating committee, we are providing comments of concern to our membership, with an understanding that many within our committee will provide additional comments detailing the local impacts for their communities and businesses. Each member of C4 has their own story to tell with respect to this project. The comments included below apply broadly and are collective in nature.

1. The 2027 travel demand modeling used to select alternatives fails to adequately account for the long-term impacts of tolling on the surrounding communities. We request that ODOT use Metro's 2040 travel demand model to assess the long-term re-routing of traffic that will result from the implementation of tolling on this segment of I-205 and impact our communities.
2. We request that ODOT seek to understand both the difference between the increase of vehicles created by diversion and the impact of those increases on local roads where diversion and delays already occur. To achieve this, apply traffic simulation to determine the impacts of traffic congestion and delay on the arterial roads and signalized intersections that will be impacted by traffic re-routing from I-205 as a result of the implementation of tolling. This analysis should include state highways – and the roads that feed them – that serve as major arterials in surrounding communities, including but not limited to OR 99E, OR 212, OR 43, and OR 213.
3. We request that ODOT analyze the following alternatives in the Environmental Assessment:
 - A. The No-Build alternative should be identified as the full 6-lane improvement to I-205 without tolling. This alternative provides the best baseline to determine the impacts of the tolling alternatives.
 - B. The following alternatives from the "I-205 Toll Project Comparison of Screening Alternatives": Alternative #3, Alternative #4, and Alternative #5.
 - C. An alternative in which the OR 43 Arch Bridge is restricted to bike/ped modes only.
 - D. An alternative in which the existing OR 43 Arch Bridge is restricted to bike/ped modes only and a new vehicle bridge across the Willamette River between Oregon City and West Linn is added with sufficient capacity for forecasted 2050 traffic volumes.
 - E. An alternative in which the tolled area of I-205 extends from a location west of the Stafford Rd interchange to a location north of the OR 212 interchange.
 - F. For each of the above, we request that a version of the alternative be modeled in which equivalent tolls are implemented on I-5 in Portland and I-205 in Clackamas County as was

recommended in the 2018 Value Pricing Feasibility Study, and also a version in which only I-205 is modeled.

4. We also request that ODOT quantify the impacts of traffic re-routing on state highways and major city and county roads throughout the full extent of Clackamas, Multnomah, and Washington Counties, rather than focusing solely on highways and roads in Clackamas County. We believe that this project will have region-wide impacts and that to meet the intent of NEPA it is necessary that those impacts be analyzed.
5. We request more detailed analysis of how each alternative will meet project objectives by adding a peak hour performance measure analysis on all major roads. While an initial evaluation has been provided, we believe each alternative should receive a full analysis to allow a comparison of all the alternatives.
6. We request that ODOT assess the health and equity impacts of each alternative in the Environmental Assessment. We recognize the Equity and Mobility Advisory Committee (EMAC) will provide a more robust analysis of this need, but we highlight this as an opportunity to incorporate health and equity criteria into the performance measures analysis, perform an equity analysis by analyzing the performance measures for subareas with a high percentage of marginalized and vulnerable populations, and partner with Oregon Health Authority (OHA) Environmental Health to explore modeling options of health outcomes.
7. We request ODOT use this NEPA process to additionally assess the original intent of HB 2017 to toll the entirety of I-5 and I-205, between the Columbia River and their intersection north of Wilsonville. Value pricing as a means of congestion relief cannot be achieved as a pilot program where select communities bear the burden of discovery. If value pricing is to have a true impact in our region, ODOT and the region at large will benefit by studying those impacts now, and potentially pursuing those methods of value pricing if they truly model congestion relief. This approach not only favors a system-wide approach to congestion relief, but also removes the already observable and unfair model of penalizing several small communities to fund a project of statewide significance.

Finally, we feel obliged to reinforce our concerns for the impacts of diversion to communities immediately surrounding this project, as well as those peripheral to the project. Diversion already exists on local roads due to bottleneck congestion on I-205. Increased diversion to roads already accommodating diversion is likely to eliminate community support. Hence why Comment 3-A is so important. The I-205 Widening and Seismic Improvements Project must be considered completed for any of this to resonate with our local communities.

We also expect the NEPA analysis to inform how ODOT plans to remedy the impacts of tolling diversion where transportation gaps exist in this area, including a need for improved transit alternatives such as bus on shoulder access and connection routes around the project, improved pedestrian accommodation on projects where diversion will increase, and additional river crossings to accommodate diversion.

Thank you for considering our comments, and we look forward to your response as part of the NEPA process.

Sincerely,



Chair Jim Bernard
C4 Co-chair



Mayor Brian Hodson
C4 Co-chair

C4 Membership: Clackamas County; the Clackamas Cities of Canby, Estacada, Gladstone, Happy Valley, Lake Oswego, Milwaukie, Molalla, Oregon City, Rivergrove, Sandy, Tualatin, West Linn, Wilsonville; Clackamas CPOs, Hamlets, and Special Districts; Ex Officio Members including Metro, MPAC Citizen Port of Portland, Urban and Rural Transit



Lucinda Broussard, Toll Program Director
Oregon Department of Transportation
355 Capitol Street NE, MS 11
Salem, OR 97301-3871

Re: I-205 NEPA Alternatives Comment Period, August 3- September 16, 2020

Dear Director Broussard,

On behalf of the Gladstone City Council, we respectfully submit comments on the identified Purpose and Need of ODOT'S I-205 Toll Project and the alternatives that will be advanced through the project's National Environmental Protection Act (NEPA) analysis.

Tolling roads hurts local economies, reduces the quality of life in residential neighborhoods, and will have negative consequences on businesses and families. Gladstone is an older, underprivileged community in Clackamas County, with a population of about 11,905, that falls within the UGB for the Portland Metro area. Gladstone's senior population (19.1%) is higher than the County's or the region's and 12.1% of residents under the age of 65 are disabled. Many of Gladstone's workers are employed in low wage jobs (restaurants, retail) and according to the State of Oregon Employment Department, 5,113 of the people that live in Gladstone travel outside of the city for employment, and would be subjected to paying the toll roundtrip.

We have a lower percentage of college education residents and home ownership than either Clackamas County or the State. Our pre-COVID-19 unemployment rate (11.6%) was substantially higher than the County (9%) – and has dramatically worsened as a result of the pandemic.

Traffic diversion is also a serious problem, crowding secondary roads near tolling facilities. Specifically, in Gladstone, we are concerned about Arlington, Dartmouth, Gloucester, Portland Ave, Exeter, and Oatfield. Diverted traffic will contribute to traffic delays, traffic accidents, and accelerated deterioration of smaller secondary roads not built for such high use. Congestion caused by toll diversion also delays response times for emergency personnel who rely on alternative routes to quickly get to and from accidents and emergencies, raising legitimate public concerns.

For these reasons, we are opposed to any of the alternatives identified in the I-205 project and instead support the "no toll, no build" option. We understand that our infrastructure needs help, but it needs the right kind of help that specifically address congestion relief and we believe the tolls, are by far, the worst way to solve transportation funding deficit.

Thank you for considering our comments during the NEPA process.



GLADSTONE
Oregon

Tammy Stempel, Mayor

Matt Tracy, City Council President

Randy Ripley, City Councilor

Linda Neace, City Councilor

Neal Reisner, City Councilor

Tracy Todd, City Councilor

Tom Mersereau, City Councilor



September 11, 2020

Lucinda Broussard
Toll Program Director
Oregon Department of Transportation
355 Capitol Street NE, MS 11
Salem, OR 97301-3871

RE: I-205 Tolling NEPA and Alternatives Analysis Comment Letter

Dear Ms. Broussard:

On behalf of the City of Oregon City and with the full support of the Oregon City City Commission, I respectfully submit our comments on the Draft Purpose and Need Statement of the Oregon Department of Transportation (ODOT) I-205 Toll Project and the alternatives that will be advanced through the project's National Environmental Policy Act (NEPA) analysis into public record.

To begin, thank you for your inclusive involvement with local stakeholders since the inception of the newly formed ODOT Toll Program office. As you have likely discerned from your numerous meetings with a variety of cities and stakeholders, our communities recognize the importance of I-205 for Clackamas County and all of northern Oregon and are passionately concerned about the impacts anticipated from the proposed tolling of I-205 through not just Oregon City, but Clackamas County as a whole.

As ODOT begins the process of developing tolling on I-205 Oregon City has three principal concerns regarding the I-205 Tolling Project.

First, the financial necessity and the benefits of tolling this section of I-205 have not been clearly articulated. After years of improving the highway system of Oregon without the use of tolling, many residents and businesses in Oregon City and Clackamas County question why it is necessary that *this* project be tolled. Oregon City requests that a financial analysis of the I-205 Widening and Seismic Improvements project be released that justifies tolling and demonstrates that it cannot be completed without toll funding. As part of that review, we also request the Oregon Transportation Commission (OTC) substantiate its policy for funding of major highway improvements and assure stakeholders that tolling will be applied equitably to all major highway improvements in the region and the state. Oregon City and Clackamas County businesses and residents should not be required to shoulder

the cost of a major improvement to the state highway system, if others in the future will not be required to do the same.

Second, we are concerned about a lack of clarity around the intentions and policies regarding toll revenue allocation and urge that toll revenue generated in a project area remain in that project area. Based on recent comments from ODOT tolling staff we understand that their intent is to seek policy direction to ensure that toll revenue collected in the corridor remains in the corridor. We strongly support ODOT staff's intention and this concept. We urge OTC to affirm that I-205 toll revenues will only be used along the I-205 corridor and other regional and local roadways and alternative mode facilities impacted or missing in the affected corridor.

Third, and the most significant Oregon City concern is with the negative and disproportionate impacts and burdens to Oregon City. Although the Toll Program identifies benefits and burdens of the program regionally, when you take a deeper dive into those impacts at a local level, Oregon City bears many of the burdens and very few benefits. Additionally, the Tolling Program and the impacts to Oregon City are contrary to City Commission Goal 3: Enhance Livability of the Community.

- **Diversion:** Preliminary modeling results show substantial diversion and increases to traffic volumes on local roadways in Oregon City in all alternatives. We are concerned with the congestion that diversion will create on local roadways already nearing capacity, as well as the impacts to the locally owned roadway infrastructure deteriorating faster than we can maintain it. Additional congestion will decrease local reliability and efficient movement of goods and people through Oregon City. Diversion impacts can be seen and felt noticeably in downtown Oregon City today and will only increase with the implementation of tolling. Diversion onto local streets comes at the expense of Oregon City and our community.
- **Safety:** Crash trends are usually directly related to congestion and the reliability of the corridor. With more vehicle trips diverting to alternate routes, the crash trend in Downtown Oregon City, as well as the diversion routes, would be expected to increase.
- **Multi-Modal Options:** With a lack of adequate transit, bicycle, and pedestrian options available for mode shift, those vehicles not able or willing to pay the toll will be diverted to local streets. This will in turn decrease vehicle, bicycle, and pedestrian safety as the traffic volumes on local streets increase. The I-205 Improvements: Stafford Road to OR 213 do not currently include bicycle and pedestrian components, which leaves limited options for commuting along the I-205 corridor as a bicyclist or pedestrian. The OR 43 Arch Bridge is not a low stress or user-friendly option for walking and biking and all other routes are too far out of the travel path for most pedestrians and bicyclists. In order to provide adequate bicycle and pedestrian mode shift options along the corridor, it is imperative that ODOT continue to work with agencies to identify both a bicycle and pedestrian option across the Willamette River and a funding strategy to pay for the infrastructure. A key to a successful decrease in congestion is mode shift to transit. The current

transit options along I-205 are already insufficient and do not lend themselves to many opportunities for mode shift. In order to provide adequate transit mode shift options along the corridor, it is imperative that ODOT allow transit providers to run bus/shuttle on shoulder along the I-205 corridor. Transit Centers, park and rides and bus lanes in the Oregon City area are nonexistent or woefully ill-equipped, inefficient, and currently over capacity. The level of diversion projected on local roadways will impact the ability for existing and future transit service, centralized around the Oregon City Transit Center, to provide reliable and efficient transit service to the project corridor as well as the Oregon City community.

- **Economic Growth:** The COVID-19 pandemic has put unimaginable stress on our small business community and regrowth with fewer customers could disproportionately disadvantage those in Oregon City. Additional traffic on our roadways and gridlock in downtown Oregon City will make it difficult at best for businesses to survive, let alone thrive. We have made great strides in promoting tourism and continue to move forward with these efforts. We currently see 65% of employees in Oregon City commuting into Oregon City. Many of these jobs are service sector and retail jobs which pay lower wages. With tolling of I-205, we will likely see regional and state economic growth, but again it comes at the expense of Oregon City's economic growth.
- **Equity:** Oregon City has one of the only census tracts in the project area that qualifies for an Opportunity Zone, which identifies the area as economically distressed. Oregon City also has several neighborhoods that are Community Development Block Grant (CDBG) eligible. The CDBG program is set up to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. Oregon City has a high population of people who identify as having a disability. Additionally, many areas in Oregon City are included in the Transportation Equity Index as 'Above County Average' or are identified as persons experiencing disability.
- **Health & Social Services:** Oregon City is home to numerous health & social services. Many of the services are not available in other locations and people requiring these services will be burdened with paying a toll or diverting around the tolling.
 - Clackamas County Courthouse located in downtown Oregon City.
 - Providence Willamette Falls Medical Center is a full-service hospital serving the south metropolitan area
 - Clackamas County Health, Housing & Human Services, which provides free health clinics and services. These services are available to many of Clackamas County's historically underserved, and underrepresented communities.
 - Clackamas County Beavercreek Health Center, a free medical clinic.
- **Air Quality & Climate Change:** We agree that reducing congestion on I-205 will reduce vehicle air pollutants and greenhouse gas emissions through enhanced travel efficiency along I-205, but again that comes at an expense to Oregon City. With a lack of adequate transit, bicycle, and pedestrian options available for mode shift, those vehicles not able or willing to pay the toll will be diverted to local streets. This will

in turn increase the air pollutants and greenhouse gas emissions in Oregon City and surrounding cities. These impacts will be seen and felt considerably in downtown Oregon City.

- **Land Use Impacts:** Oregon City is identified as one of eight Regional Centers in the metro area, tasked with being the focus of redevelopment, multi-modal transit connections and concentrated growth. Metro's 2011 State of the Centers report notes that all regional centers, with the exception of Oregon City and Tanasbourne, are well connected to the rest of the region through Max Lines, the Westside Express Service (WES) commuter rail line and frequent bus service. Oregon City has worked hard over the years to support development of our downtown area. This has included approval and adoption of a variety of plans and strategies to support a mixed-use dense downtown area that also supports our place as a Regional Center.

Work to date has included:

- Updates to our Comprehensive Plan.
- In 2004 the Oregon Transportation Commission designated OR 99E in downtown Oregon City a Special Transportation Area (STA). This designation recognizes the local mobility and access needs in Oregon City's downtown are a priority and are as important as the highways' role to move through-traffic. ODOT describes an STA as a corridor where the convenience of movement is focused upon pedestrians, bicycle and transit modes. The primary objective of an STA is to provide access to and circulation amongst community activities, businesses and residences and to accommodate pedestrian, bicycle and transit movement along and across the highway
- The City has adopted the McLoughlin Boulevard Enhancement Plan (2005) which identified that OR 99E was to be converted to a more pedestrian friendly roadway with narrower travel lanes, reduced vehicle speeds, a raised landscape median, wider sidewalks, pockets of on-street parking, and pedestrian refuges. The City continues to work on implementing this plan and continues to create a more business friendly environment in our downtown.
- Adoption of a Multimodal Mixed-Use Area (MMA) in our downtown area in 2014 strengthened our desire to create a downtown that provides a high-quality area focused on alternative modes of transportation, and supports compact, mixed use development. This designation acknowledges our commitment to a different set of values that places importance on multimodal travel and a compact, mixed-use pattern of development.
- The City has adopted a Transportation Demand Management Plan (2017) to examine opportunities and challenges in parking, access and transportation related to the redevelopment of the Willamette Falls Legacy Project, which is directly adjacent to existing downtown Oregon City. The plan provides the foundation for a new multimodal vision for the greater Oregon City downtown.

Oregon City is split from the rest of the Metro area by I-205, the Willamette River and the Clackamas River and yet continues to develop and grow. Additional housing options are planned both in downtown and throughout the city . . . would you choose to live in a location where every time you enter or leave your city you are charged a toll?

Despite concerns with tolling as a policy for funding major transportation improvements, we recognize that ODOT is mandated to advance this project. Therefore, it is our intention to provide comments that will reduce the impacts and result in maximum benefit for not only Oregon City, but Clackamas County and its cities, the Portland region, and the State of Oregon. What follows is a list of comments that we believe will improve the alternatives ODOT advances for consideration under a NEPA analysis.

ODOT has provided Draft Goals & Objectives of the I-205 Toll Project. You state the goals describe desirable outcomes the Tolling Program. Following is a review and feedback on your draft goals:

- **Provide equitable benefits for all users**
 - It is imperative that the goals and objectives not only look at the Toll Program as a whole, but that it also looks at the micro level burdens and benefits for areas immediately adjacent to the project area, especially Oregon City.
 - The Oregon Transportation Commission concluded during the Value Pricing Feasibility Analysis and Proposed Implementation that “We must adopt strategies in combination with tolling to avoid negative impacts”. Currently, we do not believe the objectives adequately address local impacts of tolling. The current alternatives analysis does not fully account for quality of life impacts in Oregon City - citizens, business owners, employees, and visitors of Oregon City will not see equitable benefits, they will be charged a toll to enter or leave Oregon City, or will be required to create diversion on other local streets just to go about their daily needs.
- **Limit additional traffic diversion from I-205 to adjacent roads and neighborhoods**
 - The Performance Comparison Summary in the Open House states that all alternatives have Average Diversion compared to other alternatives, the impacts to Oregon City should not be considered average. The two alternatives proposed for moving forward (Alternative 3 & Alternative 4) show +30 to +40% change in volumes on both the Arch Bridge and along the downtown Oregon City screen line. An increase of this magnitude does not meet this goal as it pertains to adjacent roads and neighborhoods it is essential that the Tolling Program mitigate these impacts and burdens to adjacent neighborhoods.
 - To address the local tolling impacts, we ask that the limits of tolling be revisited and that an alternative in which the tolled area of I-205 extends from a location west of the Stafford Rd interchange to a location north of the OR 212 interchange.

- **Support safe travel regardless of mode of transportation**
 - We request this include enhanced vehicle safety on I-205, and local streets impacted by diversion, by reducing congested conditions.
 - As proposed, this does not address vehicle safety outside I-205. Just as you recommend multi-modal travel does not become less safe on local roadways affected by tolling, we request you also include vehicle travel does not become less safe on local roadways affected by tolling on I-205.
- **Improve air quality and reduce contributions to climate change effects**
 - We request this also look at the impacts of vehicle air pollutants and greenhouse gas emissions resulting from traffic congested on those local roadways which will receive the diversion vehicle trips.
 - Update to address how the local traffic increase from diversion and increased congestion will improve travel efficiency. Additionally, this increased local congestion is expected to impact transit reliability.
- **Support multi-modal transportation choices**
 - The I-205 Improvements: Stafford Road to OR 213 do not currently include bicycle and pedestrian components, which leaves limited options for commuting along the I-205 corridor as a bicyclist or pedestrian. We think that was short sided and a mistake. The OR 43 Arch Bridge is not a low stress or user-friendly option for walking and biking and all other routes are too far out of the travel path for most bicyclists. Through access to and from the Arch Bridge is imperfect. In order to provide adequate bicycle and pedestrian mode shift options along the corridor, it is imperative that ODOT continue to work with local agencies to identify not only a bicycle and pedestrian option across the Willamette River, but funding for the project as well.
- **Support regional economic growth**
 - We agree that alternatives recommended for advancement should provide for reliable and efficient movement of goods and people through the I-205 corridor. We request that the objective of this goal include reliable and efficient movement of goods and people through the I-205 corridor, and local streets impacted by diversion.
- **Support travel demand management**
 - We request this includes ways to improve efficient use of roadway infrastructure and travel time reliability on I-205, and local streets impacted by diversion.
- **Maximize integration with future toll systems**
 - We agree that alternatives recommended for advancement should provide a toll system that shall be expanded in scale, integrated with tolling on other regional roadways, and adapted to future toll system applications. This goal is imperative and we want to request that Oregon Transportation Commission clarify its policy for funding of all major highway improvements and assure stakeholders that tolling will be applied equitably to major highway improvements in the region and the state.

Following are our comments related to Regional Modeling:

1. The 2027 travel demand modeling used to select alternatives fails to adequately account for the long-term impacts of tolling on the surrounding communities. We request that ODOT use Metro's 2040 travel demand model to assess the long-term diversion of traffic that will result from the implementation of tolling on this segment of I-205 and impact Oregon City.
2. We request that ODOT seek to understand both the difference between the increase of vehicles created by diversion and the impact of those increases on local roads where diversion and delays already occur. To achieve this, apply traffic simulation to determine the impacts of traffic congestion and delay on the arterial roads and signalized intersections that will be impacted by traffic diversion from I-205 as a result of the implementation of tolling. This analysis should include state highways – and the roads that feed them – that serve as major arterials in surrounding communities, including but not limited to OR 99E, OR 212, OR 43, and OR 213. The City's current Transportation System Plan (TSP) did not include the impacts of tolling in the traffic forecasts and modeling. As such, the projects identified to mitigate forecasted growth in our TSP are only the very start of the necessary mitigation for the diversion from tolling. Beginning with our list of adopted transportation projects is only the start. This analysis should also address how the tolling program will mitigate those impacts of the tolling program. If diversion creates the volume increases as projected in preliminary modeling, how will downtown Oregon City be able to develop into the south metro area Regional Center that it is expected to become.
3. We request that ODOT analyze the following alternatives in the Environmental Assessment. For each of the alternatives listed below, we request that a version of the alternative be modeled in which equivalent tolls are implemented on I-5 in Portland and I-205 in Clackamas County as was recommended in the 2018 Value Pricing Feasibility Study, and also a version in which only I-205 is modeled.
 - a. The No-Build alternative should be identified as the full 6-lane improvement to I-205 without tolling. This alternative provides the best baseline to determine the impacts of the tolling alternatives. ODOT has stated: "ODOT plans to add a third lane in each direction and make the Abernethy Bridge seismically resilient, but construction funding is not available. Toll revenue could help pay for these improvements." Oregon City is concerned that tolling would be implemented on the existing two-lane segments on I-205, creating even more diversion from the current configuration and traffic volumes that we see today.

- b. The following alternatives from the “I-205 Toll Project Comparison of Screening Alternatives”: Alternative #3, Alternative #4, and Alternative #5.
 - c. An alternative in which the OR 43 Arch Bridge is restricted to bicycle/pedestrian modes only. ODOT, along with partner agencies that includes Oregon City, is currently beginning planning work on a “Pedestrian and Bicycle Crossing: Oregon City to West Linn” project. This project is intended to conduct a planning study and complete a comprehensive public outreach effort to identify a preferred location for a low stress bicycle/pedestrian bridge over the Willamette River in the vicinity of Oregon City and West Linn.
 - d. An alternative in which the existing OR 43 Arch Bridge is restricted to bicycle/pedestrian modes only and a new vehicle bridge across the Willamette River between Oregon City and West Linn is added with sufficient capacity for forecasted 2050 traffic volumes.
 - e. An alternative in which the tolled area of I-205 extends from a location west of the Stafford Rd interchange to a location north of the OR 212 interchange.
4. We also request that ODOT quantify the impacts of traffic diversion on state highways and major city and county roads throughout the full extent of Clackamas, Multnomah, and Washington Counties, rather than focusing solely on highways and roads in Clackamas County. We believe that this project will have region-wide impacts and that to meet the intent of NEPA it is necessary that those impacts be analyzed.
5. We request more detailed analysis of how each alternative will meet project objectives by adding a peak hour performance measure analysis on all major roads. While an initial evaluation has been provided, we believe each alternative should receive a full analysis to allow a comparison of all the alternatives.
6. We request that ODOT assess the health and equity impacts of each alternative in the Environmental Assessment. We recognize the Equity and Mobility Advisory Committee (EMAC) will provide a more robust analysis of this need, but we highlight this as an opportunity to incorporate health and equity criteria into the performance measures analysis, perform an equity analysis by analyzing the performance measures for subareas with a high percentage of marginalized and vulnerable populations, and partner with Oregon Health Authority (OHA) Environmental Health to explore modeling options of health outcomes.

We request ODOT use this NEPA process to additionally assess the original intent of HB 2017 to toll the entirety of I-5 and I-205, between the Columbia River and their intersection north of Wilsonville. Value pricing as a means of congestion relief cannot be achieved as a pilot program where select communities bear the burden of discovery. If value pricing is to have a true impact in our region, ODOT and the region at large will benefit by studying those impacts now, and potentially pursuing those methods of value pricing if they truly

model congestion relief. This approach not only favors a system-wide approach to congestion relief, but also removes the already observable and unfair model of penalizing several small communities to fund a project of statewide significance.

Finally, we feel obliged to reinforce our concerns for the impacts of diversion to Oregon City. Diversion already exists on local roads due to bottleneck congestion on I-205, and is experienced on the OR 43 Arch Bridge, OR 99E and downtown Oregon City regularly. Increased diversion to roads already accommodating diversion is expected to eliminate community support. The I-205 Widening and Seismic Improvements Project must be considered completed for any of this to resonate with Oregon City.

We also expect the NEPA analysis to inform how ODOT plans to address and mitigate the impacts and burdens of tolling. In order to see the expected mode shift from single occupancy vehicles, adequate opportunities need to be available. This will require improved transit alternatives (bus/shuttle on shoulder and connection routes around the project), improved bicycle and pedestrian accommodations on roadways where diversion will increase as well as adequate bicycle and pedestrian options across the Willamette River.

Thank you for considering our comments, and we look forward to your response as part of the NEPA process.

Sincerely,



Anthony J. Konkol, III
City Manager

cc: City Commission

P:\PublicWorks\Transportation\ODOT Value Pricing & Tolling\NEPA\I-205 Tolling NEPA Comment Letter Oregon City - Final Draft for Signing.docx



City of Tualatin

www.tualatinoregon.gov

August 25, 2020

Lucinda Broussard, Toll Program Director
Oregon Department of Transportation
355 Capitol Street NE, MS11
Salem, Oregon 97301

RE: I-205 NEPA Alternatives Comment Period – City of Tualatin comments

Dear Director Broussard:

On behalf of the Tualatin City Council, I respectfully submit the following comments into the public record as a part of the National Environmental Protection Act (NEPA) comment period on the I-205 tolling alternatives:

1. Please clarify that revenues gained from I-205 tolling will be for investment in the I-205 corridor.
2. The NEPA analysis should fully account for the quality of life impacts from tolling and diversion, especially on businesses, neighborhoods, and schools that serve our equity populations. We are very concerned about the impacts to transportation reliability and access, public health, the environment, and economic impact to family and business budgets. With increased automobile traffic due to diversion on local roads, we are concerned about safety conflicts and air quality, as vehicles will spend more time in congestion emitting carbon.
3. The analysis should go beyond simple mitigation to propose and identify a funding plan for equity-informed improvements for increased transportation options and programs to serve lower income and historically marginalized communities, as is identified as a best practice in TransForm's "*Pricing Roads, Advancing Equity*" report and toolkit. The I-205 corridor has limited parallel transportation routes and many of those are severely lacking of basic safety infrastructure for pedestrians and cyclists.


Of specific importance is Borland Road, which has no transit service and is lacking safety infrastructure for pedestrians and cyclists, yet is home to a free clinic, food bank, day home serving people experiencing homelessness, and a warming/cooling center.

4. Before removing any I-205 alternatives for consideration, we would like to see the following actions, as they will better examine the reality of when I-205 tolling would be in place:
 - a. Run the model with I-5 tolling assumed

- b. Run the model with a 2040 horizon, which would be similar to other major projects in the area, such as the Southwest Corridor
 - c. Greater analysis needs to be completed on the impact to equity and health, specifically with emissions and worker commuting data
5. Clarify how the list of goals and objectives will be addressed and incorporated into the project. Traditionally, NEPA documents are guided by the purpose and need statement and federally required areas of analysis and disclosure. The proposed list of goals and objectives represents categories which are traditionally not studied through a NEPA process. Since these items address many of the equity-based concerns, they should be more than data point considerations in the process to get to a locally preferred alternative. How will solutions, such as new programs or transportation improvements, that derive from equity-based discussions be planned and funded?
 6. In addition to alternatives 3 and 4, we recommend furthering analysis of alternative 5 into NEPA.
 7. We recommend adding an alternative into the NEPA process where the tolled area extends from a location west of Stafford Road to a location north of the OR 212 interchange. We understand that this would include area located outside of the construction footprint of I-205, but we do not see this as a limiting factor. When I-5 tolling alternatives are selected, there will be no connection to a specific project's construction footprint.
 8. With our understanding of the purpose and need statement's importance in NEPA decision-making, and dedication to equity on this project, we believe that it is imperative that equity be referenced in the project's purpose and needs statement.
 9. We understand that this section of I-205 was selected from the 2018 Value Pricing Feasibility Study, but we would recommend that tolling be considered at a regional-scale to address the major chokepoints of the Boones Bridge and Columbia River Crossing. The current situation of spot tolling has unequal impacts on the region, as only certain communities will bear the greatest burden.
 10. What is the cost of the multiple-year study of tolling I-205? What are the sources and who authorized the funding? In this time of economic uncertainty, why is delaying this project not being considered?
 11. How will the project incorporate post-COVID-19 driving conditions and transportation patterns into the tolling study? For example, with the major economic and lifestyle shifts underway – such as a greater proportion of people working from home or needing access to a social safety net – this could have a major impact on future transportation patterns and needs.

We look forward to discussing your consideration and incorporation of our comments, questions, and requests into this project. We look forward to your response as a part of the NEPA process.

Sincerely,



Frank Bubenik, Mayor



CITY OF West Linn

September 15, 2020

Lucinda Broussard, Toll Program Director
Oregon Department of Transportation
355 Capitol Street NE, MS 11
Salem, OR 97301-3871

RE: I-205 NEPA Alternatives Comment Period

Dear Ms. Broussard,

On behalf of the City of West Linn, this letter outlines principal concerns with the Oregon Department of Transportation's (ODOT) NEPA review process and proposed plan to toll a limited stretch of Interstate 205 in our region. While we appreciate ODOT's outreach efforts on this matter, ODOT's proposed plan effectively continues to place the burden of essential and critical proposed upgrades to the Abernethy Bridge and Interstate squarely on the shoulders of local residents.

The ODOT tolling plan is deficient in at least four major ways:

- 1) It unfairly places a disproportionate burden for funding these needed upgrades on the local residents who, because of otherwise insufficient transportation and transit infrastructure, must utilize the facilities on a daily basis; and
- 2) It upends decades of precedent which has allocated the cost of major transportation projects to all interstate users; and
- 3) It has failed to consider the input of West Linn and other local city and county residents, who have made it clear that they do not want to be unfairly targeted for 100% of the burden of paying for this project; and
- 4) It has ignored the opportunity to ask that the state legislature and the federal government allocate funding for these two projects as they have done for highway projects along the I-5 corridor in Eugene/Springfield, Highway 97 in Central Oregon, Interstate 84, or along coastal Highway 101. This point was also made by other cities in the region, as well as the C4 Regional Transportation Coordinating Committee, made up of dozens of regional transportation leaders.

The C4 letter also made a number of key points which we support and wish to re-emphasize two key aspects at this time - these include:

A Regionwide Approach to Tolling (as suggested in the legislative intent in HB2017): *"We request ODOT use this NEPA process to additionally assess the original intent of HB 2017 to toll the entirety of I-5 and I-205, between the Columbia River and their intersection north of Wilsonville. Value pricing as a means of congestion relief cannot be achieved as a pilot program where select communities bear the burden of discovery. If value pricing is to have a true impact in our region, ODOT and the region at large will benefit by studying those impacts now, and potentially pursuing those methods of value pricing if they truly model congestion relief. This approach not only favors a system-wide approach to congestion relief, but also removes the already observable and unfair model of penalizing several small communities to fund a project of statewide significance."*

Diversion: *"Diversion already exists on local roads due to bottleneck congestion on I-205. Increased diversion to roads already accommodating diversion is likely to eliminate community support. Hence why Comment 3-A is so important. The I-205 Widening and Seismic Improvements Project must be considered completed for any of this*



CITY OF West Linn

to resonate with our local communities. We also expect the NEPA analysis to inform how ODOT plans to remedy the impacts of tolling diversion where transportation gaps exist in this area, including a need for improved transit alternatives such as bus on shoulder access and connection routes around the project, improved pedestrian accommodation on projects where diversion will increase, and additional river crossings to accommodate diversion.

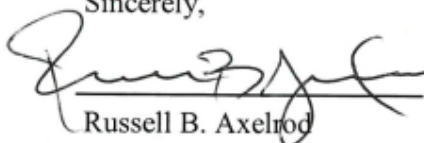
We know that ODOT understands the dire situation facing the Abernethy Bridge, and the serious safety incidents which occur almost daily along I-205. This stretch of federal highway cries out for an immediate fix. The design work is practically completed, and construction needs to begin. Yet, a "tolling-only" plan, as proposed, will very likely lead to further delays in the project.

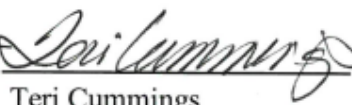
Instead, we urge the Department and the Oregon Transportation Commission to consider a plan which:

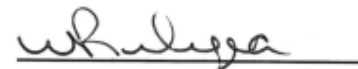
- A) Prioritizes securing immediate funding from the state legislature and any potential federal infrastructure package (the tried and proven approach that has worked for every single state highway project in the state since the 1970s);
- B) Suggests tolling only once a comprehensive, **regionwide** dialogue -- complete with public buy-in -- has been secured, and any tolling is not focused squarely and solely on the residents of West Linn, Oregon City, Milwaukie, Wilsonville, Gladstone, Tualatin, etc. At the very least, the plan needs to recommend a simultaneous and regionwide tolling approach on all major transportation highways (e.g., I-5, I-205, I-84, 217, 26), or at minimum the entirety of I-205 and I-5 through the Metro region. Further, if ODOT is unwilling to consider this alternative, and is to move forward with tolling on a limited confined reach (i.e., Stafford Rd to Abernethy Bridge or Hwy 213), then all funds generated by that tolling **must** be spent within this area **and** ODOT should extend/expand the length of any tolling for a proposed limited segment (such as the proposed Stafford Rd to Abernethy Bridge) to different endpoints to minimize problems with diversion etc. locally - for example extend the tolling reach on I-205 to between I-5 on the south and Hwy 224 on the north;
- C) Prioritizes getting construction underway as soon as possible in order to avoid severe inflationary cost drivers.

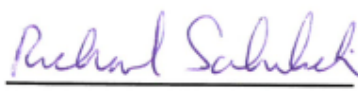
We stand ready to join arms in support of a revised ODOT plan, and ready to get to the business of upgrading this important stretch of highway which runs through the middle of West Linn and our neighboring communities.


Sincerely,

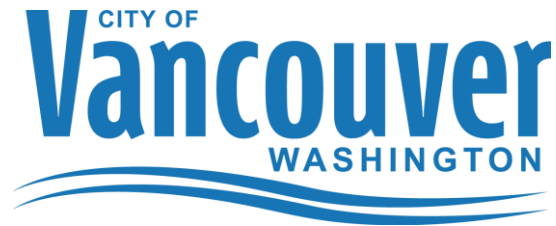

Russell B. Axelrod
Mayor


Teri Cummings
Council President


William Relyea
Councilor


Richard Sakelik
Councilor


Jules Walters
Councilor



October 16, 2020

Lucinda Broussard, Toll Program Director
Oregon Department of Transportation
Lucinda.Broussard@odot.state.or.us;

Emily Cline, Environmental Program Manager
Federal Highway Administration
emily.cline@dot.gov

RE: Agency Comments on I-205 Tolling Project Environmental Assessment Documents

This letter provides comments from the City of Vancouver, Washington, with regards to the I-205 Toll Project Environmental Assessment scoping comments. These comments pertain to the project's published Purpose and Need Statement. In addition, it reiterates the Vancouver City Council's policy framework for regional congestion pricing/tolling efforts more broadly.

The Vancouver City Council continues to recognize the significant impacts of highway congestion on the bi-state region. In the two years since the Vancouver City Council last provided testimony on tolling concepts through the Value Pricing Feasibility Study, the need to work together to fund and implement improvements to the bi-state regional transportation system- including bottleneck relief, seismic/safety upgrades, and operational and multi-modal enhancements- has only increased. Recognizing that tolling projects will have substantial impacts on commuters from around the Portland-Vancouver Metropolitan region, the Vancouver City Council will continue to advocate for fair and equitable solutions on behalf of our citizens. Our Council is appreciative that the current plan appears responsive to the issues outlined in our 2018 testimony and of the level of communication we've received from ODOT to date, and we expect the transparency and collaborative nature of the project to continue going forward.

While the current conversation is focused on the I-205 tolling project, the Vancouver City Council recognizes that policies emerging from this effort will have implications and applications region-wide, and the Council's comments reflect that. For the Vancouver City Council to support a congestion pricing proposal, it must provide equitable distribution of both impacts and benefits and reflect the principles identified below under the City's Congestion Pricing Policy Framework.

COMMENTS- PURPOSE AND NEED STATEMENT

We recommend making the following changes and clarifications to the Goals and Objectives:

- If the I-205 Toll Project is the first among several Toll Projects that are under consideration in the region (ex. I-205 Toll Project; I-5 Toll Project, I-5 Interstate Bridge Toll Project), the cumulative impact analysis should consider how populations will be impacted by multiple tolling projects, and, what are the cumulative impacts of multiple toll projects?
- The question of geographic equity in the funding and distribution of benefits of transportation improvements needs to be addressed. For example, will travelers in north-south corridors need to pay tolls to fund congestion relief projects, while east-west travelers congestion relief projects are funded through other means? What are the implications of this for diversion on to local roadways and who will be impacted by this diversion?
- Alternatives analysis should include as much detail as possible about Users who will be paying the proposed tolls and be evaluated at the Metropolitan Planning Area (MPA) geography. User considerations should include:
 1. Freight, commercial and private vehicle toll payers
 2. Income and other socioeconomic information of toll payers
 3. Resident location of toll payers, - local (within x miles of the tolled facility), by city, county and state of residence
- The Goals and Objectives discloses a factor of consideration as the flexibility for *Implementation and Operations* of the I-205 toll system as it relates to the possible expansion of tolling across the regional system. The impact analysis should define what the entire system is (as known now), and describe and address criterion being used for evaluating *Implementation and Operations* as part of the impact assessment.
- In addition, we recommend adding the following language to the Goals and Objectives section:
 - Goal: Support regional economic growth- add language about increasing access to jobs and employment centers throughout the region.
 - Goal: Support multi-modal transportation choices- add language about supporting increased transit options and frequency of transit service in project area.

CITY OF VANCOUVER CONGESTION PRICING POLICY FRAMEWORK

Regional Mitigation

The mitigation strategy for any congestion pricing project must consider the entire regional system, be equally applicable in both Oregon and Washington, and include all impacted local street systems and highways. All impacts, both direct and indirect, must be addressed by mitigation strategies that are proportional to the impact.

- Low-income residents of SW Washington must be able to access, without additional burden, discounts or subsidies that are established as part of any tolling program.
- Mitigation strategies that focus on increased transit must apply throughout the bi-state region.

As the only transit provider that operates in both Oregon and Washington, C-TRAN will be a key partner in providing enhanced service and expanded transportation options.

- In relation to transit, ODOT staff have indicated that tolling revenues may be used to support capital improvements but cannot fund expanded transit service and operational costs.
- Prior to implementation of any congestion pricing concept, regulatory barriers to using tolling revenues to fund transit operations, and geographic limitations on where funding can be directed, must be remedied.

Regional Analysis of the Bi-State Transportation System

Coordination with metropolitan area transportation and transit related agencies, including those in Southwest Washington, must be thoughtful and ongoing throughout the planning process for any long-term change to the regional, bi-state system.

- The current I-205 Toll Project, and future tolling projects on Interstate 5, will have impacts on the entire regional transportation system. The impact analysis for any tolling proposal must evaluate these system-wide impacts, and should not be limited to the areas directly adjacent to tolls. This should include local street systems and highways.
- A full analysis of the regional bi-state transportation system is required to understand potential future impacts of a priced regional system. This analysis must be conducted prior to implementation of a priced system concept (Concept C from the Value Pricing Feasibility Study), and should be the basis for determining what roadways are included in it.

Regional Project Implementation

Tolling revenues should be used to address capacity issues throughout the bi-state region, including regionally significant bottleneck projects, transit enhancements and other multi-modal improvements. We support capacity improvements that benefit the people who pay the toll.

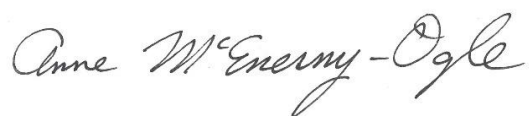
- In order to ensure that benefits are distributed equitably, improvements should be tied to the corridor where the revenue is generated.
- Increased transit options must be provided regardless of state of origin.
- Tolling revenues should be used to support capacity improvements identified in and consistent with adopted regional plans.

Regional Engagement

- The timeline for the I-205 Toll Project and other future congestion pricing projects must be sufficient to ensure that residents and policymakers throughout the region have the opportunity for meaningful participation.
- The current I-205 Toll Project and future congestion pricing projects represent a significant change to our regional transportation system. All projects should include a high level of transparency, have comprehensive risk management strategies, and be phased to contain disruptions to small areas, with the most congested areas being transitioned last.
- The Oregon Department of Transportation must continue to engage with policymakers and constituencies in Southwest Washington.

Past bi-state planning and coordination has resulted in significant and equitably beneficial regional infrastructure improvements. The Vancouver City Council hopes our concerns are acknowledged and addressed and the implementation of congestion pricing is collaborative and equitable. As a Participating Agency, we welcome the opportunity to comment on the draft Purpose and Need and Goals and Objectives for the I-205 Toll Project, and recognize that it will have implications for other future congestion pricing projects throughout the region.

Sincerely,



Anne McEnerny-Ogle, Mayor
City of Vancouver, Washington



600 NE Grand Ave.
Portland, OR 97232-2736
oregonmetro.gov

September 16, 2020

Robert Van Brocklin, Chair
Oregon Transportation Commission
355 Capitol St NE
Salem, Oregon 97301

RE: I-205 Tolling Project Comments

Dear Chair Van Brocklin and members of the Oregon Transportation Commission,

Metro Council is writing to express our support to the Oregon Transportation Commission (OTC) for the I-205 Tolling Project. We are submitting comments for the record as part of the formal comment period for the I-205 Tolling NEPA process. Metro is a Participating Agency in the NEPA process and we are committed to working with you and the Oregon Department of Transportation (ODOT) towards a successful outcome of the I-205 Tolling Project, which will reduce traffic congestion while creating revenue for transportation.

I-205 is a corridor of significant regional and state interest. It connects employers, the traveling public, and businesses to the Portland International Airport, the state of Washington, and numerous local jurisdictions. The corridor serves as vital infrastructure for the economic health of both the region and the entire state of Oregon. I-205 is often congested at the peak hour, by both daily commuters and freight. The I-205 Tolling Project, with congestion pricing, presents an opportunity to manage traffic while providing much-needed transportation revenue to the region.

Metro Council has a long history of adopting policies and plans that support congestion pricing. For example, reliability and efficiency are expressly noted in Goal 4 of the Regional Transportation Plan and objective 4.6 states: *Expand the use of pricing strategies to manage vehicle congestion and encourage shared trips and use of transit.* As we have learned from other regions, states and countries, congestion pricing can be a powerful tool to manage the transportation system and reduce impacts on climate change. Therefore Metro is pleased to be your partner in the first tolling project in the state of Oregon. Below are our comments for your consideration:

- 1. We respectfully request that the OTC include transportation demand management in the Purpose and Need Statement of the I-205 Tolling Project.** OTC and ODOT have expressed the desire for the I-205 Tolling Project to achieve the dual purpose of managing demand and raising revenue for transportation. This needs to be stated clearly in the Purpose and Need statement of the NEPA document as an essential component of any successful alternative, and not just the objectives.

2. **The I-205 Tolling Project and I-5 Tolling Project should be implemented simultaneously to maximize efficiency of the regional system and reduce greenhouse gases.** The traffic on the I-205 corridor and the I-5 corridor is interconnected, and traffic from one can easily be diverted to the other. In order to manage the system, these two major high-volume corridors need to operate in conjunction to make the entire Portland region system more efficient. Tolling is one of the best tools available for managing congestion.
3. **The I-205 Tolling Project should be implemented with an equity lens.** Specifically, ODOT should provide solutions for low-income persons and Black Indigenous and People of Color (BIPOC) who may be disproportionately impacted by the cost of the toll and/or diversion. Equity outcomes can be achieved in multiple ways, including offering discounts or exceptions from pricing, or using the revenue from the pricing in ways that provide options that benefit BIPOC communities, low income families, and other transportation disadvantaged groups. We applaud ODOT's work to form an Equity Mobility Advisory Committee (EMAC) as a voice for equity in this and future tolling projects in Oregon.
4. **The term "corridor" should be defined comprehensively when referring to both the I-205 Tolling Project and the I-5 Tolling Project to allow a range of solutions specific to each corridor.** Metro has a long-standing definition of a "mobility corridor" that includes nearby land uses, interchanges and multi-modal connections that are adjacent, near or parallel to the primary facility. We ask OTC to adopt a similar definition of a mobility corridor when making decisions about revenue and needed improvements, which will allow ODOT to provide multi-faceted and multi-modal solutions. This broader definition can help focus improvements in the immediate areas most likely to be impacted by the projects. While the term "mobility corridor" should be consistent for both tolling projects, Metro Council recognizes that the I-205 corridor has specific needs when it comes to mobility and therefore revenue raised from any tolling on I-205 should be spent on improvements that benefit users impacted by the tolling on I-205, within the broader I-205 corridor.
5. **For each alternative, ODOT should take into account diversion and multi-modal travel.** While conducting the alternatives analysis for NEPA, ODOT should take into account diversion on local streets and the transportation options that are available or could be available in the future.
6. **We recommend that the OTC continue to engage and consult Metro Council, the Joint Policy Advisory Committee (JPACT) and the public in the Portland region on all major decisions regarding the I-205 Tolling Project.** The tolling project will have localized and regional impacts, and the project needs to engage the leadership representing these geographies. As a Participating Agency in the NEPA process, Metro looks forward to working with ODOT to ensure the success of the I-205 Tolling Project. We appreciate the extensive outreach that ODOT has done to date on this project, and we recommend that ODOT continue to solicit input from the community as well as regional committees moving forward.

Thank you for your consideration of these concerns. Metro appreciates the engagement with OTC on this important project. There continues to be a need for a comprehensive congestion pricing strategy

for the Portland Metro region. As part of a Metro-led Regional Congestion Pricing Study, Metro will share information and lessons learned in partnership with ODOT and local agencies.

Thank you,



Lynn Peterson, Council President



Juan Carlos González, Deputy Council President
and District 4 Councilor



Sam Chase, Metro Councilor, District 5



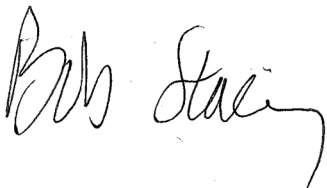
Shirley Craddick, Metro Councilor, District 1



Craig Dirksen, Metro Councilor, District 3



Christine Lewis, Metro Councilor, District 2



Bob Stacey, Metro Councilor, District 6



600 NE Grand Ave.
Portland, OR 97232-2736
oregonmetro.gov

September 16, 2020

Ms. Lucinda Broussard
Toll Program Director
Oregon Department of Transportation
355 Capitol Street NE, MS 11
Salem, OR 97301-3871

Subject: I-205 Toll Project - Metro Staff Comments on Purpose and Need, Screening, and Performance Measures

Dear Ms. Broussard:

Thank you for the opportunity to comment on the I-205 Toll Project. As a Participating Agency, Metro staff is offering the following letter as official feedback on the Draft Purpose and Need and performance measures, and on the Comparison of I-205 Screening Alternatives Technical Report.

As you know, the I-205 Toll Project is the first tolling project to be considered in our region in many years. The project would provide a unique opportunity to support our region's goals by addressing travel demand management, congestion, equity, safety, and climate goals. Tolling is one of the strongest tools available to manage travel demand, and can take the place of adding more capacity to address our region's congestion problems. Implementation of tolling will likely have significant repercussions for our regional transportation network operations, so identifying the need for travel demand management and equity as essential project components is critical to ensuring that our region can meet our shared goals as set forth in the Regional Transportation Plan adopted by Metro Council and our regional partners in 2018.

Metro Comments on the I-205 Toll Project Purpose and Need

Metro staff has reviewed the materials provided by ODOT and has the following comments.

ODOT's Draft Purpose

- *Manage congestion on I-205 between Stafford Road and OR 213*
- *Generate revenue for congestion relief*

Metro recommends additional language:

Travel demand management (TDM) is essential for the tolling project to be successful at supporting efficient use of our region's transportation infrastructure. Metro recommends TDM be added to the project purpose. *Either* replace the first bullet in the Draft Purpose with the following:

- *Manage congestion on I-205 between Stafford Road and OR 213 through travel demand management and infrastructure improvements*

Or add the following bullet:

- *Manage travel demand on I-205 and OR 213*

ODOT's Draft Need

- *Regional*
 - *3.3% population increase (2015 – 2017)*
 - *20.1% vehicle hours of delay increase (2015 – 2017)*
 - *13.4 % hours of congestion increase (2015 – 2017)*
 - *Freight tonnage movements projected to double by 2040*

- *I-205 Stafford Road to OR 213*
 - *More than 6 hours of congestion daily (2017)*
 - *NB direction is top reoccurring bottleneck during pm commute*

- *Funding needed for congestion relief projects*
 - *I-205 Widening and Seismic Improvements Project, including Abernethy Bridge*

Metro recommends adding the following bullets:

- *Travel demand management is needed for the efficient use of transportation infrastructure and can help reduce emissions*
- *Equitable distribution of benefits is important for the part of the region most likely to be impacted by the tolls and for groups more likely to be experiencing transportation disadvantages, such as Black, Indigenous, and People of Color (BIPOC), low-income, elderly, or disabled people.*

ODOT's Draft Goals and Objectives:

- *Minimize additional traffic rerouting*
 - *Toll system design*
 - *Safety Improvements*
- *Improve Air Quality*
 - *Reduce GHG emissions*
- *Minimize noise impacts*
 - *Toll system design*
- *Support Transportation Choices*
 - *Transit, telework, ridesharing, and infrastructure*
- *Provide equitable benefits for all users*
 - *Populations who have been historically underserved or negatively impacted by transportation projects.*
 - *Engage harder to reach communities*
 - *Equitable and reliable job access*

Metro recommends adding to the goals and objectives:

Overall, this a good list. Metro proposes that ODOT explicitly call out the goal of Travel Demand Management and add clarifying language to the last bullet. Language recommended:

- *Support Travel Demand Management*
 - *Pricing is implemented to lead to the more efficient use of infrastructure and reduce trips during peak/congested times*

- Under bullet “ *Provide equitable benefits for all users*” add the following:
 - Populations and geographies most likely to be impacted by a toll should be considered for improvements to expand travel options (transit, bike, and pedestrian improvements).

Metro comments on the I-205 Toll Project Performance Measures

Overall, the measures presented capture many important issues. However, there are a few changes that will better measure the benefits and impacts of the project as follows:

Under Highway Traffic Operations, the performance measure should have a second bullet to expand on the vehicle throughput and capture the high vehicle occupancy such as carpools, vanpools and transit. Suggested bullet:

- Person throughput on I-205 segments between Stafford and OR 213.

Non-Modeled (qualitative) Criteria should have an additional measure: Suggested addition:

- Affordability for transportation disadvantaged groups (BIPOC, low income, disabled, elderly)
 - This may include plans for driver discounts, caps on fees, and exemptions. Examples include: free or discounted transponders, toll discount or credits for low-income households, exemptions for people with disabilities, and no tolls during off-peak hours. In addition, transit discounts will be explored.

Metro Comments on Comparison of I-205 Screening Alternatives Technical Report

Alternatives

The report recommends moving forward with Alternatives 3 and 4 in the Environmental Assessment. While Metro staff agree that Alternatives 3 and 4 should move forward for consideration, we also believe ODOT should consider moving Alternative 5 forward for further analysis. Alternative 5 performed the best of the five alternatives for transportation system management (also known as travel demand management). As stated earlier, Metro believes that travel demand management is a central purpose for tolling I-205. Demand management is identified in both the Regional Transportation Plan and in Oregon state law [ORS 366.292 and HB 2017 Section 120(3)] as a desired and necessary outcome from roadway pricing.

In addition to further study of Alternative 5, Metro recommends considering modifications to Alternatives 3 and 4 to improve their travel demand management performance as part of the environmental analysis.

Other screening considerations

Metro proposes that screening consider analysis at the Regional Transportation Plan’s **Mobility Corridor** scale. The 2018 Regional Transportation Plan identified a number of mobility corridors as a useful geography to understand how people travel and potential land use implications for travelers.

Metro applauds ODOT for establishing the Equitable Mobility Advisory Committee (EMAC) as an advisory committee on equity considerations for the project and tolling in general. Metro proposes

that the project review alternatives using an equity lens when assessing their impacts and benefits. An equity lens should include special considerations for people already marginalized by our current transportation system. Consequently, impacts to BIPOC community members experiencing disproportionate burdens, as well as low income, disabled, and people with limited access to automobiles, among others. The equity lens should take into consideration which geographies are most affected.

Thank you for the opportunity to comment on this important project. Metro appreciates the engagement with ODOT on this project to date. We look forward to our continued collaboration to ensure that the I-205 Toll Project will benefit our region and accomplish our shared regional goals.

Sincerely,

A handwritten signature in blue ink, appearing to read 'M. Bradway', is positioned above the typed name.

Margi Bradway, Planning & Development Deputy Director

PBOT

PORTLAND BUREAU OF TRANSPORTATION

1120 SW Fifth Ave, Suite 1331, Portland OR 97204

Main: 503-823-5185 TTY: 503-823-6868 Fax: 503-823-7576

Chloe Eudaly Commissioner **Chris Warner** Director

August 26, 2020

Ms. Lucinda Broussard
Toll Program Director
Oregon Department of Transportation
355 Capitol Street NE, MS 11
Salem, OR 97301-3871

Dear Director Broussard,

As a Participating Agency on the I-205 Toll Project, this letter serves as the City of Portland's official feedback on the Draft Agency Coordination Plan.

The I-205 Toll Project is an important project not only for the project area where it is being implemented, but for the entire Portland metro region. The comprehensive list of state, regional, and local agencies identified in the Draft Agency Coordination Plan demonstrates that the potential impacts from the project are far reaching.

While it is important for individual agencies to provide feedback, collaboration and coordination across agencies can lead to even better outcomes. It will be valuable for the participating agencies to come together to discuss concerns and opportunities, especially as the project relates to future tolling projects throughout the region. The Joint Policy Advisory Committee on Transportation (JPACT) is an established forum for these conversations and should be given opportunities to provide input into the I-205 Toll Project.

Throughout all stages the project, I would also encourage the project team to hear from as many voices as possible outside of government agencies, and especially from our Black, Indigenous, and People of Color community members who have often experienced the greatest burdens from our transportation decisions.

Thank you again for collaborating with us on the I-205 Toll Project.

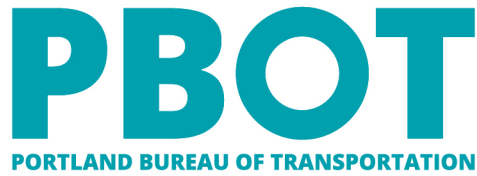
Sincerely,



Chris Warner, Director
City of Portland, Bureau of Transportation



The City of Portland ensures meaningful access to city programs, services, and activities to comply with Civil Rights Title VI and ADA Title II laws and reasonably provides: translation, interpretation, modifications, accommodations, alternative formats, auxiliary aids and services. To request these services, contact 503-823-5185, City TTY 503-823-6868, Relay Service: 711.



1120 SW Fifth Ave, Suite 1331, Portland OR 97204

Main: 503-823-5185 TTY: 503-823-6868 Fax: 503-823-7576

Chloe Eudaly Commissioner **Chris Warner** Director

August 26, 2020

Ms. Lucinda Broussard
Toll Program Director
Oregon Department of Transportation
355 Capitol Street NE, MS 11
Salem, OR 97301-3871

Dear Director Broussard,

As a Participating Agency on the I-205 Toll Project, this letter serves as the City of Portland's official feedback on the draft Purpose and Need Statement.

The I-205 Toll Project offers the region an opportunity to begin to use roadway pricing to advance the equity, climate, safety, and demand management goals that have been adopted in the Regional Transportation Plan. It is critical that the project moves us closer to a more equitable transportation system, reduces greenhouse gas emissions, decreases the number of serious and fatal crashes in the corridor, and improves travel times and reliability.

It is with these values in mind, that we offer the following feedback on the Purpose and Need Statement.

Purpose Statement

As it is currently written, the draft purpose statement does not address important goals that have been identified by the region: equity, safety, and climate. The purpose of pricing should not just be about moving cars and raising revenue, but rather it should be about making things better for people. It should be used to improve access to opportunities, especially for those who have been historically harmed by transportation and other governmental investments. It should be done in a way that reduces serious and fatal injuries. It should focus on reducing the greenhouse gas emissions that are generated in the corridor. It should lead to better and more reliable travel times so that people can get where they need to go.



The City of Portland ensures meaningful access to city programs, services, and activities to comply with Civil Rights Title VI and ADA Title II laws and reasonably provides: translation, interpretation, modifications, accommodations, alternative formats, auxiliary aids and services. To request these services, contact 503-823-5185, City TTY 503-823-6868, Relay Service: 711.

Because this project is ultimately about people, it should also be broadened to recognize that the revenue generated should be used not just to fund congestion relief projects, but to increase access and mobility for people and good.

We recommend the following as a purpose statement:

Manage transportation system demand on I-205 between Stafford Road and Oregon Route 213 (OR 213) in a manner that is safe, reliable, equitable, cost-effective and maximizes efficient use of current and future roadway capacity, while avoiding, minimizing, or mitigating negative impacts. Generate revenue to improve access and mobility for people and goods in the region.

Need for the Proposed Action

While construction funding for congestion relief projects is identified as a need, it is also clear that there are funding needs beyond future roadway expansions that are needed in this corridor in order to have successful outcomes from the I-205 Toll Project. Feedback from regional partners and community members has consistently pointed to the need for improved transit service in the area, as well as the need to increase opportunities for people to get around on foot and on bicycle. Revenues from this project should be used to improve mobility and access needs throughout the corridor.

It is also worth noting that the need statement does not mention the need to advance racial and social equity. Our existing transportation system is inequitable with much of its burdens falling on the shoulders of Black, Indigenous, and People Color (BIPOC) community members. BIPOC community members are more likely to be exposed to transportation-related pollutants, more likely to be killed or seriously injured when walking or biking, and more likely to have less access to opportunities than white community members. As people have taken to the streets the last few months to demand action, we as government entities have a responsibility to do all that we can to improve racial and social equity. If we don't get this right, we will only repeat the mistakes of the past. There is a clear need and it should be included in the need statement for this project.

Goals and Objectives

Under the *Goal: Provide equitable benefits for all users*, it would be constructive to more clearly articulate which populations have been "historically underserved or underrepresented or negatively impacted by transportation projects." Identifying these populations will make it easier to evaluate whether the goals, including project participation, have or haven't been met.

Under the *Goal: Support safe travel regardless of mode of transportation*, the goal should be more explicit that the project will be designed in a way that advances the region's efforts to reduce and eliminate fatal and serious crashes, not just on I-205, but on other roadways that are impacted by this project.

Under the Goal: Improve air quality and reduce contributions to climate change effects, reduction of vehicle air pollutants and GHG should include reference to achieving this through shifts to other modes and higher occupancy vehicles in addition to improvements in travel efficiency.

Thank you again for collaborating with us on the I-205 Toll Project.

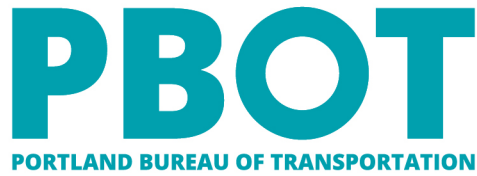
Sincerely,

A handwritten signature in black ink that reads "Chloe Eudaly". The signature is written in a cursive, flowing style.

Chloe Eudaly, Commissioner
City of Portland

A handwritten signature in black ink that reads "Chris Warner". The signature is written in a cursive, flowing style.

Chris Warner, Director
Portland Bureau of Transportation



1120 SW Fifth Ave, Suite 1331, Portland OR 97204

Main: 503-823-5185 TTY: 503-823-6868 Fax: 503-823-7576

Chloe Eudaly Commissioner **Chris Warner** Director

August 20, 2020

Ms. Lucinda Broussard
Toll Program Director
Oregon Department of Transportation
355 Capitol Street NE, MS 11
Salem, OR 97301-3871

Dear Director Broussard,

As a Participating Agency on the I-205 Toll Project, this letter serves as the City of Portland's official feedback on the Comparison of Screening Alternatives report.

The City of Portland appreciates the collaboration that has taken place on the I-205 Toll Project to date. Our staff have been engaged with the project team and regional partners through the Equity and Mobility Advisory Committee, Modeling Technical Committee, and Multimodal Working Group.

While the I-205 Toll Project is located outside of Portland's city limits, we know that this is an important project that will have impacts in our city and throughout our region. It is part of a larger effort to utilize tolling to advance the equity, climate, safety, and demand management goals that are in the 2018 Regional Transportation Plan.

It is with these outcomes in mind that we offer the following comments on the Comparison of Screening Alternatives report.

Alternative 5 should be advanced for further consideration

The stated purpose of the I-205 Toll Project is to *both* manage transportation system demand and to raise revenues for future projects. In reviewing the evaluation of the five alternatives, we agree that alternatives 3 & 4 should be advanced for further consideration. Both alternatives perform well at raising revenues relative to the other alternatives. However, the relative performance of these alternatives for managing transportation system demand and I-205 traffic is not as strong as Alternative 5.



The City of Portland ensures meaningful access to city programs, services, and activities to comply with Civil Rights Title VI and ADA Title II laws and reasonably provides: translation, interpretation, modifications, accommodations, alternative formats, auxiliary aids and services. To request these services, contact 503-823-5185, City TTY 503-823-6868, Relay Service: 711.

The report does not articulate why revenue generation has seemingly been prioritized over transportation system demand management at this point. Demand management is identified in both the Regional Transportation Plan and in state law [ORS 366.292 and HB 2017 Section 120(3)] as desired and necessary outcomes from roadway pricing.

Alternative 5 should be advanced for further study. Additionally, Alternatives 3 & 4 should be further analyzed for how they can be implemented in a way that better supports system demand management.

Include Tolling on I-5 in the Evaluation

While we understand why the analysis of tolling on I-205 has been done separately from an analysis of future tolling on I-5, we want to emphasize the importance of taking a comprehensive, systemic approach to tolling in our region. Our interstate system is designed as an interconnected network, not a collection of individual pieces. As was recommended in the 2018 Value Pricing Feasibility Study, an effective tolling system that both manages transportation system demand and raises revenues should be evaluated as a system and not as a series of individual projects.

We encourage future modeling and analysis to include tolling on the I-5 corridor so that we can all understand the potential regional benefits and burdens from the tolling alternatives.

Use the Regional Transportation Plan's Mobility Corridors Framework

The Regional Transportation Plan has identified a number of mobility corridors throughout the region. The regional mobility corridors framework is useful for understanding the multimodal ways in which people travel within a corridor, as well as the implications for land use. These are defined in the RTP as:

Mobility corridors represent subareas of the region and include all regional transportation facilities within the subarea as well as the land uses served by the regional transportation system. This includes freeways and highways and parallel networks of arterial streets, regional bicycle parkways, high capacity transit, and frequent bus routes. The function of this network of integrated transportation corridors is metropolitan mobility – moving people and goods between different parts of the region and, in some corridors, connecting the region with the rest of the state and beyond. This framework emphasizes the integration of land use and transportation in determining regional system needs, functions, desired outcomes, performance measures and investment strategies.

When evaluating the I-205 tolling alternatives, the future multimodal impacts, and potential uses and locations of tolling revenues, we would ask that this be done using these existing, regionally adopted mobility corridors.

Apply an Equity Lens to Analysis

The Comparison of Screening Alternatives uses a standard technical approach to narrowing down tolling alternatives. While this is an accepted practice in transportation planning, we also know that traditional approaches that largely focus on automobile movement have helped to create a transportation system today that is inequitable with Black, Indigenous, and People of Color (BIPOC) community members experiencing a disproportionate amount of the burdens. It is noticeable that the report does not once mention equity.

Through all stages of this project, including the narrowing of alternatives, we should be asking what are the impacts of the choices that are being made and who is being impacted. This analysis should include the members of our community who have traditionally been most harmed. It should be transparent so that policy decisions can be made to help create a more equitable transportation system. We appreciate that ODOT has established an Equitable Mobility Advisory Committee (EMAC) and strongly encourage you to incorporate their expertise and advice on how to robustly assess the benefits and burdens associated with the project and the tolling program more generally.

Thank you again for collaborating with us on the I-205 Toll Project.

Sincerely,



Chloe Eudaly, Commissioner
City of Portland



Chris Warner, Director
Portland Bureau of Transportation



August 26, 2020

Emily Cline, FHWA Environmental Program Manager
530 Center Street NE, Suite 420
Salem, OR 97301

Dear Ms. Cline,

The purpose of this letter is to accept the invitation for the Port of Portland to serve as a Participating Agency on the I-205 Toll Project. We understand that the Federal Highway Administration (FHWA), with the Oregon Department of Transportation (ODOT) as a joint lead agency, seeks to coordinate with agencies and Tribes in association with the preparation of an Environmental Assessment (EA) for a proposed tolling project on I-205.

The efficient movement of people and goods is at the core of what we do the Port. Carrying out this work successfully and equitably as our population grows is a challenge we all share. The belief that we must find ways to better manage the system and achieve multiple outcomes – congestion relief, greenhouse gas reductions and revenue generation – guided my work on the Portland Metro Area Value Pricing Advisory Committee. At that time and still today, I believe that broad implementation of pricing is the best path toward achieving goals related to traffic and revenue, while creating more opportunities to mitigate negative impacts. I'm encouraged by the work ODOT and regional partners are undertaking toward this goal, and that equity is at the forefront of those discussions. As we work through the details of implementing tolling on I-205, we should be mindful of how the decisions made on this project will inform the public narrative on tolling – and the ultimate success of future projects.

As the front door to Portland International Airport (PDX), I-205 is a hugely important facility. It's the primary route between PDX and shippers in the Willamette Valley, Southern Oregon, and Oregon Coast. Whether it's seafood, mushrooms, blueberries, or other Oregon products—nearly all of what moves on I-205 to PDX is highly perishable and relies on quick, reliable transit times. Small package cargo—including medical items and medicine, as well as machine parts—also moves in both directions each day. And of course, travelers and workers come from all over the region to reach PDX, and those trips are fundamentally time sensitive. We want and need for this highway to continue serving these purposes long into the future, and view pricing as an important tool.

Copied below are the members of our team who will be your main points of contact for the I-205 Toll Project. Thank you for including us in this work. We're happy to get started.

Sincerely,

A handwritten signature in black ink, appearing to read 'Curtis Robinhold'.

Curtis Robinhold
Executive Director

CC: Emerald Bogue, Director of Regional Government and Community Affairs
Tom Bouillion, Planning Manager, Land Use, Transportation & Marine
Lewis Lem, Senior Transportation Planner



August 26, 2020

Oregon Department of Transportation
355 Capitol Street NE, MS 11
Salem, OR 97301-3871 USA

RE: Port of Vancouver Comments on using tolls to raise funds, improve travel on I-205

Dear ODOT Project Staff:

The Port of Vancouver USA appreciates the opportunity to comment on the on five preliminary alternatives for tolls on Interstate 205 around the Abernethy Bridge. The port supports over 24,000 jobs and \$3.8 billion in economic activity annually. Our tenants and partners rely on a robust and reliable transportation system throughout the region. While the area under consideration is not the highest utilized corridor for our freight partners, the outcome of this project will have a direct impact as well as setting a precedent for future tolling projects in the I-5/I-205 corridors.

Considering the importance of freight and trade to our regional economy, any successful alternative should, at a minimum, preserve freight mobility. Consideration for reducing tolling rates during non-peak hours, as well as limits to the number of tolls charged per vehicle per day may also serve to mitigate the impacts of additional costs on businesses and workers. Opportunities to improve freight mobility through this project should also be fully vetted.

Additionally, funds raised in this corridor must be reinvested into maintenance and improvements in the same corridor, consistent with the goals and desired outcomes of the project. The ability to sustain needed funding to ensure reliability and the efficient mobility of freight users is critical to the success of this effort.

Thank you again for the opportunity to comment and for your consideration of our feedback.

Sincerely,

A handwritten signature in black ink that reads "Julianna Marler".

Julianna Marler
CEO



September 16, 2020

1300 Franklin Street, Floor 1
P.O. Box 1366
Vancouver, WA 98666-1366

564-397-6067
564-397-6132 fax
<https://www.rtc.wa.gov>

Member Jurisdictions

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

I-205 Toll Project Lead Agencies

Transmitted via email to:

Oregon Department of Transportation
c/o
oregontolling@odot.or.us

Lucinda Broussard, Toll Program Director, ODOT
Lucinda.Broussard@odot.state.or.us;

Federal Highway Administration
c/o Emily Cline, Environmental Program Manager, FHWA
emily.cline@dot.gov.

RE: Agency Comments: I-205 Toll Project Environmental Assessment Draft Documents (published August 2020)

This letter transmittal offers comments from the Southwest Washington Regional Transportation Council (RTC) in regards to the I-205 Toll Project Environmental Assessment draft scoping documents. These comments pertain to the project's published: Agency Coordination Plan; Purpose and Need Statement; and Comparison of Screening Alternatives.

Agency Coordination Plan

RTC staff and contact information is switched with Tri-Met staff and contact information on page 14.

Purpose and Need Statement

The Purpose and Need lacks clarity and may create confusion for the public and agencies in regards to the scope of the project and environmental impact and mitigation assessments. The Purpose and Need Statement suggests that the I-205 Improvements Project and I-205 Tolling Project have independent utility. However, it is not clear whether that means the I-205 Improvements Project can proceed without a *Build* Action from the I-205 Toll Project (or vice-versa). Greater clarity regarding the dependent relationship(s) between the I-205 Toll Project and the I-205 Improvements Project is needed. Such clarity will enable better

disclosure and analysis of the potential environmental impacts of the No-build and Build alternatives.

Additional Questions and Observations:

- i. The I-205 (Stafford Road to OR 213) capital improvement is identified in Metro's financially constrained RTP. Is the I-205 project dependent upon revenue from the tolling project or may the project secure other non-toll related funding in the future? Will the toll revenue provide the possibility to advance the construction timing of the I-205 Improvements Project? If so, advancing the construction of currently unfunded congestion relief projects should be included in the Purpose and Need Statement and analyzed for impacts and benefits.
- ii. The Need statement suggests that the I-205 Improvements Project and I-205 Tolling Project have independent utility. However, in the preliminary screening of alternatives, all of the Build alternatives included tolling and the I-205 Improvements Project. The environmental process of the I-205 Tolling project should consider evaluating the utility of tolling without including the I-205 Improvements Project, as well as the inclusion of the I-205 Improvement Project without tolling.

The Goals and Objectives section needs to characterize the assessment impacts, and specifically traffic and user equity impacts (direct and cumulative) within the geography of the Portland-Vancouver Urbanized Area (UZA) / Metropolitan Planning Area (MPA).

Additional Questions and Observations:

- i. How will the impact mitigation geography be defined? Fair and equitable use of toll revenue for impact mitigation must be defined at the UZA/MPA geography.
- ii. What other defined Congestion Relief projects could be funded by the proposed Toll Project and therefore should be disclosed and evaluated in the environmental impact analysis? If other *Congestion Relief Projects* can or will be funded by tolls generated by the I-205 Toll Project, those should be disclosed and evaluated as part of the cumulative impact assessment.
- iii. The question of geographic equity in the funding and distribution of benefits of transportation improvements needs to be addressed. For example, will travelers in north-south corridors need to pay tolls to fund Congestion Relief projects, while east-west travelers congestion relief projects are funded through other means?

- iv. Alternatives analysis should include as much detail as possible about users who will be paying the proposed tolls and be evaluated at the UZA/MPA geography. User considerations should include:
 - a. Freight, commercial and private vehicle toll payers
 - b. Income and other socioeconomic information of toll payers
 - c. Resident location of toll payers, - local (within x miles of the tolled facility), by city, county and state of residence
- v. The Goals and Objectives and Alternatives Screening analysis discloses a factor of consideration as the flexibility for Implementation and Operations of the I-205 toll system as it relates to the possible expansion of tolling across the regional system. The impact analysis should define what the entire system is (as known now), and describe and address criterion being used for evaluating *Implementation and Operations* as part of the impact assessment.
- vi. If a purpose of the tolling project is to advance the construction of unfunded *Congestion Relief Projects*, the lead agency should disclose what those projects are, and it would be appropriate to develop evaluation criteria that specifically considers issues such as: the timing of construction and the impacts and benefits of the accelerated construction timing. This may include accumulated system performance and air quality benefits.

Comparison of Screening Alternatives

Each alternative in the initial screening alternatives report is a Build alternative that includes construction of the I-205 Stafford Road to OR 213 Improvement Project. To date, the analysis discloses improved performance on I-205 is due to implementation of “both” the Improvement Project and Toll Project. This approach does not address how much of the improvement is due to the addition of general-purpose traffic and auxiliary lanes constructed by the Improvement Project, versus, how much of any system performance benefit can be attributed exclusively to the Toll Project.

If both the I-205 Tolling Project and the I-205 Improvements Project have independent utility, then this Toll Project impact analysis should demonstrate that independent utility and associated impacts and benefits in the impact analysis.

Additional Questions and Observations:

- i. A No-toll / *Improvement Project* alternative should be considered among the range alternatives for future analysis. Public opposition to a possible *Build Action* is known.
- ii. The No-Action alternative and the evaluation alternatives should consider whether any currently non-tolled facilities will/may become tolled in the future (i.e., perform a

cumulative impact analysis of the contemplated toll system.) Further, it may be appropriate to assume the implementation of other regional toll facilities in the No-Action alternative to assess the cumulative impact of the diversion, rerouting and system performance of other future tolled facilities and directly related impacts for travel within the I-205 and specific project corridor.

- iii. Alternative 5 arguably provides the greatest system improvement and generates toll revenue. Yet, it is proposed to be excluded from further analysis due to a criterion regarding Implementation and Operations, which remains largely undefined. The public documentation does not provide any definition or details regarding what that “Implementation and Operations” is and what it means. It is premature to eliminate the best performing alternative from a system perspective due to undefined issues with flexibility and scaling with future regional tolling that has yet to be defined. The impact analysis should further define that criterion and describe how that relates to system performance benefits, prior to eliminating that alternative.



September 15, 2020

Chair Bob Van Brocklin
Oregon Transportation Commission
355 Capitol Street NE, MS 11
Salem, OR 97301

Dear Chair Van Brocklin and Commissioners:

On behalf of the Washington County Board of Commissioners, I want to express our appreciation for the overview Toll Project Director Lucinda Broussard shared with our Board recently, and to share our comments on the purpose and need statement for the environmental review process and considerations as the project moves forward.

We support the dual purpose of the Toll Project on I-205 between Stafford Road and OR 213 to both manage congestion and fund congestion relief projects through the application of variable-rate tolls. Congestion on I-205 is a problem now and will worsen due to regional and statewide growth in population, jobs and goods movement. New revenue sources are needed to address the bottleneck on I-205 and to modernize the existing freeway system we depend on.

We support evaluating a full range of alternatives and analysis to provide a full understanding of diversion. Understanding the extent that diversion can be relieved through better traffic flow on I-205 with tolling and widening or worsened will be important in determining adequate mitigation for impacted communities.

Plan for the future implementation of tolling on both the I-5 and I-205 Corridors during this initial phase. Consistent with the recommendations from the Value Pricing Feasibility Analysis to implement tolling on I-5 and I-205 from the Columbia River to the Tualatin River, consider the interrelationship between tolling on one segment and another and the implementation phasing.

Keep equity in the forefront of the planning and implementation. This could include pricing levels, travel options, decriminalizing unregistered ratepayers and other considerations identified by the Equity and Mobility Advisory Committee.

I also want to clarify our interests regarding the proposal before you to dedicate tolling revenue to the corridor. We believe the highest priority remains to fund I-205 improvements and to mitigate the diversion impacts, especially in Canby, Oregon City, West Linn and adjacent arterials identified in the

Board of County Commissioners

155 North First Avenue, Suite 300, MS 22, Hillsboro, OR 97124-3072

phone: (503) 846-8681 • fax: (503) 846-4545



initial analysis. Beyond that, we support dedicating the revenue to modernizing the region's freeway system and supporting viable transit alternative. Ratepayers from across the state need to know that the funding will benefit the system they are paying for. More discussion will be needed to determine how these funding allocations are made.

Thank you for considering our comments as part of this initial comment period. Our Board remains committed to our participation in the planning and implementation of the ODOT Toll Program.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kathryn Harrington'.

Chair Kathryn Harrington

Washington County Board of Commissioners

cc: Board of Commissioners
Lucinda Broussard, ODOT Toll Program Director
Stephen Roberts, Director of Land Use & Transportation
Christina Deffebach, Senior Policy Analyst



**Washington State
Department of Transportation**

Southwest Region
11018 Northeast 51st Circle
Vancouver, WA 98682-6686
360-905-2000 / FAX: 360-905-2222
TTY: 1-800-833-6388
www.wsdot.wa.gov

September 3, 2020

Phillip A. Ditzler
FHWA Division Administrator
530 Center Street NE, Suite 420
Salem, Oregon 97301

Subject: I-205 Toll Project
Location: Clackamas County, Oregon
Action: Preparation of an Environmental Assessment

RE: Request for Participating Agency Designation

Dear Mr. Ditzler:

On behalf of the Washington State Department of Transportation (WSDOT), I would like to thank the Federal Highway Administration (FHWA) and the Oregon Department of Transportation (ODOT) for the opportunity to participate and provide input and review on the variety of topics listed in your letter. Recognizing the interconnected nature of our regional transportation system, WSDOT accepts your invitation to become a Participating Agency and to engage on development of the projects as part of the National Environmental Policy Act (NEPA) analysis.

As you know, in Washington State we use tolling as a strategic tool that can serve multiple functions. Whether tolling is used as a congestion management tool, revenue tool, or both, WSDOT's position has always been that the implementation of tolling should bring direct benefits to those paying the user fee. We appreciate the opportunity to engage further as this planning work continues.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carley Francis', with a long horizontal stroke extending to the right.

Carley Francis, AICP
WSDOT SW Regional Administrator

cc: Lucinda Broussard, ODOT Toll Program Director
Casey Liles, Interstate Bridge Replacement Program
Scott Langer, WSDOT ARA for Operations and Planning

Redland-Viola-Fischers Mill CPO
redlandviolafischersm.CPO@gmail.com

September 8, 2020

Lucinda Broussard, Toll Program Director
Oregon Department of Transportation
355 Capitol Street NE MS 11
Salem Oregon 9301-3871

Re: I 205 NEPA alternatives comment period, August 3, to September 16, 2020

Dear Director Broussard;

Redland-Viola-Fischers Mill CPO is a County recognized Community Planning Organization for a portion of Clackamas County located southeast of Oregon City and north of the Clackamas River. On September 2, 2020, after notice, the CPO met and discussed among other things the Oregon Department of Transportation's current plans for tolling of I 205 through Clackamas County, the State's plans to finally expand the interstate to six lanes from the Abernethy bridge to the Stafford Road interchange, and the August 13, 2020 NEPA letter comment submitted to you by the Clackamas County Coordinating Committee (the "C4 Letter"). After motion, discussion, and a vote, the board authorized sending this letter to you.

Redland-Viola-Fischers Mill CPO incorporates by reference and supports all the comments made in the C4 letter, but wishes to emphasize the following points:

1. The section of I 205 that passes through Clackamas County is the only section of the I 5 interstate roadway system that was not originally constructed for six lanes of traffic. Clackamas County citizens effectively contributed towards that system, while having to contend with its own resulting four-lane congestion. The State's plans to expand I 205 to six lanes through Clackamas County will therefore remedy a historical shortfall to the I 5 interstate road system through the Portland area. Six lanes of I 205 traffic should therefore be the default "no build" alternative without penalty to Clackamas County citizens. Specifically, road expansion should not be tied to tolling.
2. Clackamas County citizens should not alone bear the tolling costs of expanding the system from four to six lanes. No other discrete population was required to pay for its own portion of a six-lane interstate system through the Portland area. We should not be alone in shouldering the costs of seismic upgrades to the Abernethy bridge that will benefit the entire region. Tolling must take place throughout the entire system, if at all.

3. To the extent the State proceeds with tolling, then the tolling monies collected at Clackamas County tolling sites should stay in Clackamas County, and be used entirely within the County. To now require Clackamas County residents to first pay for expanding this section and then see any excess toll proceeds used elsewhere would be adding insult to the original injury. Finally, to forestall future competing claims to excess proceeds, the State should not just commit, but legally bind itself to using tolling proceeds only in the areas where they are generated.

4. Similarly, studies how traffic will divert from I 205 onto secondary and tertiary roads should be studied throughout the system and not just along the I 205 corridor. The Redland and Fischers Mill areas for instance, provide a logical alternative route for traffic between the mid-Willamette valley and the Columbia Gorge, but our area has not been included in any ODOT study. Our community is just as entitled to understand how this proposed sea change to Oregon interstate road will have on its community as any of the areas immediately adjacent to the I 205 corridor.

Thank you,

Redland-Viola-Fischers Mill CPO

C via email: Clackamas County Coordinating Committee
Clackamas County Board of Commissioners
Rep. Christine Drazan
Rep. Alan Olsen
Abe Morland
CPO Summit