

<b>ODOT I-205 Toll EA - RECORD #1 DETAIL</b>
--

**Submission Date :** 2/22/2023

**First Name :** Allison

**Last Name :** Howard

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Thank you for allowing public comment. I'm sure others will have articulated things better, so I'll just say that I hate the idea of tolls. Just.... No. We don't want that here!

**ODOT I-205 Toll EA - RECORD #2 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Lita

**Last Name :** Colligan

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Please count my vote for congestion pricing vs bridge tolls. Give those of us on fixed incomes a chance to continue to use the highways at a slower and cheaper pace. I live in Oak Grove and can't afford a toll every time I need to cross the river. Beautiful downtown oregon city will be very negatively impacted as traffic increases on their historic bridge that will be used as an alternative.

Congestion pricing is much more equitable for low income people.

**ODOT I-205 Toll EA - RECORD #4 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Sheri

**Last Name :** Quinn

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** So am I right in assuming that those of us that live in west linn are going to get hit paying tow fees every-time we venture out going and coming it seems you are boxing West Linn in how is this fair we already pay taxes on our roads now we will be paying on top of that which with several people in the household heading to work can get pretty spendy! Our traffic thru west linn is already insane now with tolls it will be worse! Why don't you put a toll cross from Oregon to Washington it makes more sense if you want more money these tolls are not going to make traffic better! I'm hearing that these tolls can add on up to 300 or more a month in a household that can be quite a hit which is just crazy I'm sure your toll charge will be more than the 50 cent charge! This just seems like we all ready pay for our roads now you want to take more of our money to drive on them. Times are hard and these tolls will not be cheap it's not a fair solution at all.

**ODOT I-205 Toll EA - RECORD #5 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Susan

**Last Name :** Callihan

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :**

My primary concern about tolling us the impact it will have on:  
(A) Seniors on fixed income who travel to visit family. Food and fuel prices are already stretching our budgets, and tolling will directly impact seniors' mobility. Also, many seniors travel to Portland from more rural areas for cultural events such as plays in small venues (Broadway Rose, Lakewood Theater for example) that are already barely affordable (under \$70 per ticket, as opposed to unaffordable \$300 per ticket for large venues), and adding tolls reduces these cultural/social opportunities, further isolating them.

(B) Nonprofits 501(c) are already smarting from the pandemic due to reductions in donations and sponsorships. They rely on volunteers for many essential tasks, and those volunteers are not reimbursed for fuel expenses. Nor will they be reimbursed for tolls. Many volunteers are seniors with time, but not a lot of discretionary income, and they will have to decide whether they can afford to continue to help these nonprofits if they have to pay tolls to get to and from. For many, even \$10 or \$20 a month in tolls is another out-of-reach discretionary expense.

Private animal rescues such as Cat Adoption Team and Feral Cat Coalition, for example, have impact not only directly on the people who are adopting, but on the communities they serve by reducing the population of outdoor cat communities. The volunteer drivers for these organizations travel extensively around Portland communities and the state to collect rescued animals from smaller public shelters for adoption in this larger metro area, as well as transporting donated food to pet food banks. The organizations may find it necessary to reduce intakes from outlying areas due to lack of volunteer drivers who would be less willing to provide transportation, so euthanization rates in the outlying areas would likely increase.

Nonprofits that serve people will, of course, also disproportionately feel the impact of tolling on drivers who transport goods for food banks and food kitchens, and clothing drives around the metro area to serve the homeless and disadvantaged, or those who provide services such as dental and haircuts, serving food, and handing out clothing for the homeless. Again, these nonprofits will suffer from reduction in volunteer workforce who have to consider not only cost of fuel but cost of tolls.

Offering discounts or waivers for qualifying nonprofits would not have a huge effect on toll revenue but definitely will have a disproportionately large impact on the organizations that are already struggling.

**ODOT I-205 Toll EA - RECORD #14 DETAIL**

**Submission Date :** 2/21/2023  
**First Name :** Russell  
**Last Name :** Smith  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Hello,

I would like to add a comment regarding the impact of the proposed I205 tolls.

My household which is in Milwaukie, OR shares custody 50/50 with a child that attends school in Tualatin. Besides going to and from school this child also participates in sports and other after school activities that require on most days multiple trips from Milwaukie to Tualatin via I205 passing through both proposed Toll locations. This would have a major effect on our households income leaving the only option turning to surface streets to avoid the Toll further effecting the West Linn community.

I would like to request the no build alternative or use our already inflated vehicle registration fees and gas tax to be used for this and any other roadway projects. Or please put these Tolls to a vote and allow the citizens to have a voice in how their money is being spent.

<b>ODOT I-205 Toll EA - RECORD #15 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** GREGG

**Last Name :** LEONETTI

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Regarding the tolling proposal on I-205, where does the billions of dollars already allocated for infrastructure projects from the Biden Administration fit in for Oregon? With high fuel tax and now a proposed tolling tax it would seem Oregon would have sufficient funding already.

**ODOT I-205 Toll EA - RECORD #16 DETAIL**

**Submission Date :** 2/21/2023  
**First Name :** Tim and Jenny  
**Last Name :** Anderson  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Dear ODOT,

As residents of Lake Oswego, we are emphatically frustrated and unresponsive of ODOT's tolling initiative currently underway across the Portland metro area. We firmly believe these proposed tolling projects should require voter approval. Thus, we are very much in support of IP-4 being brought forth by Dean Suhr onf West Linn and Lorely Miller of Oregon City that would amend Oregon's Constitution.

<b>ODOT I-205 Toll EA - RECORD #18 DETAIL</b>
---

**Submission Date :** 2/22/2023

**First Name :** Bill

**Last Name :** Guise

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Don't do it "NO". If no other way do a gas tax of nickel for 2 to 3 years.



<b>ODOT I-205 Toll EA - RECORD #19 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Mimi

**Last Name :** Doukas

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Tolling should only be to cross the Columbia River on both I-5 and I-205. If folks want to take advantage of the low income taxes in Washington and good jobs in Oregon, they should pay to cross the state lines. And this will not divert traffic onto local streets.

Do not toll corridors of Oregon highways. It will push traffic into neighborhoods. Taxes and fees are off the chart in Portland and Oregon and folks are moving out of the region as a result. This will continue that pattern.

**ODOT I-205 Toll EA - RECORD #20 DETAIL****Submission Date :** 2/21/2023**First Name :** Kuldip**Last Name :** Dhadwal**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** I am one of those who hate tolls on hways.

To justify toll will reduce highway congestion is nothing more than a sales pitch. Those who cannot afford to pay toll every day to go to work will take the city street. Is there a way to reduce that city traffic.

<b>ODOT I-205 Toll EA - RECORD #21 DETAIL</b>	
---	--

**Submission Date :** 2/21/2023

**First Name :** Jeremy

**Last Name :** Tunney

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I am a resident in Lake Oswego. When there are accidents we see a dramatic increase in traffic on 43. This impacts local driving and safety of our children.

Also I have lived in states with tollways. I don't understand why there isn't a sunset clause to end tolling after the infrastructure is built? It seems to be a money grab in the long term. I understand the need to improve all highway systems like the 5 and 205 and possibly adding more bi-ways. If that is the case you should look at either tolling of of the highways in the tri-county area. If everyone has to pay a toll it's more likely everyone will just accept it. It seems like an unfair tax for people that live in a certain geographical place. Why are you not tolling the whole 205?

I am against this toll proposal.

**ODOT I-205 Toll EA - RECORD #22 DETAIL****Submission Date :** 2/21/2023**First Name :** Jimmy**Last Name :** L**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** I am over 75 years of age and retired on fixed income.

I am in support of the funding to improve roads. I travel 3x every week from Wilsonville on Stafford road on Exit 3 to my daughter in Milwaukie off Exit 9 on I-205. I help them babysit our little grandson. That said, I hope there would be a special pricing for seniors. Also, to reduce the cost of maintenance, you should use unmanned automated toll booth collection system like the EZ-Pass or RFID toll pass tags. Then the user could be billed later, or maybe required to put some funds in the account. Regular users could opt for paying a monthly or discounted annual fee instead of paying per use.

<b>ODOT I-205 Toll EA - RECORD #23 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Marti

**Last Name :** Long

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I live near the 10th Street exit off of 205 and I fully support tolling.

<b>ODOT I-205 Toll EA - RECORD #24 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Troy

**Last Name :** Thomas

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** The tolls WILL reduce traffic on 205. However, Highway 99 will become clogged from Milwaukie through Canby with people trying to get around the tolls. It's going to create a huge mess for the local people.

<b>ODOT I-205 Toll EA - RECORD #25 DETAIL</b>
---

**Submission Date :** 2/24/2023

**First Name :** David

**Last Name :** Tooze

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :**

Don't do it!

Tolls on the freeway will drive traffic onto highway 99 from Aurora to Oregon city. Oregon city at the tunnel/falls is already backed up. Your toll proposal will hugely impact Oregon city traffic...also Aurora, Canby.

Then there's 99 on McLaughlin. Same story...you move traffic onto secondary highways and even residential streets.

Where's the equity in clogging milwaukie, oak Grove, Gladstone streets?

Tolls won't help.... They're just ODOTs back door money grab.

**ODOT I-205 Toll EA - RECORD #26 DETAIL**

**Submission Date :** 2/24/2023

**First Name :** m

**Last Name :** fujiyoshi

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Sounds like Highway 5 will get a lot more traffic as well as the neighborhoods that are already overwhelmed with side streets shortcuts. Toll all the highways or none. Toll only incoming traffic from Washington. No toll returning to Washington.



<b>ODOT I-205 Toll EA - RECORD #27 DETAIL</b>
---

**Submission Date :** 2/24/2023

**First Name :** E.H.

**Last Name :** elmer

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I hope there will be off road parking if I get to the toll to early and have to wait a for some time

<b>ODOT I-205 Toll EA - RECORD #28 DETAIL</b>
---

**Submission Date :** 2/24/2023

**First Name :** Kyle

**Last Name :** Nickels

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** If I was to request copies or a link to the 4,600 responses who would I request that from?

**ODOT I-205 Toll EA - RECORD #29 DETAIL**

**Submission Date :** 2/24/2023

**First Name :**

**Last Name :** jonezinor

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :**

We live in what is considered rural Clackamas county. Our street we reside on is Childs rd. In the Rivergrove area. The speed limit on this rd is 25 which is rarely followed. This is a cut through from I5 to I205 at the present. We can only imagine the increased traffic that will be diverted to our neighborhood rd to avoid the tolling. Childs to Stafford will be a bottle neck even more than it is now. Drivers that know this path will use it more often to avoid the said tolls. We count at most times 10 to 15 cars per minute down our 25 mph road doing an average of 32 mph. We know because the city of Rivergrove installed a solar speed sign in plain view of our home. Please consider the consequences to our residential road as it already needs a fix to a large amount of traffic which we walk every day in fear of being hit by a speeding vehicle.

**ODOT I-205 Toll EA - RECORD #30 DETAIL**

**Submission Date :** 2/24/2023

**First Name :** Kyle

**Last Name :** Nickels

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Seems you are dead-set to do this. Yet the vast majority of the comments show people do not want or support tolling.

Your efforts just convey the message that "Government doesn't give a damn what people think. They are gonna do what THEY want regardless".

Prove me wrong

**ODOT I-205 Toll EA - RECORD #31 DETAIL****Submission Date :** 2/24/2023**First Name :** Scott**Last Name :** Johnson**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** I do not have a problem with tolling and I understand and agree with the solid reasons behind it. I just want to point out that having a toll gantry at the I205 bridge between Oregon City and West Linn may have some people like me deciding to shop in different places. I live in Oregon City and on occasion will drive over to some shops I like in West Linn. Depending on the toll amount I may avoid going there and instead go north to Clackamas or other places where I won't be tolled.

Thank you for the opportunity to comment.

**ODOT I-205 Toll EA - RECORD #32 DETAIL**

**Submission Date :** 2/24/2023

**First Name :** Ron

**Last Name :** G Sarsten

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Whether you want to admit it, the money for the roads exist already. Your poor management of road funds is the only thing happening here, anyone in this area with a ¼ of common sense would see this as disastrous . Traffic in this area is already a nightmare. Humans will do anything to avoid "YOUR TOLLS". My street is already a mess from just common occurrence's from the highway now. DMV Fee's have quadrupled in the last 20+ years, why not allocate them for road maintenance??? No more politics just proper community work.

**ODOT I-205 Toll EA - RECORD #33 DETAIL****Submission Date :** 2/24/2023**First Name :** Thomas**Last Name :** Kelly**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Years ago I sent you suggestions on solving the needed highways and bridges to meet the traffic needs of the Portland/Vancouver area now and the future. It consisted of a new ring road starting south of Wilsonville going east to Gresham and north across the Columbia River and joining I-5 north of Ridgefield, and going west to Hillsboro and north across the Columbia River and joining I-5 north of Ridgefield in Washington.

Instead you have insisted on re-arranging the chairs on the Titanic by just widening I-205 and I-5 and replacing the I-5 bridge to Vancouver, and worse, tolling those improvements, or should I say, distractions, because they do nothing to solve the future traffic needs of the area.

Sorry to say, you will do what you wish and we will still be caught up in future traffic jams, tolling and meaningless projects.

**ODOT I-205 Toll EA - RECORD #34 DETAIL**

**Submission Date :** 2/24/2023  
**First Name :** George  
**Last Name :** Sessoyeff  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Hello,

I am against adding tolls to our roads. I feel that our tax burden is too high already.

I don't often travel the road where the toll will be installed. We all know that once one toll is implemented it won't be long before others appear.

Why not add a toll at the end of my driveway? Or at my place of work? Grocery store parking lot? Where will it end?

No tolls.



**ODOT I-205 Toll EA - RECORD #35 DETAIL**

**Submission Date :** 2/24/2023

**First Name :** Jack

**Last Name :** Andrews

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :**

Hi,

I wanted to let you know that there are hundred of comments about your toll plan that if you could read if you actually cared about any of this.

I once asked you to send me evidence tolls will help people but instead you added me to your mailing list and sent me canned responses that did not address my question. Below are links to discussions from Portland area people about the hilariously poorly designed tolling program

200 people commented on this post from about a week ago, if you honestly believe you are doing a helpful or the correct thing about tolls then I implore you to read this or other posts below

[https://www.reddit.com/r/Portland/comments/1100gsd/tolls\\_are\\_coming\\_to\\_portlandarea\\_freeways\\_and/](https://www.reddit.com/r/Portland/comments/1100gsd/tolls_are_coming_to_portlandarea_freeways_and/)

250 comments from a month ago

[https://www.reddit.com/r/Portland/comments/109csyw/former\\_odot\\_director\\_oregon\\_needs\\_to\\_slam\\_the/](https://www.reddit.com/r/Portland/comments/109csyw/former_odot_director_oregon_needs_to_slam_the/)

this post has around 700 comments from people:

[https://old.reddit.com/r/Portland/comments/yxtn2d/tolls\\_are\\_coming\\_to\\_i205\\_and\\_i5\\_around\\_portland/](https://old.reddit.com/r/Portland/comments/yxtn2d/tolls_are_coming_to_i205_and_i5_around_portland/) - 3 months ago

800 comments from 3 months ago

[https://www.reddit.com/r/Portland/comments/z5hnn9/odot\\_plans\\_to\\_toll\\_portland\\_freeways\\_but\\_first/](https://www.reddit.com/r/Portland/comments/z5hnn9/odot_plans_to_toll_portland_freeways_but_first/)

300 comments from a year ago

[https://www.reddit.com/r/Portland/comments/wt3z2g/odot\\_considering\\_tolls\\_for\\_portland\\_highways/](https://www.reddit.com/r/Portland/comments/wt3z2g/odot_considering_tolls_for_portland_highways/)

a hundred comments from a year ago

[https://www.reddit.com/r/Portland/comments/soofwj/oregon\\_tolling\\_plan\\_south\\_end\\_of\\_i205\\_would\\_be/](https://www.reddit.com/r/Portland/comments/soofwj/oregon_tolling_plan_south_end_of_i205_would_be/)

another hundred comments from a year ago

[https://www.reddit.com/r/Portland/comments/sevx2a/ron\\_wyden\\_i205\\_tolling\\_not\\_fair\\_as\\_primary/](https://www.reddit.com/r/Portland/comments/sevx2a/ron_wyden_i205_tolling_not_fair_as_primary/)

300 comments from a year ago

[https://www.reddit.com/r/Portland/comments/uk3ud8/odot\\_survey\\_on\\_congestion\\_pricing\\_tolling\\_on\\_i5/](https://www.reddit.com/r/Portland/comments/uk3ud8/odot_survey_on_congestion_pricing_tolling_on_i5/)

**ODOT I-205 Toll EA - RECORD #36 DETAIL****Submission Date :** 2/24/2023**First Name :** Bruce**Last Name :** Bennett**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Please find another way to raise money. Vehicle registration, fuel tax, income tax, anything but tolling! I won't go into the many reasons why not as you've heard many times about the inevitably diverted traffic onto side roads that are already overloaded, the huge inefficiencies of setting up and operating the payment systems, the inequalities of the proposed plans and the many other very legitimate reasons NOT to toll. Thank you

**ODOT I-205 Toll EA - RECORD #37 DETAIL**

**Submission Date :** 2/25/2023

**First Name :** Laurie

**Last Name :** Vandeberghe

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I live in Wilsonville and if I have to pay a toll it will cut me off from my family and doctors. I live on SSDI. You are already getting a gas tax from us. Learn to work within that budget. This tolling should be voted on by the people of Oregon.

<b>ODOT I-205 Toll EA - RECORD #38 DETAIL</b>
---

**Submission Date :** 2/26/2023

**First Name :** Jeff

**Last Name :** Wynn

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** NO TO TOLLS! They will NOT solve congestion! They will NOT make the world somehow wonderful again! YOU WILL JUST MAKE US LIKE WASHINGTON DC AND DULLES AIRPORT. Who is paying bribes here?!??

<b>ODOT I-205 Toll EA - RECORD #39 DETAIL</b>
---

<b>Submission Date :</b>	2/26/2023
<b>First Name :</b>	Greg
<b>Last Name :</b>	Brown
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email
<b>Q3. Comments :</b>	These are a tax and should be put to vote.

<b>ODOT I-205 Toll EA - RECORD #40 DETAIL</b>	
---	--

**Submission Date :** 2/26/2023

**First Name :** GB

**Last Name :** Arrington

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Oregon needs balanced transportations. Tolls are a proven way to reduce traffic while tolls are constitutionally limited to Highway improvements ODOT can do better with transit and other active modes of transportation. Now is the time to commit that ODOT will offset toll revenues by flexing eligible federal and local funds 1:1 to transit and active transportation.

**ODOT I-205 Toll EA - RECORD #41 DETAIL****Submission Date :** 2/26/2023**First Name :** Bruce**Last Name :** Schade**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** I want to say I totally and unequivocally disagree with tolling I-205 bridges. That goes for any tolling on existing roadways and bridges. Besides being illegal in my eyes, it will disproportionately burden lower income families, create unintended traffic issues on side streets and roads. Just stop this insanity right now. Do you folks take illegal drugs prior to thinking this stuff up??

**ODOT I-205 Toll EA - RECORD #42 DETAIL****Submission Date :** 2/26/2023**First Name :** Deanna**Last Name :** Mulder**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** I think tolling on both the Abernethy Bridge and at the Tualatin River is totally unfair. That would mean I would be charged tolls twice if I needed to go to Meridian Park Hospital. It would force me to go another way if I needed to help out my elderly mother and stepfather. What about lower-income workers? How about service workers in general? That plumber that travels and services the metro area may reduce their service area or most definitely pass that cost on to their customers. It feels as if this tolling idea is being shoved down our throats. While it appears this tolling idea is not popular or wanted by the vast majority your intention of proceeding demonstrates how government officials don't care about the impact on peoples live don't really care about our opinions or feedback.



<b>ODOT I-205 Toll EA - RECORD #43 DETAIL</b>
---

<b>Submission Date :</b>	2/27/2023
<b>First Name :</b>	EDWIN
<b>Last Name :</b>	MORTERUD
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email
<b>Q3. Comments :</b>	We in Clackamas County, do not want tolls.

**ODOT I-205 Toll EA - RECORD #44 DETAIL****Submission Date :** 2/27/2023**First Name :** Andrew**Last Name :****Affiliation :****Submission Method :** Accessible form

**Q3. Comments :** The detailed transportation analysis that supports the EA falls short in evaluating toll rate alternatives. As described to the February 27 Regional Toll Advisory Committee, there should be a Level 2 Transportation and Revenue Analysis. By presenting an evaluation of alternatives, the analysis would provide the information that supports the proposed toll rate scheme. For example, what is the maximum peak toll that could be implemented without the diversion of vehicles resulting in a drop in revenue. Further, what would be the impact on revenues if a strict congestion pricing scheme were implemented (i.e tolls set at a level at different times of day sufficient to maintain the target speeds and no toll when there is no congestion). Finally, what alternative toll rat schedules for different times of day could be considered with higher or lower emphasis on peak periods vs. off-peak. For each of these alternatives, there would be variations in traffic operations on the facility itself, on revenue raising capacity and on traffic diversion at different times of the day and night. Avoiding this type of alternatives analysis and presentation to the various publics on the basis that the actual toll rates will be set just prior to implementation as part of the Level 3 Investment Grade T&R Analysis keeps a significant issue hidden from the public. Further, it creates a risk exposure on the adequacy of the EA by leaving out reasonable alternatives that should be considered.

**ODOT I-205 Toll EA - RECORD #45 DETAIL****Submission Date :** 2/27/2023**First Name :** Diane**Last Name :****Affiliation :****Submission Method :** Accessible form

**Q3. Comments :** The governor should stop the tolling of this project. It is unfair to working class families and there was federal transportation dollars available for this project (Go back & watch the Senator who admitted Oregon could have applied but chose not too). You want to spend millions on low-income housing, only to betray those low income families by having them pay more to get to work. You should be ashamed. I hope the cities of Oregon City and West Linn file to stop the project as the impact to traffic in the cities will be astronomical. People will be forced to travel roads to avoid the tolls. I realize Kate Brown was used to the East Coast tolling (I heard her say many times that we should be like the east coast. Frankly, we should be proud NOT to be like them & have our own identity. I also know these comments are just a means to appease and it's the beaucratic way to go through the motion. The Governor needs to step up if she wants voters to respect her.

<b>ODOT I-205 Toll EA - RECORD #46 DETAIL</b>
---

<b>Submission Date :</b>	2/27/2023
<b>First Name :</b>	Roger
<b>Last Name :</b>	Suds
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email
<b>Q3. Comments :</b>	We need tolls to cover this !

**ODOT I-205 Toll EA - RECORD #47 DETAIL****Submission Date :** 2/27/2023**First Name :** Edward**Last Name :** Grensky**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :**

There is no doubt I-205 needs improving; If the Governor stopped wasteful spending and cut back on less essential programs, the city would not have to increase taxes through tolls. Once these tolls are put into service, the government will not stop collecting tolls but will increase toll prices year after year. A governor must re-visit programs and make cuts rather than find ways to take hard-earned money from its citizens and stick to the budget. If Oregon citizens managed money like our Governor, most of us would hear from collectors. I could go on about this issue, but I know this response will fall on deaf ears, so I will stop here. If you've read this response, thank you.

<b>ODOT I-205 Toll EA - RECORD #48 DETAIL</b>
---

**Submission Date :** 2/27/2023

**First Name :**

**Last Name :** DK

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I am an Oregon resident and against all tolling on Oregon roads.

**ODOT I-205 Toll EA - RECORD #53 DETAIL**

**Submission Date :** 2/28/2023  
**First Name :** Madison  
**Last Name :** Thesing  
**Affiliation :** City of Lake Oswego  
**Submission Method :** Letter

**Q3. Comments :** Hello,  
Attached is a letter from Mayor Buck - The City of Lake Oswego is requesting an additional 45 days be added to the review period to adequately review and comment on the entire package as presented. This is necessary for both staff and for the general public who will be significantly impacted by this project. Please let me now if you have any questions or follow up.  
Thank you for your attention and consideration.  
Sincerely, Assistant to the City Manager

**Attachments :** City of LO 45-day Review Extension Request - 02-28-2023 Signed.pdf (168 kb)  
City\_of\_LO\_45day\_Review\_Extension\_Request\_\_02282023\_Signed.pdf (168 kb)



February 28, 2023

Mandy Putney  
Oregon Department of Transportation  
Via email  
CC: Keith Lynch, FHWA, Kris Strickler, ODOT

Dear Ms. Putney,

Last week on February 21, we were made aware the I-205 Toll Project Environmental Assessment (EA) was open for a 45-day public comment period. Our initial review of the documents shows there are several thousand pages of documentation to review. We believe this is insufficient time for either staff or the general public to adequately review.

The proposed schedule includes two webinars and one three-hour public hearing, all intended to occur within this 45-day period. While this may be an attempt to engage the public, it's simply not adequate given the vast amount of information provided in the EA.

We acknowledge there have been previous engagement points, but the feedback from local agency involvement is not documented or traceable within the current EA, and it will be necessary for our staff to go through each document carefully to determine how, or if, our concerns were addressed and proper mitigation provided. This project will significantly impact the surrounding local circulation system and our communities, pushing congestion from the freeways into our neighborhoods. This is a serious and significant concern for all of our constituents.

Therefore, on behalf of the people we serve, and as a participating agency for the I-205 Tolling Project, we formally ask that an additional 45 days be added to the review period to adequately review and comment on the entire package as presented. This is necessary for both staff and for the general public who will be significantly impacted by this project.

Thank you for your consideration.

Sincerely,

Mayor Joseph M. Buck

Cc: Martha Bennett, City Manager  
Erica Rooney, City Engineer | Public Works Director  
Will Farley, Traffic Engineer





February 28, 2023

Mandy Putney  
Oregon Department of Transportation  
Via email  
CC: Keith Lynch, FHWA, Kris Strickler, ODOT

Dear Ms. Putney,

Last week on February 21, we were made aware the I-205 Toll Project Environmental Assessment (EA) was open for a 45-day public comment period. Our initial review of the documents shows there are several thousand pages of documentation to review. We believe this is insufficient time for either staff or the general public to adequately review.

The proposed schedule includes two webinars and on three-hour public hearing, all intended to occur within this 45-day period. While this may be an attempt to engage the public, it's simply not adequate given the vast amount of information provided in the EA.

We acknowledge there have been previous engagement points, but the feedback from local agency involvement is not documented or traceable within the current EA, and it will be necessary for our staff to go through each document carefully to determine how, or if, our concerns were addressed and proper mitigation provided. This project will significantly impact the surrounding local circulation system and our communities, pushing congestion from the freeways into our neighborhoods. This is a serious and significant concern for all of our constituents.

Therefore, on behalf of the people we serve, and as a participating agency for the I-205 Tolling Project, we formally ask that an additional 45 days be added to the review period to adequately review and comment on the entire package as presented. This is necessary for both staff and for the general public who will be significantly impacted by this project.

Thank you for your consideration.

Sincerely,

Mayor Joseph M. Buck

Cc: Martha Bennett, City Manager  
Erica Rooney, City Engineer | Public Works Director  
Will Farley, Traffic Engineer

**ODOT I-205 Toll EA - RECORD #54 DETAIL**

**Submission Date :** 2/28/2023

**First Name :** Frank

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** NO TOLLING. You will cause huge negative impacts on people, environment, communities, finances, traffic, safety, environment and much more. You are acting like dictators.

**ODOT I-205 Toll EA - RECORD #55 DETAIL**

**Submission Date :** 2/28/2023

**First Name :** Penelope

**Last Name :**

**Affiliation :** Oregon tax payer

**Submission Method :** Accessible form

**Q3. Comments :** Increased cost of food and gas plus high property taxes makes any toll over 50 cents per trip unreasonable for most families including myself on a fixed income. It would mean I would have to quit some regular volunteering and visiting relatives. Proposed tolls are likely to burden families already struggling to make ends meet. The unintended consequences of the tolls will cause many people choose gas for their cars or feeding their families. This is unacceptable. Tolls for high peak times and special rates for "certain" groups is fundamentally biased and is a disservice to the people in the communities affected most.

**ODOT I-205 Toll EA - RECORD #56 DETAIL**

**Submission Date :** 2/28/2023

**First Name :** David

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** This project will negatively impact on low and middle income people, making them choose between eating and going to work or visiting family.

**ODOT I-205 Toll EA - RECORD #57 DETAIL****Submission Date :** 2/28/2023**First Name :** Dennis**Last Name :** Taylor**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** The tolling project is a perfect example of government overreach, and cherry picking evidence to support their predetermined goal. This project allows unelected bureaucrats to dictate policy, and impose fees without voter support. Tolling will not reduce congestion, only worsen it by diverting traffic to surface streets that have inadequate capacity. Tolling will enrich an out-of-state company that collects the fees. Tolling will have a more severe economic impact on low-income workers that need to travel our area's freeways to get to and from work, on their bosses' schedules. They don't have the flexibility to travel at non-peak hours. Please consider other alternatives to funding that are more broad-based. If you're so certain that tolling is the ONLY option, then make your case to the voters, and let us decide with a statewide vote.

**ODOT I-205 Toll EA - RECORD #58 DETAIL**

**Submission Date :** 3/1/2023  
**First Name :** Paulette  
**Last Name :** Alexandria  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** This whole project is an insult to the people who have been paying taxes their whole lives in Oregon and thinking you guys were using that money to improve our roads. Our roads don't get improved but instead we get bike paths and walking Bridges and Light Rail and more buses and commuter programs. I see this latest tool project is a way for you to finally force and I mean force people into carpooling giving up their car using the max using the bus or some other commitactic you've been cooking up all these years. Stop it people hate this they love their cars they want their cars cars equal personal freedom the right to move around as you wish. Roads equal personal freedom don't you get it? Use the money that was given to you to improve our roads and freeway systems like other states have. And in case you misjudge me I already own an electric car and a huge electrical array tied to my. There are drop in the bucket. Your toll scheme will further degrade Oregon into socialist hell. Just stop and fix the roads and freeways thank you.

**ODOT I-205 Toll EA - RECORD #59 DETAIL****Submission Date :** 3/1/2023**First Name :** Darlene**Last Name :** Schwartz**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** I would like to strongly recommend NO TOLLING in the West Linn area. My husband and I are seniors who live on a restricted budget and having to pay a toll to just do errands, shopping, doctor appointments, etc. would be a horrible hardship on us and so many others in our town. It's going to be bad enough with all the extra traffic going through our town for people trying to avoid the tolls. You will be affecting our regular life and to add an additional financial burden is disgusting! I hope you will reconsider this action and give seniors and other struggling citizens a break!!!!

**ODOT I-205 Toll EA - RECORD #62 DETAIL**

**Submission Date :** 2/28/2023

**First Name :** Lynn

**Last Name :** Peterson

**Affiliation :** Metro Council

**Submission Method :** Letter

**Q3. Comments :** Please find attached our letter requesting an extension of the public comment period for the I-205 Toll Project Environmental Assessment. Thank you

**Attachments :** Picture (Device Independent Bitmap) 1.jpg (9 kb)  
MCP\_ I-205 Toll Project EA - Request for 45 day Extension for Public Comment Period.pdf (88 kb)





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

**Council President Lynn Peterson**

February 28, 2023

Mandy Putney  
Oregon Department of Transportation  
Via email  
CC: Keith Lynch, FHWA, Kris Strickler, ODOT

Dear Ms. Putney,

We are aware that the public comment period for the I-205 Toll Project Environmental Assessment (EA) began on February 21, 2023. **After initial review of the materials, we do not feel that the 45-day public comment period that ODOT is offering is sufficient.** The Environmental Assessment includes thousands of pages of information that must be reviewed and analyzed before comments can be developed. Comments will then need to be presented, discussed and coordinated through our Council, and our regional coordinating bodies.

Based on the extensive amount of analysis presented in the EA, we consider this proposal a major change to how our transportation system functions both on and off the highway. While we have not completed our review, this proposal has the potential to cause significant impacts to communities within the Metro region. As the federally designated Metropolitan Planning Organization (MPO) we need to understand what those impacts will look like and how this change will impact the region.

We are also concerned about the lack of opportunities for public engagement. Two webinars, one three-hour public hearing, and a survey all set to occur within 45 days will not provide sufficient opportunity for community members to become informed and have the opportunity to provide feedback. More time and more opportunities for meaningful engagement are needed.

Therefore, as a participating agency for the I-205 Toll Project Environmental Assessment, we formally request an additional 45 days be added to the public comment period for the I-205 Toll Project Environmental Assessment which will result in a 90-day public comment period. This extension will allow adequate time for review and public engagement.

We look forward to offering substantive comments but need the time along with the communities we represent to appropriately engage in this critical process. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn Peterson".

Metro Council President  
Lynn Peterson

A handwritten signature in black ink, appearing to read "Christine Lewis".

Deputy Council President  
Christine Lewis

**ODOT I-205 Toll EA - RECORD #64 DETAIL**

**Submission Date :** 2/28/2023

**First Name :** Kasi

**Last Name :** Woidyla

**Affiliation :** Virginia Garcia Memorial Health Center

**Submission Method :** Letter

**Q3. Comments :** [Melanie Ware forwarded: Request to extend the I-205 Toll Project EA comment period. Providing for tracking purposes.]

From: <kwoidyla@vgmhc.org<mailto:kwoidyla@vgmhc.org>>

Sent: Tuesday, February 28, 2023 3:51 PM

To: MOSIER Della D

<Della.D.MOSIER@odot.oregon.gov<mailto:Della.D.MOSIER@odot.oregon.gov>>

Cc: Kim, David <david.kim1@wsp.com<mailto:david.kim1@wsp.com>>

Subject: RTAC Input on I-205 Toll Project EA Public Comment Period

Please find the attached.

Thank you

**Attachments :** image002.jpg (12 kb)  
EA survey letter.pdf (122 kb)



Virginia Garcia Memorial  
**HEALTH CENTER**

Tuesday, February 28, 2023

To: ODOT Urban Mobility Office

Cc: David Kim, WSP

Re: RTAC Input on I-205 Toll Project EA Public Comment Period

To Whom it May Concern:

On Monday, February 27 during the monthly Regional Toll Advisory Council meeting Nicole McDermott presented the I-205 Toll Project EA Overview. She also provided details on the public comment period, including the fact that the period had already begun and would last for 45 days.

Virginia Garcia had the opportunity to review the website and supporting information on the ODOT website prior to the meeting. During this review, we noted that, while the landing page was available in multiple languages, the supporting graphics and videos were only available in English. In addition, the survey that ODOT wanted each person to complete, was only available in English.

I raised my concerns with this at the meeting with the ODOT team and was assured that translations were in process, and it would be available "soon". No timeframe was given.

Other committee members supported my assertions and further suggested delaying the start of the 45 days to align with the availability of the information in all necessary languages or to extend the end date to accommodate this delay.

Virginia Garcia is committed to ensuring all voices are given the opportunity to be heard. The lack of cultural awareness by ODOT on this matter is concerning. This information is difficult to understand in any language and at any level. For that reason, it is our recommendation that the I-205 Toll Project Environmental Assessment public comment period be extended to no less than 60 days. Further, the public engagement period should NOT begin until the multi-language materials are widely available to the public in print and digital formats, as well as made available online.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Kasi Woidyla".

Kasi Woidyla

RTAC Member

Marketing Communications Director

Virginia Garcia Memorial Health Center

**ODOT I-205 Toll EA - RECORD #65 DETAIL**

**Submission Date :** 2/28/2023

**First Name :** Lorraine

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I am against tolling .... People will take the backroads & cause congestion

**ODOT I-205 Toll EA - RECORD #66 DETAIL**

**Submission Date :** 3/2/2023  
**First Name :** Jacque  
**Last Name :** Betz  
**Affiliation :** City of Gladstone  
**Submission Method :** Letter

**Q3. Comments :** Ms. Putney,

Attached is a letter from the City of Gladstone requesting a 45 day extension to review and comment on the I-205 Toll Project Environmental Assessment.

Thank you for the consideration.

**Attachments :** EA Comment Period Extension.pdf (401 kb)  
I-205\_EA\_Extension\_Gladstone.pdf (401 kb)



March 2, 2023

Mandy Putney  
Oregon Department of Transportation  
Via email  
CC: Keith Lynch, FHWA, Kris Strickler, ODOT

Dear Ms. Putney,

On behalf of the Gladstone City Council, we respectfully request that an additional 45 days be added to the review period to adequately review and comment on the I-205 Toll Project Environmental Assessment (EA), which began on February 21, 2023. The Environmental Assessment includes thousands of pages of information that must be reviewed and analyzed before comments can be submitted.

We appreciate that there have been opportunities for public engagement, and that two webinars, one three-hour public hearing, and a survey are forthcoming however, we do not believe that will provide sufficient opportunity for our community members to become informed and have the opportunity to provide feedback. More time and more opportunities are needed.

You are proposing a major change to how our transportation system operates (both on and off the highway), as evidenced by the extensive analysis presented in the EA. This proposal will cause significant impacts to our community, which we do not take lightly. Of particular concern is traffic diversion in Gladstone, which will be a serious problem crowding secondary roads near tolling facilities. Diverted traffic will contribute to traffic delays, traffic accidents, and accelerated deterioration of smaller 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.

Therefore, we formally request an additional 45 days be added to the public comment period for the I-205 Toll Project Environmental Assessment, which will result in a 90-day public comment period.

Thank you for your consideration.

Sincerely,

*Michael Milch*

Mayor Michael Milch



March 2, 2023

Mandy Putney  
Oregon Department of Transportation  
Via email  
CC: Keith Lynch, FHWA, Kris Strickler, ODOT

Dear Ms. Putney,

On behalf of the Gladstone City Council, we respectfully request that an additional 45 days be added to the review period to adequately review and comment on the I-205 Toll Project Environmental Assessment (EA), which began on February 21, 2023. The Environmental Assessment includes thousands of pages of information that must be reviewed and analyzed before comments can be submitted.

We appreciate that there have been opportunities for public engagement, and that two webinars, one three-hour public hearing, and a survey are forthcoming however, we do not believe that will provide sufficient opportunity for our community members to become informed and have the opportunity to provide feedback. More time and more opportunities are needed.

You are proposing a major change to how our transportation system operates (both on and off the highway), as evidenced by the extensive analysis presented in the EA. This proposal will cause significant impacts to our community, which we do not take lightly. Of particular concern is traffic diversion in Gladstone, which will be a serious problem crowding secondary roads near tolling facilities. Diverted traffic will contribute to traffic delays, traffic accidents, and accelerated deterioration of smaller 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.

Therefore, we formally request an additional 45 days be added to the public comment period for the I-205 Toll Project Environmental Assessment, which will result in a 90-day public comment period.

Thank you for your consideration.

Sincerely,

*Michael Milch*

Mayor Michael Milch

**ODOT I-205 Toll EA - RECORD #67 DETAIL**

**Submission Date :** 3/3/2023

**First Name :** Ardine

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** tolling will only divert traffic to other roads and neighborhoods. The effect will be terrible.



<b>ODOT I-205 Toll EA - RECORD #68 DETAIL</b>
---

<b>Submission Date :</b>	3/3/2023
<b>First Name :</b>	John
<b>Last Name :</b>	DeMott
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email

### Q3. Comments :

I have some general comments about the tolling project and the environmental assessment, and some specific comments about the impact on the geographic area of greatest concern to me, the Stafford Road corridor in Lake Oswego.

#### General comments on the project

The design of the environmental assessment is grossly flawed in the way it defines the Build and No Build alternatives. The way those two alternatives are defined predetermines the outcome of the analysis.

Anyone who uses the I-205 highway in the project area can see that an additional travel lane and other improvements are badly needed. There is an obvious bottle neck causing unacceptable traffic congestion, with resulting impacts on traffic safety, fuel consumption, travel times, etc. It doesn't take a multi million dollar analysis to see that widening the highway will reduce congestion on I-205. The need for the improvements is so obvious that widening the highway should be the base case in the analysis.

The misleading element in the design of the environmental assessment is the decision to present the novel (for Oregon) use of tolling as a hybrid social engineering/financing measure only in combination with the infrastructure improvements. If we are to understand the effects of the tolling proposal, the environmental assessment must show a meaningful and unbiased comparison between the situation with and without the implementation of tolls. Oregon has a long history of building and improving its highways without any toll based financing and has kept its highway system open to all for generations. This has benefited all Oregonians in many ways, not least in providing more equitable access to transportation for people of limited means. Toll free roads are the normal, base case expectation in Oregon. In the case of I-205 there are two separate questions. What is the impact of widening the highway? And what would happen if we add a congestion pricing toll to a segment of the highway? When the environmental assessment combines the clearly needed widening of the highway with the unprecedented use of tolling, it serves only to obscure and confuse any understanding of the merits and demerits of the tolling proposal and of the physical improvements.

A fair and transparent analysis of the tolling proposal requires that the environmental assessment must show the impact of the tolling independently of the infrastructure improvements. In other words, there must be an analysis of the impacts of widening the highway using the same non-tolling financing techniques that Oregon has always used, and doubtless will continue to use for years to come for many projects. That analysis would be, in every sense of the word, a build/no build analysis, showing the effects of new construction. There then should be a toll/no toll comparison showing the separate effects of tolling--i.e., a comparison of a widened I-205 without tolls and a widened I-205 with tolls. ODOT's own documentation describes the project as a "tolling project." The environmental assessment should let us understand what are the effects of tolling.

Presumably much of the analysis presented in the environmental impact statement is based upon exactly this sort of two step comparison--an analysis of the impact of build/no build of the physical highway and its impacts upon traffic flows and a separate analysis of the impacts of tolling. So I assume ODOT planners have a very good idea what the separate impacts would be. Presenting these logically separate components in a combined form can only be the result of a conscious decision to obscure the full effects of tolling and to bias the interpretation of the tolling proposal.

I understand that there are various arguments for the use of tolling as a way to control traffic congestion and that tolling has been used for that purpose in other jurisdictions with varying degrees of success and acceptance. Nonetheless, I believe that ODOT fails to recognize and appreciate the way these proposals are seen by those who are directly affected. The daily congestion along I-205, along the only stretch of the highway that has not been widened to three lanes, can only be seen as a failure of traffic planning.

The need is obvious and yet the work hasn't been done. Now, the same traffic planners propose to inflict more suffering on the same drivers in the form of a toll--a punishment not visited upon most of their fellow Oregonians who have the good fortune to have highways that were better designed for their needs. Where is the fairness in that?

Specific comments regarding the Stafford corridor

I appreciate that there has been a great deal of careful work done to identify and analyze specific impacts of the project, particularly as they affect local areas within the project boundaries. As a resident of the Palisades neighborhood in Lake Oswego, I am daily user of the Stafford corridor both as a driver and as a pedestrian. My chief concerns are the impact of the proposal on pedestrian safety--congestion and fender benders are of course a concern for drivers, but any encounter between a motor vehicle and a pedestrian is much more serious for the pedestrian.

As I understand the analysis in the environmental impact, traffic volumes along Stafford Road in Lake Oswego, as measured at the roundabout at Rosemont Road, are forecast to be even worse after the implementation of the tolling project. Obviously, more traffic means more risk for pedestrians. For those of us who live in the Stafford area, many or most of whom use both Stafford Road and I-205, the tolling proposal will mean the worst of all possibilities--we will be less safe, and experience more congestion, AND we will be paying tolls for the privilege of our increased misery.

I thought the suggestions for pedestrian safety improvements at the Rosemont roundabout were very useful. As a pedestrian who regularly crosses at that intersection, I can testify that it is very dangerous. It is currently not well marked and drivers exiting the roundabout are often focused on exiting quickly without full attention on potential hazards. I would also note that sight lines for drivers are poor so they have little time to react to pedestrians in the cross walk as they exit the circle. Also, as a general comment, while pedestrian warning lights are certainly a good idea, for some reason they do not get the reaction from drivers that one would expect--too often I have seen drivers fail to react to the warning lights.

The sort of mitigation measures proposed for the Rosemont roundabout should also be applied to the next intersection along Stafford--the signaled intersection with Overlook Drive which has much, much higher pedestrian traffic due to the proximity of a high school, a senior living center, and a major parks and recreation complex.

**ODOT I-205 Toll EA - RECORD #69 DETAIL****Submission Date :** 3/4/2023**First Name :** Larry**Last Name :****Affiliation :****Submission Method :** Accessible form**Q3. Comments :** Articles I have been reading the past three or four months is that the US is already in a recession and some contrarians -- those against the media narrative -- is that there will not be a soft landing. Only time will tell and it should be evident before the end of 2023. I'm confident 'I told you so' will / is coming to pass. Look at the John Williams ShadowStats graphs and the 24% unemployment, not 3.5%, is the kiss of death. Job losses over the past two decades are permanent.

**ODOT I-205 Toll EA - RECORD #70 DETAIL**

**Submission Date :** 3/4/2023  
**First Name :** Elizabeth  
**Last Name :** Feddersen  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** I do not believe there is an argument that declines the need for the upgrades to the highway system. The argument is in how this proposal was presented and the "surprise" if you will; on the back lash.

Frustrated:

This should have gone to the voters. This is essentially a tax per the Oregon State Constitution: Section 32. Taxes and duties; uniformity of taxation. No tax or duty shall be imposed without the consent of the people or their representatives in the Legislative Assembly; and all taxation shall be uniform on the same class of subjects within the territorial limits of the authority levying the tax. [Constitution of 1859; Amendment proposed by H.J.R. 16, 1917, and adopted by the people June 4, 1917]

Question?

We already pay a gas tax that is intended for road maintenance & improvements. Where is the documentation of where that funding is being used? Oregon has the third highest income tax rate in the nation. Where is the accounting of where that money has gone?

Concern:

There does not appear to be an 'end date'. The east coast has a similar situation. There, as one suspects will occur here; this will be permanent tax. Does Oregon have Lobbyists & Politicians who are lining their pockets on the backs of Oregon tax payers?

Responsible and prudent State organizations should be mindful of the use and abuse of tax payers dollars. A transparent discussion would be to state and stick with an end date.

Example: A year to raise the funds. Projects done and paid for in 10 years. Tolls are removed.

Unfortunately, Oregon has not been transparent about the use of tax dollars. Thus the a level of mistrust with the voters. Examples: The building of a prison never used and plans for a bridge construction, that never came to fruition.

The coastal communities have serious road maintenance problems. Where is the discussion on road maintenance and infrastructure support for these communities?

Thank you for your time and attention

**ODOT I-205 Toll EA - RECORD #71 DETAIL**

**Submission Date :** 3/6/2023  
**First Name :** Stephanie  
**Last Name :** Broadhurst  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** Hello, ODOT staff. As a resident of West Linn, I would like to express my opposition to the planned tolling where I-205 crosses the Willamette and Tualatin Rivers because it will disproportionately affect residents of West Linn. A glance at a map shows that about half of the perimeter of West Linn is bordered by these rivers. The only way to cross the Willamette River is by using the narrow Arch Bridge or I-205. The only way to cross the Tualatin River is by using SW Stafford Road, I-205, Willamette Falls Drive, or SW Pete's Mountain Road. We citizens of West Linn should not be penalized because of the geography of this area. We have very few options if we need to cross these rivers and most of us cross by using I-205. If funds are needed to improve I-205 I do not think West Linn citizens should not be forced to pay every time we use I-205 to cross a river. Certainly there are funding options that don't unfairly impact those of us who happen to live near these rivers.

Thank you for your attention.

**ODOT I-205 Toll EA - RECORD #78 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Laura

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Unless there are rules against corporate perks - this will simply be another tax on the middle class. Why can't we simply agree to tax corporate profits. Infrastructure is directly linked to cost of business. People are sick of constantly being stripped of their ability to afford to work while corporations are constantly dodging their responsibilities. DOT allowed NIMBY to kill the MAX out to Estacada as well as other public transportation projects and this is what you come up with instead? Come on!!!

**ODOT I-205 Toll EA - RECORD #80 DETAIL**

**Submission Date :** 3/6/2023

**First Name :** Cody

**Last Name :** Field

**Affiliation :** City of Tualatin

**Submission Method :** Letter

**Q3. Comments :** Good morning Ms. Putney,

Attached to this email please find a letter on behalf of Mayor Frank Bubenik and the Tualatin City Council requesting an additional extension of the I-205 Toll Project EA comment period.

Please contact us if you have any questions. Thank you!

Sincerely,

**Attachments :** FINAL\_Request-Extension of I-205 Toll Project EA Comment Period (City of Tualatin).pdf (180 kb)





City of Tualatin

[www.tualatinoregon.gov](http://www.tualatinoregon.gov)

March 6, 2023

Mandy Putney  
Oregon Department of Transportation  
355 Capitol Street NE, MS11 Salem, OR 97301  
*Via Email*

**RE: I-205 Toll Project Environmental Assessment Comment Period Extension**

Dear Ms. Putney,

On February 21, 2023, the City of Tualatin received notification that the I-205 Toll Project Environmental Assessment (EA) was available for public comment. The City appreciates ODOT's willingness to extend the comment period an additional 15 days; however, we still have concerns regarding the length of the comment period and respectfully request that ODOT extend the 60-day comment period to 90-days for the following reasons:

- 1) The length and complexity of the EA document presents a challenge for city staff to properly review and analyze the contents with sufficient time to share findings with City Council. With limited time and resources, City staff will not have sufficient time to review thousands of pages of information, share that information with Council, and generate meaningful comments prior to the April deadline. Furthermore, if the length and complexity of the document presents a challenge for staff, it presents an even greater challenge for residents of the City.
- 2) We feel that ODOT will not provide sufficient public engagement opportunities over the 60-day period. With additional time, ODOT will be able to provide more than just the two webinars, one three-hour long public meeting, and one survey currently scheduled.
- 3) Many of the public engagement materials are currently only available in English. This excludes members of our community with limited English proficiency. 21.5 percent of Tualatin's population is Hispanic or Latino/Latina. The lack of translated materials further marginalizes these members of our community.
- 4) The significant and unprecedented impact the Toll project will have on our community, and the entire region, is substantial. We feel such a substantial change necessitates a longer and more thorough public engagement process.

For the reasons stated above, we urge ODOT to extend the public comment period for an additional 30 days, for a total of 90 days. This extension will allow adequate time for staff review of the EA and for thorough public engagement.

Thank you for your consideration,

Sincerely,

A handwritten signature in blue ink that reads "Frank Bubenik". The signature is written in a cursive, flowing style.

Frank Bubenik  
Mayor, City of Tualatin  
On behalf of the Tualatin City Council

CC: Kris Strickler, Oregon Department of Transportation  
David Kim, WSP

**ODOT I-205 Toll EA - RECORD #81 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** mary

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Do NOT toll on The Abernathy Bridge, where it is the ONLY access from West Linn for my daily visits to my Residential Care Facility off of McLoughlin.

**ODOT I-205 Toll EA - RECORD #82 DETAIL**

**Submission Date :** 3/8/2023

**First Name :** Saud

**Last Name :** Badri

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I don't normally write to any government agency but I felt it was necessary to say something. Who do I need to get in contact with to stop the tolling project? Well I understand that people think toll roads provide a service It is at the cost of low-income individuals that will be paying a heavy burden to drive on the roads.

Any help would be greatly appreciated

Thank you

**ODOT I-205 Toll EA - RECORD #83 DETAIL**

**Submission Date :** 3/9/2023

**First Name :** John

**Last Name :** Williams

**Affiliation :** City of West Linn

**Submission Method :** I-205 EA email

**Q3. Comments :** Good morning Mandy,  
The West Linn Council would very much appreciate a presentation from your team on the Environmental Assessment and the opportunity for a conversation, ideally before the end of the public comment period. Would the evening of April 3 work for your team? This would be a work session and these typically start at 6 PM. Our April 10 meeting is already very full so not ideal. April 17 is an option, but a bit close to the end of the public comment period. Council would appreciate having time after meeting with ODOT to finalize their comments.

As a heads-up, at their meeting this week, Council approved a letter requesting a full 90-day public comment period. In addition to all of the timeline reasons you've been hearing from others, we have an additional rationale for this request. We have a special election next week for two Council positions, and the winner will likely not be formally sworn in until April. The 205 Tolling Project has been an issue of interest to those campaigning, and if possible we'd like to allow the new candidates time to help shape the City's formal comments to your team. Anyway...the letter will be probably arriving by email today.

Thanks - and let me know if April 3 is a possibility. I can only imagine how busy you and your team are right now!

Sincerely,

**ODOT I-205 Toll EA - RECORD #85 DETAIL**

**Submission Date :** 3/9/2023

**First Name :** Kathy

**Last Name :** Mollusky

**Affiliation :** City of West Linn

**Submission Method :** Letter

**Q3. Comments :** Please see attached letter formally requesting a 90-day public comment period for the I-205 Toll Project Environmental Assessment.

Thank you.

City of West Linn

**Attachments :** 2023-03-09 I205 Tolling Public Comment Extension Request.pdf (863 kb)  
I-205\_EA\_Extension\_West\_Linn.pdf (863 kb)



# CITY OF West Linn

March 9, 2023

Mandy Putney  
Oregon Department of Transportation  
*Via email*  
CC: Keith Lynch, FHWA, Kris Strickler, ODOT

Dear Ms. Putney,

On behalf of the West Linn City Council, I am writing to request an extension to the public comment period for the I-205 Toll Project Environmental Assessment (EA), which began on February 21, 2023. We appreciate the additional time that ODOT recently provided. However, as we continue our review of the voluminous materials that have just been released, we request a 90 day public comment period to complete our work and provide you with specific, concise, and well-reasoned comments. The Environmental Assessment includes thousands of pages of information that must be reviewed and analyzed before comments can be developed. For a smaller city like ours, this review must be conducted at the same time as a multitude of other projects. We then need to work our comments through local review, particularly our City Council meeting schedule.

We are also concerned about the lack of opportunities for public engagement. Two webinars, one three-hour public hearing, and a survey all set to occur within 45 days will not provide sufficient opportunity for our community members to become informed and have the opportunity to provide feedback. More time and more opportunities are needed.

Specifically, we request that ODOT present directly to the West Linn City Council at an upcoming Council meeting within the public comment period timeline, and request that you reach out to our Neighborhood Associations and local business organizations with a similar offer. West Linn will be perhaps the most impacted community by the tolling proposal, and we would appreciate that ODOT conduct public outreach accordingly.

In summary, as a participating agency for the I-205 Toll Project Environmental Assessment, we **formally request that you provide a 90-day public comment period for the I-205 Toll Project Environmental Assessment.** We could certainly make good use of even more time but understand you are working within limitations as well. A 90-day comment period will allow much-needed time for review and public engagement.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rory Bialostosky".

Rory Bialostosky, Interim Mayor  
City of West Linn

A handwritten signature in blue ink, appearing to read "John Williams".

John Williams, City Manager  
City of West Linn



# West Linn

March 9, 2023

Mandy Putney  
Oregon Department of Transportation  
*Via email*  
CC: Keith Lynch, FHWA, Kris Strickler, ODOT

Dear Ms. Putney,

On behalf of the West Linn City Council, I am writing to request an extension to the public comment period for the I-205 Toll Project Environmental Assessment (EA), which began on February 21, 2023. We appreciate the additional time that ODOT recently provided. However, as we continue our review of the voluminous materials that have just been released, we request a 90 day public comment period to complete our work and provide you with specific, concise, and well-reasoned comments. The Environmental Assessment includes thousands of pages of information that must be reviewed and analyzed before comments can be developed. For a smaller city like ours, this review must be conducted at the same time as a multitude of other projects. We then need to work our comments through local review, particularly our City Council meeting schedule.

We are also concerned about the lack of opportunities for public engagement. Two webinars, one three-hour public hearing, and a survey all set to occur within 45 days will not provide sufficient opportunity for our community members to become informed and have the opportunity to provide feedback. More time and more opportunities are needed.

Specifically, we request that ODOT present directly to the West Linn City Council at an upcoming Council meeting within the public comment period timeline, and request that you reach out to our Neighborhood Associations and local business organizations with a similar offer. West Linn will be perhaps the most impacted community by the tolling proposal, and we would appreciate that ODOT conduct public outreach accordingly.

In summary, as a participating agency for the I-205 Toll Project Environmental Assessment, we **formally request that you provide a 90-day public comment period for the I-205 Toll Project Environmental Assessment.** We could certainly make good use of even more time but understand you are working within limitations as well. A 90-day comment period will allow much-needed time for review and public engagement.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rory Bialostosky".

Rory Bialostosky, Interim Mayor  
City of West Linn

A handwritten signature in blue ink, appearing to read "John Williams".

John Williams, City Manager  
City of West Linn



**ODOT I-205 Toll EA - RECORD #88 DETAIL**

**Submission Date :** 3/9/2023  
**First Name :** Jennifer  
**Last Name :** Aberg  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** I am a resident of West Linn and I am not happy with the way tolling is being rolled out. It is putting undue pressure on citizens in West Linn, Oregon City and parts of Gladstone. In order for West Linn residents to move around the city we must get on and off I 205 80% of the time. When the toll goes in, people in WL will divert to the neighborhoods who would have normally gotten on the freeway for a short trek around the City. This does not include the diversion we will receive in WL from people getting off 205 to divert through West Linn. ODOT keeps stating they are aware of the diversion but never actually speaks about a plan as to what they are going to do to stop this. Stop asking for questions and never provide answers.  
My suggestions are:  
Put the gantry on 205 before the Stafford exit if going North bound. This will stop anyone wanting to divert because they have paid the toll already. I understand some federal funding requirements require tolling only the road that is being improved etc. I would urge you to see if you can get a variance for that due to this very specific issue that in most cases is not an issue in other cities.  
Allow WL citizens who sign up for a transmitter to only be allowed to be charged \$10 or XXX number of dollars due to the proximity of the toll. This will provide some relief to WL citizens.  
I am happy to answer any questions,

**ODOT I-205 Toll EA - RECORD #89 DETAIL**

**Submission Date :** 3/9/2023

**First Name :** Bunny

**Last Name :** Brooks

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I have owned my home in West Linn for 30 years. The proposed tolls and subsequent local traffic changes unfairly impact local resident cost and livability. I am already forced to schedule errands and appointments around peak traffic hours. With tolls, I will still be unable to get to the freeway during peak hours via local routes and also be charged. This is not an equitable cost burden between residents and commuters.

No other Oregon Highway (Hwy 26, Hwy 217 or I5) widening projects have been subject to tolls.

These improvements and fees should not move forward unless they can be done in an equitable manner for homeowners.

<b>ODOT I-205 Toll EA - RECORD #90 DETAIL</b>
---

**Submission Date :** 3/9/2023

**First Name :** Robert

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :**

1. Fining us to use the roads we have already paid for is a unfair! It is a user tax and should not be implemented without a vote by the public.
2. Odot should stop spending millions on studies and spend it on new roads and traffic lanes instead. Your mission is to transport goods and people, not prevent us from using the roads.
3. Until electric vehicle owners are required to pay their fair share of road taxes, I cannot support any further tax increases for the rest of us.
4. This website needs to be redesigned so that comments can be collected in an unbiased environment. This entire presentation is skewed to farm answers that support ODOT's agenda.

**ODOT I-205 Toll EA - RECORD #93 DETAIL****Submission Date :** 3/9/2023**First Name :** Julia**Last Name :** Marie**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** I live on Johnson Rd, West Linn. Traffic on our supposedly 40 mile Road limit goes often to over 60. People bypass the freeway especially at prime commute times now in huge volume, how will that not continue to increase when people are avoiding tolls. There is absolutely no police oversight of this 4 mile stretch of road (I've lived here for 35 years so I know) Quality of life is extremely effected by constant flow of speeding traffic. Tolling would be horrible for our neighborhoods on Johnson Rd. I hope you are considering some solution to this impending problem.

**ODOT I-205 Toll EA - RECORD #95 DETAIL**

**Submission Date :** 3/9/2023

**First Name :** Rennie

**Last Name :** Muzii

**Affiliation :** Troubled Citizens in Fear of Taxation without Representation

**Submission Method :** I-205 EA email

**Q3. Comments :** I read a recent article about the planned Toll project in which you were quoted as saying a number of studies were done showing "limited impact" to the local communities.

I'm not sure if you have seen it yourself, but the surface roads off of the OR 43 exit, 10th street exit and Stafford road exit already are terribly backed up at rush hour or with any weather.

Near West Linn High School you are unable to turn and it takes upwards of 30 minutes to cross the Oregon City Bridge.

Finally there is often a back up from Fields Bridge Park all the way to a stand still though West Linn's Old Willamette downtown village.

Each of these will get demonstrably worse with toll avoidance not to mention the placement of the tolls is completely discriminatory to the residents of West Linn. We are locked between both proposed toll locations and cannot go anywhere without paying a toll. The Biden Administration recently signed a \$1 Trillion Infrastructure Bill, why couldn't that be used to pay for this?

I look forward to your response which I plan to post across several social media platforms.

**ODOT I-205 Toll EA - RECORD #96 DETAIL**

**Submission Date :** 3/9/2023

**First Name :** Lisa

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Poor or working class people who have to cross for work or medical appointments will be disproportionately affected. Restrict tolls to corporate commercial vehicles.

<b>ODOT I-205 Toll EA - RECORD #97 DETAIL</b>
---

**Submission Date :** 3/9/2023

**First Name :** Lisa

**Last Name :** Baldasar

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Please restrict tolling to truck and corporate travel. Ordinary people don't make enough to afford this on a daily basis.

**ODOT I-205 Toll EA - RECORD #98 DETAIL**

**Submission Date :** 3/10/2023

**First Name :** Deanna

**Last Name :** Mulder

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I just have to say that I feel like this comment time is for show only. Despite the number of people who are opposed to the tolls it feels like you intend to proceed anyway. I think it is highly unfair to ask an Oregon City, Gladstone or Milwaukie resident to pay tolls twice if the need to travel to Tualatin, Tigard area or to receive care at Meridan Park. It may prove to costly to folks and it feels like no one is listening or cares.

Just once I wish bureaucrats and politions would put themselves in the shoes of the average citizen and look at things from our perspective.



**ODOT I-205 Toll EA - RECORD #104 DETAIL**

**Submission Date :** 3/11/2023

**First Name :** Dennis

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Just another attempt to scam taxpayers, violates the ability to travel freely between states. Total government outreach to expand their agenda. We the People demand a vote.

**ODOT I-205 Toll EA - RECORD #105 DETAIL**

**Submission Date :** 3/13/2023

**First Name :** John

**Last Name :**

**Affiliation :** Frustrated Tax Payer

**Submission Method :** Accessible form

**Q3. Comments :** Tolling seems to be yet another state of Oregon 'Pet Project', for a state who perceives itself having a revenue problem while in reality it boils down to the state having a spending problem!

Being a Native Oregonian, I was once very proud of Oregon, wake up and smell the roses, as compared to incentivizing Oregon taxpayers to vacate the state, thus killing the golden goose!

The state's new tag line should read; "We're not happy 'til you're not happy!"

<b>ODOT I-205 Toll EA - RECORD #106 DETAIL</b>
--

**Submission Date :** 3/14/2023

**First Name :** lance

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** My concern is continuing the toll after the work has been paid for. I see in the 120 page report charts reflect tolling out till 2060 year. People will refuse to pay the toll and skirt the toll driving around the toll, this increases traffic in neighborhoods that had not been there before. Its undeniable there is a burden on family's with two minimum wage jobs travelling on this route. Also, the same burden on people traveling to school or day care multiple times a day for school, sports etc.,. There and back. Please stop the toll after the project is paid for given other federal funding available.

**ODOT I-205 Toll EA - RECORD #107 DETAIL**

**Submission Date :** 3/14/2023

**First Name :** Chris

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** ODOT has not taken into consideration other viable options to pay for expanded lanes on I205. A gas tax with federal dollars can pay for it and take the main burden off those who reside in the contiguous communities to the toll area. NOW is not the time for a toll. CONGESTION on the roadways near the tolls that are already congested . All you are doing is moving problem A (freeway traffic) to problem B (local road traffic). HOW MANY ODOT employees live in these communities or have driven our roads in the morning or evening commuter traffic? SOMEONE in ODOT must have a sense of reason about TOLLING NOT BEING THE BEST OPTION TO FUND THESE PROJECTS.

**ODOT I-205 Toll EA - RECORD #108 DETAIL**

**Submission Date :** 3/14/2023  
**First Name :** Everett  
**Last Name :** Wild  
**Affiliation :** Clackamas County Board of Commissioners  
**Submission Method :** Letter  
**Q3. Comments :** ODOT Staff:

Please accept the attached letter from the Clackamas County Board of Commissioners reiterating our request for a 90-day comment period for the I-205 Toll Project Environmental Assessment public comment period.

We respectfully request acknowledgement that our comment has been received and will be included in the record.

Thank you,

Everett Wild  
Commission Policy Advisor  
Clackamas County Administration  
2051 Kaen Road, Suite 450 | Oregon City, OR 97045  
503-307-2032 (cell) | 503-742-5912 (desk)  
ewild@clackamas.us<mailto:ewild@clackamas.us>

**Attachments :** Clackamas County Request for Additional I-205 EA Comment Extension - 2023-03-14.pdf (56 kb)  
I-205\_EA\_Extension\_Clackamas\_County\_Board.pdf (56 kb)



BOARD OF COUNTY COMMISSIONERS  
PUBLIC SERVICES BUILDING  
2051 KAEN ROAD | OREGON CITY, OR 97045

Mandy Putney  
Oregon Dept. of Transportation  
355 Capitol Street NE  
Salem, OR 97301  
*Via email*

March 14, 2023

Dear Ms. Putney:

We are aware that the public comment period for the I-205 Toll Project Environmental Assessment (EA) was extended by 15 days to April 21<sup>st</sup>, 2023. While we appreciate the small extension, we do not feel that the 60 day public comment period is sufficient. The Environmental Assessment includes thousands of pages of information that must be reviewed and analyzed before comments can be developed. The proposed additional 15 days of review time does not provide sufficient time for analysis, material development, and coordination through this body.

We also remain concerned about the lack of opportunities for public engagement. Two webinars, one three-hour public hearing, and a survey all set to occur within 60 days will not provide sufficient opportunity for our community members to become informed and have the opportunity to provide feedback. Additionally, the proposal to set up Information Tables at local grocers and libraries during normal working hours will not reach the majority of residents. We are hearing from our constituents that more time and more accessible opportunities are needed. **We formally request an additional public hearing occur during the final 30 days of the requested 90 day public comment period.**

You are proposing a major change to how our transportation system (both on and off the highway) will function as evidenced by the extensive analysis presented in the EA. This proposal will cause significant impacts to our communities which we do not take lightly.

Therefore, as a participating agency for the I-205 Toll Project Environmental Assessment, **we reiterate our request that you extend the public comment period to 90 days by adding an additional 30 days.** This extension will allow adequate time for review and public engagement.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Tootie Smith".

Tootie Smith, Chair  
On Behalf of the Clackamas County Board of Commissioners

CC: Kris Strickler, Oregon Department of Transportation  
Keith Lynch, Federal Highway Administration



BOARD OF COUNTY COMMISSIONERS  
PUBLIC SERVICES BUILDING  
2051 KAEN ROAD | OREGON CITY, OR 97045

Mandy Putney  
Oregon Dept. of Transportation  
355 Capitol Street NE  
Salem, OR 97301  
*Via email*

March 1, 2023

Dear Ms. Putney:

We are aware that the public comment period for the I-205 Toll Project Environmental Assessment (EA) began on February 21, 2023. **After initial review of the materials, we do not feel that the 45 day public comment period that ODOT is offering is sufficient.** The Environmental Assessment includes thousands of pages of information that must be reviewed and analyzed before comments can be developed. Comments will then need to be presented, discussed and coordinated through this body and our coordinating body, the Clackamas County Coordinating Committee (C4).

We are also concerned about the lack of opportunities for public engagement. Two webinars, one three-hour public hearing, and a survey all set to occur within 45 days will not provide sufficient opportunity for our community members to become informed and have the opportunity to provide feedback. More time and more opportunities are needed.

You are proposing a major change to how our transportation system (both on and off the highway) will function as evidenced by the extensive analysis presented in the EA. This proposal will cause significant impacts to our communities which we do not take lightly.

Therefore, as a participating agency for the I-205 Toll Project Environmental Assessment, we formally request an additional 45 days be added to the public comment period for the I-205 Toll Project Environmental Assessment which will result in a 90 day public comment period. This extension will allow adequate time for review and public engagement.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Tootie Smith".

Tootie Smith, Chair  
On Behalf of the Clackamas County Board of Commissioners

CC: Kris Strickler, Oregon Department of Transportation  
Keith Lynch, Federal Highway Administration

**ODOT I-205 Toll EA - RECORD #111 DETAIL**

**Submission Date :** 3/16/2023  
**First Name :** Jason  
**Last Name :** Neal  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** I have been commuting from Salem since 2014 due to the cost of housing up in the Portland metro area at the time being way more expensive than living in Salem and commuting in. Plus in my profession it is impossible to find a job that pays as well and uses all my skills down here in the Salem area and even south of here.

So with that said I just started a job in Milwaukie just off the expressway, after having lost my old job due to shutdown of the old Tektronix model shop in Beaverton, and so have to commute on 205 every day to and from work. Pending on how it happens for tolling it will add \$4.40 to my expenses per day and with that every week it will cost me 22 dollars a week, ~88 dollars a month, 1144 dollars a year. That is without adding in travels up to shop at places like Ikea and the like on weekends or even making a trip up to Washington to visit friends.

There is not enough security at the stops for 1X anymore and there is no public transportation anywhere near my work place. So that removes the possibility of taking public transport. Plus if there was a bus that did make it's way to that area early in the mornings it would take me 2+ hours to get to work and get home from work instead of the 45 minutes in the morning and approx 1 hour in the afternoon.

And so I would look at alternate routes just like quite a few others which will clog 213 and 99E even worse than it is now and so would cause distress to locales like Canby, Aurora, Oregon city, mulino, mollala, and other towns on the way.

So there is my 2 cents and hope that the tolls are denied as it is an added expense to a expensive cost of living as it is.



**ODOT I-205 Toll EA - RECORD #112 DETAIL**

**Submission Date :** 3/17/2023  
**First Name :** Bob  
**Last Name :** Blackmore  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** I strongly oppose tolling on I-205. If tolled, it will ruin my business, which is C-3 zoned property in Gladstone that is designed for businesses in the trade, such as contractors, plumbers, and so on. My property is just off I-205 in Gladstone, and my tenants serve West Linn, Lake Oswego, and other communities to the south and north. This toll will kill the business, as none of my tenants could afford the cost, or the time to drive around the tolls. I also note that my property is in a business zone that is in a distressed area and defined as an opportunity zone. Gladstone is a low-income area. ODOT's toll will disproportionately affect low-income people and further depress the area. This concept will also increase traffic on side streets, as I will no longer be able to go to my property as I will not be able to afford the toll. I will go through Lake Oswego, West Linn, Oregon City, Sellwood area, Portland, etc. I live in Lake Oswego. I expect my tenants and workers will do the same. My tenants will no longer be able to serve Lake Oswego, West Linn, Tualatin, etc. The projected cost of \$575/year for people using the bridge is low, the real cost will be in the thousands, \$4,000 range based on simple math, and the impact on low income areas will be devastating to businesses and people's lives in general. Reduction in wages of \$3,000,000 is also ridiculously low, and this will kill jobs in areas that need them most. The projection of benefits is non-sense, it is a one-way street, there will be no net economic benefits whatsoever. In fact, economic activity will be hit hard, there will be no environmental benefits, and the only economic activity generated will be the tolling business and any short-term improvement wages.

I ask Mayor Buck to share this with the Lake Oswego City Council, and I and asking our legislators to pass Senate Bill 933

For the record I also oppose tolling on I-5 for similar reasons and am frankly appalled at ODOT for proposing such a regressive and hateful bill. It may alleviate some congestion, but it will also destroy lives and businesses. This is not how congestion should be addressed, and I don't know why my existing tax money can't solve the issues. Perhaps our legislators could set some priorities for ODOT to fix it the congestion within their existing budget. To vacation in Bend, or Sunriver will include a calculation of at least several hundred dollars for tolls. Oregon residents will, in essence, be landlocked and face significant barriers to access the outdoor activities that we all love.

Please, don't let this happen.

**ODOT I-205 Toll EA - RECORD #113 DETAIL****Submission Date :** 3/17/2023**First Name :** Shane**Last Name :****Affiliation :****Submission Method :** Accessible form

**Q3. Comments :** I would like to see federal funding being used for this purpose. Charging drivers who have no other choice but to pay a toll to work is unethical and immoral. All of use are suffering income wise due to covid and the economy. Now ypu want me to pay for a project thatcan b managed on the fed level. I have lived in states with toll roads before and they stifle local businesses always. Just look at new jersey. This is a wrong move for oregon and washington. The budgets will get bloated and tolls wont even go into supporting the roads and bridges that they were implemented to help. Its just another tax on the working class who need to travel through these coorodors for work. The idea that tolling a toad to reduce congestion is absurd since most of the congestion is from workers teaveling to or from work. Do all the studies you want but this is the truth.

<b>ODOT I-205 Toll EA - RECORD #114 DETAIL</b>
--

**Submission Date :** 3/18/2023

**First Name :** Dave & Kris

**Last Name :** Laurance

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** We are vehemently opposed to toll roads of any shape or size in Oregon.

Poor planning and management is the reason for toll roads. Any other reason is an excuse.

How do we know this? Over the years we have been involved on planning commissions, city councils, budget committees plus as business owners who have paid PUC's, fuel & tire taxes, property taxes, etc.

**ODOT I-205 Toll EA - RECORD #115 DETAIL**

**Submission Date :** 3/17/2023  
**First Name :** Theresa  
**Last Name :** Gartner  
**Affiliation :** Washington County  
**Submission Method :** Letter

**Q3. Comments :** Mandy,

Please find the attached letter requesting a 30-day extension for the public comment period on the I-205 Toll Project Environmental Assessment.

If you have any questions please contact Stephen Roberts or Chris Deffebach.

Thank you,

**Attachments :** I-205 Tolling EA review time extension request 03-17-23 .pdf (167 kb)  
I-205\_EA\_Extension\_Washington\_County.pdf (167 kb)



March 17, 2023

Mandy Putney  
Oregon Dept. of Transportation  
355 Capitol Street NE  
Salem, OR 97301  
*Via email*

Dear Ms. Putney:

I am writing to request a 30-day extension of the public comment period for the I-205 Toll Project Environmental Assessment. We have established a cross-departmental team to provide consolidated comments from Washington County staff and are finding the review and comment process time-consuming. While your extension from 45 days to 60 days is appreciated, an additional 30 days will allow us to provide more thoughtful comments and update our Board on significant policy implications. The extension will also benefit the public at large for additional comment opportunities.

As the first environmental assessment of a toll project in Oregon, the analysis is both new to us and precedent setting for the environmental assessment for the Regional Mobility Pricing Program in the future. Thank you for your consideration for additional review time during the public comment period.

Sincerely,

Stephen Roberts, AICP  
Director of Land Use & Transportation



March 17, 2023

Mandy Putney  
Oregon Dept. of Transportation  
355 Capitol Street NE  
Salem, OR 97301  
*Via email*

Dear Ms. Putney:

I am writing to request a 30-day extension of the public comment period for the I-205 Toll Project Environmental Assessment. We have established a cross-departmental team to provide consolidated comments from Washington County staff and are finding the review and comment process time-consuming. While your extension from 45 days to 60 days is appreciated, an additional 30 days will allow us to provide more thoughtful comments and update our Board on significant policy implications. The extension will also benefit the public at large for additional comment opportunities.

As the first environmental assessment of a toll project in Oregon, the analysis is both new to us and precedent setting for the environmental assessment for the Regional Mobility Pricing Program in the future. Thank you for your consideration for additional review time during the public comment period.

Sincerely,

Stephen Roberts, AICP  
Director of Land Use & Transportation

**ODOT I-205 Toll EA - RECORD #117 DETAIL**

**Submission Date :** 3/19/2023

**First Name :** Tracey

**Last Name :** Rainey

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Main street in Oregon city and Willamette main street are expected to get more traffic.  
I drive that way from wilsonville to Mcloughlin most days as the highway is usually very backed up.  
There is already a lot of traffic in those areas and hence delays. If the traffic there is expected to increase because of tolling, what plans do you have to alleviate that as well? Drivers get quite aggressive on non highway streets as it is, that will also not improve once the rolling project is settled in.  
Don't you think that aggression on a highway is much better than where people are crossing the streets and conducting daily business?

Thank you for allowing me to comment. I do appreciate the signage that has been added to 205.

<b>ODOT I-205 Toll EA - RECORD #118 DETAIL</b>
--

**Submission Date :** 3/19/2023

**First Name :** John

**Last Name :** Little

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I'm against having road tolls in the State of Oregon. I would encourage ODOT to find other ways to finance our transportation system.



**ODOT I-205 Toll EA - RECORD #119 DETAIL**

**Submission Date :** 3/20/2023

**First Name :** Judy

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I agree we need update bridge structures to withstand earthquakes, Funding is a huge issue but I'm concerned that cost for commuting up and down I-205 will cause further struggles for Oregonians financially.  
This project should have been put before voters; perhaps funds used to wrangle homeless into car camps / tents around SE Portland area ( \$\$\$ millions wasted ), feel that large company's with tax loopholes should pay their fair percentage of state taxes to fund this.

**ODOT I-205 Toll EA - RECORD #120 DETAIL**

**Submission Date :** 3/20/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Lack of on going connection to the people of Oregon is likely to cost you your ability to toll roads. You did not even make this reply to you easy to do. We are all going to pay in lack of money for roads for what you have done. Find a way to have forums and town halls about what is happening in Seattle around tolling. MOST PEOPLE do not know that driving through Seattle will cost them a toll. Talk about what would of happened to Seattle with out tolls and what tolling in Seattle is like and what it has done for them. If you do not get it across enough, then the voters will block your money and it will be hard for you to do what you want/need to for the roads. Talk about the toll roads in the east and how they help to reduce taxes and improve the roads. On this and some other pages you are talking about the projects that you are currently doing. You must also talk about what you are prevented from doing because of lack of money. Show the people what lack of money means and what it can be with you having enough money to do what is wanted / needed. Make it plain to Portland people and even to those in Bend and Ashland.

**Attachments :** formsubmission.csv (1 kb)

**ODOT I-205 Toll EA - RECORD #121 DETAIL**

**Submission Date :** 3/20/2023  
**First Name :** Annette  
**Last Name :** Michael  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** I am against the tolling of highways.

First off you are expecting only drivers along N I-5 and 205 to pay for bridge upgrades and road repairs. ODOT has lost a lot of money due to the government (Federal & State) pushing electric vehicles. Was government so blind to not realize that the high gas tax Oregonians pay was going to be reduced since wealthier individuals could afford electric vehicles? So poor individuals and small businesses can't afford electric vehicles so now our gas prices won't drop because ODOT still needs the gas tax. Now the poorer Oregonians will be hit with the gas tax and now tolls. I'm sure government will be raising the gas tax in the future so again the poor get hit but the rich are fine. At least the gas tax hit EVERYONE in Oregon.. The tolls will only affect Northern Oregonians living along I-5 & 205 but the poor in that area get hit twice (gas tax & tolls).

I live and my business is in Wilsonville. I will be hit hard by your locations of the toll booths. I travel these roads a lot and mostly deal with high traffic, especially heading to Wilsonville. These tolls will only make traffic WORSE! You aren't fixing traffic at all. Plus the toll has been set so high. I take highways because I typically use less gas in my V8 2001 Econoline van. Now trying to save the cost of tolls will force me to use side roads with more stops, using more gas. Either way as a small business I will take a hit. The rich in electric cars can take the side roads to save money and will actually save money. I find it sad that a Democratic run state is passing tolls which will hurt the poor (who Democrats claim are their priority) and benefit the rich.

For business, yes I can add it to my cost of a project. But don't you understand that then I'm just passing the buck to someone else? Then that company is paying my tolls and their tolls and it snowballs from there. I try to give my clients a fair and decent price without hurting them. During COVID I didn't take any business money that the federal government offered, it only adds to our deficit. During inflation my costs went up but I kept my margins the same. I didn't want to snowball inflation. My question is why can't the State of Oregon operate within what they receive already? Why can't the government in the State of Oregon work within it's budget? Why pass laws like pushing electric cars without thinking about how they will lose money? Oregonians pay so much but we don't get value for our money!

Finally, the other reason I don't support tolling is because you will not keep it at the original rate. Personally, I believe the amount is RIDICULOUSLY high. If it makes you money you will pull some of that toll money to "fix" other things. Then you won't meet your quota for fixing the bridges so you will raise the toll. The toll will be another way Oregonians get blackmailed by the state government. The government cuts school, police and fire budgets to get us to vote for more initiatives. We pay because schools, police and fire affect us. The tolls will be the same thing. You will raise it without our vote. Then again, you are forcing the tolls on us without a vote. Maybe the majority of Oregonians should vote to be a part of Idaho because right now our government is concerned with what is best for us.

**ODOT I-205 Toll EA - RECORD #122 DETAIL**

**Submission Date :** 3/20/2023

**First Name :** RALPH

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Tolls are a economic curse on the working persons livelihood. The economic gain to the government is barely realized, in relationship to the effects of personal expense to the public that make our state liveable. We are taxed and deprived of making a living in a state where we need good career jobs and businesses that can support employees that are not taxed to death to support political agendas with ideals that are not compatable with common sense (economics).

**ODOT I-205 Toll EA - RECORD #123 DETAIL****Submission Date :** 3/20/2023**First Name :** JoAnne**Last Name :****Affiliation :****Submission Method :** Accessible form**Q3. Comments :** The idea that you can generate more money by tolling I205, is just not going to work. People will go out of their way to avoid the toll, even if it is just for the principle. Every time we get a tax "for roads", it never makes a difference in the roads. I live in the Stafford triangle, which is where all these cars will end up to avoid paying the toll. So all the \$\$ spent on putting tolls on the road will be in vain.

**ODOT I-205 Toll EA - RECORD #125 DETAIL**

**Submission Date :** 3/21/2023  
**First Name :** Don  
**Last Name :** Hardy  
**Affiliation :** City of Canby  
**Submission Method :** Letter

**Q3. Comments :** Hi Mandy,

I'm providing the City of Canby letter from our Mayor Brian Hodson requesting additional review time for the I-205 Toll Project Environmental Assessment.

Thank you for your consideration of our letter.

**Attachments :** ODOT I-205 Toll Project Letter 3-15-2023.pdf (1 mb)  
2023\_0420\_I-205\_EA\_Canby.pdf (1 mb)



PO Box 930  
222 NE Second Ave.  
Canby, OR 97013

Phone: 503-266-4021  
Fax: 503-266-7961  
[www.canbyoregon.gov](http://www.canbyoregon.gov)

March 15, 2023

Mandy Putney  
Oregon Department of Transportation  
Via email

CC: Keith Lynch, FHWA, Kris Strickler, ODOT

Dear Ms. Putney,


Thank you for extending the review timeline for the I-205 Toll Project Draft Environmental Assessment (EA) until April 21, 2023. Canby like many participating agencies is very interested in providing complete comments on the draft EA. Therefore we would appreciate if the review period could be further lengthened. Given the significant size of the draft EA document having more time would provide adequate time to review the substantial assessment that has been prepared over the last two years. We are requesting that the draft EA comment period be extended until May 26, 2023.

As previously documented, Canby has specific concerns with anticipated traffic diversion and forecasted intersection failure, and subsequent need and implementation timing of mitigation and potential impacts to Canby Area Transit. Additional concerns relate to impacts on forecasted residential and employment growth based on recently completed housing needs and economic opportunity analysis and how diversion Impacts could effect this growth over the next two decades.

We also concur with other participating agencies who have requested additional review time to evaluate and provide substantive comments to the Oregon Department of Transportation.

Thank you for your consideration of our request.

Sincerely,



Brian Hodson  
Mayor

Cc: Scott Archer, City Administrator  
Don Hardy, Planning Director



# City of Canby

PO Box 930 Phone: 503.266.4021  
222 NE 2nd Ave Fax: 503.266.7961  
Canby, OR 97013 www.canbyoregon.gov

April 20, 2023

Mandy Putney  
Oregon Department of Transportation  
Via email  
CC: Keith Lynch, FHWA, Kris Strickler, ODOT

## **RE: I-205 Toll Project Draft Environmental Assessment (EA)**

Dear Ms. Putney:

The City of Canby appreciates this opportunity to provide comments addressing the EA for the I-205 Toll Project.

Although Canby is not located directly along either the I-5 or I-205 freeway corridors, our community is strategically located at a point in the regional transportation network that is directly affected by regional commute patterns. State Highway 99E traverses and bisects the heart of Canby and serves as the only major through-route surface highway between population centers along I-5 (i.e., Aurora, Hubbard, Woodburn, Salem, and points south) and the eastern metro area (i.e., Oregon City and beyond). As more and more commuters choose to work in the Portland area but live outside the metro area, Canby and its neighbors have experienced increased pressure from growth and congestion on Highway 99E. Additional congestion on 99E through Canby is both an economic and quality of life issue for our community: peak hour traffic volumes on 99E affect how our local businesses conduct their day-to-day operations and also affect the safety of residents walking and biking between neighborhoods.

Canby has a number of concerns with impacts from anticipated I-205 tolling diversion and this letter addresses them at a high level and is supported by the April 14, 2023 I-205 Toll Project Technical Report– Canby Review prepared by DKS Associates, attached and incorporated by reference. We request that EA comment responses address both this letter and the analysis gaps and lack of mitigation identified by DKS Associates memorandum.

Canby has many planning studies underway, Housing Needs Analysis, Housing Production Strategy, Housing Code Efficiency Measure Development, Economic Opportunity Analysis and 20-year Comprehensive Plan and Transportation System Plan Updates. Substantial work has been completed on the Housing Needs Analysis, Housing Production Strategy,



and Economic Opportunity Analysis (EOA) all supported by Department of Land Conversation and Development Grants. The EOA was approved by city council on April 19, 2023. We understand that the EA did not assess this body of work as it was not adopted when the EA was prepared and is not an existing condition; however, we provide this information for context of Canby's overall concern which is that traffic diversion is likely to limit needed housing and employment growth due to significant increase traffic volumes on 99E and on city streets. This is further elaborated in the DKS Associates --April 14, 2023 I-205 Toll Project Technical – Canby Review memorandum.

Our draft housing needs analysis and economic opportunity analysis work has been completed consistent with state buildable lands assessments standards and both a housing and employment urban growth boundary expansion will be needed to accommodate roughly 6,000 residents over the next 20-years along with associated employment lands. Urban growth boundary expansion for residential development is currently forecasted to be between 50 and 150 acres and roughly 450 acres of employment lands.

We realize that the EA baseline of environmental assessment was based on current adopted plans; however, we provide this information to support our request that an Environmental Impact Statement be completed for the I-205 Toll Project in place of an EA. We believe that future road capacity on city streets is directly tied to the I-205 Toll project and is foreseeable and should be considered as part of an Environmental Impact Statement. The magnitude of traffic increase from anticipated tolling diversion in the EA is significant.

We also understand that the use of an EA implies that all environmental impacts have been addressed and mitigated to the point of non-significance. There are a number of impacts that we believe have not been mitigated. We also believe that the EA does not provide analysis of diversion impacts onto city streets and this is further identified by DKS Associates. Canby, like many Oregon cities, has adopted its own level of service standards as documented in the Canby 2010 Transportation System Plan. Acknowledging impacts caused from tolling diversion onto city streets is especially important for those intersections leading to the heart of downtown Canby, including the Elm Street, Grant Street, Ivy Street, and 4<sup>th</sup> Avenue intersections with 99E.

The Ivy Street/99E intersection is predicted to fail in 2027 and with the tolling diversion impacts will almost double in intersection delay. We understand that the right-of-way constraints to this intersection restrict intersection improvements but we believe to substantiate an EA other corridor improvements to off-set this impact need to be analyzed and documented, including those at the Pine Street/99E intersection. We believe additional 99E corridor analysis should be completed to provide off-setting mitigation to substantiate approval of and EA and Record of Decision, including but not limited to analysis at additional intersections, providing queuing analysis, and presenting mitigated operations.

Canby also has concerns with the data referenced by DKS Associates and cited in their memorandum for the Redwood Street/Sequoia Parkway/99E intersection as the forecasted 2027 the intersection is expected to operate within 1 percent of the mobility target during the p.m. peak hour (0.89 v/c versus the 0.90 v/c mobility target). The City provided feedback through DKS Associates to the ODOT EA team that incorrect signal timing data and other inputs were utilized for the evaluation at both signalized intersections in Canby. Once these discrepancies are corrected, the Redwood Street/Sequoia Parkway/99E intersection may require additional mitigation. In our opinion this analysis is needed to determine the full project impacts in the EA.

We believe consequential intersection failure from tolling diversion will substantially increase queuing at the Ivy Street/99E intersection and an evaluation of those impacts should be addressed and mitigated as part of the EA or preferably in an environmental impact statement. This issue was raised during the two ODOT mitigation meeting discussions but has not been addressed. We understood from those mitigation meetings that impacts from lengthened queues onto city streets were addressed but have never seen this analysis. Our overall concern is that when development review occurs for proposed development and development trips distribute to the Ivy Street/99E intersection that this may result in the need for project denial based on adopted city level of service. The City of Canby is also aware of other intersections along 99E through development review, including 4<sup>th</sup> Avenue-Pine Street and Elm Street, that are operating near their mobility target during peak periods without layering on the additional traffic from the tolling diversion.

As Ivy Street and these other noted intersections are in the center of town, most development projects will result in trips impacts. Consequential decreases in the level of service at these intersections should be fully addressed and mitigated in EA, including the impacts to nearby intersections as drivers divert around this congested segment of 99E. Resulting development project denials from tolling diversion causing city street levels of service failure is a substantial impact on both current anticipated city growth and anticipated future growth. We don't see how the EA mitigates these impacts to a point of non-significance, nor is this clearly explained in the EA.

More broadly Canby also believes that overall diversion onto the city street system needs to be evaluated to determine impact on city adopted levels of services for vehicles, and pedestrian and bicycle travel. The city streets included in the diversion assessment should include the following and others where the analyses shows that there will be significant impacts:

- Ivy Street/Canby-Marquam Highway (north-south route with an intersection at 99E that is approaching a failure of mobility standards)
- Knights Bridge/S Arndt Road/S Barlow Road (network of related east-west streets connecting Canby and Barlow to I-5)
- NE Territorial Road (east-west road increasingly used as alternative to 99E)
- Haines Road (roughly parallel to 99E, with existing safety issues where it connects to 99E)

- 13<sup>th</sup> Avenue (east-west route paralleling 99E to the south)
- Birch Street
- Holly Street
- SW Berg Parkway

We also believe that bike and pedestrian mobility impacts are understated in the EA as noted by DKS Associates and request that more analysis be provided for:

- Local pedestrian routes and safety
- Local bicycle routes and safety
- Equity impacts from creating or exacerbating physical barriers
- Impacts related to installation of intersection improvements that widen or otherwise enlarge portions of the local transportation network

Canby also requests that impact to Canby Area Transit operations be assessed for ridership and operational impacts as noted by DKS Associates—transit travel time increases by over 3 minutes during the peak hours between Canby and Oregon City.

In closing we request that further analysis be completed along with associated mitigation to truly address long term tolling impacts. Canby along with other Clackamas County jurisdictions will be living with the consequential impacts from tolling for decades and more analysis of impacts is critical to Canby's future.

Thank you for your consideration and we look forward to continuing our role as a participating agency and to engaging in future steps of this project.

Sincerely,



Mayor Brian Hodson  
City of Canby

Attachment: April 14, 2023 I-205 Toll Project Technical – Canby Review prepared by DKS Associates

cc: Clackamas County Coordinating Committee (C4)  
Canby City Council, ATTN Council President Traci Hensley  
Canby Traffic Safety Commission, ATTN Robert Cambra, Chair  
Oregon State Representative, James Hieb  
Oregon State Senator, Daniel Bonham  
Don Hardy, Planning Director  
Ryan Potter, AICP, Planning Manager



## I-205 TOLL PROJECT TECHNICAL REPORT - CANBY REVIEW

DATE: April 14th, 2023

TO: Don Hardy | City of Canby

FROM: Kevin Chewuk, Dock Rosenthal | DKS Associates

SUBJECT: Canby Regional Mobility Pricing Project Support  
205 Tolling Project Environmental Assessment Review Memorandum

---

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

### INTERSECTIONS ANALYZED IN CANBY

The I-205 Tolling EA included 2 intersections within Canby and another just to the north of the City (at Haines Road) as part of its transportation area of potential impact (API) analysis (see Figure 1). The intersections are noted below:

- OR 99E and S New Era Road/S Haines Road (ID #47)
- OR 99E and Ivy Street (ID #48)
- OR 99E and N Redwood Street/Sequoia Parkway (ID #50)

---

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

### Findings for Canby:

While 3 intersections were analyzed in or near Canby, many were not included, especially along OR 99E through Downtown Canby. These intersections will likely be impacted by the added traffic in the Build scenario, and particularly those through Downtown Canby impacted by queuing and the potential spill back from the adjacent intersections. The I-205 Tolling EA states that "Implementation of mitigation strategies may cause secondary impacts at adjacent intersections or roadways. Secondary impacts from implementing mitigation measures may require additional avoidance, minimization, or mitigation measures. An assessment of the effects associated with mitigation will be included in the Revised EA." Additional intersections that were not analyzed in the I-205 Tolling EA that may see impacts include: OR 99E & SW Berg Parkway, OR 99E & Elm Street, OR 99E & Grant Street, OR 99E & S Pine Street/NE 4<sup>th</sup> Avenue and OR 99E & Territorial.

FIGURE 1. CANBY STUDY INTERSECTIONS INCLUDED IN THE I-205 TOLLING TRANSPORTATION API



## TRAFFIC DIVERSION WITH I-205 TOLLING

Tolling on I-205 will cause many highway users to shift their trips to OR 99E and other roadways in Canby to avoid tolling. Significant increases in traffic volumes are forecasted from highway user diversion in Canby in the I-205 Tolling EA Transportation Technical Report, most notably along OR 99E and streets connecting to it, and other major streets connecting Canby to areas outside of the City, such as Knights Bridge Road and SE 13<sup>th</sup> Avenue.

## TRAFFIC DIVERSION IN 2027 WITH I-205 TOLLING

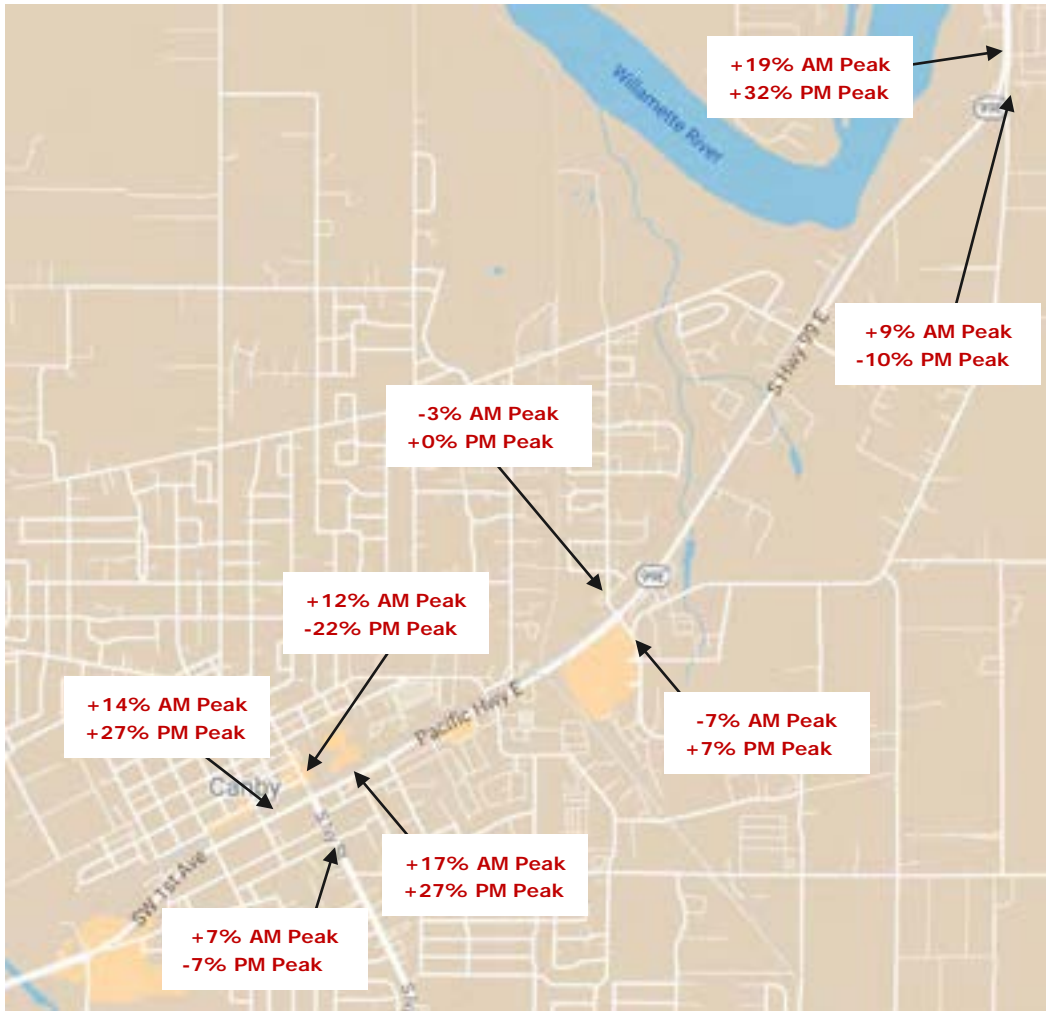
---

The I-205 Tolling EA Transportation Technical Report provides projected daily traffic volume changes for segments of OR 99E surrounding Canby, although it excludes the segment through downtown Canby, comparing the average weekday volumes in the 2027 Pre-Tolling and Build Scenarios to those in the 2027 No-Build Scenario. It estimates daily volume increases in 2027 from tolling diversion along OR 99E up to 24 percent in the northbound direction and up to 21 percent in the southbound direction east of Sequoia Parkway/Redwood Street, and daily volume increases along OR 99E near Lone Elder Road (between Canby and Aurora) up to 110 percent in the northbound direction and up to 93 percent in the southbound direction.

Figure 2 shows projected 2027 peak hour volume increases along studied roadway segments in Canby with I-205 tolling. As shown, increases of up to 19 percent are expected during the a.m. peak along OR 99E at the northeast part of the City, and up to 17 percent along OR 99E through Downtown Canby. On side streets approaching OR 99E, increases of up to 12 percent are expected during the a.m. peak hour.

During the p.m. peak hour, significant volume increases are projected along OR 99E in Canby (see Figure 2) when compared to 2027 conditions without I-205 tolling, most notably increasing 32 percent and 27 percent near Haines Road and Ivy Street respectively. On side streets approaching OR 99E, increased volumes are expected along Sequoia Parkway with decreasing volumes expected along Haines Road and Ivy Street.

**FIGURE 2. PROJECTED PEAK HOUR VOLUME CHANGES IN 2027 WITH I-205 TOLLING COMPARED TO WITHOUT**



**TRAFFIC DIVERSION IN 2045 WITH I-205 TOLLING**

Figure 3 shows projected changes in daily volumes between the 2045 Build Scenario and the 2045 No-build Scenario for roadway segments in Canby. As shown, daily volumes are expected to increase in 2045 from tolling diversion up to 20 percent along OR 99E at the northeast part of the City and through Downtown Canby and up to 30 percent along OR 99E at the southwest part of the City.

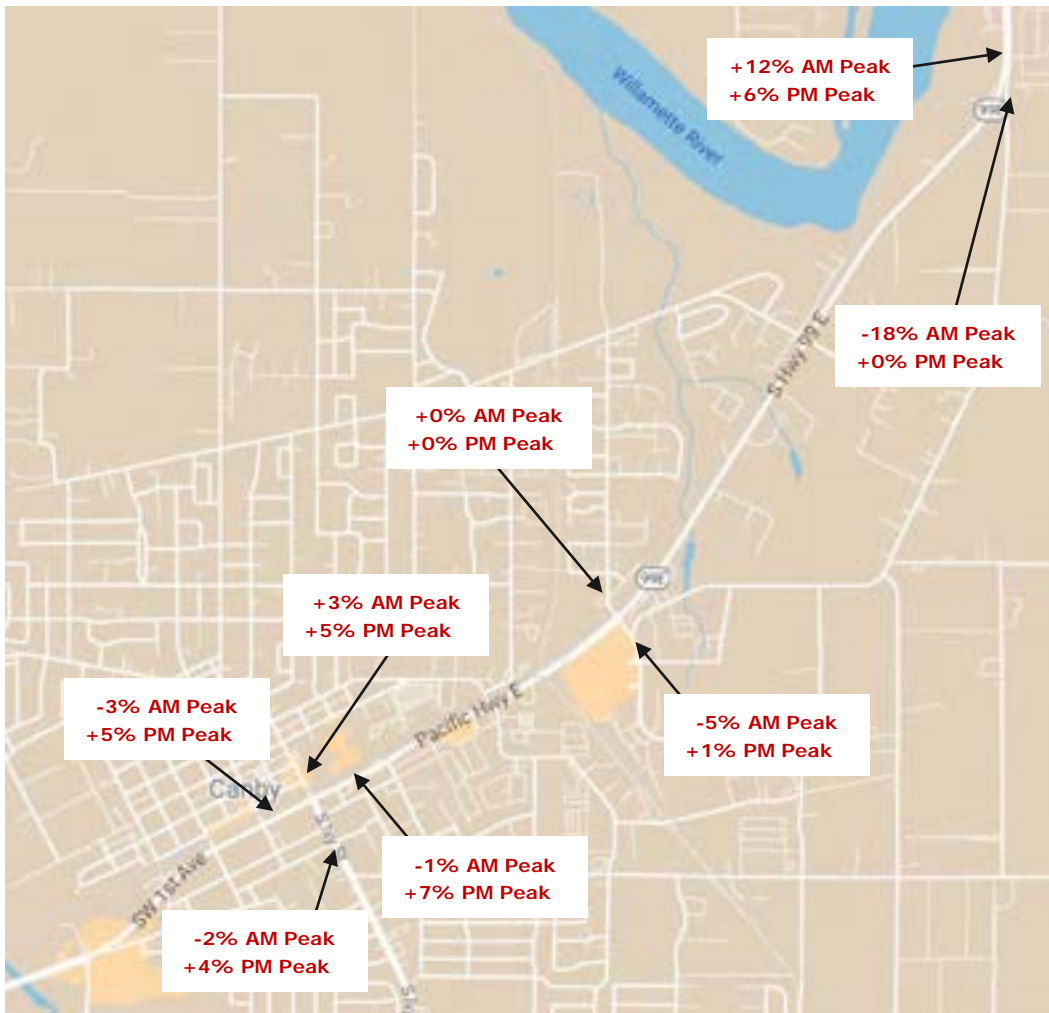
**FIGURE 3. PROJECTED DAILY VOLUME CHANGES IN 2045 WITH I-205 TOLLING COMPARED TO WITHOUT**



Figure 4 shows the projected 2045 peak hour volume changes along studied roadway segments in Canby with I-205 tolling. As shown, volume increases during the a.m. peak hour are projected along OR 99E at the northeast part of Canby near Haines Road, while slight decreases are projected through Downtown Canby when compared to 2045 conditions without I-205 tolling. During the p.m. peak hour, volume increases are projected along OR 99E up to 7 percent through Downtown Canby and 6 percent at the northeast part of Canby near Haines Road.



FIGURE 4. PROJECTED PEAK HOUR VOLUME CHANGES IN 2045 WITH I-205 TOLLING COMPARED TO WITHOUT



### Findings for Canby:

While the roadway segments and intersections included in the I-205 Tolling EA Report do not reflect the complete picture, they do provide some insight into the projected highway user diversion impact to surface streets in Canby, indicating that I-205 tolling will increase daily and peak hour traffic along OR 99E, and along Ivy Street, Sequoia Parkway and Haines Road. This includes adding more peak hour traffic on critically congested links along OR 99E through Downtown Canby, up to 27 percent more in 2027 and up to 7 percent more in 2045.

Tolling will also significantly increase traffic along connecting streets to OR 99E in Downtown Canby, with up to 12 percent more peak hour traffic in 2027 and up to 5 percent more in 2045. It is difficult to assess the impact of these peak hour volume increases at adjacent intersections along OR 99E and other Downtown streets since the I-205 Tolling EA Report only included analysis at the Ivy Street intersection.

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

The forecasted analysis results from the I-205 Tolling EA for the 3 study intersections in Canby indicate that two intersections are impacted by the 2027 Build Alternative when compared to the 2027 No-Build Alternative, including the following:

- OR 99E and S New Era Road/S Haines Road (ID #47)
- OR 99E and Ivy Street (ID #48)

The reported results at the OR 99E/ N Redwood Street/Sequoia Parkway (ID #50) for 2027 also indicate that the intersection is expected to operate within 1 percent of the mobility target during the p.m. peak hour (0.89 v/c versus the 0.90 v/c mobility target). The City provided feedback to the I-205 Tolling EA project team that incorrect signal timing data and other inputs were utilized for the evaluation at both signalized intersections in Canby. Once these discrepancies are corrected, the OR 99E/ N Redwood Street/Sequoia Parkway may also be identified as a roadway impact under the Build alternative.

The 2045 results indicate that the same two intersections that were also impacted in 2027 analysis are impacted by the 2045 Build Alternative when compared to the 2045 No-Build Alternative.

Queuing results were not provided for intersections in Canby.

### Findings for Canby:

Impacts were identified at two of the 3 Canby area intersections analyzed in the I-205 Tolling EA, including the OR 99E intersections with Ivy Street and Haines Road.

In addition, several noted modifications to the analysis may change the resulting volume-capacity ratios at the study intersections in Canby in the Revised I-205 Tolling EA. The reported results at the OR 99E/ N Redwood Street/Sequoia Parkway for 2027 also indicate that the intersection is expected to operate within 1 percent of the mobility target during the p.m. peak hour. The City provided feedback to the I-205 Tolling EA project team that incorrect signal timing data and other inputs were utilized for the evaluation at both signalized intersections in Canby. These changes include cycle length and coordination settings at both intersections and the split phasing at Redwood/Sequoia Parkway intersections. Additionally, the truck percentages seem to have discrepancies, with no trucks included at OR 99E & Redwood/Sequoia Parkway intersection in the existing and 2045 PM reports. In the AM existing and 2045 reports truck percentages over 100 percent are used.

Another issue is when the volume data was collected, as the volume data in Canby used for the operations analysis was not seasonally adjusted according to ODOT analysis procedures. While most of the study area and study intersections are within the Metro boundary (where seasonal fluctuations are assumed to be minor and no adjustments are assumed), those near the City of Canby are not and volumes for traffic analysis are typically seasonally adjusted to reflect the 30 HV hour. The expected seasonal adjustment from October to the peak month (typically July/August) is approximately 7 percent.

Tolling I-205 will cause many highway users to shift their trips to roadways in the City. These trips would result in significant new congestion along roadways and at intersections, and increased delay and travel times for people in the City, particularly along OR 99E and its connecting side streets through the City. Additionally, queue spill back from OR 99E intersections to the adjacent intersections are major concerns. The I-205 Tolling EA does not provide queuing analysis for intersections studied in Canby and these potential impacts to other nearby streets and intersections in Downtown Canby were not assessed.

Travel times were estimated for the 2045 No-Build and Build Alternatives along various segments of OR 99E, including the segment from Grant Street in Canby and S 2<sup>nd</sup> Street in Oregon City as shown in Figure 5. A typical trip taken today along this 8-mile OR 99E segment during the peak hour takes around 10 to 14 minutes in either direction. The 2045 Build scenario is estimated to add up to 20 seconds to the travel time along this segment when compared to the 2045 No-Build scenario, with the travel times in the southbound direction estimated to decrease during the a.m. peak hour. It is unclear why the travel times would improve in the a.m. peak under the build alternative with increased traffic volume. While the total estimated corridor travel time reported in the I-205 Tolling EA along OR 99E is reported beyond Canby, the overall increase in travel time along the segment is likely estimated to occur within the segment through Canby.

FIGURE 5: 2045 NO BUILD AND BUILD PEAK HOUR TRAVEL TIMES ALONG OR 99E



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

Transit travel times were estimated for the 2045 No-Build and Build Alternatives along OR 99E through Canby. The results indicate that transit travel times along OR 99E through Canby are expected to increase up to 20 seconds during the peak hours, and by over 3 minutes during the peak hours between Canby and Oregon City. The increased transit travel times along these OR 99E segments correlate to the decline in the estimated transit multimodal level of service along the segments between 11<sup>th</sup> Street and Main Street, and Railroad Avenue and S 2<sup>nd</sup> Street in Oregon City utilized by the CAT 99X route, with the former declining from C to D and the later declining from D to E. While the reported transit multimodal level of service along OR 99E through Canby did not show a decline in the I-205 Tolling EA between the No Build and Build scenarios, these segments still operate with a transit level of service of D or E.

### Findings for Canby:

Transit impacts were identified along two Oregon City roadway segments analyzed in the I-205 Tolling EA utilized by the Canby Area Transit 99X route, including along OR 99E from 11th Street to Main Street (southbound) and OR 99E from Railroad Avenue to MP 12.74 (northbound). This impact was not identified in the I-205 Tolling EA.

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

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

Bicycle level of traffic stress was estimated for the 2045 No-Build and Build Alternatives along OR 99E through Canby. The results indicate moderate to high stress (Bike Level of Traffic Stress 3 or 4) for bicyclists along OR 99E. The results also indicate no change in the expected level of stress for bicyclists along this segment between the 2045 No-Build and Build scenarios. Bicycle level of traffic stress was not analyzed along any other streets or intersections in Canby in the I-205 Tolling EA, although bicyclist will likely experience increased stress levels along it given the significant increase in traffic expected in Downtown Canby in the Build scenarios when compared to the No-Build.

A pedestrian corridor multimodal level of service analysis was also completed for the 2045 No-Build and Build Alternatives along the same OR 99E segments in Canby as the bicycle level of stress analysis. The results indicate a pedestrian level of service ranging from C to E along OR 99E. Again, the results indicate no change in the expected pedestrian level of service along these segments between the 2045 No-Build and Build scenarios. Again, pedestrian analysis was not analyzed along any other streets or intersections in Canby in the I-205 Tolling EA, although pedestrians will likely experience increased stress levels, particularly at intersections, given the significant increase in traffic expected in Downtown Canby in the Build scenarios when compared to the No-Build.

### Findings for Canby:

No bicycle impacts were identified in Canby in the I-205 Tolling EA, although several of the analyzed roadway segments include high levels of traffic stress for bicyclists in both the 2045 No-Build and Build scenarios. OR 99E lacks bike facilities through much of Canby. The bikeway gap along OR 99E is one of the most critical in the City, with high levels of traffic stress experienced by these users. The increased traffic along OR 99E with the Build scenario will further exacerbate the high bicycle level of traffic stress along this corridor and could deter people from biking.

No pedestrian impacts were identified in the I-205 Tolling EA, although several of the analyzed roadway segments include a high pedestrian level of service. Existing sidewalks along OR 99E are narrow and often directly adjacent to the travel lane with no buffer provided. Additionally, segments of OR 99E exist with no sidewalk coverage. Adding additional traffic with the Build scenario to these already heavily traveled lanes, coupled with the high travel speeds, will negatively impact those walking along OR 99E and between the nearby neighborhoods. This will lead to uncomfortable walking conditions and a high level of stress, and difficult street crossings for some of the most vulnerable users in the City.

Although not analyzed in the I-205 Tolling EA, additional streets in the City could see increases in the level of traffic stress experienced for bicyclists and worsening pedestrian level of service as the level of traffic increases in the Build scenario, especially along streets approaching OR 99E and other streets in Downtown Canby.

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

The I-205 Tolling EA does not include a metric for identifying an impact to truck freight. Freight corridor travel times were estimated for the 2045 No-Build and Build Alternatives along OR 99E between Canby and Oregon City. The results indicate that freight corridor travel times along OR 99E during the peak period are expected to increase up to 34 percent (over 3 minutes) between Grant Street in Canby and Arlington Street just north of Oregon City.

### Findings for Canby:

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

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

A transportation safety impact was identified along the OR 99E segment from Redwood Street-Sequoia Parkway to Ivy Street through Canby. This segment is estimated in the I-205 Tolling EA to see an increase in the predicted number of fatality/severe injury crashes per year in the Build scenario when compared to the No-Build scenario. A safety impact was also identified at the OR 99E/Ivy Street intersection.

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

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

### Findings for Canby:

A transportation safety impact was identified along the OR 99E segment from Redwood Street-Sequoia Parkway to Ivy Street and at the OR 99E/Ivy Street intersection.

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

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

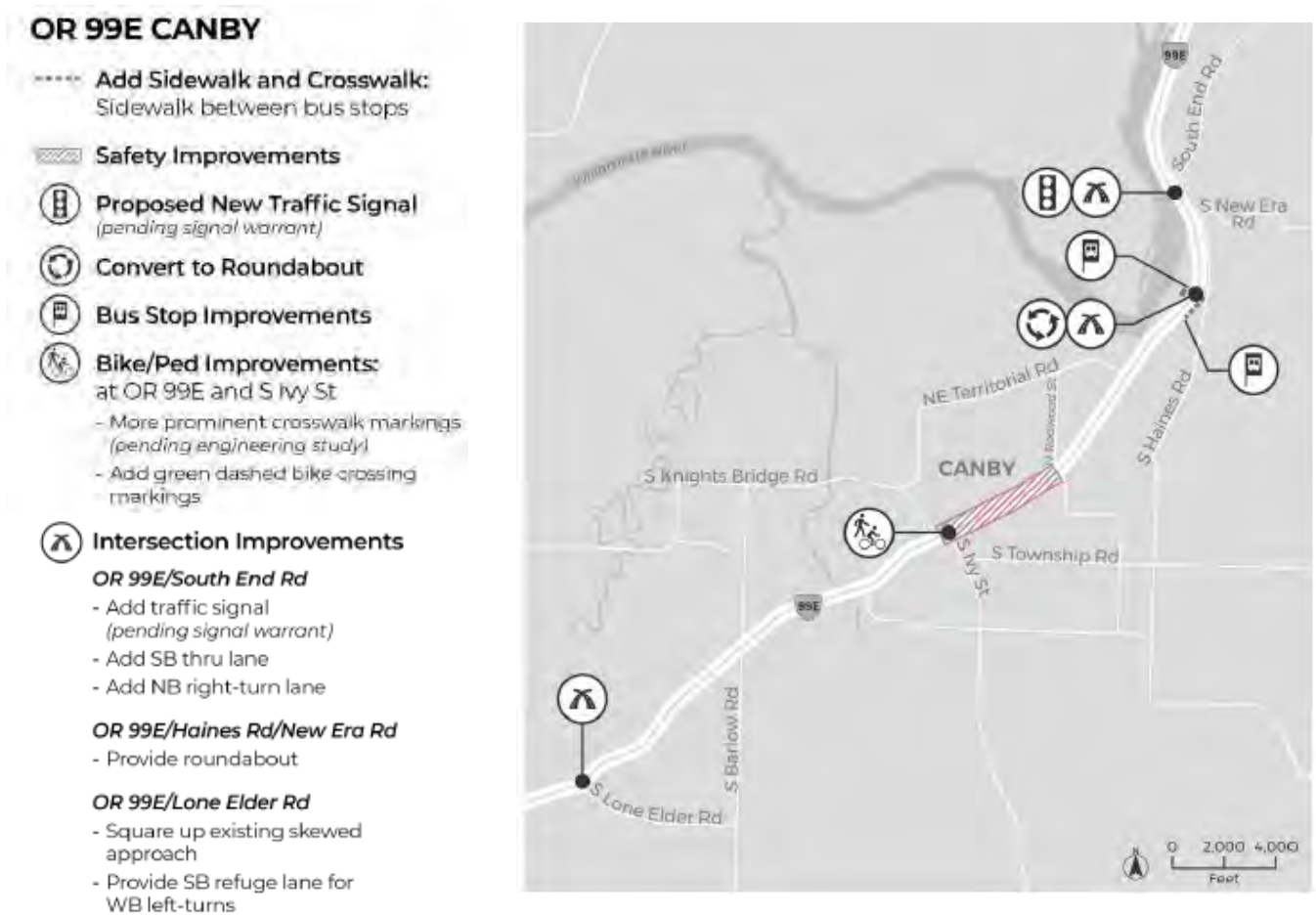
The following sections provide a summary of the mitigations recommended in the I-205 Tolling EA to address the Build scenario impacts identified in Canby. These identified impacts are summarized below:

- Roadway impacts were identified at six intersections, including:
  - OR 99E and S New Era Road/S Haines Road (ID #47)
  - OR 99E and Ivy Street (ID #48)
- Transit impacts were identified along roadway segments utilized by Canby Area Transit Route 99X in Oregon City, including:

- OR 99E from 11th Street to Main Street (southbound)
- OR 99E from Railroad Avenue to MP 12.74 (northbound)
- A transportation safety impact was identified along the OR 99E segment from Redwood Street-Sequoia Parkway to Ivy Street and at the OR 99E/Ivy Street intersection.

Figure 6 summarizes the proposed mitigations in Canby for these identified impacts.

**FIGURE 6: PROPOSED MITIGATIONS IN CANBY FOR IMPACTS IDENTIFIED IN THE I-205 TOLLING EA**



**OR 99E AND IVT ST (ID #48)**

The OR 99E/ Ivy Street intersection is projected to see significant increases in daily and peak hour traffic in the 2027 Build Scenario compared to the No-Build scenario. The increased traffic causes the intersection to exceed the mobility standard in the peak hour of the 2027 Build scenario. Additionally, this segment of OR 99E is estimated to see an increase in the predicted number of fatality/severe injury crashes per year due to the increased traffic. No mitigation is recommended



in the I-205 Tolling EA at this intersection (see Table 1) for the roadway impact, outside of a note to consider improvements at the OR 99E/Pine Street intersection.

**TABLE 1: PROPOSED MITIGATIONS AT OR 99E/ IVY ST INTERSECTION IN THE I-205 TOLLING EA**

MITIGATION TYPE	IMPACTS IDENTIFIED IN THE I-205 TOLLING EA	PROPOSED MITIGATION IN THE I-205 TOLLING EA
ROADWAY	Intersection operations exceed the mobility standard	Consider operational improvements at OR 99E and Pine St to facilitate more traffic use of that intersection to reach downtown Canby, thereby alleviating some traffic impact at Ivy St.
TRANSIT	None	None
PEDESTRIAN	None	Provide more prominent crosswalk markings; Add green dashed bike crossing markings across OR 99E.
BICYCLE	None	
TRANSPORTATION SAFETY	Increase in predicted number of fatality/severe injury crashes per year	Add 3-inch yellow reflective sheeting to signal backplates and a hardened centerline.

**OR 99E AND HAINES ROAD (ID #47)**

The OR 99E/ Haines Road intersection is projected to exceed the mobility standard in the peak hours of both the 2027 and 2045 No-Build scenarios and this mobility standard exceedance is expected to worsen under the Build scenarios. Recommended mitigations are shown in Table 2 and include installing a roundabout, in addition some transit enhancements.

**TABLE 2: PROPOSED MITIGATIONS AT OR 99E/ HAINES ROAD INTERSECTION IN THE I-205 TOLLING EA**

MITIGATION TYPE	IMPACTS IDENTIFIED IN THE I-205 TOLLING EA	PROPOSED MITIGATION IN THE I-205 TOLLING EA
ROADWAY	Intersection operations exceed the mobility standard	Install a roundabout.
TRANSIT	None	Install landing pads at bus stops (i.e., paved area at the bus stop where passengers board or exit the bus), crosswalks with RRFB to facilitate crossing of OR 99E and extend sidewalks to New Era Rd.
PEDESTRIAN	None	Install crosswalks and RRFBs to improve pedestrian access to bus stops and safety for crossing/
BICYCLE	None	
TRANSPORTATION SAFETY	None	None

### Findings for Canby:

While improvements at the OR 99E/Pine Street intersections are supported by Canby to help mitigate some of the identified Build scenario impacts along OR 99E in Canby, it does not adequately address the impacts at OR 99E & Ivy Street. Given the intersection is over capacity it is reasonable to expect some local diversion through City streets parallel to OR 99E. The distribution of the added Build scenario traffic through Downtown Canby streets is unclear given the lack of intersection analysis in the I-205 Tolling EA. Peak hour volume data from the study intersections indicate significant increases are expected with the Build scenarios and the impact that it is projected to have along adjacent roadway segments and at intersections is not documented in the I-205 Tolling EA.

Additionally, the note to “Consider operational improvements at OR 99E and Pine St” is unclear, and any process recommended in the I-205 Tolling EA for identifying and implementing an unknown mitigation should be clarified.

It is also unclear how the significant levels of congestion reported at the OR 99E/ Ivy Street impacts adjacent intersections since queuing analysis was not provided for intersections in Canby. The mitigated operational results were also not reported in the I-205 Tolling EA or provided in the appendices, so it is unclear how the proposed mitigations impact operations.

There are some changes needed in the analysis to ensure results reflect accurate impacts of the project. Even with the analysis included in the I-205 Tolling EA the missing intersections in Downtown Canby that were not studied could be omitting potential impacts of the Build alternative. For example, field observations in July 2022 showed that even with the updated signal timing, segments of OR 99E from Elm to Ivy were at capacity in the peak periods and queues were regularly filling the available storage. While the analysis at the OR 99E/ Ivy Street intersection shows that traffic operations will exceed mobility targets in the future alternatives there are other impacts to the system, such as queue spillback and local diversion, that are not captured by Highway Capacity Manual methodology alone.

**ODOT I-205 Toll EA - RECORD #126 DETAIL**

**Submission Date :** 3/22/2023

**First Name :** Nick

**Last Name :** Gelbard

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** The plan to place tolls on I-5 and I-205 will hurt lower income Oregonians. No tolls should be placed on these vital highways where there are few options.

I do support a toll on the proposed Columbia River Crossing until it paid for (similar to the Astoria-Megler Bridge).

**ODOT I-205 Toll EA - RECORD #128 DETAIL**

**Submission Date :** 3/22/2023

**First Name :** Chuan

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I would like to see the tolling a smooth experience that do not congest the traffic. I agree that the toll is needed for maintenance of the infrastructure.

**ODOT I-205 Toll EA - RECORD #129 DETAIL**

**Submission Date :** 3/23/2023

**First Name :** Keith

**Last Name :** Huffstutter

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Feedback on i205 i5 tolling

My vote is no

This is a bad idea as the off freeway traffic that will be created in local neighborhoods will be detrimental to safety and security to local residents. Additionally, not putting this to a vote by constituents of the areas impacted is not good. Frankly, extremely disappointing

Thank you for the consideration

West Linn resident

**ODOT I-205 Toll EA - RECORD #132 DETAIL**

**Submission Date :** 3/15/2023

**First Name :** Jakob

**Last Name :** Wiley

**Affiliation :** City of Oregon City

**Submission Method :** Letter

**Q3. Comments :** Dear Mandy,

Please see the attached letter from our mayor. Please confirm that you have received it.

Thank you,

**Attachments :** image001.jpg (6 kb)  
I-205\_EA\_Extension\_Oregon\_City.pdf (193 kb)



March 15, 2023

*Sent Via Electronic Mail*

Mandy Putney  
Oregon Department of Transportation  
CC: Keith Lynch, FHWA  
Kris Strickler, ODOT

Dear Ms. Putney:

We are aware that the public comment period for the I-205 Toll Project Environmental Assessment (EA) began on February 21, 2023. **After initial review of the materials, which include a 192-page Environmental Assessment and 2,801 pages of Appendices, we do not feel that the 45-day public comment period that ODOT is offering is sufficient.** We also feel that the additional 15 days of review time ODOT recently provided is insufficient.

The EA includes nearly 3,000 pages of information on a comprehensive array of topics that must be reviewed and analyzed before comments can be developed. Comments will then need to be presented, discussed, and coordinated through our City Commission.

We acknowledge there have been previous engagement points, but the feedback from local agency involvement is not clearly documented or traceable within the current EA, the ODOT updates to these documents have not been documented in a way that is conveniently traceable, and it will be necessary for our staff to go through each document carefully to determine how, or if, our concerns were addressed, and proper mitigation provided.

We also recognize that for Oregon City many of the project goals and objectives, as suggested by ODOT, have either not been met or as asserted are not supportable. ODOT has also elected to put off needed micro model simulations that would otherwise validate mitigation needs and highlight realities due to tolling diversion through the Oregon City areas of potential impact. One other document not included in the EA but critical to the ODOT plans for mitigation is the recent I-205 Tolling financial analysis, and we consider our full understanding of this document together with the EA as also critical to being able to provide meaningful feedback on the EA. Analysis and confirmation of these interest areas will be time consuming, adding needed review time.

This project will significantly impact the surrounding local circulation system and our communities, pushing congestion from the freeways into our neighborhoods. This proposal will cause significant negative impacts to our communities which we recognize is not mitigation as proposed in this EA, and these shortcomings are not taken lightly.

Therefore, on behalf of the people we serve, and as a participating agency for the I-205 Toll Project Environmental Assessment, we formally request, at a minimum, an additional 45 days be added to the original 45-day public comment period for the I-205 Toll Project Environmental Assessment which will result in a minimum of a 90-day public comment period. This extension

will allow more time for the technical review and some level of public engagement around our EA comments.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Denyse C. McGriff". The signature is written in a cursive style.

Denyse C. McGriff  
Mayor



<b>ODOT I-205 Toll EA - RECORD #133 DETAIL</b>
--

**Submission Date :** 3/24/2023

**First Name :** kim

**Last Name :** baller

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** As a third generation oregonian I oppose any tolling of I5 or 205 which will be used to build more highways and/or freeway improvements. If Oregon wants to do something, build a light rail from PDX metro area down through the willamette valley to Eugene, including cities in-between. That I would support.

I also oppose the proposed new bridge over the Columbia river. Again, build a light rail from PDX to Vancouver, Wa.

**ODOT I-205 Toll EA - RECORD #134 DETAIL**

**Submission Date :** 3/24/2023

**First Name :** Richard

**Last Name :** Leonetti

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** You know the numbers from your impact statement: tolling I-5 and 205 are expensive bad ideas. It will not improve traffic flow, and will cost a fortune to everyone. (It would be silly of me to mention that the state is already spending a fortune on EV subsidies to encourage more travel)

Stop the tolls now--at least this will cut off the substantial spending ongoing and to come in setting up the mechanisms.

Really unhappy driver.

**ODOT I-205 Toll EA - RECORD #135 DETAIL**

**Submission Date :** 3/24/2023

**First Name :** John

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** The total \$ value of the benefit is less than the cost. therefore, don't execute this project

**ODOT I-205 Toll EA - RECORD #136 DETAIL**

**Submission Date :** 3/24/2023

**First Name :** Hugh

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Seems that all Federal/State elected officials are in place by the people,for the people, get paid by the people of all political parties. Of the words on this page the most used is "Environment "  
Does the air in China, Russia, India, Turkey etc just hang out over their countries or maybe cover the globe, stop their pollution, may just help everyone's. I'm retired, fixed income, don't get reimbursed for expenses don't get auto provided by taxpayers that you want to impose another tax on without a vote of the people.  
What has happened to our "DEMOCRACY"  
Sincerely  
Tax Paying Citizen of Oregon since 1959

**ODOT I-205 Toll EA - RECORD #137 DETAIL****Submission Date :** 3/25/2023**First Name :** garry**Last Name :****Affiliation :****Submission Method :** Accessible form**Q3. Comments :**

The purpose of the project mainly is to reduce the impact of an earthquake on the bridges. This is being wildly used for an event that has never happened in Oregon before and highly unlikely to happen anytime in the future. Spending hundreds of million of dollars for an unlikely event is wasteful spending. Forcing drivers to adhere to congestive flow traffic is again totally unnecessary and an intrusion into the motoring public use of roads.

**ODOT I-205 Toll EA - RECORD #138 DETAIL****Submission Date :** 3/25/2023**First Name :** Elizabeth**Last Name :** House**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** I think the tolling is wrong. To many people have to use this to go to work. It would just put another hardship on them

**ODOT I-205 Toll EA - RECORD #139 DETAIL**

**Submission Date :** 3/25/2023

**First Name :** GARY

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** THIS IS JUST ANOTHER TAX ON LOW INCOME AND MIDDLE CLASS OREGONIANS.VEHICLE COMMUTERS SHOULD NOT HAVE TO PAY FOR BIKING WALKING OR PUBLIC TRANSPORTATION.

<b>ODOT I-205 Toll EA - RECORD #140 DETAIL</b>
--

**Submission Date :** 3/25/2023

**First Name :** Ann

**Last Name :** Bakkensen

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I do not support tolling in Oregon. Our future generations should not be expected to finance necessary road projects which have been neglected in favor of alternate transportation. Oregon's money needs to be managed better. A family tries to budget to anticipate future needs because money doesn't sprout from nowhere to cover poor planning.



**ODOT I-205 Toll EA - RECORD #141 DETAIL**

**Submission Date :** 3/25/2023  
**First Name :** Rob  
**Last Name :** Powell  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Please, NO TOLLS on Oregon freeways.  
Thank you...  
- registered voter

**ODOT I-205 Toll EA - RECORD #142 DETAIL****Submission Date :** 3/26/2023**First Name :** Donald**Last Name :** Keller**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** I do not want a toll on Oregon roads. Many of us on low or fixed incomes need to use these roads. It would be a financial hardship for us. For example, my daughter is a single mom. In order to pick up and return her daughter, she has to cross the bridge multiple times. That would be very expensive. I have to cross the bridge also, which would be difficult on a retired income. We live in Beaverton, and she lives in Hillsboro.

**ODOT I-205 Toll EA - RECORD #143 DETAIL**

**Submission Date :** 3/26/2023

**First Name :** Lori

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Transportation analysts needs to consider how hwy 43 and hwy 99E will be affected by the traffic increase regarding emergency vehicles and school buses. As a newly retired person I'm upset at the cost to see family members in west linn, it's taking money out of my budget that I would be spending at local businesses and entertainment options

**ODOT I-205 Toll EA - RECORD #144 DETAIL**

**Submission Date :** 3/27/2023  
**First Name :** Clyde  
**Last Name :** Harmon  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** I am a 88 year resident of Oregon. I, like most Oregonians resent being told by Government Officials that they know what is best for us. We elect state representatives to represent us, not to dictate to us nor should the appointed department heads tell us that they know what is best for us. I know what the problems facing Oregon are, as do most of our citizens do. If road tolling is the solution fine-PUT THAT TO A VOTE OF THE CITIZENS OF THIS STATE. TO THOSE IN POWER, REPRESENT US, DO NOT, I REPEAT DO NOT DICTATE TO US. I DO NOT WANT ROAD TOLLING IN MY STATE. Do you understand, we do not want tolling in this STATE. The taxing of The residents of Oregon is already too high.  
--I SERVED MY COUNTRY/ STATE for MORE THAN 60 YEARS.

<b>ODOT I-205 Toll EA - RECORD #145 DETAIL</b>
--

**Submission Date :** 3/27/2023

**First Name :** Jeff

**Last Name :** Hood

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I live on Willamette Falls Drive in West Linn and witness daily commute time congestion in front of my house as I-205 backs up. With the proposed tolling, we will see more frustrated drivers leaving the freeways and using our already deteriorating surface roads as an alternative route. With the high price of fuel, few people get in their vehicles just to go for a ride. ODOT's comment that tolls will reduce the number of cars on the roads is ridiculous, those drivers will just find an alternate route. Perhaps one additional tolled lane on I-205 and I-5 would make more sense.

<b>ODOT I-205 Toll EA - RECORD #146 DETAIL</b>
--

<b>Submission Date :</b>	3/27/2023
<b>First Name :</b>	lola
<b>Last Name :</b>	
<b>Affiliation :</b>	
<b>Submission Method :</b>	Accessible form
<b>Q3. Comments :</b>	no comment

<b>ODOT I-205 Toll EA - RECORD #147 DETAIL</b>
--

**Submission Date :** 3/27/2023

**First Name :** c

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I will not pay tolls period! Good luck on that!

**ODOT I-205 Toll EA - RECORD #148 DETAIL**

**Submission Date :** 3/28/2023

**First Name :** Roberta

**Last Name :** Powell

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I am opposed to any tolling on Oregon freeways or highways. This is a terrible idea and a regressive tax that affects those least able to pay and working people who must use these freeways in order to get to and from their workplaces the most.

Oregon has done very little to improve the freeways where tolls are being proposed yet wants to charge people to travel them which doesn't make any sense.

Thank you for considering my concerns about this.



**ODOT I-205 Toll EA - RECORD #149 DETAIL**

**Submission Date :** 3/28/2023

**First Name :** Pat

**Last Name :** Guild

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I feel that this would put an unfair burden on those that must commute to work.  
Personally I have no reason to travel to Washington since my mom died.  
However, I have always supported the working class.  
If this must be done, maybe persons commuting with at least one or two other passengers to reduce traffic could be given a pass?  
Sincerely,

<b>ODOT I-205 Toll EA - RECORD #150 DETAIL</b>
--

<b>Submission Date :</b>	3/29/2023
<b>First Name :</b>	Kerri
<b>Last Name :</b>	
<b>Affiliation :</b>	Local resident
<b>Submission Method :</b>	Accessible form

**Q3. Comments :**

To Whom it may concern,  
Tolling on 205 not fair to Oregon city residents at all. Streets are already bogged down clogged up and there are a few thousand Apartments and low income apartments being built on those bogged down roads. It takes 5 consecutive traffic lights to get through the one light at 213 to get across it during traffic hours. There have been NO road improvements already and more apartments and homes being built other places also. Now you want to add all the traffic getting off highway to avoid toll area. Also it will cause problems with Police, Fire, ambulance, first responders, County and state workers, PGE will have problems getting to places and doing their work with so much more traffic and traffic problems. So you will be risking lives and needed services in all of our area and if you think that's ok you need to think again. There are 2 rivers we can't get across to go anywhere you have us boxed in we don't have shopping other than Fred Meyers and groceries but other shopping none that we will be able to get to Oregon city is NOT equipped to handle this at all, and we won't be able to get to even Clackamas in timely manner. It already takes 30-45 Min's one way. and you want us to pay the toll also if we get on Highway which is one of 2 options to cross rivers and Both would be tolled. The only ways across the river except the bridge down town Oregon city that gets hugely all blocked up already and is just 2 lanes it blocks up down town and parts of west Linn but you want to add to that. The road to avoid 205 S. is also very backed up This could cost us hours. The area you picked is not appropriate with the rivers there and such small roads in Oregon city. It will cause a bottleneck, accidents, road rage, hassles for Police fire and all needed services and first responders, It will also cause increased prices for everything as trucks will charge more to stores and we will get that expense also and so much frustration you will be trapping those of us who live in Oregon city. I have lived here over 30 years. You also are not considering all the apartments going in that are going to cause a huge amount of more traffic already and the fact that Oregon City has no real shopping or a motel we are not as a town equipped to handle this our roads are already filled some don't have hours to spend to go elsewhere to shop and Some can't sit that long due to disabilities. Just so very wrong Toll roads don't work anywhere else why do you think they will work here you are wasting more money on doing this using our tax dollars for something we don't want at all, nobody does in this area, especially in Oregon city.. Let's vote on it and let those it affects the most as we live near by have the say. You also did not make necessary road enhancements and you did not take our livability into consideration. I would move if I could but I'm disabled and Can not physically do what it takes to move nor can I afford to hire people to do it for me. and just going to doctor will cost me \$8 to go one exit and back really 1/2 to 3/4 mile and about 1 hour of time this would double that time I have no way to avoid the toll as I have to cross both rivers and I can't sit for over 45 mins or it damages my spine So what am I to do let you cause me harm. That is just so very wrong. I don't even leave Oregon city but would have to pay a toll twice to Doctor or to get my prescriptions. The small bridge is always backed up already. It will cause people their jobs and livelihoods by being late due to huge traffic issues in our town and being unable to get to work besides the cost of tolls So Many do not have an extra \$180 a month and more due to trucks and services having to pay tolls and economy that's already too high going up more. The added costs and problems will cause more homelessness, More crime when we have little police or law and order, and cause more anger outrage and frustration. The State is causing more problems to their people than good. It's just greed by our Government and leaders that does not use tax money efficiently as it is and does not care about the people who pay the taxes. You will be causing harm to the people of this area. I am so against 205 being a toll road and really believe you did not take the residents Of Oregon City being trapped and highly burdened into consideration. at least give us free tolls, but would prefer this whole idea being stopped it's a waste of time money and causes more problems than it's worth as your toll road will cause us so many problems and heartache just with the traffic coming in our town to avoid the toll, as well as added time loss in our schedules less services and problems for buses first responders and more. You Will be ruining lives already having to work 2 jobs to make it and cutting out any real family time by just adding even more travel time. Just so very wrong. Obviously the People in this area do not matter to Our Leaders or

Our Government The Oregon city Government officials are all against this but you wont listen to reason.Cause a worse economy cause delays in first responders and needed care Cost people their homes Jobs and just ruin lives that is not right. So very wrong to Use a trap to get more tolls and Harm the residents that live near by. Just so very WRONG and would harm many of The people who pay taxes that pay your salary. We are your boss not the other way around. Why would you think this is OK at all WE THE PEOPLE do not want this at all Stop The toll on 205 Please.....

, Oregon City resident for over 30 years. I am also disabled for 11 years and can not move away.

<b>ODOT I-205 Toll EA - RECORD #152 DETAIL</b>
--

**Submission Date :** 3/29/2023

**First Name :** Howard

**Last Name :** Spindel

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I am very opposed to these new tolls. They are a regressive tax on people who can ill afford it.

For the record, it won't affect me much because I am retired and rarely drive anywhere. But I think this is very bad policy for the city of Portland.

<b>ODOT I-205 Toll EA - RECORD #153 DETAIL</b>
--

**Submission Date :** 3/29/2023

**First Name :** Diane

**Last Name :** Good

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** My husband and I live in Oregon City and are concerned about the toll roads that will be on I205. We have a lot of medical doctors in Tualatin and do not have extra money for road taxes.  
We are both in our 70's and it would be a hardship on our set incomes.

**ODOT I-205 Toll EA - RECORD #154 DETAIL**

**Submission Date :** 3/29/2023  
**First Name :** Richard  
**Last Name :** Krippaehne  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** To Whom it May Concern:

We are requesting addition of the comments below to the environmental assessment file on ODOT tolling in the Portland, Oregon metropolitan area, including Interstate 205 in Clackamas County. We strongly oppose tolling on our freeways.

Sincerely,

-----  
We are writing to express our concern about proposed tolling on I-205 in Clackamas County. We live in the Willamette district of West Linn a short distance off of Willamette Falls Drive. We are native Oregonians, have lived in West Linn since 1992, and drive the I-205 freeway and Borland Road/Willamette Falls Drive every day. We experience first-hand the impact of alternate-route driving due to congestion on the freeway. On many days, eastbound traffic backs up from 10th Street approximately 2 miles to the west. Westbound traffic backs up on Willamette Falls Drive from 10th Street half-way to Oregon City. Our freeway system does not have capacity to accommodate the population using it. The region continues to grow, and no amount of social engineering (tolling) will reduce the need to get around. We feel quite certain tolling will severely and negatively affect our neighborhood. We anticipate drivers taking Borland Road/Willamette Falls Drive to avoid paying tolls on the freeway, making it extremely difficult if not impossible to get into and out of our neighborhood to carry out normal daily activities. Also, tolling on the I-205 system from Tualatin to Clackamas unfairly burdens the local residents who more frequently need to use that portion of the freeway. We need the freeway system to get to and from work, and there are no reasonable alternatives to travel through and within the region. Many people do not have a choice of workday hours and do not have the flexibility to alter their driving patterns. Mass transit is not an option because the system does not provide an efficient way to get around.

We strongly oppose tolling on our freeways and feel adding capacity (more lanes) to the freeway system would be a better use of taxpayers' resources.

Please support us in maintaining a livable community by opposing the proposed tolling on local freeways.

Sincerely,

**ODOT I-205 Toll EA - RECORD #155 DETAIL**

**Submission Date :** 3/30/2023  
**First Name :** David  
**Last Name :** Filmer  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Greetings!

Regarding the proposal to add tolls along the I-205 corridor..

I live in the Parkrose/Gateway area, adjacent to I-205, and I use I-205 often.

I must admit to mixed feelings on this. I certinally would not want any toll BOOTHS or any such nonsense. The tolling system in Washington state is very well done, with zero traffic delays for anybody.

As a reasonably affluent impatient person who doesn't do a lot of driving, I selfishly favor a system that takes more traffic off the interstates.

But, as the son and grandson of civil engineers, I realize that freeways require disproportionately more maintenance than surface streets, yet they cover far fewer miles. Cost per mile is much higher, yet vehicle gas taxes (which fund most highway maintenance) does not distinguish.

As a conservative-minded person, I believe that people should pay for what they use, and so tolls make sense. But I also feel like I am already paying for roads through gas taxes, so it feels like I'm paying twice for the same thing (even though I feel the gas tax is an ineffective instrument).

I would perhaps prefer a system where ALL roads are tolled (and gas taxes are eliminated). Each car keeps track of its route using GPS, and can calculate per-mile tariffs dependig on factors such as type of road, type of vehicle, and time of day. Everybody receives a monthly (or yearly) road use bill which fairly charges them for their actual impact.

As we move towards electrification, our entire funding model must change to some sort of fair use-based system. Perhaps freeway tolling would be a good start. Just, please, do it like Washington.

Respectfully,



**ODOT I-205 Toll EA - RECORD #156 DETAIL**

**Submission Date :** 3/30/2023

**First Name :** Jaye

**Last Name :** Cromwell

**Affiliation :** JPACT

**Submission Method :** Letter

**Q3. Comments :** Hello, I am submitting this letter as official comments on behalf of JPACT Chair Gonzalez and JPACT members, as requested at their March meeting. The letter requests an additional 30-day extension for the EA comment period.

Thanks!

**Attachments :** JPACT I-205 comment letter 033023Final.pdf (129 kb)  
I-205\_EA\_Extension\_JPACT.pdf (129 kb)



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

March 30, 2023

Mandy Putney  
Oregon Department of Transportation  
Urban Mobility Office  
123 NW Flanders St  
Portland OR 97209

Dear Ms. Putney,

I am writing you regarding the public comment period for the I-205 Toll Project Environmental Assessment, currently scheduled to close on April 21, 2023. On March 16, 2023, members of Metro's Joint Policy Advisory Committee on Transportation (JPACT) discussed this matter and took a formal action to request an extension of the 60-day comment period to 90 days. The current timeline for the public comment period does not allow for the public to fully engage in this critical process or for timely review by partner agencies.

Both JPACT and the Metro Council support tolling as a critical step in meeting the Portland region's goals to manage demand, reduce greenhouse gases and improve mobility on the entire transportation system. Both bodies have spent countless hours working to develop tolling policies through the 2023 Regional Transportation Plan update, including outreach to local community and elected officials. It is critically important that tolling in our region is responsive to local needs.

Members of JPACT formally request that the public comment period be extended by 30 days. Thank you for your consideration and continued collaboration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Juan Carlos González".

Metro Councilor Juan Carlos González  
JPACT Chair

cc: Bob Van Brocklin, OTC Chair  
Kris Strickler, ODOT  
Brendan Finn, ODOT  
Margi Bradway, Metro



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

March 30, 2023

Mandy Putney  
Oregon Department of Transportation  
Urban Mobility Office  
123 NW Flanders St  
Portland OR 97209

Dear Ms. Putney,

I am writing you regarding the public comment period for the I-205 Toll Project Environmental Assessment, currently scheduled to close on April 21, 2023. On March 16, 2023, members of Metro's Joint Policy Advisory Committee on Transportation (JPACT) discussed this matter and took a formal action to request an extension of the 60-day comment period to 90 days. The current timeline for the public comment period does not allow for the public to fully engage in this critical process or for timely review by partner agencies.

Both JPACT and the Metro Council support tolling as a critical step in meeting the Portland region's goals to manage demand, reduce greenhouse gases and improve mobility on the entire transportation system. Both bodies have spent countless hours working to develop tolling policies through the 2023 Regional Transportation Plan update, including outreach to local community and elected officials. It is critically important that tolling in our region is responsive to local needs.

Members of JPACT formally request that the public comment period be extended by 30 days. Thank you for your consideration and continued collaboration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Juan Carlos González".

Metro Councilor Juan Carlos González  
JPACT Chair

cc: Bob Van Brocklin, OTC Chair  
Kris Strickler, ODOT  
Brendan Finn, ODOT  
Margi Bradway, Metro

**ODOT I-205 Toll EA - RECORD #157 DETAIL****Submission Date :** 3/30/2023**First Name :** Linda**Last Name :** Berning**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** If tolling is going to happen on I 205, I feel it should be done on the Jackson Bridge where cars cannot get off the Interstate to avoid a toll. I live in Oregon City and it is going to cause such a nightmare in our small downtown area if people can get off at Hwy 213 avoid the Abernathy Bridge and get back on 205 in West Linn via Washington St. Same if you reverse direction. Thank you for your consideration.

**ODOT I-205 Toll EA - RECORD #160 DETAIL**

**Submission Date :** 3/30/2023  
**First Name :** Shatrine  
**Last Name :** Krake  
**Affiliation :** West Linn Chamber of Commerce  
**Submission Method :** Letter  
**Q3. Comments :** Dear Oregon Department of Transportation,

Attached is a formal comment letter written on behalf of the Beaverton, Canby Area, Lake Oswego, North Clackamas, Oregon City, Sandy Area, Sherwood, Tigard, Tualatin, Washington County, West Linn and Wilsonville Chambers of Commerce regarding the I-205 Toll Project Environmental Assessment.

To address any delivery issues, can you please confirm receipt of this email and letter at your earliest convenience?

Thank you for the time and attention, we appreciate it.

Sincerely,

**Attachments :** Outlook-jhphkuhg.jpg (98 kb)  
CHAMBER23\_ODOTEALetter.pdf (348 kb)



Dear Oregon Department of Transportation:

On behalf of the Beaverton, Canby Area, Lake Oswego, North Clackamas, Oregon City, Sandy Area, Sherwood, Tigard, Tualatin, Washington County, West Linn and Wilsonville Chambers of Commerce, **we are collectively requesting a 30-day extension to the I-205 Toll Program Environmental Assessment Public Comment Period.**

The current 60-day review process is insufficient for thorough review and coordination for a program that will be deeply impactful to our businesses and communities.

Additionally, we would like to **request a second public hearing to be held during non-business hours or on the weekend** to create an opportunity for employees and business owners to attend and provide feedback. We noted, and it was brought to our attention publicly, that none of the in-person events are accessible to those working a standard schedule. More opportunities should be created for in-person informational sessions that allow people who work normal business hours to attend. These individuals are heavily impacted by this assessment and not given an equitable opportunity to speak on their own behalf, please make this second public hearing a priority as well as additional in-person informational sessions.

We thank you for this consideration and look forward to seeing more inclusive opportunities arise throughout our communities to discuss these Toll Program Assessments.

Sincerely,

*Alicia Bermes, CEO, Beaverton Area Chamber of Commerce*

*Audrey Traaen, Interim Executive Director, Canby Area Chamber of Commerce*

*Liz Hartman, CEO, Lake Oswego Chamber of Commerce*

*Jay Jones, CEO & Maranda Camacho, Admin Assistant, North Clackamas Chamber of Commerce*

*Victoria Meinig, CEO, Oregon City Chamber of Commerce*

*Khrys Jones, Executive Director, Sandy Area Chamber of Commerce*

*Renee E Brouse, Executive Director/CEO, Sherwood Chamber of Commerce*

*Megan De Salvo, CEO, Tigard Chamber of Commerce*

*Anneleah Jaxen, CEO, Tualatin Chamber of Commerce*

*Deanna Palm, President/CEO, Washington County Chamber of Commerce*

*Shatrine Krake, Executive Director, West Linn Chamber of Commerce*

*Kevin Ferrasci O'Malley, CEO, Wilsonville Area Chamber of Commerce*

**ODOT I-205 Toll EA - RECORD #161 DETAIL**

**Submission Date :** 3/31/2023

**First Name :** Lisa

**Last Name :** Hostick

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Please do not put tolls in place!!

I am against this 200%.

We are over taxed as it is and many of us are deciding where we will be moving. I am born and raised in Oregon, live in Washington and use these corridors to keep connected to family.

Stop these increases in our everyday living.

Voting no.

**ODOT I-205 Toll EA - RECORD #162 DETAIL**

**Submission Date :** 3/31/2023

**First Name :** Jeff

**Last Name :** Aden

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** To whom it may concern,

I am opposed to the proposed tolling for the following reasons. Data presented based on research conducted by Eric Fruits, Ph D., vice president of Research at Cascade Policy Institute:

ODOT estimates that the first phase of tolls will cost the average household \$575 per year which takes away discretionary income that people would put back into the local economy through retail and restaurant spending.

ODOT estimates that the tolls will cause more than 750 people to lose their jobs and reduce wages by about \$3 million per year.

The transportation department projects it will collect \$132 million a year in combined household and freight carrier tolls. Simultaneously ODOT estimates that reduced traffic will produce only \$105 million in economic benefits from reduced congestion, environmental improvements and economic activity. This would result in Oregonians being \$27 million worse off annually.

Ideally congestion pricing should make us better off because the value of the time we save is worth more than the toll we pay.

Very truly yours,



**ODOT I-205 Toll EA - RECORD #163 DETAIL****Submission Date :** 3/31/2023**First Name :** Corina**Last Name :** Goodrich**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** This tolling project seems criminal! Imposing a 4 cent gas tax that everyone pays is a much more equitable solution then penalizing a few to foot the bill on this entire project (although what is being done with the gas tax collected? Shouldn't a portion be used to fund projects like this in the first place?). ODOT shouldn't be allowed to impose tolling without, at least, a vote by the population. Many are going to be greatly affected personally by this as our neighborhoods will become overwhelmingly congested with middle income, fixed income and low income people attempting to avoid these tolls. This will cause more neighborhood accidents and put our citizens, particularly our children, at even a greater risk. This plan does not solve the traffic problem. It won't go away. It just redirects it and will create a financial hardship to many. Has this actually been thought thru carefully? AND this doesn't even begin to speak to the effect tolling will have on contract drivers, ubers/lifts, businesses who deliver services, etc. and the effect it will have on our economy as a whole. Outrageous!

**ODOT I-205 Toll EA - RECORD #164 DETAIL**

**Submission Date :** 4/1/2023

**First Name :** Jeanne

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** The toll is essentially a tax that will be imposed even though there is much dissent. Once imposed it will never be removed. Traffic will absolutely increase in all surrounding areas because people will most certainly take measures to avoid the tolled locations. If these improvements are imperative, there should be some options for funding. Those options should be presented to citizens and voted upon.

**ODOT I-205 Toll EA - RECORD #165 DETAIL**

**Submission Date :** 4/2/2023

**First Name :** Curtis

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** By odots on admission this project will HURT Oregonians, there are better was to pay for it, raise gas tax for one, charge evs their fair share. We CANNOT afford 600 to 1200\$ a year! The congestion from dodging tolls, loss of business around area will be substantial. ODOT admiited on its owan report this project will be 27 million dollars under water regarding ANY,ANY potential benefits. WE OPPOSE THIS TOLL PROJECT AND WILL NEVER DRIVE THAT BRIDGE AGAIN IF TOLLING PUSHED ON US.

**ODOT I-205 Toll EA - RECORD #166 DETAIL**

**Submission Date :** 4/2/2023

**First Name :** Jeff

**Last Name :** Jones

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** We are opposed to the I205 tolling. We understand the need to generate money for our roads, highways and bridges upkeep, but we strongly feel that the I205 toll plan is not the best way to go about it. We would like to see the I205 tolling plan suspended until further research can be done to find other resource options.

To implement a tolling on I205 without the public transportation availability would be a disaster. The people most affected by the tolling will be the folks who depended on public transportation, but will have a more difficult time finding routes that will get them to where they want to go without spending hours and multiple transfers getting there.

The tolling is only going to hurt the folks who are already burdened by higher rents, groceries, limited employment, child care issues, to name a few. This I205 plan is simply not a fair and equitable solution even though your plan is to have a sliding fee

**ODOT I-205 Toll EA - RECORD #167 DETAIL**

**Submission Date :** 4/2/2023

**First Name :** Jill

**Last Name :** Jones

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I am opposed to the I205 tolling. I understand the need to generate money for our roads, highways and bridges upkeep, but I strongly feel that the I205 toll plan is not the best way to go about it. I would like to see the I205 tolling plan suspended until further research can be done to find other resource options.

To implement a tolling on I205 without the public transportation availability would be a disaster. The people most affected by the tolling will be the folks who depend on public transportation, but will have a more difficult time finding routes that will get them to where they want to go without spending hours and multiple transfers getting there.

The tolling is only going to hurt the folks who are already burdened by higher rents, groceries, limited employment, child care issues, to name a few. This I205 plan is simply not a fair and equitable solution even though your plan is to have a sliding fee.

Could you not look into:

1. Modestly taxing EV vehicles (this would include ALL EV vehicles and buses)
2. Have one lane for those folks that want to pay to go faster
3. Start with an I-5 toll bridge toll crossing into Portland/Vancouver (both the old and the new bridges)
4. Charging cars who enter Oregon with out of state licenses (Washington residents come into Oregon to purchase items to avoid their sales tax)

Thank you for letting me share my thoughts.

**ODOT I-205 Toll EA - RECORD #168 DETAIL**

**Submission Date :** 4/2/2023

**First Name :** Jeannette

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Gridlock on toll road, gridlock on surface streets for those avoiding toll road, increased damage to surface streets from increased usage, increase in road accidents from drivers trying to get through toll roads and side streets, increase in road rage incidents from frustrated drivers, impact on homeless people and wild animals (such as the Canadian Geese) in areas where the number of cars has increased from injury or pollution, household finances for low income families who have to use their cars to go to work to make enough money just to scrape by. I would prefer to have the state stop trying to bring in more low income, homeless, or undocumented people so they can give them welfare, and work on checking on those who are already here and homeless to see if they need mental, physical, or educational help to be able to hold a job (especially those who are veterans), and get them matched with jobs (for those who are high tech skilled-stop allowing outsourcing to other countries for jobs that people who live here can do). Stop using gas and other taxes for any other projects than what these monies were originally stated that they were going to be used for. People move out of those states that have bad ideas like toll roads. At some point you may not have anyone left in the state paying any money in taxes, just the ones getting wanting to receive the monies charged as taxes to the workers. Have I made my points yet? Stop trying to penalize those who work for a living with the toll roads and increased taxes. Bad for everything and everybody. Completely against these. Yes, I moved out of a state that has crazy expensive TOLL ROADS!

**ODOT I-205 Toll EA - RECORD #169 DETAIL**

**Submission Date :** 4/2/2023  
**First Name :** Paul  
**Last Name :**  
**Affiliation :** State Representatives 17th District  
**Submission Method :** Accessible form  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #170 DETAIL**

**Submission Date :** 4/2/2023

**First Name :** Andrew

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :**

NO TOLLS...

I travel into the 205/I5 corridor for work a couple times a week. Tolling will cause me and a lot of other people to find alternative routes to get to where they want to go. I could cross the Sellwood for example, then head south or west depending on where I need to go. No tolls paid, but adding another vehicle onto secondary streets. ODOT should be ashamed. More people will go elsewhere. Another reason to leave Oregon



**ODOT I-205 Toll EA - RECORD #172 DETAIL**

**Submission Date :** 4/3/2023

**First Name :** Kari

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** As a resident of West Linn, there are no traffic alternatives to using I 205 on a daily basis and the economic impact to residents would be substantial. I would like to suggest that West Linn residents receive a discounted rate for tolling due to the impact on our community. There are very few alternatives to driving as only 1 bus serves the area where I live with limited service. And truck traffic will undoubtedly increase once the additional lane is added which will bring more noise and congestion to the freeway system.

**ODOT I-205 Toll EA - RECORD #176 DETAIL**

**Submission Date :** 4/3/2023  
**First Name :** Greg  
**Last Name :** Smith  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Dear ODOT managers,

I'm a 30-year resident of the Willamette neighborhood in West Linn. We are one of the communities to be most heavily affected by the introduction of tolling on I-205. Traffic congestion on Borland Road and Willamette Falls Drive is already a problem when the freeway is moving slowly. Congestion levels on local roads seem very likely to become excessive after the initiation of tolling, especially if drivers can use the old Oregon City arch bridge to get to their destination. Two passages from the Environmental Assessment raise significant concerns for me because of the absence of knowledge about post-tolling air quality impacts in the Willamette community.

There may be localized areas where ambient concentrations of MSAT could be different under the Build Alternative compared to the No Build Alternative. The localized changes in MSAT concentrations would likely be most pronounced on roadways where traffic volumes would be higher under the Build Alternative relative to the No Build Alternative due to rerouted trips. However, the magnitude and the duration of these potential increases compared to the No Build Alternative cannot be reliably quantified due to incomplete or unavailable information in forecasting project-specific MSAT concentrations and related health impacts.

Localized increases in air pollutant emissions can occur where traffic volumes increase or where vehicles spend more time idling at signalized intersections. Increased delay or degraded LOS at an intersection may cause elevated air pollutant concentrations in these vicinities; however, localized pollutant concentrations were not modeled because it is not required for projects located in attainment areas and because it is unlikely that emissions from an individual project would exceed the NAAQs. (EA, 3-49)

What these passages make clear is the absence of current knowledge about how much particulates and other pollutants will increase in a place where several thousand people now live. Although more polluting truck traffic will most likely remain on the freeway, the amount of idling from passenger cars though the Willamette commercial district seems almost certain to lead to a dramatic spike in airborne pollutants. Intentionally or not, ODOT may be turning our community into an environmental sacrifice zone where children and adults will experience higher levels of asthma and potentially life-threatening cancers. The writers of the Environmental Assessment acknowledge their inability to predict some of the most serious consequences of a policy decision that will have a direct effect on the bodies of people who reside in this community. I strongly urge you to find other ways to support highway maintenance and improvements.

Sincerely yours,

**ODOT I-205 Toll EA - RECORD #177 DETAIL**

**Submission Date :** 4/3/2023  
**First Name :** Nancy  
**Last Name :** Kyker  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** To Whom it may concern:

My husband and I live in Clark County, Washington. My husband works in Wilsonville, Oregon; and I work in Lake Oswego, Oregon.

The anticipated TOLLING that ODOT and/or the Oregon State is seeking to impose on the citizens - (working class, those still willing to go to work), will be cost prohibitive. The TOLLS will imposes a financial burden on those trying to make ends meet for their families, including myself.

Again, because my husband and I are working in different Oregon locations and on different time schedules, each of us will be required to pay multiple tolls just to go to and from work each day. This TOLL is an unfair burden you are putting on the working class citizens.

I would hope that the state departments would look more closely at the impact the TOLLS will have on the working class and their families - and the economic impact for this region.

Having traveled in locations that have fair TOLLS - drivers' are given options or choices. Usually, the drivers have a choice to take various routes - one route WITHOUT a toll which may take longer; or a route WITH a TOLL that may be shorter or a bypass, etc. Thus the TOLL is a choice if you want to pay to use the "shorter/more direct" option. However, what ODOT and/or the State is imposing is not a choice - there are no other freeways --- this is not a choice --- just FORCED TOLLS which is unfair on the citizens.

DO NOT IMPOSE TOLLS on I-205 nor I-5, and not for any of the bridges that are along those two freeways. Without the bridges, you would not have a freeway. The bridges are just part of the freeway due to the rivers that flow in this area.

**ODOT I-205 Toll EA - RECORD #178 DETAIL**

**Submission Date :** 4/3/2023  
**First Name :** Jim  
**Last Name :** Purcell  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Dear ODOT,

I am writing to express my concerns about your plan to toll the Abernethy and Tualatin River Bridges on I-205. I believe that these tolls will have a negative impact on the economy and on low-income families.

First, I believe that the tolls will be too expensive. ODOT estimates that the average household will pay \$575 a year in tolls. This is a significant amount of money for many families, and it will make it more difficult for them to afford to live in the Portland area.

Second, I believe that the tolls will not be effective in reducing congestion. ODOT estimates that the tolls will reduce traffic on I-205 by 10%. However, I believe that this is a very optimistic estimate. In reality, I believe that the tolls will only have a small impact on congestion.

Third, I believe that the tolls will disproportionately impact low-income families. Low-income families are more likely to live in areas that are already congested, and they are less likely to be able to afford to pay the tolls. This will make it more difficult for them to get to work, school, and other essential services.

For these reasons, I urge you to reconsider your plan to toll the Abernathy and Tualatin River Bridges on I-205. I believe that these tolls will have a negative impact on the economy and on low-income families.

Thank you for your time.

**ODOT I-205 Toll EA - RECORD #179 DETAIL**

**Submission Date :** 4/3/2023

**First Name :** Don

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** see the another topic above re: auto's not paying their fair share on license plate tags; also if they re-new they don't pay for all the years they didn't

**ODOT I-205 Toll EA - RECORD #181 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Lisa

**Last Name :** Eirene

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :**

Hello,

I am a Gladstone resident and I want to voice my concerns about the tolling. I have major concerns that are going to affect the small city of Gladstone. It will become a major traffic issue on streets that are quiet, safe and low speeds. People will be getting off 205 to avoid tolls and will speed through Gladstone with no care about the neighborhood streets where speed limits are 20 or 25. It will create havoc in our neighborhoods and decrease housing values and cause environmental issues as well. I am not opposed to tolling, I just wish that Odot would reconsider where they are considering putting the tolling on 205. Thank you.

**ODOT I-205 Toll EA - RECORD #183 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Audrey

**Last Name :** Duval

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I am opposed to having a toll on I-205.

I'm a low income single mom, this would be a MAJOR financial hardship for me. I depend on I-205 for important activities for my children, I would not have an option to choose an alternate route.  
Please contact me for any opportunities available to speak out against the proposed toll plan.

Thank you,

**ODOT I-205 Toll EA - RECORD #185 DETAIL****Submission Date :** 4/4/2023**First Name :** Scott**Last Name :** Held**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Why is it you department will not communicate with the city's that are impacted by your thoughtless, and when I say thoughtless, I'm know you have put a lot of thought and design into this project, but only to get the job done, check a box and move on. Your department does not care about the local population, the cities or the impact it will have on the neighborhoods! Make a name for yourself and move on. It is disgusting! I thought Oregon was one area in the country that cared and listened to its people, obviously your group is not part of that dialogue. Most of you probably don't even live in this area, so you could care less...that you don't care is obvious. What good around comes around and your don't give a shit attitude will come back at you on some future project that you'll need the people's support for, well you let that ship sail!



**ODOT I-205 Toll EA - RECORD #186 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Terry

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** What are the projected toll costs not including ODOT discounts? Please explain your savings calculation method for the expected \$9.8 M annual cost savomgs for the freight incustry. How much in annual salaries does the Mobility Advisory Committee cost Oregon taxpayers?

<b>ODOT I-205 Toll EA - RECORD #187 DETAIL</b>
--

**Submission Date :** 4/4/2023  
**First Name :** Greg  
**Last Name :**  
**Affiliation :**  
**Submission Method :** Accessible form  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #188 DETAIL**

**Submission Date :** 4/4/2023  
**First Name :** Kathy  
**Last Name :** Baker  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Hello,

I would like to voice my comments on the I-205 toll project. I want to let you know that I am STRONGLY opposed to installing tolls anywhere on I-205 or any other Oregon roads! How can you force these tolls on us the people without allowing us to vote on if we want them or not? We the people DO NOT want tolls on any of our freeways! We would vote NO if given the opportunity! We already pay many taxes that should cover any needed repairs or improvements. If you think you do not have enough money to cover the needed repairs or improvements then I would suggest that you look at your expenditures and use the money you have more wisely because you have plenty of money. Quit wasting it! It looks to me like ODOT is receiving over \$5.1 billion in revenue for 2021-2023. That should be more than enough to take care of all of Oregon's transportation needs. We the people do not want to keep funding your wasteful spending. No tolls for Oregon!!!

Sincerely,

**ODOT I-205 Toll EA - RECORD #189 DETAIL****Submission Date :** 4/4/2023**First Name :** Greg**Last Name :** Wilson**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Hello, I am against any tolls for our roads. We the tax payers have already payed for or are going to pay for what is being built. When the States & Federal governments waist so much money on "projects" other than the primary reason they exist it is wrong to punish people with more tolls. Which is just another tax. When the Federal government gives tens to hundreds of billions of our money to foreign governments with the stroke of a pen without any accountability, that is wrong. Spend OUR TAX DOLLARS here at home. That is why we are required to pay taxes. That is why "you" are required to fulfill your duty to the state of Oregon tax payers. Your employers.

**ODOT I-205 Toll EA - RECORD #190 DETAIL****Submission Date :** 4/4/2023**First Name :** Karen**Last Name :****Affiliation :****Submission Method :** Accessible form

**Q3. Comments :** Tolling this seven miles of I-205 will disproportionately impact residents of Oregon City, West Linn, Gladstone, Lake Oswego and other smaller communities both livability-wise and financially. There is already congestion on Hwy 43/Willamette Drive/Hwy 99/downtown Oregon City at peak times. Adding tolls will steer more drivers off the freeway on to these and other local roads impacting air quality, commute times and creating possible safety issues. There is no public transportation option for many residents in this part of Clackamas County, nor does public transportation meet the needs of most Oregonians. While biking lanes have increased, Oregonians actually commuting via bikes have dramatically decreased for various reasons. Costs have risen in all sectors of the economy and tolling is not the long-term answer, as it's been proven not to be a sustainable revenue generator in other states. Also a factor in consideration are those that need to be able to access emergency medical care without the hinderance of tolls or clogged local roads. Providence Willamette Falls Medical Center provides health services to many local communities as the closest medical center in the area. There are other options than tolling and the gas tax to consider to move forward with seismic upgrades. Tolling is type of taxation that needs to be put out to the voters to make decisions, not buried in a multi-paged bill to be snuck through the state legislature. Thank you.

**ODOT I-205 Toll EA - RECORD #191 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** cynthia

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** the transportation analysis needs to realize how many cars will try to avoid toll and use local roads between Tualatin/Abernathy Bridge. how is all this going to affect Historic Oregon City Bridge that already funnels too much traffic in peak times? going to put toll fare on O.C. Bridge as well?  
Big NO on toll. Find the money elsewhere.

<b>ODOT I-205 Toll EA - RECORD #192 DETAIL</b>
--

**Submission Date :** 4/4/2023

**First Name :** Mitch

**Last Name :** Besser

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I'm opposed to tolls for I205.

This is a tax that hurts lower income individuals more than wealthy individuals.

Also, having grown up in a city with tolls. In all my experience, these tolls are never removed, even after the repairs are completed and promises were made to remove them when completed.

If we need the improvements, just raise taxes to pay for it. This may not be popular, but this is what should happen.

**ODOT I-205 Toll EA - RECORD #193 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Eric

**Last Name :** Chase

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** As the subject line states, I and everyone I have spoken to, DO NOT WANT TOLLS.  
We live in West Linn and using tolls to control traffic is a TERRIBLE idea. Tolls will turn our quiet Willamette area into the best route to avoid tolls. As it is, every day during rush hour/s traffic is backed up for miles trying to "get around" the traffic on the freeway. Also, our gas taxes and recently new county DEQ fee of 11 million/ year is where you can get the funds for this project.

I don't ever remember voting for tolls. Perhaps it should be put on the ballot??  
Just in case my point wasn't clear, WE DONT WANT TOLLS!!!!  
Thank you  
Concerned resident.



**ODOT I-205 Toll EA - RECORD #194 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Mark

**Last Name :**

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** This is just another example of the Portland area falling apart. And we all know that trying to force more commuters to use mass transit has failed in the past. Especially today with all the crime in the area people are not going to ride Max . Tolls are not the answer. It hurts the poor and families in the corridor most.

This just reminds me of the failed attempt to build the I-5 bridge over the Columbia and all that tax money (our hard earned money)that was just sent down a rabbit hole.

**ODOT I-205 Toll EA - RECORD #195 DETAIL**

**Submission Date :** 4/5/2023  
**First Name :** Brandon  
**Last Name :** C  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Please don't build the tolls!  
We DON'T want it!

**ODOT I-205 Toll EA - RECORD #196 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** DAVID

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** This toll is a penalty to residents of the Oregon City and West Linn communities. We support road construction in all of Oregon. We do not support tolls for the miles of seldom used roads in rural Oregon which the local population could not afford on their own. I suggest no tolls and use another revenue source to not penalize just a small segment of the population. Treat all Oregonians the same whether they are urban or rural

**ODOT I-205 Toll EA - RECORD #197 DETAIL****Submission Date :** 4/5/2023**First Name :** Braheem**Last Name :** Hazeem**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** I am a Clackamas county resident and delivery driver. I think these tolls are extremely unfair, especially to people like me. I go over that bridge several times a day on occasion and only make \$25 an hour before taxes, gas and wear and tear on my car. Yes many of these things can be written off, but it's still more of a burden on us who don't make an excessive amount of money. I really wish you would reconsider these tolls or at least give us delivery drivers a discounted pass or something because we just can't afford these extra costs.

**ODOT I-205 Toll EA - RECORD #198 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Lisa

**Last Name :** Wilson

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Just because it is called tolling it is really equivalent to a use tax and we as voters should be able to vote for any new tax or tax like assessments. Moving forward with your rolling scheme is under handed and not welcome. I'd like to see how heavy in excess salaries and pensions are within the agency. Why not start cutting back like any business that is struggling to manage their cash inflows and so the jobs we already pay enough taxes to cover.

Put this on the ballot and let the citizens decide if they can tolerate more government grabbing of our meager incomes. Those hanging on by a thread don't need any more taxes, fees or rolling. Enough is given and not used appropriately. Civil servant should not be able to take tax payer money that was not voter approved.

**ODOT I-205 Toll EA - RECORD #199 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Francisco

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Tolling should not be allowed in the Portland Metro Area. We as tax payers have provided funds to maintain roads with little to show. Funds are spent putting in bike lanes rather than making roads safer for all. Government funding came in to provide adequate finances to repair roads. The initial proposal for tolls was to cover the shortage in budget and now its to "relieve" congestion. Oregon is turning into another Seattle and that is not who we are and we need to stop trying to be like them. I do not agree with the tolls.

**ODOT I-205 Toll EA - RECORD #200 DETAIL**

**Submission Date :** 4/5/2023  
**First Name :** Bob  
**Last Name :** Prochnau  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** ODot,

Please STOP taking money from hard working people! It is clear the city of Portland and ODot can't control spending and have NO IDEA how to manage money. How long have we had the "Gas tax" to fix local roads? YEARS! And we still have the SAME pot holes! Our local roads are falling apart and ODot tolls will only increase local traffic on a road system that is FAILING the TAX PAYERS OF OR!!!

This state is taxing working people to the point of no return! We are planning on moving out of OR do to the never ending TAXING and OUT OF CONTROL SPENDING, AND now tolling?!?! We can't afford to pay for everything and everyone! The local government and ODot need to back off before it's to late! Hard working tax payers are moving OUT OF OR due to this out of control spending!

NO TO TOLLING!

NO TO MORE TAXES!

NO TO SPENDING MORE TAX MONEY ON HOMELESS CAMPS!

START FIXING OUR LOCAL ROADS!

START ENFORCING OUR LAWS!

START HOLDING POEPLA ACCOUNTABLE!

STOP WASTING OUR TAX MONEY!!

Start supporting the TAX PAYERS - We are the people that PAY the bills for services we are NOT getting.

What the f@#\$ am I missing here?!?! Just stop!!

Please feel free to reply to this email, I am open to helping you understand the tax payers point of view.

Best,

<b>ODOT I-205 Toll EA - RECORD #201 DETAIL</b>
--

**Submission Date :** 4/5/2023

**First Name :** Barbara and Norm

**Last Name :** Lemly

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** My husband and I are elderly, living on SSI, so our income is limited. We live in Oregon City, our daughter and her family live in West Linn, and we have a son with family in Wilsonville. We come to their homes weekly to spend time and enjoy events with our grandkids. If you put a toll on the bridge it will limit our ability to spend time with our grandkids and other family and friends. Please consider us seniors in this decision.



<b>ODOT I-205 Toll EA - RECORD #202 DETAIL</b>
--

**Submission Date :** 4/5/2023

**First Name :** Dan

**Last Name :** Wood

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I would like you to know I fully support the ODOT plan for tolls on the bridges of I205.

Toll roads are(

- an important source of revenue to help pay for improvements
- a valuable method to possibly reduce traffic congestion
- have proven to be highly successful in many other states

As an Oregon resident, please put me in the "thumbs up" column for tolls

<b>ODOT I-205 Toll EA - RECORD #203 DETAIL</b>
--

**Submission Date :** 4/5/2023

**First Name :** CHRIS

**Last Name :** LIMBRICK

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** We pay enough taxes on these crappy roads.. take the money from the homeless..

**ODOT I-205 Toll EA - RECORD #204 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Rosie

**Last Name :** Steenson

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I am opposed to and strongly urge you to reconsider tolling I205. This will not reduce traffic - it will only move it to side streets. For those of us who live in this area, public transportation is not always a viable alternative. And why only 205 - why not I5 or I405?

To implement a toll and not give information on just what the cost will be seems hasty and non-transparent.

If nothing else, please put this up for a vote.

Thank you.

**ODOT I-205 Toll EA - RECORD #205 DETAIL**

**Submission Date :** 4/5/2023  
**First Name :** Tim  
**Last Name :** McPhee  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Good morning,

I live in West Linn in the Willamette neighborhood and I am against tolling on I-205 mostly because of the impact it will have in my neighborhood. I can understand the need to improve our roads but there has got to be another way to do it. I am concerned for safety in the Willamette area as I walk downtown daily and it is already pretty bad using the crosswalks with all of the traffic. I am also concerned with the impact tolls will have on property values and not being able to leave my house without getting caught up in rush hour traffic on neighborhood streets.

I also believe this should be on a ballot and get voted on by the citizens of Clackamas County.

Thank you,

**Attachments :** image001.jpg (1 kb)

**ODOT I-205 Toll EA - RECORD #206 DETAIL**

**Submission Date :** 4/5/2023  
**First Name :** Keith  
**Last Name :** Batryn  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Hi,

I missed the meeting yesterday afternoon for public comments on the I205 tolling project so I would like to provide my own comments. I am a resident in Tualatin and work in Tualatin so while this doesn't directly affect me from a working standpoint, I frequently take I205 to get to the airport as well as the gorge any my girlfriend's house in Oregon City. I fail to see how implementing tolling does anything to help congestion besides punish local residents that are either going to work, or like me are travelling for fun. There is no alternative transportation option for me to get to the airport or Oregon City other than driving. I understand the want to reduce road use, but it's just not a viable option right now. It will just punish those who use the road to live their lives. If there is a need to raise funds for road maintenance, there has to be better options than punishing those who want to use the roads we already pay for in our property taxes.

**ODOT I-205 Toll EA - RECORD #207 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Allan

**Last Name :** Konrad

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Stop Highway Robbery

Go pick on the billionaires - they can afford it. People struggling just to make ends meet cant afford more taxes.

I strongly OPPOSE tolls on oregon highways, especially I-5.

<b>ODOT I-205 Toll EA - RECORD #208 DETAIL</b>
--

**Submission Date :** 4/5/2023

**First Name :** Leo

**Last Name :** Schoenbeck

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I do not want toll lanes in Oregon. Use gas tax to raise money for projects needed

**ODOT I-205 Toll EA - RECORD #209 DETAIL**

**Submission Date :** 4/5/2023  
**First Name :** Dan  
**Last Name :** Doherty  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** Hello,  
I am opposed to tolling for numerous reasons:

- \* Unfair burden placed on people that live in the immediate area
- \* This could be mitigated by offering cheaper toll amounts for residents of the area. This was done in Boston
- \* While the goal of tolling is to raise money for infrastructure, toll money often gets abused and repurposed by politicians.
- \* There should be safeguards in place to ensure that the money collected can only be used on infrastructure projects and not misappropriated
- \* We already pay the highest state income tax in the country. Why cannot we not manage our state's budget appropriately with the income tax revenue? Tolling is a lazy solution to raise revenue instead of actually digging into the problems/waste in our state's budget.



**ODOT I-205 Toll EA - RECORD #210 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** kenneth

**Last Name :** reed

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** As a Native Oregonian and Local West Linn resident. I oppose the tolling of I205.

Living in West Linn does not provide all needed services. We travel to our neighboring communities, Oregon City, Gladstone, Tualatin, Lake Oswego, Wilsonville for additional services. By implementing tolls on I205 you are placing West Linn residents on an island. Making it impossible to access other local communities for our needed services.

As a retired resident ,the tolls will be an additional cost of living expense that will adversely effect our budget.

Tolls will push more traffic into our local neighborhoods, as commuters try to avoid Tollways. The closure of the Arch Bridge will further make it difficult to leave or enter our community. This is a trap! Penalizing West Linn residents. Our tax dollars have already paid for the FREEWAY and fuel tax dollars continue to pay for maintenance and improvements. Voters should have the final say.....NO TOLLS !

**ODOT I-205 Toll EA - RECORD #211 DETAIL****Submission Date :** 4/5/2023**First Name :** Jon**Last Name :** Slack**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** To Whom It May Concern:

I am a BIPOC, first generation immigrant and I am against tolling.

I commute from Newberg to Gresham for work and I-205 is my route as it offers the fastest, safest, and easiest way for me to get to and from my destination. Putting a toll on this route will already add to the exponential gas prices increase from the last year which have caused me to pay on average \$400 a month just to get to my job. This money is already approximately 1/6 of my net income , and now I must be taxed on it again. Tolling minorities such as myself does not hold fast the vision of DEI so boasted by every government agency in Oregon.

Additionally, It's not clear how ODOT will use the revenue from tolling as the homeless are allowed to freely camp, defecate, use drugs, and throw piles of garbage all over ODOT owned land. In addition to many spots along I-205, this is happening even here in Newberg on ODOT owned land allocated for the bypass. This is a great illustration of how funds from tolling will be grossly misallocated. Why make the working citizens of Oregon pay even more to live in this state. We can barely get by as it is.

I'm available by phone for any questions you may have. Thank you.

**ODOT I-205 Toll EA - RECORD #212 DETAIL**

**Submission Date :** 4/5/2023  
**First Name :** MARIAN  
**Last Name :** HART  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** The bottom line for me is that state funds should be used for this, not victimizing the people who have to use that highway. You erroneously assume everyone has extra money? What about a mom without money to even get the food she needs for her family? What about her rights? How about a handyman trying to make it doing odd jobs and has to travel back and forth? Why victimize him just because of his job?

. . . and the idea that everyone should ride a bike is ridiculous and that the money should go for bike lanes. What segment of the population can bike miles to work in the rain, that the elderly can bike up the hill to OHSU, that pregnant women can bike, that ill people should bike, chronically ill people and on and on. People have to get groceries, pick up kids, do multiple errands for their family. If they need a car they should not be penalized.

I find this whole idea disgustingly ignorant of people's basic needs.

**ODOT I-205 Toll EA - RECORD #213 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Erin

**Last Name :** Waggoner

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I am opposed to tolls on I-205. I live in Tigard and work in Oregon City. If tolls are imposed on I-205 I will likely avoid them by using back roads. This will just take one issue for traffic and make a new one. Another option needs to be implemented.

**ODOT I-205 Toll EA - RECORD #214 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Gary

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Being tolled for occasional hwy use is not acceptable. Being on a limited budget, having to use I-205 with no alternate, and facing extended construction delays is not an option. This will be the start of additional tolls and more promises not fulfilled. Giving more money to state agencies is never a good idea.

<b>ODOT I-205 Toll EA - RECORD #215 DETAIL</b>
--

<b>Submission Date :</b>	4/5/2023
<b>First Name :</b>	Matthew
<b>Last Name :</b>	bancroft
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email

### Q3. Comments :

The ODOT toll proposal is a terrible idea. It is poorly thought out, extremely unfair, and is inaccurate in its current proposed state as an all or nothing, two option, "false dilemma" style proposition. After reviewing the sited studies and various materials that the claims are derived from I can see many false correlations that have been exploited in order to create the claims made by ODOT on everything from funding, to maintenance, to traffic mitigation. Please look these over for yourself as I'm sure that you'll find many as well.

First of all, This is not a two option proposal, we either add tolls or we do nothing to the highway. The current proposal is tantamount to a permanent, open ended money grab by ODOT that is being strong armed into fruition through this all or nothing perception. While I agree, somewhat, that these upgrades are needed, I fully disagree that tolling is the answer to their funding. A limited timeline, creative, tax collection option or other alternative funding choice would achieve the same funding goal while not giving ODOT an open ended monetary collection system that is wielded at their discretion in perpetuity mostly against daily commuters and local communities. The idea that tolling relieves traffic is only acceptable if you negate the clear understanding that you are diverting that same traffic onto other local roadways that cannot handle the burden. This is made quite clear by the ODOT statements that tolling has been proven to reduce traffic and that variable tolling during peak hours will limit peoples desire to travel at those times, but we all know that peak travel times aren't dictated by drivers, they are dictated by employers, so obviously charging more cannot possibly change traffic patterns.

If my commute is currently ten minutes on back roads and twenty minutes on the highway but under the new proposal it will now realistically be twenty minutes on backroads and ten minutes on the highway, then what's the difference? The toll, obviously. My commute hasn't changed. The burden of costs has shifted more to local communities and to me as a driver as I now have to pay the new toll and I get no relative time savings in my commute. It's simply the same time frame that now costs more. (Never mind the clear environmental toll of running gas vehicles at lower, less efficient speeds, off highway for a longer duration of time every day.)

As it's proposed on the I-205, my wife and I would both be forced to pay this "variable toll" at the height of commute times, (the most expensive tolls), minimally four times a day five days a week in two small commuter cars, (that's eight tolls/day or forty tolls/week), just to get to and from work. A freight truck using the route intermittently would pay a negligible amount but would be responsible for more wear and tear and traffic displacement on the same stretch of road. Hardly seems fair or well thought out. Basically a small group of local commuters are being forced to foot the bill for these upgrades.

As someone who has lived in states with and without tolled highway systems I can tell you that the systems that are not tolled are certainly better in nearly every way. Both have comparable integrity and maintenance levels regardless of tolling. Tolled highways, however, create undue and unjust burdens on local communities surrounding the highway, from increased noise, pollution, loss of property value, increase in local traffic congestion and wear and tear on locally funded and maintained roadways. They create added local traffic and congestion to communities that are then forced to increase taxes or foot the bill for otherwise unnecessary maintenance in the direct forms of road widening, re-striping, repaving, adding traffic control devices, and in secondary costs such as noise barriers, foot bridges, safe pedestrian passage ways, new landscaping and visual preservation plant outs. Traffic flows better without tolls in every instance, as toll systems require traffic to slow, or even stop, in order for toll collection. Even in this proposed camera capture system currently being floated, traffic would need to slow for the radio collection from transmitters as well as the photo collection of license plates and drivers faces as it does in every other state that uses these systems (MA, NH, NY, etc.). Tolled highways flood secondary routes and streets with more traffic both in the form of commuters and freighters, not only increasing congestion and traffic but ruining local neighborhoods and killing property values. So the claim that traffic would decrease anywhere, in any instance is simply not sound and flies in the face of already demonstrated factual evidence.

Let's talk about this variable toll idea. Is there a cap on toll fees? Who gets tolled what amount? Who decides what those amounts will be? Is there any

public input? Obviously there is no way to budget for a variable cost so who controls that burden?

Also obvious, the tolling system is directly connected to a drivers financial system in the form of a credit card, a bank card, or account, so what security measures are in place to safeguard these systems? This collection system poses an untold security risk to anyone using it. ODOT plans to collect data on traffic numbers, license plates, driver photos, and more. Who has access to this info? What exactly is it used for? Who owns it? Where is it stored? For how long? Can it be sold? Can data collection or storage be outsourced to other entities? If so, what can they do with it? More importantly who is responsible when this information is hacked or compromised?

Given these points I propose that ODOT be mandated to use a portion of all tolls collected to directly reimburse drivers/property owners from local communities affected by these changes quarterly or annually in a way as to offset not just the cost of the tolls, but also the loss of community comfort, property value losses, any necessary home upgrades to compensate for these negatives and any and all new costs to local communities as discussed above to compensate for added traffic off the highway. Maybe then this would be an acceptable proposal.

ODOT needs to think better. You need to hold them to that.

Locally Affected Property Owner/ Daily Commuter/ Tax Payer



<b>ODOT I-205 Toll EA - RECORD #216 DETAIL</b>
--

<b>Submission Date :</b>	4/5/2023
<b>First Name :</b>	Candice
<b>Last Name :</b>	KELLY
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email

**Q3. Comments :**

To All it may Concern,

Wow! I am so disappointed in the logic used for the I-205 tolling project from the lack of transportation in the area used for tolling as apposed to areas where there is actual transportation options, to the careless way in which you are expressing how this will work "pay now and maybe we will fix/build later" with MAYBE in capital letters really. When I look at this I understand I will be, as an elderly person, in great trouble should I need to travel as I-205 is often the highway I need to use and that would mean immediately I will pay not one but two tolls with in what, maybe around 10-12 miles? And then two tolls to return? I am on a fixed income and in addition to those of us on fixed incomes even more disappointing it will be for the many, many people who have to travel for work as this will be yet another added expense every single day .... four times .... This is in my opinion intolerable and really quite amazing that this very important issue has been designed in such a lackluster way. So since I live in Tualatin and we already have tremendous traffic issues in the idea that you are just fine with adding to those as people attempt to dodge at least one of the two tolling areas is really disappointing. Looks like you did a traffic study close to 10 years ago, so that is obsolete .... I understand the Pandemic could have put a wrinkle into the numbers perhaps from 2020-2022 however if not done this year like NOW then at minimum 2019 should have been used. So, why wasn't it? You are planning to disrupt more people then you are helping, we already have so much congestion here and your plan is to make it far worse with genuinely no upside, save maybe a seismic retrofit, I don't believe for a minute that this will help our Tualatin economy if that was some part of what you were thinking .... All it will do is add more traffic on our arterial boulevards and then quickly congest our residential areas as people attempt to circumvent these tolls that are so very close together. Looks like you are not interested in planning any actual other transportation choices in this suburban area so what is your point? This won't help get people out of their cars since we really don't have any other serious transportation options available here. By the way I live in Washington County and everything seems to be in support of Clackamas County, granted there is a sliver of Tualatin in Clackamas but most of it is in Washington County. Huh!

So your options are only Build with tolling a small area or NO Build? Really? You can't come up with actual OPTIONS? Honestly? Again WOW! How disappointing.

Unless you are going to GUARANTEE any and ALL tolls will be used exclusively for this stretch that you are sectioning off with these tolling areas, so immediately fixing the Tualatin bridge then the, to be added lane/s, and onto the Abernathy bridge without fail, why should we be paying the bulk of this on such a consistent basis? And if starting with Abernathy bridge then toll there first, and then only until ready to do the other things have a discussion about what should be used at that time. And if you are going to accomplish these changes right away, why then is there no end date for the tolling? Why not "pay as you go" only toll until the original amount is paid off? This is especially hard on those who work and don't live in Tualatin and those how live in Tualatin and don't work here. This is an enormous penalty to an area that has much retail, so not always more then minimum wage earners, as well as many people living in this area who like myself are either on a fixed income (read less then middle class) or need to consistently commute to a job elsewhere.

I am unclear why you want to begin with tolling and no guarantee you will do anything in this area .... Bottom line, there must be a broader discussion with some concrete options that will actually work for ALL fairly, this one isn't it as presently suggested for sure. Please think carefully how to proceed with this ill conceived, not well liked, too much wiggle room for not doing what it is meant to accomplish choice.

I could go on but I will leave it here, as I expect you get the picture by now. I don't agree with this tolling idea AT ALL!

**ODOT I-205 Toll EA - RECORD #217 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Shellie

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I am a 5th generation Clackamas County resident. My family farms in this county. My family also has an Electrical Contracting business. ODOT and the state of Oregon has put the squeeze on the hard working people of C.C. All the money ODOT has put into the Portland's Tri-Met and Bicycle riders is obscene. So let's screw over the smaller community and rural living people. In the past 5+ years the state of Oregon's focus has been Portland. Oregon is not supportive of Small businesses, farmers, ranchers, loggers, any Ag business. Please spread the pain to those up north of W.L. And O.C. They have received most of ODOT's money and support.

**ODOT I-205 Toll EA - RECORD #218 DETAIL**

**Submission Date :** 4/5/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I am writing to express my strong opposition to the proposal of introducing tolls on our freeways. While tolling may seem like a quick solution to funding road infrastructure projects, it is a flawed approach that will create a number of problems for drivers and the surrounding communities as a whole.

Firstly, tolls disproportionately affect low-income drivers. Many people rely on highways to commute to work, and introducing tolls will create an added financial burden that they may not be able to afford. A study by the International Bridge, Tunnel and Turnpike Association found that tolls tend to be regressive, meaning they take a larger percentage of income from lower-income drivers than from higher-income drivers. This is because lower-income drivers tend to have less disposable income and may have fewer transportation options.

Secondly, tolling creates congestion and traffic delays. Drivers who want to avoid paying tolls will be forced to take alternative routes, which will create more traffic on local roads and cause delays for everyone. Texas A&M Transportation Institute found that toll roads tend to be more congested than non-toll roads, particularly during peak travel times. This is because drivers who are unwilling or unable to pay the tolls will often take alternative routes, which can cause congestion on local roads.

Thirdly, tolls can negatively impact the economy. Tolling can also discourage tourism and other recreational travel. Many businesses rely on highways to transport goods and services, and tolls will increase their transportation costs, which will ultimately be passed on to consumers in the form of higher prices. This could result in a decrease in sales and job losses. A report by the U.S. Public Interest Research Group found that tolls can create economic inefficiencies, as the costs of tolls are ultimately passed on to consumers in the form of higher prices for goods and services. The report also notes that tolls can discourage travel and commerce, particularly in rural areas.

Finally, tolls can create an administrative burden. The collection of tolls requires significant infrastructure and staff to manage the system, which will add additional costs to taxpayers.

Furthermore, tolling systems are prone to errors and fraud, which can lead to disputes and legal issues. A report by the National Cooperative Highway Research Program found that tolling systems can be complex and costly to operate and maintain, and that they are prone to errors and fraud.

In conclusion, while funding road infrastructure is important, tolling is not the solution. It creates unfair financial burdens on low-income drivers, causes congestion and delays, negatively impacts the economy, and creates an administrative burden. I urge you to reconsider the proposal of tolling and instead seek out alternative solutions to fund our highways.

**ODOT I-205 Toll EA - RECORD #220 DETAIL**

**Submission Date :** 4/5/2023  
**First Name :** Joe  
**Last Name :**  
**Affiliation :**  
**Submission Method :** Accessible form

**Q3. Comments :**

#1. The new Athey Creek Middle School that is being built across from Fields Bridge Park on Willamette Falls Drive is not mentioned in your EA. This is a huge safety concern, especially when your EA mentions that traffic along Willamette Falls Drive “could experience 30% to 100% higher daily volumes under the Build Alternative compared to the No Build Alternative...” The increased traffic due to parent and bus dropoff at the same time as peak commuter traffic is going to create a mess, both on Willamette Falls Drive and Dollar Street and Ostman Rd. How are you going to mitigate this congestion and safety hazard?

“For the most part, differences in daily traffic volumes on local roadways would be largest closest to the tolled bridges. Parallel routes to I-205, including SW Borland Road and Willamette Falls Drive, could experience 30% to 100% higher daily volumes under the Build Alternative compared to the No Build Alternative because some drivers would choose to reroute to these roadways to avoid tolls. By contrast, some of the surrounding roads between 10th Street and OR 43 would experience lower volumes (by up to 30% under the Build Alternative compared to the No Build Alternative). Because the I-205 segment between 10th Street and OR 43 would not include a toll gantry and would have an additional lane of capacity in both directions with the Build Alternative, traffic performance on I-205 is expected to improve, which could attract more traffic back to I-205 and away from local streets.” Long-Term Effects, Daily Traffic Volumes p3-12

#2- Regarding the above quoted paragraph- this scenario describes traffic leaving Northbound (NB) I-205 to avoid the toll across the Tualatin River and travelling on either Ek or Stafford Rds and converging onto Willamette Falls Dr. This will lead to a miles long traffic jam that continues past the newly constructed Athey Creek Middle School, and into the Willamette Falls historic district and the neighborhood streets in the area. And it's here (at 10 th street) you expect traffic to get back on to NB I-205? This will be chaos! How have you accounted for the loss of business to the Willamette Falls Drive shops when people have turned away from visiting due to the inability to find a parking spot or to back out into unyielding traffic? The traffic entering and leaving 8 th court (Chevron and McDonalds) will be at a gridlock, spilling over from Willamette Falls Dr. The fire trucks at Station 59 will be unable or significantly delayed in leaving and returning to their station due to the gridlock on Willamette Falls Dr. How do you plan to mitigate this without increasing their response time?

And for those pedestrians and school kids brave enough to cross Willamette Falls Drive anywhere from Fields Bridge Park to the intersection at 10 th St., just through sheer increase in exposure, the number of accidents will likely increase. How specifically are you going to mitigate that risk?

#3 In your Purpose and Need Sections, you cite the need for funding, (paying for Abernathy bridge rebuild) and how traffic congestion affects or creates unreliable travel, freight movement, safety, contributes to climate change, etc. You admit that overall traffic is not being reduced, it is only be redirected to the neighborhoods. While you might reduce the number of vehicles on I-205

you are increasing the number of vehicles on side streets, which is a net effect of zero. So, this EA has failed to recognize the weight (significance) of impacts to residents living in the affected area. How will you address this? The Area of Potential Impact contains three parks, two school lands, one recreational area, two water trails, and three land-based trails (Metro 2022). The three parks (West Bridge Park, McLean Park and House, and Jon Storm Park), recreational area... Land Use, Affected Environment, p3-101

#4 Where is West Bridge Park? If you meant Fields Bridge Park, you also need to consider the relationship between the new school and the park and how they interact and the impact of a 100% increase in traffic on Willamette Falls Dr. which bi-sects them. I would like to see how this safety issue will be mitigated.

**ODOT I-205 Toll EA - RECORD #221 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Laura

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I grew up between Oregon City and West Linn for over 66 years. I am very disappointed with ODOT stating they want to turn basically the Abernathy bridge into a Toll bridge.  
Why the burden of the who metro area is being put up on the people that live in the four mile stretch in West Linn.  
As a person that lives next to the Abernathy bridge and can see The Oregon City shopping center from my home in West Linn and you want the people that are local pay to pay to Cross a bridge that has been paid for over 50 years Ago.  
If I do not want to pay the Toll in West Linn Will have to use the only other bridge in over 10 mile. You want me to use the Arch Bridge that is over 100 years old. It is a narrow bridge the large trucks with big mirrors. I personally have been sideswiped and Lost my side mirror on many occasions.  
The trucks keep driving and Their is nothing you can do be cause the old bridge is so narrow and during the afternoon till around 6:00pm the traffic Gets backed Up for hours right now.  
I don't think that the people that live in the West Linn, Oregon City have to have the burden of the state of Oregon.  
I have been on toll road all over the nation and in most cases a brand new freeway is built and then they toll the road.  
In Oregon we are already taxes at one of the highest in the nation.  
Why not TOLL the bridge between Oregon and Washington!  
When people cross that bridge every day to work. Use our roads and put ware and tear on our streets and bridges.



<b>ODOT I-205 Toll EA - RECORD #222 DETAIL</b>	
--	--

**Submission Date :** 4/6/2023

**First Name :** Daniel

**Last Name :** Kiser

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I am extremely opposed to tolls on I-205 and other freeways. I am opposed to the tolls being set by the Oregon Transportation Commission, who are not directly accountable to voters.

ODOT has not communicated how much the tolls will cost, how much revenue the tolls will generate, or even what amount of revenue is needed to fund proposed projects. These tolls are a greedy avenue that will punish commuters, low-income drivers, and communities of color. ODOT needs to find other ways to equitably fund their projects.

**ODOT I-205 Toll EA - RECORD #228 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Travis

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I am against the I-205 tolling proposal as this will only be a money maker for the state of Oregon and hurt those who are making under \$50,000.00 a year. The State of Washington has tolling on a number of freeways. When traffic is light, the amount of tolling is less than a dollar per trip, when traffic is congested, tolling can reach as high as ten dollars per trip. That is over \$500.00 per year for someone who makes less than \$50,000.00 per year. There is also no accounting of where the funds are to be spent for tolling. Thank you.

**ODOT I-205 Toll EA - RECORD #230 DETAIL**

**Submission Date :** 4/6/2023  
**First Name :** THOMAS  
**Last Name :** NANCARROW  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** I am writing to express my displeasure with ODOT's recent renewed attempts to add tolling to Oregon's highways. I have travelled in other areas of the country where tolling is more pronounced and it's always a traffic snarled mess. In addition, it's a regressive form of taxation as the average low to middle income commuter needs to travel to their place of employment whereas more upper income workers often have more options available to them in terms of remote working.

I do not believe tolling should be allowed without direct local voter approval via a local or where appropriate state measure.

Thank you for your consideration of this matter.

**ODOT I-205 Toll EA - RECORD #232 DETAIL****Submission Date :** 4/6/2023**First Name :** Anna**Last Name :** Dahl**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** Every year we pass more and more taxes to help pay for the roads now you guys want to do another tolling to pay for the roads when you haven't even use the first tax money to fix the roads. Why don't they figure out what to do with the money they've already taken from us before they start taking more! I am against tolling, and it should be up to a vote of the people.

<b>ODOT I-205 Toll EA - RECORD #240 DETAIL</b>
--

<b>Submission Date :</b>	4/6/2023
<b>First Name :</b>	Eric
<b>Last Name :</b>	Fruits
<b>Affiliation :</b>	Cascade Policy Institute
<b>Submission Method :</b>	Letter

**Q3. Comments :**

Please accept the attached comments and add them to the record.

All the best.

[Text from attachment]

Comments on I-205 Toll Project Environmental Assessment  
Cascade Policy Institute  
Submitted to the  
Oregon Department of Transportation  
April 6, 2023  
FWHA should require an Environmental Impact Statement (EIS) for the I-205 Toll Project

I am requesting that the Federal Highway Administration (FHWA) make a finding of significant environmental impact regarding the Oregon Department of Transportation's I-205 Toll Project ("the Project"). The Environmental Assessment (EA) excludes significant cumulative impacts and misrepresents the economic benefits of the Project.

FWHA should require an Environmental Impact Statement (EIS) for the Project to include the cumulative effects of ODOT's Regional Mobility Pricing Policy (RMPP) and, possibly, the Interstate Bridge Replacement Program (IBRP).

Exhibit 1 (attached) shows the Interstates to be tolled under the Regional Mobility Pricing Project alongside the transportation and economic Areas of Potential Impact under the I-205 Toll Project. It is clear from these figures that the RMPP's Areas of Potential Impact will entirely overlap the I-205 Toll Project's Areas of Potential Impact.

ODOT has arbitrarily chopped up its tolling projects into three pieces, in part to avoid the scrutiny of an EIS. For example, ODOT's Proposed Action for NEPA Analysis on the RMPP states, "The Regional Mobility Pricing Project is being studied as an independent project, following two other proposed projects that include tolls: the Interstate Bridge Replacement Program and the I-205 Toll Project."<sup>1</sup>

In contrast, ODOT and representatives for local governments view the I-205 Toll Project and the RMPP as two phases of a single project. For example, both the January 2023 and February 2023 meetings of the Regional Toll Advisory Committee had lengthy discussions about "reducing the implementation gap" between the I-205 Toll Project and the RMPP. One suggestion was to "[s]eek concurrent U.S. Department of Transportation approval of cooperative agreement with NEPA process."<sup>2</sup>

Indeed, the EA indicates the forthcoming EA for the RMPP will include the I-205 Toll Project in its cumulative impact analysis. As discussed below, NEPA analysis must assess the cumulative effects of "past, present, and reasonably foreseeable future actions." If the I-205 Tolling Project will have a cumulative effect on the RMPP, then surely the RMPP will have a cumulative effect on the I-205 Tolling Project. ODOT's exclusion of the RMPP from this EA's cumulative effects is an attempt to avoid scrutiny until after the tolling "ship has sailed."

1 Oregon Department of Transportation, Regional Mobility Pricing Project: Proposed Action for NEPA Analysis (Nov. 2022),

[https://www.oregon.gov/odot/tolling/Documents/RMPP\\_NEPA\\_Proposed\\_Action\\_November\\_2022\\_508.pdf](https://www.oregon.gov/odot/tolling/Documents/RMPP_NEPA_Proposed_Action_November_2022_508.pdf).

2 Regional Toll Advisory Committee, Meeting #5 (Feb. 27, 2023),

[https://www.oregon.gov/odot/tolling/Documents/RTAC%20Meeting%205%20PPT\\_508.pdf](https://www.oregon.gov/odot/tolling/Documents/RTAC%20Meeting%205%20PPT_508.pdf).

32 CFR § 651.16 mandates:

NEPA analyses must assess cumulative effects, which are the impact on the environment resulting from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions. Actions by federal, nonfederal agencies, and private parties must be considered (40 CFR 1508.7).

Appendix Q to the EA notes:

Cumulative impacts are defined as the effects on the environment that result

from the incremental effects of the proposed action when added to the effects of other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions (Council on Environmental Quality 2022).

Surprisingly, the EA for the Project asserts ODOT's Regional Mobility Pricing Project does not meet the criteria to be considered a "reasonably foreseeable future action" because:

The planning process is under way, with the formal environmental review beginning in late 2022. Because key details about the RMPP are unknown (e.g., starting and ending points for tolling, potential toll rates), impacts cannot be reliably qualified or quantified at this time. The RMPP is also not currently included in Metro's RTP.

Several of these statements are false. For example, regarding the starting and ending points for tolling, ODOT's Proposed Action for NEPA Analysis of the RMPP clearly states:

- "ODOT is proposing to implement and operate congestion pricing on all lanes of approximately 55 miles of Interstate-5 (I-5) and Interstate 205 (I-205) in the Portland metropolitan area."
- "Congestion pricing will be applied to all lanes of I-5 and I-205."
- "The project concept includes congestion pricing all lanes of the existing interstate, rather than pricing a single lane or set of lanes, building a new tolled turnpike, or tolling a newly constructed lane."
- "The evaluation area for the Proposed Action ... includes I-5 from the Interstate Bridge to the Boone Bridge in Wilsonville, Oregon and I-205 from the Glenn Jackson Bridge to the point at which I-205 intersects with I-5 in Tualatin, Oregon."
- "Drivers would not pay on additional toll for the Regional Mobility Pricing Project on the sections of I-5 and I-205 that are tolled by [the Interstate Bridge Replacement Program and the I-205 Toll Project]."

ORS 383.150 states:

(3) The [Oregon Transportation Commission] shall assess tolls in the following locations:

(a) On Interstate 205, beginning at the Washington state line and ending where it intersects with Interstate 5 in this state.

(b) On Interstate 5, beginning at the Washington state line and ending where it intersects with Interstate 205.

Thus, ODOT's claim the starting and ending points for tolling are unknown is unambiguously false.

Oregon law mandates where the tolling begins and ends and ODOT has publicly stated numerous times and in numerous forums precisely where tolling under the RMPP will begin and where it will end and what portions will be excluded from tolling.

Regarding potential toll rates, ODOT's Proposed Action for NEPA Analysis identifies several projected benefits from the Regional Mobility Pricing including:

- Decreased duration of congestion on I-5 and I-205;
- Improved travel times and reliability of travel times; and
- Reduced vehicle miles traveled, vehicle hours traveled, and single occupancy vehicle trips.

ODOT indicates these projections come from "studies to define the project concept and determine how congestion pricing can be most effective." There is no way these studies could have been conducted without evaluating a range of potential toll rates. Thus, ODOT's claim that "potential toll rates" are unknown is completely disingenuous. While ODOT may not know what toll rates ultimately will be imposed, it is well aware of the range of "potential" toll rates that will be imposed.

In addition to the EA's omission of the significant cumulative effects of the RMPP, the EA misrepresents the economic benefits of the I-205 Tolling Program. In particular, it does not indicate that once the tolls are in place, the region will be more than \$27 million a year worse off.

The EA estimates the average household will pay \$575 a year just for its first phase of tolls on I-205. That's \$575 a year that Oregonians won't be able to spend on other things, with restaurants and retail establishments the hardest hit. Imagine putting years into building your restaurant or store, only to find that road tolls have driven away your customers and forced you out of

business. But, we don't have to imagine—because the EA estimates that the Project's tolls will cause more than 750 people to lose their jobs and reduce wages by about \$3 million a year.

As shown in the table below, the EA forecasts the Project will collect \$132 million a year in tolls:

\$93 million a year from households and \$39 million a year from freight carriers. At the same time, the EA estimates that reduced traffic on I-205 will produce only \$105 million in economic benefits from reduced congestion, environmental improvements, and economic activity. That means Oregonians will be \$27 million worse off every year these tolls are collected.

Tolls collected: Households \$93.0

Tolls collected: Freight 39.0

Total tolls collected \$132.0

Monetized value of travel benefits \$104.9

Consumer spending: Labor income 0.1

Consumer spending: Econ. Output 0.3

Indirect: Labor income (3.2)

Indirect: Econ. Output 2.4

Total economic impacts \$104.5

Net benefit/(cost) \$(27.5)

This is not how congestion pricing is supposed to work. Done correctly, congestion pricing makes us better off because the value of the time we save is worth more than the tolls we pay. Somehow, ODOT got way off track and concocted a tolling scheme that charges outrageous tolls, doesn't generate sufficient time savings, impoverishes families, and drives out employers. These are significant impacts that warrant the scrutiny of an Environmental Impact Statement.

Exhibit 1

Regional Mobility Pricing Project

I-205 Toll Project Transportation API

I-205 Toll Project Economic API

**Attachments :**

Comments on I-205 Toll Project Environmental Assessment 230406.pdf (1 mb)

Comments\_on\_I205\_Toll\_Project\_Environmental\_Assessment\_230406.pdf (1 mb)



## Comments on I-205 Toll Project Environmental Assessment

**Eric Fruits, Ph.D.**  
**Cascade Policy Institute**

Submitted to the  
**Oregon Department of Transportation**  
April 6, 2023

### **FWHA should require an Environmental Impact Statement (EIS) for the I-205 Toll Project**

I am requesting that the Federal Highway Administration (FHWA) make a finding of significant environmental impact regarding the Oregon Department of Transportation's I-205 Toll Project ("the Project"). The Environmental Assessment (EA) excludes significant cumulative impacts and misrepresents the economic benefits of the Project.

FWHA should require an Environmental Impact Statement (EIS) for the Project to include the cumulative effects of ODOT's Regional Mobility Pricing Policy (RMPP) and, possibly, the Interstate Bridge Replacement Program (IBRP).

Exhibit 1 (attached) shows the Interstates to be tolled under the Regional Mobility Pricing Project alongside the transportation and economic Areas of Potential Impact under the I-205 Toll Project. It is clear from these figures that the RMPP's Areas of Potential Impact will entirely overlap the I-205 Toll Project's Areas of Potential Impact.

ODOT has arbitrarily chopped up its tolling projects into three pieces, in part to avoid the scrutiny of an EIS. For example, ODOT's Proposed Action for NEPA Analysis on the RMPP states, "The Regional Mobility Pricing Project is being studied as an independent project, following two other proposed projects that include tolls: the Interstate Bridge Replacement Program and the I-205 Toll Project."<sup>1</sup>

In contrast, ODOT and representatives for local governments view the I-205 Toll Project and the RMPP as two phases of a single project. For example, both the January 2023 and February 2023 meetings of the Regional Toll Advisory Committee had lengthy discussions about "reducing the implementation gap" between the I-205 Toll Project and the RMPP. One suggestion was to "[s]eek concurrent U.S. Department of Transportation approval of cooperative agreement with NEPA process."<sup>2</sup>

Indeed, the EA indicates the forthcoming EA for the RMPP will include the I-205 Toll Project in its cumulative impact analysis. As discussed below, NEPA analysis must assess the cumulative effects of "past, present, and reasonably foreseeable future actions." If the I-205 Tolling Project will have a cumulative effect on the RMPP, then surely the RMPP will have a cumulative effect on the I-205 Tolling Project. ODOT's exclusion of the RMPP from this EA's cumulative effects is an attempt to avoid scrutiny until after the tolling "ship has sailed."

---

<sup>1</sup> Oregon Department of Transportation, Regional Mobility Pricing Project: Proposed Action for NEPA Analysis (Nov. 2022),

[https://www.oregon.gov/odot/tolling/Documents/RMPP\\_NEPA\\_Proposed\\_Action\\_November\\_2022\\_508.pdf](https://www.oregon.gov/odot/tolling/Documents/RMPP_NEPA_Proposed_Action_November_2022_508.pdf).

<sup>2</sup> Regional Toll Advisory Committee, Meeting #5 (Feb. 27, 2023),

[https://www.oregon.gov/odot/tolling/Documents/RTAC%20Meeting%205%20PPT\\_508.pdf](https://www.oregon.gov/odot/tolling/Documents/RTAC%20Meeting%205%20PPT_508.pdf).

32 CFR § 651.16 mandates:

NEPA analyses must assess cumulative effects, which are the impact on the environment resulting from the incremental impact of the action **when added to other past, present, and reasonably foreseeable future actions**. Actions by federal, non-federal agencies, and private parties must be considered (40 CFR 1508.7).

Appendix Q to the EA notes:

Cumulative impacts are defined as the effects on the environment that result from the incremental effects of the proposed action **when added to the effects of other past, present, and reasonably foreseeable future actions** regardless of what agency (federal or non-federal) or person undertakes such other actions (Council on Environmental Quality 2022).

Surprisingly, the EA for the Project asserts ODOT's Regional Mobility Pricing Project does not meet the criteria to be considered a "reasonably foreseeable future action" because:

The planning process is under way, with the formal environmental review beginning in late 2022. Because key details about the RMPP are unknown (e.g., starting and ending points for tolling, potential toll rates), impacts cannot be reliably qualified or quantified at this time. The RMPP is also not currently included in Metro's RTP.

Several of these statements are false. For example, regarding the starting and ending points for tolling, ODOT's Proposed Action for NEPA Analysis of the RMPP clearly states:

- "ODOT is proposing to implement and operate congestion pricing on all lanes of approximately 55 miles of Interstate-5 (I-5) and Interstate 205 (I-205) in the Portland metropolitan area."
- "Congestion pricing will be applied to all lanes of I-5 and I-205."
- "The project concept includes congestion pricing all lanes of the existing interstate, rather than pricing a single lane or set of lanes, building a new tolled turnpike, or tolling a newly constructed lane."
- "The evaluation area for the Proposed Action ... includes I-5 from the Interstate Bridge to the Boone Bridge in Wilsonville, Oregon and I-205 from the Glenn Jackson Bridge to the point at which I-205 intersects with I-5 in Tualatin, Oregon."
- "Drivers would not pay on additional toll for the Regional Mobility Pricing Project on the sections of I-5 and I-205 that are tolled by [the Interstate Bridge Replacement Program and the I-205 Toll Project]."

ORS 383.150 states:

(3) The [Oregon Transportation Commission] shall assess tolls in the following locations:

(a) On Interstate 205, beginning at the Washington state line and ending where it intersects with Interstate 5 in this state.

(b) On Interstate 5, beginning at the Washington state line and ending where it intersects with Interstate 205.

Thus, ODOT's claim the starting and ending points for tolling are unknown is unambiguously false. Oregon law mandates where the tolling begins and ends and ODOT has publicly stated numerous

times and in numerous forums precisely where tolling under the RMPP will begin and where it will end and what portions will be excluded from tolling.

Regarding potential toll rates, ODOT’s Proposed Action for NEPA Analysis identifies several projected benefits from the Regional Mobility Pricing including:

- Decreased duration of congestion on I-5 and I-205;
- Improved travel times and reliability of travel times; and
- Reduced vehicle miles traveled, vehicle hours traveled, and single occupancy vehicle trips.

ODOT indicates these projections come from “studies to define the project concept and determine how congestion pricing can be most effective.” There is no way these studies could have been conducted without evaluating a range of potential toll rates. Thus, ODOT’s claim that “potential toll rates” are unknown is completely disingenuous. While ODOT may not know what toll rates ultimately will be imposed, it is well aware of the range of “potential” toll rates that will be imposed.

In addition to the EA’s omission of the significant cumulative effects of the RMPP, the EA misrepresents the economic benefits of the I-205 Tolling Program. In particular, it does not indicate that once the tolls are in place, the region will be more than \$27 million a year worse off.

The EA estimates the average household will pay \$575 a year just for its first phase of tolls on I-205. That’s \$575 a year that Oregonians won’t be able to spend on other things, with restaurants and retail establishments the hardest hit. Imagine putting years into building your restaurant or store, only to find that road tolls have driven away your customers and forced you out of business. But, we don’t have to imagine—because the EA estimates that the Project’s tolls will cause more than 750 people to lose their jobs and reduce wages by about \$3 million a year.

As shown in the table below, the EA forecasts the Project will collect \$132 million a year in tolls: \$93 million a year from households and \$39 million a year from freight carriers. At the same time, the EA estimates that reduced traffic on I-205 will produce only \$105 million in economic benefits from reduced congestion, environmental improvements, and economic activity. That means Oregonians will be \$27 million worse off every year these tolls are collected.

Tolls collected: Households	\$93.0
Tolls collected: Freight	39.0
<b>Total tolls collected</b>	<b>\$132.0</b>
Monetized value of travel benefits	\$104.9
Consumer spending: Labor income	0.1
Consumer spending: Econ. Output	0.3
Indirect: Labor income	(3.2)
Indirect: Econ. Output	2.4
<b>Total economic impacts</b>	<b>\$104.5</b>
<b>Net benefit/(cost)</b>	<b>\$(27.5)</b>

This is not how congestion pricing is supposed to work. Done correctly, congestion pricing makes us better off because the value of the time we save is worth more than the tolls we pay. Somehow, ODOT

got way off track and concocted a tolling scheme that charges outrageous tolls, doesn't generate sufficient time savings, impoverishes families, and drives out employers. These are significant impacts that warrant the scrutiny of an Environmental Impact Statement

Respectfully submitted by:

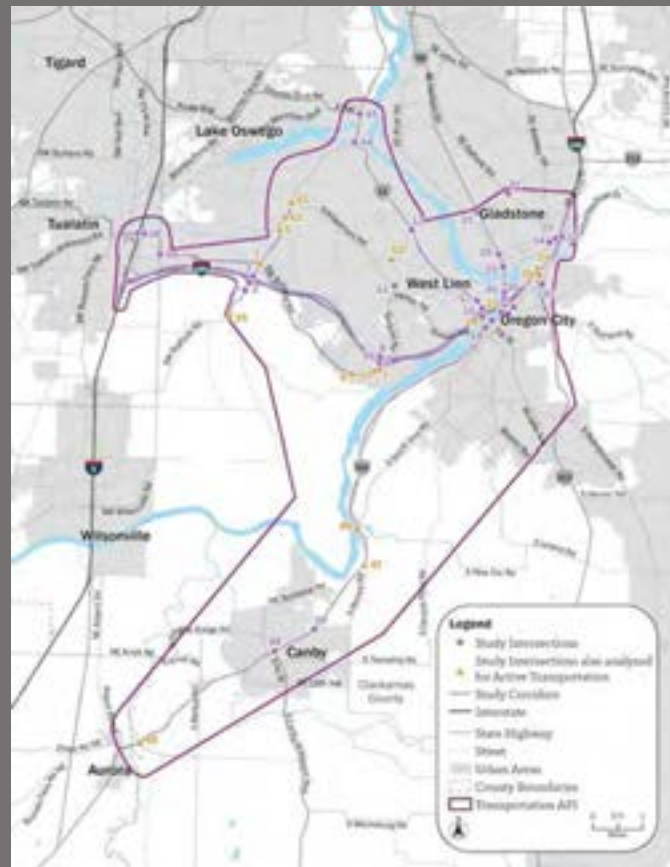
Eric Fruits, Ph.D.  
Vice President of Research  
Cascade Policy Institute  
[eric@cadepolicy.org](mailto:eric@cadepolicy.org)  
503-242-0900

# Exhibit 1

## Regional Mobility Pricing Project

## I-205 Toll Project Transportation API

## I-205 Ec



Source: Proposed Action for NEPA Analysis

Source: Environmental Assessment, Figure 3-1

Source: Environ

## Comments on I-205 Toll Project Environmental Assessment

**Eric Fruits, Ph.D.**  
**Cascade Policy Institute**

Submitted to the  
**Oregon Department of Transportation**  
April 6, 2023

### **FWHA should require an Environmental Impact Statement (EIS) for the I-205 Toll Project**

I am requesting that the Federal Highway Administration (FHWA) make a finding of significant environmental impact regarding the Oregon Department of Transportation's I-205 Toll Project ("the Project"). The Environmental Assessment (EA) excludes significant cumulative impacts and misrepresents the economic benefits of the Project.

FWHA should require an Environmental Impact Statement (EIS) for the Project to include the cumulative effects of ODOT's Regional Mobility Pricing Policy (RMPP) and, possibly, the Interstate Bridge Replacement Program (IBRP).

Exhibit 1 (attached) shows the Interstates to be tolled under the Regional Mobility Pricing Project alongside the transportation and economic Areas of Potential Impact under the I-205 Toll Project. It is clear from these figures that the RMPP's Areas of Potential Impact will entirely overlap the I-205 Toll Project's Areas of Potential Impact.

ODOT has arbitrarily chopped up its tolling projects into three pieces, in part to avoid the scrutiny of an EIS. For example, ODOT's Proposed Action for NEPA Analysis on the RMPP states, "The Regional Mobility Pricing Project is being studied as an independent project, following two other proposed projects that include tolls: the Interstate Bridge Replacement Program and the I-205 Toll Project."<sup>1</sup>

In contrast, ODOT and representatives for local governments view the I-205 Toll Project and the RMPP as two phases of a single project. For example, both the January 2023 and February 2023 meetings of the Regional Toll Advisory Committee had lengthy discussions about "reducing the implementation gap" between the I-205 Toll Project and the RMPP. One suggestion was to "[s]eek concurrent U.S. Department of Transportation approval of cooperative agreement with NEPA process."<sup>2</sup>

Indeed, the EA indicates the forthcoming EA for the RMPP will include the I-205 Toll Project in its cumulative impact analysis. As discussed below, NEPA analysis must assess the cumulative effects of "past, present, and reasonably foreseeable future actions." If the I-205 Tolling Project will have a cumulative effect on the RMPP, then surely the RMPP will have a cumulative effect on the I-205 Tolling Project. ODOT's exclusion of the RMPP from this EA's cumulative effects is an attempt to avoid scrutiny until after the tolling "ship has sailed."

---

<sup>1</sup> Oregon Department of Transportation, Regional Mobility Pricing Project: Proposed Action for NEPA Analysis (Nov. 2022),

[https://www.oregon.gov/odot/tolling/Documents/RMPP\\_NEPA\\_Proposed\\_Action\\_November\\_2022\\_508.pdf](https://www.oregon.gov/odot/tolling/Documents/RMPP_NEPA_Proposed_Action_November_2022_508.pdf).

<sup>2</sup> Regional Toll Advisory Committee, Meeting #5 (Feb. 27, 2023),

[https://www.oregon.gov/odot/tolling/Documents/RTAC%20Meeting%205%20PPT\\_508.pdf](https://www.oregon.gov/odot/tolling/Documents/RTAC%20Meeting%205%20PPT_508.pdf).

32 CFR § 651.16 mandates:

NEPA analyses must assess cumulative effects, which are the impact on the environment resulting from the incremental impact of the action **when added to other past, present, and reasonably foreseeable future actions**. Actions by federal, non-federal agencies, and private parties must be considered (40 CFR 1508.7).

Appendix Q to the EA notes:

Cumulative impacts are defined as the effects on the environment that result from the incremental effects of the proposed action **when added to the effects of other past, present, and reasonably foreseeable future actions** regardless of what agency (federal or non-federal) or person undertakes such other actions (Council on Environmental Quality 2022).

Surprisingly, the EA for the Project asserts ODOT's Regional Mobility Pricing Project does not meet the criteria to be considered a "reasonably foreseeable future action" because:

The planning process is under way, with the formal environmental review beginning in late 2022. Because key details about the RMPP are unknown (e.g., starting and ending points for tolling, potential toll rates), impacts cannot be reliably qualified or quantified at this time. The RMPP is also not currently included in Metro's RTP.

Several of these statements are false. For example, regarding the starting and ending points for tolling, ODOT's Proposed Action for NEPA Analysis of the RMPP clearly states:

- "ODOT is proposing to implement and operate congestion pricing on all lanes of approximately 55 miles of Interstate-5 (I-5) and Interstate 205 (I-205) in the Portland metropolitan area."
- "Congestion pricing will be applied to all lanes of I-5 and I-205."
- "The project concept includes congestion pricing all lanes of the existing interstate, rather than pricing a single lane or set of lanes, building a new tolled turnpike, or tolling a newly constructed lane."
- "The evaluation area for the Proposed Action ... includes I-5 from the Interstate Bridge to the Boone Bridge in Wilsonville, Oregon and I-205 from the Glenn Jackson Bridge to the point at which I-205 intersects with I-5 in Tualatin, Oregon."
- "Drivers would not pay on additional toll for the Regional Mobility Pricing Project on the sections of I-5 and I-205 that are tolled by [the Interstate Bridge Replacement Program and the I-205 Toll Project]."

ORS 383.150 states:

(3) The [Oregon Transportation Commission] shall assess tolls in the following locations:

(a) On Interstate 205, beginning at the Washington state line and ending where it intersects with Interstate 5 in this state.

(b) On Interstate 5, beginning at the Washington state line and ending where it intersects with Interstate 205.

Thus, ODOT's claim the starting and ending points for tolling are unknown is unambiguously false. Oregon law mandates where the tolling begins and ends and ODOT has publicly stated numerous

times and in numerous forums precisely where tolling under the RMPP will begin and where it will end and what portions will be excluded from tolling.

Regarding potential toll rates, ODOT’s Proposed Action for NEPA Analysis identifies several projected benefits from the Regional Mobility Pricing including:

- Decreased duration of congestion on I-5 and I-205;
- Improved travel times and reliability of travel times; and
- Reduced vehicle miles traveled, vehicle hours traveled, and single occupancy vehicle trips.

ODOT indicates these projections come from “studies to define the project concept and determine how congestion pricing can be most effective.” There is no way these studies could have been conducted without evaluating a range of potential toll rates. Thus, ODOT’s claim that “potential toll rates” are unknown is completely disingenuous. While ODOT may not know what toll rates ultimately will be imposed, it is well aware of the range of “potential” toll rates that will be imposed.

In addition to the EA’s omission of the significant cumulative effects of the RMPP, the EA misrepresents the economic benefits of the I-205 Tolling Program. In particular, it does not indicate that once the tolls are in place, the region will be more than \$27 million a year worse off.

The EA estimates the average household will pay \$575 a year just for its first phase of tolls on I-205. That’s \$575 a year that Oregonians won’t be able to spend on other things, with restaurants and retail establishments the hardest hit. Imagine putting years into building your restaurant or store, only to find that road tolls have driven away your customers and forced you out of business. But, we don’t have to imagine—because the EA estimates that the Project’s tolls will cause more than 750 people to lose their jobs and reduce wages by about \$3 million a year.

As shown in the table below, the EA forecasts the Project will collect \$132 million a year in tolls: \$93 million a year from households and \$39 million a year from freight carriers. At the same time, the EA estimates that reduced traffic on I-205 will produce only \$105 million in economic benefits from reduced congestion, environmental improvements, and economic activity. That means Oregonians will be \$27 million worse off every year these tolls are collected.

Tolls collected: Households	\$93.0
Tolls collected: Freight	39.0
<b>Total tolls collected</b>	<b>\$132.0</b>
Monetized value of travel benefits	\$104.9
Consumer spending: Labor income	0.1
Consumer spending: Econ. Output	0.3
Indirect: Labor income	(3.2)
Indirect: Econ. Output	2.4
<b>Total economic impacts</b>	<b>\$104.5</b>
<b>Net benefit/(cost)</b>	<b>\$(27.5)</b>

This is not how congestion pricing is supposed to work. Done correctly, congestion pricing makes us better off because the value of the time we save is worth more than the tolls we pay. Somehow, ODOT



got way off track and concocted a tolling scheme that charges outrageous tolls, doesn't generate sufficient time savings, impoverishes families, and drives out employers. These are significant impacts that warrant the scrutiny of an Environmental Impact Statement

Respectfully submitted by:

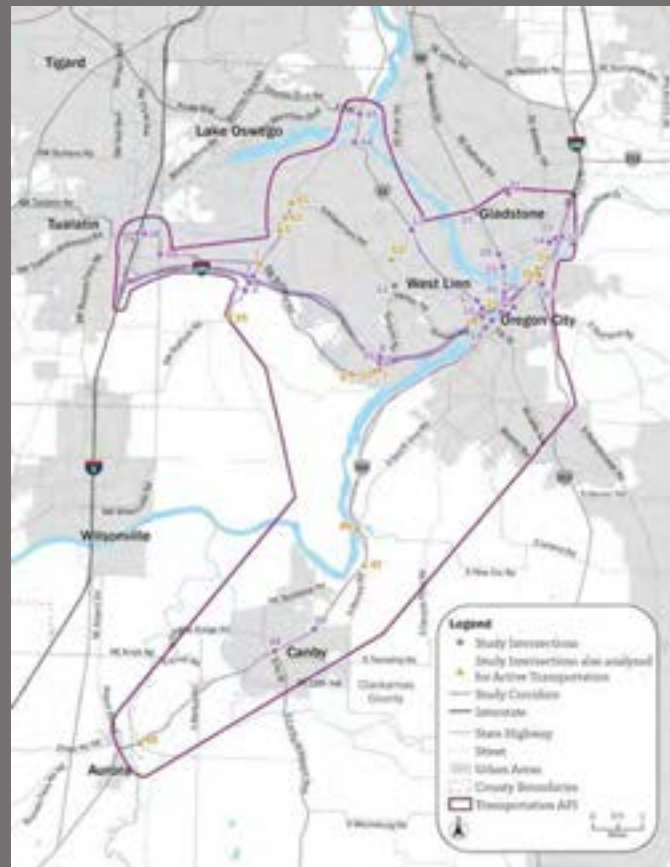
Eric Fruits, Ph.D.  
Vice President of Research  
Cascade Policy Institute  
[eric@cadepolicy.org](mailto:eric@cadepolicy.org)  
503-242-0900

# Exhibit 1

## Regional Mobility Pricing Project

## I-205 Toll Project Transportation API

## I-205 Ec



Source: Proposed Action for NEPA Analysis

Source: Environmental Assessment, Figure 3-1

Source: Environ

**ODOT I-205 Toll EA - RECORD #241 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Zach

**Last Name :** Weigel

**Affiliation :** City Engineer, City of Wilsonville

**Submission Method :** I-205 EA email

**Q3. Comments :** I am writing to request the following documents for the I-205 Toll Project Environmental Assessment - Appendix C I-205 Toll Project Transportation Technical Report  
Attachment P Future 2045 Intersection PM Peak-Hour Operations – No Build  
Attachment Q Future 2045 Intersection PM Peak-Hour Operations – Build  
Attachment U Future 2027 Intersection PM Peak-Hour Operations – No Build  
Attachment V Future 2027 Intersection PM Peak-Hour Operations – Build

**ODOT I-205 Toll EA - RECORD #242 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Suanne

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** The tolling will have a great impact on the quality of life in the Willamette area, as we will become landlocked. We will not be able to get anywhere without hitting the toll bridge or traveling on local streets, which will already be overloaded by others with the same issues. It will impact neighboring cities' economy as fewer trips will be made, and the increased traffic will create a dangerous environment for those on foot and on bikes

**ODOT I-205 Toll EA - RECORD #243 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Chad

**Last Name :**

**Affiliation :** West Linn Resident

**Submission Method :** Accessible form

**Q3. Comments :** This tolling unfairly prejudices residents of West Linn that now have to pay tolls every day to drive to work, pick up groceries, really go anywhere. If we are forced to use the bridge into Oregon City, it is only one lane and is already subject to long waits and congestion during the "peak" hours that even more people will use to avoid paying the proposed tolls.

The federal government gave out billions of dollars for infrastructure improvements. How is this not included in that money? It is not fair to make the West Linn residents foot the bill on this highway improvement.

<b>ODOT I-205 Toll EA - RECORD #244 DETAIL</b>
--

**Submission Date :** 4/7/2023

**First Name :** Peter

**Last Name :**

**Affiliation :** citizen

**Submission Method :** Accessible form

**Q3. Comments :** we already own these roads. making us pay again for them is unfair. paying for some future project is also unfair. tolling is unfair to poor people who must drive to work. another \$80 a month for tolls is going to hurt them. we dont want your tolls to be forced on us. it seems undemocratic....tyranny. I think that the public should VOTE on such a heinous proposal. get your highway money somewhere else.

**ODOT I-205 Toll EA - RECORD #245 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Peter

**Last Name :** Jensen

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** stop the tolls get your money somewhere else , it is not just an onerous burden on poor people (\$80.00 a month) but unfair to all of us. we already own these roads why should we pay again? future projects are just empty promises. Stop the tolls or let the

<b>ODOT I-205 Toll EA - RECORD #246 DETAIL</b>
--

**Submission Date :** 4/7/2023

**First Name :** Jennifer

**Last Name :** Bowdon

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Please do not toll. As Oregon City residents, this would be detrimental to us in so many ways.  
Should you need further details, you add welcome to reach out to myself and my husband (cc' in email).  
We want the best for the community. Tolling us is not the answer.



**ODOT I-205 Toll EA - RECORD #248 DETAIL**

**Submission Date :** 4/7/2023  
**First Name :** Steven  
**Last Name :** Rebischke  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** Oregonians deserve the right to vote before ODOT implements the I-205 toll project between Stafford Road and Oregon 213. Tolling will impact Oregonians statewide. ODOT fails to address the cost of tolls or the number of gantries on a freeway. Some people can't afford to pay tolls but must get to work or medical appointments. From grocery deliveries to Uber to the airport, the cost will be passed on to consumers, who will pay for each gantry, gas, gas tax, license and registration fee. Tolling I-205 will have a disproportionate effect on people and businesses in Clackamas County, costing jobs, inflating costs and doing irreparable harm rerouting traffic. We are a mile or more from transit stations with no mobility options. Biking, carpooling or taking the bus aren't feasible solutions to get to jobs or day care. These equity issues hurt people who can least afford it. Congestion relief means flooding arterial highways, creating chaos and accidents, to avoid tolls. McLoughlin Boulevard, an important freight route, will be stopped. There are no alternatives to cross the Willamette besides the I-205 Abernethy Bridge. Tolling Canby, Oregon City, West Linn, Gladstone and Milwaukie will have unmitigated effects on their people and businesses. Where is the \$1.5 billion in federal infrastructure money? The Rose Quarter and WES rail line illustrate a lack of due diligence and fiscal responsibility. Why trust ODOT? Tolling plans continue as if Oregonians don't deserve a voice. The right to vote is fundamental; let Oregonians decide.

**ODOT I-205 Toll EA - RECORD #249 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Mike

**Last Name :** Meyers

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** NO Tolling - it is Fascist and Un-American. I reject your hateful attack on citizens who need to use our roads and don't really have choices. Figure out another way to pay for the roads. All too many taxes, lame or non existent services. This is no different. Keep your hand out of my pocket!

Oregonians deserve the right to vote before ODOT implements the I-205 toll project between Stafford Road and Oregon 213. Tolling will impact Oregonians statewide. ODOT fails to address the cost of tolls or the number of gantries on a freeway. Some people can't afford to pay tolls but must get to work or medical appointments. From grocery deliveries to Uber to the airport, the cost will be passed on to consumers, who will pay for each gantry, gas, gas tax, license and registration fee.

Tolling I-205 will have a disproportionate effect on people and businesses in Clackamas County, costing jobs, inflating costs and doing irreparable harm rerouting traffic. We are a mile or more from transit stations with no mobility options. Biking, carpooling or taking the bus aren't feasible solutions to get to jobs or day care. These equity issues hurt people who can least afford it.

Congestion relief means flooding arterial highways, creating chaos and accidents, to avoid tolls. McLoughlin Boulevard, an important freight route, will be stopped. There are no alternatives to cross the Willamette besides the I-205 Abernethy Bridge. Tolling Canby, Oregon City, West Linn, Gladstone and Milwaukie will have unmitigated effects on their people and businesses. Where is the \$1.5 billion in federal infrastructure money?

The Rose Quarter and WES rail line illustrate a lack of due diligence and fiscal responsibility. Why trust ODOT? Tolling plans continue as if Oregonians don't deserve a voice. The right to vote is fundamental; let Oregonians decide.

**ODOT I-205 Toll EA - RECORD #250 DETAIL**

**Submission Date :** 4/7/2023  
**First Name :** Courtney  
**Last Name :** Watson  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** The job of the government is to represent the people, not to push through measures without support. The tolling project is universally derided by the overwhelming majority of the citizens. Based on estimates that I've seen, this will cost 750 jobs, and will likely make commuting out of the price range of most commuters. It will cost my family nearly \$400 a month. As a result, people will be taking side roads through West Linn, Canby, and other communities to avoid this cost. The roads are not able to handle this, and the increase in emissions from people sitting in traffic on side streets is environmentally damaging. The infrastructure on these side roads (such as the Oregon City - West Linn bridge) are not equipped to handle the inevitable influx.

Most citizens do not have the job flexibility to change hours or work from home, and those without the flexibility are least able to afford the tolls. Public transit is not only a joke in terms of availability, but no longer safe.

This project has never had community support, and yet ODOT continues to push it through. There is complete disregard for people in pursuit of money and ideology. The clear corruption is shameful. I'm frankly shocked that you are allowing email feedback, as your attempts at face-to-face outreach have been pathetic in their obviously planned inaccessibility for commuters.

**ODOT I-205 Toll EA - RECORD #251 DETAIL**

**Submission Date :** 4/7/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** STRONGLY, STRONGLY, OPPOSED THE I-205 TOLL PROJECT. PLEASE  
DON'T DO THIS TO OUR COMMUNITY.

<b>ODOT I-205 Toll EA - RECORD #252 DETAIL</b>	
--	--

**Submission Date :** 4/7/2023

**First Name :**

**Last Name :** StevefM

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I'm completely against using tolling to finance the 205 project. If there is a vote, myself and everyone I know intend to vote against it.

The alternative of build or no build is a false choice. Since roads have been built around the world for thousands of years, almost every road has been built without the use of tolling.

Rely on income tax to fund this project or don't do it at all.

**ODOT I-205 Toll EA - RECORD #253 DETAIL****Submission Date :** 4/7/2023**First Name :** Gerard J**Last Name :****Affiliation :** BLM Planner, retired**Submission Method :** Accessible form**Q3. Comments :** The upgrades are needed and long overdue. ODOT has dithered away time and overall state budget surpluses and now is preparing to implement measures that are short sighted and with unacceptable impacts.

The tolling concept is fatally flawed. The tolls, particularly at peak hours, will cause exceptional congestion at the toll sites with an attendant massive increase in vehicle emissions/pollution. Traffic will be shunted onto a handful of roads (Borland Road, Willamette Falls Drive, Hwy 99E, and others that are already at capacity, with attendant increases in pollution and effects to communities, alternative travel modes, and public safety.

The toll concept is highly regressive. Lower income commuters will likely not complete the paperwork for reduced tolls or rebates. And, once the tolls are in place they are highly unlikely to disappear. It's too easy to keep the toll income source than to set a proper tax level for all user groups to keep our essential infrastructure in good maintenance.

Overall, the proposed action appears to continue an unconscionable lack of coordination between all levels of government. The commuter traffic is, part, a result of the jobs and affordable housing being so distant in the Portland metro area. This is a local/regional planning failure that tolling will not cure. This is especially true for the workforce on the lower range of the pay scale who need to work 2-3 jobs to pay their bills. Public transportation can't fill the gap.

Instead of using the insidious toll idea, the state of Oregon needs to redo its approach to fuel taxes/road use fees to fairly apportion charges for all user groups: big rigs, passenger-type vehicles, and hybrid/EVs. Special assessments should be made for the use of studded tires. This effort should be done in coordination with county and local governments to assure secondary roads and arterials are sufficient to withstand rerouted traffic when the main highways are inoperable. A huge element in this effort would be to reinstate timber harvesting on national forest lands and resume the old receipt sharing formula (roads & schools).

**ODOT I-205 Toll EA - RECORD #255 DETAIL**

**Submission Date :** 4/7/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** STRONGLY, STRONGLY, OPPOSED THE I-205 TOLL PROJECT. PLEASE  
DON'T DO THIS TO OUR COMMUNITY.L

**ODOT I-205 Toll EA - RECORD #256 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Steven

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** My concern is that ODOT is not listening to the people! I have not talked to anyone that thinks this is a good idea, in anyway. They see it as just another tax on the people, more problems on our streets. Stafford, Borland, and others.  
For what this cost just for the study you could have already fixed a big part of 205.  
Environmental issues on the side streets will impact the residents, our farmers, and wildlife.  
Yes,we need to add lanes to 205, but without the tolls. People don't want the tax/tolls.  
It's time for the State of Oregon to listen to it's people!



**ODOT I-205 Toll EA - RECORD #257 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** David

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I would like to see additional bridges across the Willamette and Clackamas Rivers between Interstate 5 and the Sellwood Bridge. ODOT is solely responsible for the current conditions we face in Interstate 205. ODOT has funneled all local traffic onto Interstate 205 by design. Now they are going to drop the hammer on us. My business will take a big hit with the proposed exorbitant tolls.

**ODOT I-205 Toll EA - RECORD #258 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Marlow

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** This project is once again a money grab by the State of Oregon. Our region passed a bond measure over 10 years ago to already address the I-205 issue. Would be very interested in how those funds have all been mismanaged by ODOT.

The tolling with have a huge impact on the Borland Road/65th Street intersection next to Meridian Park Hospital. There are already issues during the morning and evening commutes with traffic is backed up on both I-5(Boones Bridge) and I-205. I have actually witnessed emergency vehicles that get delayed in this area. I see people dying in this area when people use these two critical Tualatin roadways to get around paying the tolls. I know the State of Oregon doesn't really care about this when it comes to stealing more money from its citizens. I am retired but there are many people who use the roads to get to and from work. I doubt that all their employers will pay the extra \$5,000 per year for them to get to work. But once again the State of Oregon has proven many times over that they don't care about hard working Oregonians.

I sure that I will be once again end up being disappointed in the State I have lived in my entire 66 years of life. Idaho is looking better every day.

**ODOT I-205 Toll EA - RECORD #259 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Shannon

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** tolling i205 renovations may cover costs but WILL push traffic onto side streets leading to congestion and over use of side roads. This will happen. As a physician, I speak to a lot of people daily from many walks of life, who all agree that this will lead to congestion of side streets as they have already identified alternative routes, as have I. All leading to congestion of the OC bridge and along highway 43 (which is already heavily trafficked, thus pushing more people onto residential streets). I have experienced tolling while stationed in California with the USAF, it does lead to significant traffic slowing and congestion during pay point... even with the fast track. This is in contrast to the stated objective of reducing congestion! Consideration needs to be given to alternative funding for this project!

**ODOT I-205 Toll EA - RECORD #260 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Ronald

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** A small number of tolls would be a burden on some of us because we would have to figure out how to pay those tolls.

**ODOT I-205 Toll EA - RECORD #261 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Susan

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** This plan will make travel more expensive and slower. This is a BAD idea.

**ODOT I-205 Toll EA - RECORD #262 DETAIL**

**Submission Date :** 4/7/2023  
**First Name :** Vivian  
**Last Name :** McQueeney  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** The stress on the side roads between West Linn and Oregon City are already congested and take forever to travel between the towns during commute travels times. The people the tolls will affect the most is low income. They will divert off I205 to side streets! As a 47 year resident of Oregon City I can attest that we are already having traffic problems on the Arch bridge, through OC on McLoughlin, Willamette Falls Drive and Highway 43! It will divert traffic off I 205 and we who live in these neighborhood cities will virtually be unable to leave our homes. I already have 35 minute commute at 5:30 on Tuesdays when I come home from a friends in West Linn off 9th Street. On non-commute times that trip is 10 minutes. Why isn't ODOT listening to the people who live here and already experience traffic nightmares on our residential streets? Aren't you supposed to be working for Oregonians benefits not your paychecks??? Stop the tolls projects now before you waste any more money in setting up this stupid charge.

**ODOT I-205 Toll EA - RECORD #263 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** David

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I oppose all tolling of Oregon Infrastructure.  
Reducing institutionalized waste & mismanagement in ODOT and Oregon government will eliminate the need for tolling.

<b>ODOT I-205 Toll EA - RECORD #264 DETAIL</b>
--

<b>Submission Date :</b>	4/8/2023
<b>First Name :</b>	John
<b>Last Name :</b>	Wynn
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email
<b>Q3. Comments :</b>	I am a senior and barely make it on my money



**ODOT I-205 Toll EA - RECORD #265 DETAIL**

**Submission Date :** 4/8/2023

**First Name :** Eric

**Last Name :** Youngman

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** This is outrageous if you all were to use our(the peoples/tax payers not magic money that grows on trees fyi) money already allocated by our hard earned tax dollars in the first place in a responsible manner like we would have to! We would not have this issue. Instead you all have pushed and wasted billions of dollars on a transportation system and god knows what on other things that dont even pertain to road maintenance/construction like the max or what bs that nobody want or uses in the first place(the max) why do you all get your head out of your ass stop wasting our tax money and use it for what it is intended for and not your personal pet projects. then have the audacity to charge us money 4 bridges we have already paid for what a joke.. you get 5.1 billion dollars and you don't seem to know how to manage that i could only imagine what you will do with more of our money... TRY SERVING THE PEOPLE FOR ONCE YOU KNOW THE ONES THAT PAY YOUR SALARY AND NOT YOUR BUDDIES. THIS IS GETTING OLD. PUT IT TO A VOTE FOR AND BY THE PEOPLE.

**ODOT I-205 Toll EA - RECORD #266 DETAIL**

**Submission Date :** 4/8/2023  
**First Name :** Earl  
**Last Name :** Baker  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** The traffic problem in Portland stems from over population and under management of our current freeways. Our entire city is surrounded by four major freeway corridors all leading in our out of the city, and completely under capacity. Twenty five years ago people could travel anywhere in the city at any time of the day or night without traffic complications unless it involved a accident on the I-5 curves. Today there are millions of vehicles entering the I-5, I205, 217 and the 26 freeways bottle necking traffic and impeding flow.

Charging for the use of highways is a horrible decision, Our city officials should get out of their chairs and solve the big problem. Forcing people to drive on side surface streets to bypass the tolls simply because they cannot afford the additional cost is not the answer. Besides, freeways, bypasses, and corridors are all Federally funded. We pay taxes for the use of roadways and traffic corridors....put that money to work! .

I VOTE "NO" on toll roads.

**ODOT I-205 Toll EA - RECORD #267 DETAIL**

**Submission Date :** 4/8/2023  
**First Name :** Angela  
**Last Name :** Hove  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :**

I now live in Eastern Oregon but lived in the West Linn, Canby and Molalla areas for a decade in the early 2000's and used the Portland Freeways regularly as I worked in downtown for some of those years.

I do NOT support a toll on any of the Portland freeways.

1. The Portland area highways are NOT improved enough to handle the traffic by design because managers there have wanted to frustrate commuters into mass transit. No additional lanes and no additional freeways, like outer beltloops, which are typical in other major cities! Even Columbus, Ohio recognized the need for a new freeway leading to the airport and so they built it. Portland is woefully behind in road building....all to be green.

2. There are no alternate routes. If you look at the 80/90 turnpike toll road through Ohio/PA/IN/IL, there are alternate parallel routes. There are no other options for the Portland area because of neighborhoods, topography like rivers and steep hills, which block the flow. Any possible side roads will be plugged with traffic thru neighborhoods, creating a new problem for you to deal with. Even Denver, Colorado's toll roads have alternate untolled routes and expanded, well-flowing freeways. Portland does not.

3. I-5 and 205 are major thru-ways for interstate traffic to/from WA and CA. Family vacationers, movement of goods from ports, etc. There are NO other options. Businesses are already suffering from the lack of tourism to Portland and Salem, but you will drive any remaining possible visitors with tolls.

You must provide adequate alternate routes and expanded freeways before you can even think of adding tolls.

Sincerely,

**ODOT I-205 Toll EA - RECORD #268 DETAIL**

**Submission Date :** 4/8/2023

**First Name :** etha

**Last Name :** sabel

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** The Great State of Oregon has a Democrat Governor and two Democrat United States Senators and the Great State of Washington has a Democrat Governor and two Democrat United States Senators.

Why in the world do the people of our two states have to pay tolls on the I-205 as well as the I-5 for bridge improvements when all four US Senators voted for a Trillion dollar "Infrastructure Bill?". It makes no sense.

Why don't any of those six elected people ask President Biden and Sec of Transportation Pete Buttigieg for the necessary funds from that Infrastructure Bill to improve the I -205 and the I-5, as well as any other bridges in our two states?

Your group needs to pressure the Biden Administration for some of those funds. And don't toll Their constituents!!!!

**ODOT I-205 Toll EA - RECORD #269 DETAIL**

**Submission Date :** 4/8/2023

**First Name :** bruce

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** the financial effect has a very negative impact on those families that have the need to conduct their daily business such as school activities, doctor/dentist visits, shopping needs, commuting to work, etc. all in the area that they live. Because of geographical boundaries they will be forced to use the tolled roads just to stay in their 3-5 mile communities. Also, the neighborhood roads are already in such poor condition due to lack of resources within their communities. Adding the extra volume of diverted traffic, which we all know will occur, just exacerbates the problem and will expedite the deterioration of neighborhood roads. All this to achieve a 10-15 minute improved commute at peak times in the next 3-5 years? Laughable!

<b>ODOT I-205 Toll EA - RECORD #270 DETAIL</b>
--

**Submission Date :** 4/8/2023

**First Name :** Patrice

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Tolls are regressive for those who do not have much money to spend. Use state or regional taxes instead of tolls to pay for this bridge.

**ODOT I-205 Toll EA - RECORD #271 DETAIL**

**Submission Date :** 4/8/2023

**First Name :** Andreana

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I would like to see the gantry for the Abernethy bridge be installed after the OR-43 exits. I go from Gladstone (exit 9 on I-205) to OR-43 (exit 10) 3 times a week for various appts. There is no other way to get there without crossing the bridge, except crossing the Oregon City bridge which would impact local traffic. For those of us only traveling one exit, it would be unfair to pay the same tolls as people who travel the whole length of I-205 from Portland.

**ODOT I-205 Toll EA - RECORD #272 DETAIL**

**Submission Date :** 4/8/2023

**First Name :** Linda

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** All this will do is to put more cars on the side streets. Drivers no having the funds for the toll will just use any side street to where they need to go.  
Another idea for the rich to hurt the poor!



<b>ODOT I-205 Toll EA - RECORD #273 DETAIL</b>
--

**Submission Date :** 4/8/2023

**First Name :** Cynthia

**Last Name :**

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Would traffic from hwy 43 heading to northbound 205 be subject to toll?  
I can't tell from the project maps how the new interchange will be located relative to the gantry .

**ODOT I-205 Toll EA - RECORD #274 DETAIL**

**Submission Date :** 4/8/2023

**First Name :** Joe

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I'm highly disappointed in the process. Input is not input - it's just feedback on an already-determined plan. This plan is ridiculous - impact on local neighborhoods and congestion will be huge - but you don't care. Put it to a vote!!!! We pay enough taxes - just reallocate the existing funds we pay to cover any road expenses. Isn't that what a gas tax is for anyway? We're paying a toll for the mis-management of existing taxes. Put it to a vote!!!!

**ODOT I-205 Toll EA - RECORD #275 DETAIL**

**Submission Date :** 4/9/2023

**First Name :** Jerry

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Totally against 205 tolling. Will render Willamette area where I have lived since 1983 impossible to navigate 24 hours a day due to by passers of the tolling. Already bad enough during freeway backup while which we do not travel but the proposed tolling will make it 24 hours a day and our streets are not designed for this. The expansion of a third northbound lane from I 5 to Stafford road caused a lot of the problem due to by passers using that lane at high speeds to Stafford then crowding in to the two lane or taking the exit right across to the on ramp to merge back in which slowed the primary 2 lanes to a crawl I notified odot of this problem and was told there was nothing they could do about drivers taking the wrong exit which is not what they were doing. I suggested they make the off ramp a mandatory right or left hand turn and block the straight off and on drivers and they said it could not be done. Roundabouts contrary to belief do not work Take Stafford road and borland road Lake Oswego traffic overwhelm that roundabout to a point it backs up terribly on borland road for over a mile at times. Your tolling will raise the funds you desire but will create irreparable harm to the communities on the side roads which I know ODOT will not attempt to correct. In 1983 it was said that I205 would handle the traffic needs till 2020 so they had plenty of time to address this. Tolling is not the fair way to handle this problem where just local people will be hurt the most. Our city of West Linn will be severly impacted so we will take the brunt of the pain while other areas of Portland and the state will get off scott free. This proposal needs to go to a vote of the people you are supposed to be representing before any further implantation and just do the right thing

**ODOT I-205 Toll EA - RECORD #276 DETAIL**

**Submission Date :** 4/9/2023

**First Name :** Lawrence

**Last Name :** Sikarskie

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** We have been sold out by our legislature and need to get voter approval on tolling before any toll should be added..

<b>ODOT I-205 Toll EA - RECORD #278 DETAIL</b>
--

<b>Submission Date :</b>	4/9/2023
<b>First Name :</b>	Sue
<b>Last Name :</b>	Kalt
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email

**Q3. Comments :**

This is so disingenuous. You want feedback but you are not listening to it. Totally tone deaf. You have made up your minds and are now just ramming it down our throats --- forcing us to spend hard-earned money on the privilege of going to work, appointments and running necessary errands. This tolling will raise prices and increase the strain on our limited budgets. Unlike your department, we can't just go out and raise more taxes on people to subsidize overspending.

Toll prices will be higher at peak traffic times, a concept known as "congestion pricing." With ODOT toll projects:

- \* Toll prices will not be a surprise.

How are these two even congruent? They cannot both be true.

- \* Drivers only pay for what they use.

Ahh yes, go to work, pay the price

- \* Tolls provide needed funding for critical infrastructure and safety improvements.

This is what this is all about --- a money grab (GREED). You must have realized I still had a few pennies in my pocket and now you want that too -- would you also like that lint that goes with it?

Rather than looking at your budgets and cutting where things need to be cut, it is just too easy to figure out schemes to add more taxes on people who are already trying to figure out between which bill they will pay each month Shame on you.

Tolling is a tax. It is a variable tax. Surprise, you used I-205 and now you owe \$X today and tomorrow it might be \$Y, oh yes, we also will add "congestion" pricing to that. How is that stable? You get to raise it when you want more money at any time.

HOW ARE WE BILLED FOR THAT? On a monthly basis? A paper statement? What other fees will be associated with that? Transparency is lacking. Seriously.

Just call it what it really is --- We Want Your Money and You Will Have to Pay Through Your Teeth.

- \* Tolls help traffic move more smoothly.

No, that is false. I want to know what funny weed you are smoking.

More people equals more traffic (population). More cramped housing means more people living in areas where they need to commute. Just look at all those 3+story housing complexes which have replaced perfectly good single-family homes. One family vs 20+ families in that same cramped space. That adds to the traffic congestion. To say otherwise is to ignore why there is more traffic and more congestion. In my neighborhood, single-family homes (heritage homes) were torn down and replaced with cereal-box style apartment complexes. Where we used to have corner grocery stores or gas stations, and large yards, we now have apartment building next to another apartment building in the same space where we might have had two single-family homes with large yards. So instead of two or four people needing to

commute to work, we now have 40+ people needing to use that same infrastructure.

That is what is causing that congestion. This is a money-grab on your part and will not address the congestion. It just means another tax on the poor working people.

Also, in case you don't understand this, TRANSPORTATION costs will be factored into the price of goods and services. So hello, inflation increases to even more painful heights.

Increased costs = increased prices.

\* Tolls provide a more reliable trip.

Not even close. All it takes is one accident or two to really mess up the commute.

**ODOT I-205 Toll EA - RECORD #279 DETAIL**

**Submission Date :** 4/9/2023

**First Name :** Paul

**Last Name :** Burros

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :**

I oppose tolling of roads in Oregon. I live on the West side of the Abernethy bridge and my family members all live on the East side. That will mean for me or my wife to go see any family we will have to pay 2 tolls. I do a lot of my own home and car repairs because I can and as I draw Social Security it is how to save my money. The Abernethy tolling will again mean 2 tolls to just go to Home Depot for materials or to an Auto Parts store.

My wife babysits one of our grandsons 2 days a week so my daughter and son-in-law can hold fulltime jobs. This means 4 tolls a week just to help out family with their expenses.

It may not seem like a lot for a single toll, whatever that ends up being, but it is going to seriously hurt mine, my wife, and our extended families lives as tolls in aggregate will cost a significant portion of our limited income.

We have no alternative routes to travel to see our family. Please do not toll Oregon roads.



**ODOT I-205 Toll EA - RECORD #280 DETAIL**

**Submission Date :** 4/9/2023

**First Name :** Sue

**Last Name :** Kalt

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why are you not being transparent about all the fees? This will have serious negative impacts on our pocketbooks.

from the Urbanist<<https://www.theurbanist.org/2023/02/25/how-to-finance-a-highway-spending-spree-records-reveal-oregons-plans-for-toll-hikes/>> article

Tolls on the I-205 Abernethy and Tualatin River Bridges will be \$2.20 each at the peak hour. (Orange)

Tolls on the I-5 Interstate Bridge will be up to \$5.69 (Green)

In addition to these tolls, drivers on I-5 and I-205 will pay tolls of 17 cents to 38 cents per mile during peak hours. Twenty miles of driving on I-5 or I-205 will cost you between \$3.40 and \$7.60. (Blue)

People who don't have transponders will also pay a \$1.77 processing fee per transaction

YOu are planning on charging a \$1.77 processing fee per transaction?!!!!!!! Seriously?

What is a transaction? Each time I have to drive to work? Each time I drive to another job? Each time I drive home from one of my three-part time jobs? On top of the usurious toll pricing?!

That means \$1.77 for four transaction on the same day? which equals \$7.08 just for the transaction fees plus the Payroll transit tax, plus the toll (tax) for using those bridges or portion of that freeway. So realistically, when one adds up everything that is \$20 per day

In one week that is \$100

In one year that is 50 weeks (minus vacation time) == \$5,000 per year

But wait, I still have to run errands on my "vacation" so that means I will be paying tolls on those roads 52 weeks. So that is more than \$5,000 per year.

I only make on average, \$2,500 per month (gross). Net is approximately \$1,700 per month. I don't live on gross, I live on net. Part of that net includes that ridiculous payroll TRANSIT tax.

I have to pay my mortgage each month, utilities each month (electricity, heating, water garbage), property taxes (yearly). House insurance, health insurance. The food budget and household supplies is \$200 per month. To afford going to all my jobs, I will have to take that food budget to zero. I already eat one major meal per day (dinner) with a small snack at noon.

This Tolling money-making scheme, (really a TAX) will not relieve congestion. It will serve to divest hard-working people from their last shekels and drive them deeper in debt. But then you don't care. Your office needs another Krups machine, right?

Here's a novel idea, an audit needs to be done on PBOT, ODOT and figure out how you are spending every penny. Then look at redundant positions. Then eliminate excess spending from your budget instead of dipping into our pocketbooks. All I have left is lint in my pocketbook.

<https://www.theurbanist.org/2023/02/25/how-to-finance-a-highway-spending-spree-records-reveal-oregons-plans-for-toll-hikes/>

**ODOT I-205 Toll EA - RECORD #281 DETAIL**

**Submission Date :** 4/9/2023

**First Name :** Mark

**Last Name :** Rose

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I don't know anyone that thinks tolling I-205 is good idea. It will reduce congestion on the freeway only because people will avoid the freeway and drive on arterial roads causing more issues.  
We are already paying extremely high gas taxes to pay for our freeways, another tax is not the answer.  
As you know Light Rail has been failure and is not a safe alternative.  
I strongly oppose the 205 toll, but it's sounds like it's out of the taxpayers hands at this point.

For what my opinion is worth, I do not support the I-205 toll.

Thank you,  
[ ]

**ODOT I-205 Toll EA - RECORD #282 DETAIL**

**Submission Date :** 4/9/2023

**First Name :** Cheri

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** My biggest concern, by far, is the diverted traffic. As someone who lives in the Hidden Springs area of West Linn, I doubt I will even be able to travel to a toll spot as all of the roads around me (Salamo, Pimlico, Rosemost, Highway 43, and Stafford/McVey will be undoubtedly impossible. Hence, I guess I will get to stay in my driveway. Ridiculous.  
Also, I am concerned for people who do not have the funds to cross the Abernathy Bridge daily. Shall the drive up to the Sellwood Bridge?

<b>ODOT I-205 Toll EA - RECORD #283 DETAIL</b>
--

**Submission Date :** 4/10/2023

**First Name :** Brian

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** This is the main artery for Oregon City. If you charge a toll, that will fall disproportionately on the OC people, not a wealthy demographic. They do not have a realistic alternative to get to I-5 or I-84. This isolates them in a way that is unfair and unwise.

Please note: if a toll is charged, on principle, I will avoid the freeway altogether and only use side streets and that highways nearby. This will only further impact other infrastructures.

Like ALL road construction in the state, this burden should be paid by all OR taxpayers.

**ODOT I-205 Toll EA - RECORD #284 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Alana

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I am absolutely not in support of tolling at the Abernathy bridge. It is just a way to take more money out of my pocket that I cannot afford. It will limit my ability to go help my elderly mom because I won't be able to pay the toll. This is awful. ODOT should be asking us our opinion before doing anything like this. Also manage your money. We already pay .

**ODOT I-205 Toll EA - RECORD #285 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Bert

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I drive 205 every day for work tolls will add cost at a time when we are all  
ready struggling  
NO TOLLS PLEASE

**ODOT I-205 Toll EA - RECORD #286 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Matt

**Last Name :** Markstaller

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Suggesting a toll on Oregon roads is absurd in a state that already is very close to the highest taxed state in the Union. It is very problematic that ODOT is even able to enact tolls without a public vote. Please learn to manage the extreme amount of taxation the Oregon already receives.

Additionally enacting just one toll at a time is extremely unfair to the populous. I live close the Abernethy bridge and travel 205 frequently. Why should I pay a toll when no one else in the state does?

Why are you doing the work on the Abernethy bridge without having a way to pay for it?

Traffic is much less now than it was before Covid, so why do you say that the congestion needs to be relieved. I commute every day and there is not nearly the congestion that there used to be.

What taxes are being reduced that the proposed tolls will replace?

Please respond to this email with the answers to my questions.

Thanks,

**Attachments :** image001.png (40 kb)

**ODOT I-205 Toll EA - RECORD #287 DETAIL**

**Submission Date :** 4/10/2023  
**First Name :** Jess  
**Last Name :** Lauthner  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Hello,

Please do not approve a toll on I205. As a widowed parent that drives from Wilsonville to PDX daily for work, the toll would have a significant negative impact on my family. With inflation, it is already extremely difficult for families, especially single parent families, to provide basic necessities. My children, and many others, will be worse off if a toll is enacted.

Sincerely,



<b>ODOT I-205 Toll EA - RECORD #288 DETAIL</b>
--

<b>Submission Date :</b>	4/10/2023
<b>First Name :</b>	Sarah
<b>Last Name :</b>	Iannarone
<b>Affiliation :</b>	The Street Trust
<b>Submission Method :</b>	Letter

**Q3. Comments :**

[Long email thread; topic codes reflect main themes in Sarah Iannarone's emails.]

Mandy,

It's a challenge, for sure, especially post-pandemic which upended how we gather and communicate. But I don't need to tell you that. It's been painstaking to engage even highly active community members around this issue because of the education necessary - tolling is new to the state, and transportation justice and equity is still new to many people, as well. The complexity of multiple simultaneous processes (205, RMPP, and IBR) mean even the transpo pros in my base struggle to keep up.

The Street Trust often provides direct compensation in the form of Visa gift cards to members of historically marginalized groups for their input. We also offer subgrants to CBOs who host engagement opportunities or sessions. We provide stipends to individuals who serve as ambassadors, translating between projects and communities. We also serve hot meals at some engagement events.

In addition to directly compensating people in the community, ODOT should also be paying NGOs market rate for the hours they spend consulting with the agency on outreach and for access to their email lists, which are powerful tools for reaching communities.

Hope that helps,  
Sarah Iannarone  
The Street Trust

-----  
[Mandy Putney, ODOT]  
Hi Sarah,

Thank you for helping us spread the work about the ways folks can comment on the Draft Environmental Assessment. We've included 100s of community based organizations on our notification list and are always happy to add more; please feel free to send me any suggestions you have. We'll be sending out reminders today and early next week about the 4/21 deadline, so this is great timing on your email.

Best,  
Mandy

-----  
[Sarah Iannarone, The Street Trust]

Thank you for the update, Mandy, I appreciate you following up on and accommodating The Street Trust's request for no less than 60-day public comment period. I know others have asked for as many as 90 days and I was curious where you had landed on that.

For what it's worth, I can trace a throughline directly from The Street Trust's advocacy to 100% of the people who showed up and testified in support of the I-205 Toll Project at the virtual public hearing this past Tuesday. We invested significantly in education and outreach to get even that modest turnout. I would really like to see ODOT/WSP more actively engaging, supporting, and mobilizing other climate and equitable mobility groups in the remaining two weeks of this comment period to ensure a diversity of well-informed voices are included in shaping a better I-205 Toll Project.

Have a good weekend, all -  
Sarah

-----  
[Mandy Putney, ODOT]

Dear Sarah Iannarone,

The Oregon Department of Transportation (ODOT) has received your letter

regarding the public comment period for the I-205 Toll Project Environmental Assessment. A full response is attached.

We appreciate your continued involvement in the project and welcome your comments about the possible impacts, benefits, and mitigations identified in the Environmental Assessment.

Thank you,  
Mandy

-----  
[Sarah Iannarone, The Street Trust]

Hi RTAC team,  
It's my understanding that Metro staff on behalf of JPACT would be sending a letter to ODOT requesting an additional extension of the 60-day public comment period to 90-day. Have you received that request and, if yes, has a decision about a further extension been made?

Thanks for the update and have a great week,  
Sarah

-----  
[Sarah Iannarone, The Street Trust]

Dear Della,  
Please accept for ODOT's Urban Mobility Office, The Street Trust's comment following the robust discussion at Monday's RTAC meeting on ODOT's community engagement on the I-205 Toll Project EA. There are no shortcuts to inclusive engagement - it's critical to the success of this project and the health of our region.

Thank you

**Attachments :**

image001.png (2 kb)  
~WRD3530.jpg (823 bytes)  
I-205\_EA\_Extension\_Street\_Trust.pdf (105 kb)



Feb 28, 2023

To: ODOT Urban Mobility Office

Cc: David Kim, WSP

Re. RTAC Input on I-205 Toll Project EA Public Comment Period

To Whom it May Concern:

At the Regional Toll Advisory Committee meeting earlier this week (2/27/23) several committee members including The Street Trust expressed equity concerns about ODOT's public engagement process on the I-205 Toll Project Environmental Assessment public comment period.

We understand that ODOT is attempting to engage the public for 45-days beginning 2/21 through 4/7/23; however, the engagement materials for this effort are only currently available in the English language, which excludes community members with limited English proficiency (LEP). This potentially further marginalizes already disenfranchised members of our community whose voices are critical in this effort.

ODOT needs to act quickly to make sure that the necessary information about I-205 Toll Project Environmental Assessment is provided for LEP residents (in alignment with the demographics of the Greater Portland Metro region and Metro regional government's community engagement language policies).

The subject matter is challenging for the residents of our region to understand regardless of their primary language. For that reason, it is our recommendation that the I-205 Toll Project Environmental Assessment public comment period be extended to no less than 60 days. Further, the public engagement period should NOT begin until the multi-language materials are widely available to the public in print and digital formats, as well as made available online.

Thank you for your timely consideration in this matter, as the clock is currently ticking.

Sincerely,

Sarah Iannarone

Sarah Iannarone  
Executive Director, The Street Trust

**ODOT I-205 Toll EA - RECORD #289 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Mike

**Last Name :** Morris

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** tolls are not the way to help people get back and forth to work the  
Doctors office or get their kids to school all the tolls will do is  
cause more problems off the 205 because WE THE PEOPLE CAN NOT  
AFFORD  
YOUR SO CALLED HELP

**ODOT I-205 Toll EA - RECORD #290 DETAIL****Submission Date :** 4/10/2023**First Name :** Carol**Last Name :** Sadich**Affiliation :****Submission Method :** Paper form

**Q3. Comments :** Oregon is already the highest taxed state in the country according to the Taxpayer Association of Oregon. Our property taxes go up every year even though the value of our houses don't change that much. Tolls should be voted on by the citizens as they will increase our cost of living when we are already in a recession. Everything shipped into our area — food, cars, clothes —all goods— will go up due to truckers having to pay tolls. Traffic on side streets will increase [???] with people trying to avoid tolls.

For those of us living in West Linn, the traffic on Borland Road is already bad during rush hour — so we will see a great increase in local traffic. Plus which, for West Linn residents, you seemingly are taking out both of our entrance & exit roads to I-205 with tolls encompassing both Stafford Rd and 43 and 10th street making it impossible for us to use any of I-205 without paying tolls & greatly increasing our cost of living. I was also told that you have not come up with a yearly rate making us have to pay tolls everyday to go & come home from work. This is unfairly worst for West Linn & Oregon City residents.

**Attachments :** L Hamilton\_Letter\_2023.pdf (131 kb)  
C Sadich\_Letter\_2023.pdf (464 kb)

Mandy Putney  
ODOT Urban Mobility Office  
18277 Boones Ferry Rd.  
Tualatin, OR 97224

16750 SW King Charles Ave.  
King City, OR 97224  
April 4, 2023

Dear Mandy Putney:

Thank you for the opportunity to provide comments on the Environmental Assessment (EA) on Tolling and Improvements I-205 in Oregon.

According to Sec. 1.2, page 1-2, the full project is the Oregon Toll Program and includes tolling on I-5 and I-205. It notes that FHWA approved a categorical exclusion (CE) for the improvement portion of the project on I-205 before tolling was considered part of the project.

This raises some issues. 1) the entire project includes tolling other locations on I-5 and I-205 and possibly elsewhere on interstates in Oregon; 2) the EA is for a portion of the entire project and is based on a CE approval without tolling; and 3) tolling of the Interstate Highway system must be approved by the Federal Government. That approval has not yet been granted.

The entire project, tolling interstates in Oregon, requires an Environmental Impact Statement (EIS) prepared by FHWA. What ODOT has done is segmenting the project. *Overland Park vs Volpe* (1971) requires a hard look at all of the agency's actions. All of the ODOT actions under the direction of the Oregon legislature involve improvements and tolls on Oregon's interstate highways. Therefore an EIS should have been prepared. While an outcome of an EA may direct the preparation of an EIS, the portion of the project under the EA is still a segment of the whole.

Another failing is the consideration of only two alternatives. There are other alternatives that should be considered. The underlying issue is a lack of sufficient funds to maintain and improve Oregon highways. Thus, other ways of raising funds besides tolls should be considered. Since gas taxes may decline due to electric vehicle use, an annual tax on electric vehicles could be imposed. A cost per mile has been mentioned elsewhere; how this would be applied to Oregonians' travel out of state and to visitors eludes me. The Oregon legislature could place funds from other departments to supplement dedicated highway funds. House bill 5045 includes \$70 million for ODOT. ("The Oregonian", Sunday, April 2, 2023, p. A5) Dropping tolls when the improvements are paid off is another possibility.

P3-11. The statement under the proposed action that induced demand is less likely to occur because of strong State land use laws should be reconsidered if Senate Bill 4 becomes law. This statement is contradicted by p.3-74 where expected future growth would occur under the no build alternative.

P3-31. That mitigation measures would be included in a revised EA implies a need for an EIS.

There are several concerns under the proposed action for the potential for traffic diverting to local roads that are not discussed. The EA assumes there will be very little diversion to avoid tolls and only addresses improving certain local intersections as a solution. There will likely be considerable

avoidance of I-205 toll locations. Local streets and land uses could be severely impacted by heavy traffic. There are businesses and residences along these local roads. People will have problems getting into and out of businesses and homes. Air pollution is likely to increase. Access to parks and historical sites may be affected. One historical site not mentioned is the municipal elevator in Oregon City which was added to the National Register of Historic Places in 2014. The access to this feature is the lower end of 7<sup>th</sup> street, just beyond the narrow historic bridge. Traffic avoiding I-205 will go this route to Oregon City and Milwaukie. (I already go this way as I don't like I-205.) Other features and park accesses may also be adversely affected by traffic. The Legacy Meridian hospital will likely be adversely affected by traffic avoiding I-205. A more realistic estimate of traffic avoiding tolls and the direct and indirect impacts of this traffic must be considered.

P. 3-112. Cumulative impacts of the entire project also need to be addressed. Tolling is expected to be a part of the new I-5 bridge over the Columbia River. If tolling the Oregon Interstate Highway system is approved, there will likely be other tolling locations. Someone driving across Oregon could be hit by tolls many times. These would have cumulative impacts and direct impacts to other local areas. Has the cost of mailing toll bills to all of Oregon's out of state visitors been considered? Out of state travel does not seem to be considered by this project.

P. 3-120/123. This section fails to discuss the expected impacts of future tolls or impacts of traffic avoiding tolls. The proposed action presents an economic advantage for EVs using the tolled sections over otherwise fueled vehicles. Operators of gasoline and diesel vehicles will be paying both the gas tax and the toll. An increase in the costs of goods and services related to these additional costs seems likely. Long-distance travel, heavy vehicles, and electrical outages necessitate other forms of fuel which will have to be paid for in addition to tolls.

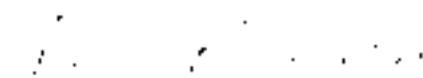
P. 3-127/128. The final paragraph is questionable. That "some traffic" would divert vastly underestimates reality. A thorough analysis of traffic diversion is required.

There is another cultural impact not mentioned, perhaps not considered by younger generations. Tolling, especially throughout the State, contributes to another loss of privacy. Once tolls are in place the State will have a toll record of every car and every mile travelled. Toll booths instead of transponders and cameras would remedy this issue.

An EA, traditionally, is a brief document. This EA requires extensive review, more appropriate for an EIS.

Cc: Sen. Wyden

Sincerely,



Lynne Hamilton





Miss Lorne Hamilton  
1750 S.W. King Charles Ave.  
King City, OR 97224-0362

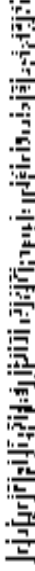


PORTLAND OR 972

4 APR 2023 PM 4 L

Merry Putney  
ODOT Oregon Mobility Office  
18277 Boone Ferry Rd  
Sundata OR 97224

97224-767099



# I-205 Toll Project Environmental Assessment Comment Form

Oregon is already the highest TAXED State in the Country according to The Taxpayers Association of Oregon. Our property Taxes go up every year even though the value of our houses don't change that much. Tolls should be voted on by the citizens as they will increase our cost of living when we are already in a recession. Everything shipped into our area - food, cars, clothes - all goods will go up due to truckers having to pay tolls. Traffic on side streets will increase substantially with people trying to avoid tolls.

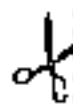
To those of us living in West Linn, the traffic on Portland Road is already bad during rush hour - so we will see a great increase in local traffic. Plus which, for West Linn Residents, you seemingly are taking out both of our entrances & exits roads to I-205 with tolls encompassing both Stafford Rd. and 403 and 10th street making it impossible for us to use any of I-205 without paying tolls & greatly increasing our cost of living. I was also told that you have not come up with a grade gate making us have to pay tolls every day to go if home from work.

MAIL THIS FORM WITH YOUR COMMENT TO:

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

This is unfairly worst for West Linn of Oregon City residents.

**Please submit your  
comments by 4 p.m.  
on April 21, 2023.**



# I-205 Toll Project Environmental Assessment Comment Form

## Contact Information

First Name: CAROL ~~XXXXXXXXXX~~

Last Name: DADICH

ZIP/Postal Code: 97068 Email: Carol.Dadich@yahoo.com

Phone Number: (503) 650-4616 Affiliation (leave blank if none): \_\_\_\_\_

Contact information will not be included in any comment summary. Contact information is subject to public records disclosure upon request.

The Environmental Assessment analyzed potential short- and long-term effects of the I-205 Toll Project on a variety of topics, including the transportation system, local communities, the economy and the environment, along with possible solutions to address negative effects. These topics are listed below.

Among the topics we analyzed, please select those that best represent the topic of your comment:

- Project Purpose, Need, Goals and Objectives
- Effects to the **transportation system** - including rerouting/diversion to local streets, congestion and traffic flow on I-5 and I-205, traffic safety, active transportation, biking, walking, transit and freight
- Effects to the local **natural environment** - including air quality, climate change, noise, geology and soils, hazardous materials, vegetation and wildlife and wetlands and water resources
- Effects to the local **built environment** - including land use, visual quality and historic and archeological resources
- Effects to local **communities** - including household finances, the regional economy, environmental justice and the combined effects of the improvements and tolling
- Proposed **mitigation** - or solutions developed to reduce adverse impacts identified in the environmental review process
- Another topic: NEEDS TO be VOTED ON BY CITIZENS

When considering the topics you selected above, what comments do you want to share with the project team about the analysis, effects and potential solutions to negative impacts (also called "mitigation") included in the I-205 Toll Project Environmental Assessment?

To help the project team understand your interests and concerns, we recommend using the following guidance for your comment:

**Be specific** about a project element, phrase, word, or text. (For example: "I would like to see additional mitigation at the intersection of X and Y.")

**Include a brief explanation** about an issue that should be evaluated further. (For example: "The transportation analysis needs to consider how cars using other roads to avoid tolls could slow down buses, particularly along X route in Z city/neighborhood.")



Oregon is already the highest TAXED State in the Country according to The Taxpayers Association of Oregon. Our property Taxes go up every year even though the value of our houses don't change that much. Tolls should be voted on by the citizens as they will increase our cost of living when we are already in a recession. Everything shipped into our area - food, cars, clothes - all goods will go up due to trucking money to pay tolls. Traffic on side streets will increase substantially with people trying to avoid tolls.

For those of us living in West Linn, the traffic on Portland Road is already bad during peak hours - so we will see a great increase in local traffic. Plus which, for West Linn Residents, you seemingly are taking out both of our entrances. I-205 roads to I-205 with tolls encompassing both Stafford Rd. and 43 and 10th street making it impossible for us to

use any of I-205 without paying tolls & greatly increasing our cost of living. I was also told that you have not come up with a yard gate making us have to pay tolls & expect to go if come home from work.

MAIL THIS FORM WITH YOUR COMMENT TO:

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

This is unfairly slow for West Linn  
of Oregon city roads etc.

**Please submit your  
comments by 4 p.m.  
on April 21, 2023.**

of

# I-205 Toll Project Environmental Assessment Comment Form

## Contact Information

First Name: CAROL ~~STADICHA~~  
Last Name: STADICHA  
ZIP/Postal Code: 97068 Email: Carol.Stadicha@yahoo.com  
Phone Number: (503) 650-4616 Affiliation (leave blank if none): \_\_\_\_\_

Contact information will not be included in any comment summary. Contact information is subject to public records disclosure upon request.

The Environmental Assessment analyzed potential short- and long-term effects of the I-205 Toll Project on a variety of topics, including the transportation system, local communities, the economy and the environment, along with possible solutions to address negative effects. These topics are listed below.

Among the topics we analyzed, please select those that best represent the topic of your comment:

- Project Purpose, Need, Goals and Objectives
- Effects to the **transportation system** – including rerouting/diversion to local streets, congestion and traffic flow on I-5 and I-205, traffic safety, active transportation, biking, walking, transit and freight
- Effects to the local **natural environment** – including air quality, climate change, noise, geology and soils, hazardous materials, vegetation and wildlife and wetlands and water resources
- Effects to the local **built environment** – including land use, visual quality and historic and archeological resources
- Effects to local **communities** – including household finances, the regional economy, environmental justice and the combined effects of the improvements and tolling
- Proposed **mitigation** – or solutions developed to reduce adverse impacts identified in the environmental review process
- Another topic: NEEDS TO BE VOTED ON BY CITIZENS

When considering the topics you selected above, what comments do you want to share with the project team about the analysis, effects and potential solutions to negative impacts (also called "mitigation") included in the I-205 Toll Project Environmental Assessment?

To help the project team understand your interests and concerns, we recommend using the following guidance for your comment:

**Be specific** about a project element, phrase, word, or text. (For example: "I would like to see additional mitigation at the intersection of X and Y.")

**Include a brief explanation** about an issue that should be evaluated further. (For example: "The transportation analysis needs to consider how cars using other roads to avoid tolls could slow down buses, particularly along X route in Z city/neighborhood.")



Ms. Carol Sadich  
2470 Michael Dr.  
West Linn, OR 97068

PORTLAND OR 972  
4 APR 2023 PM 5 L



*Mandy Postney  
ODOT Urban Mobility Office  
18877 SW Brown Ferry Road  
Tualatin, Oregon 97224*

57226-787033

Postage and Fees Paid

**ODOT I-205 Toll EA - RECORD #291 DETAIL**

**Submission Date :** 4/10/2023  
**First Name :** Katherin  
**Last Name :** Kirkpatrick  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Dear ODOT:

I,m writing in opposition to proposed tolls on I-205. They aren't the best way to raise or use infrastructure funds, and they'll only result in more population drain.

I'm a lifelong Oregonian, and over the last forty years have seen a large portion of my taxes go to infrastructure projects that have never taken shape. Citizens have zero reason to trust that this project will be any different. The livability of the Portland metro area has gone from one of the highest in the country to one of the lowest, despite the huge number of infrastructure studies, projects and levies that have been undertaken.

The simple fact is that people's lives have degraded to the point where they can't afford basic upkeep.

Oregon must address that first; anything else is pointless.

Over the last two decades, accelerating over the last three years, my husband and I have seen nearly every local friend and family member leave the Portland metro area. Some to other Oregon communities, most to other states. In every case, the reason they cited was the growing discrepancy between cost of living and quality of life.

My husband died last month of a stress-related heart attack on the way to work, waiting at a vandalized bus stops, on the way to a downtown core beset by drug-related fires, where most of his coworkers no longer physically come to the building, and where he habitually went without lunch because there are no longer any restaurants or stores nearby and it's not safe to walk even in daytime. A few weeks before he died, he had walked past a dead body on his way to work, but 911 would not answer his call nor that of his office building's concierge. When I identified his body at the state medical examiner's office, the labeled bag containing my husband's watch, glove and book sat in a pile of bags containing hypodermic needles and wads of hundreds. The examiner fielded at least a dozen overdose calls in the few minutes I was there to sign papers; he was so overworked he looked as though he too would have a heart attack. On my way back to the car, past a bus station that is no longer in use because of drug crime and loss of nearby businesses, an addict was urinating on my car door as I tried to open it.

Now my financial support is gone, and my only asset-my home-is plummeting in value. I may be the next Oregonian who has to leave her own state to survive. If I manage to keep my home, I'll be alone, because my daughter can't stay here-four carjackings of young women her age last year, two active-shooter lockdowns, and a quadruple homicide down our once-safe street; yet her job wouldn't begin to pay for the high taxes she'd be charged for services she'd never receive.

Our state's financial problems are due to the loss of economic activity; which in turn is driven by rampant drug-related crime.

Charging people more for their suffering, without addressing its cause, will only make things worse.

Sincerely,



**ODOT I-205 Toll EA - RECORD #292 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** William

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** This is a complete waste of tax payers money and will hurt the hard working middle class. I for one will drive around the tolls once they are operational. Use all the money that ODOT has, instead of placing another tax.

**ODOT I-205 Toll EA - RECORD #293 DETAIL**

**Submission Date :** 4/10/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Do not add tolls!  
You waste too much \$ as it is. Stop taking so much from us, and we will produce more revenue and existing taxes will be sufficient. Stop taking our money and wasting it.

**ODOT I-205 Toll EA - RECORD #294 DETAIL**

**Submission Date :** 4/10/2023  
**First Name :** Heathyr and Danny  
**Last Name :** Nance  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** My family and I live in the Stafford area of Wilsonville, Oregon. We are adamantly against the tolling on I-205 in our area. We live in a very scenic part of our area and have a Christmas Tree, Flower Farm and sell our hay to local farms in the area. Since we have lived here the last 9 years we have seen such an increase in traffic on Stafford Rd. Every year we have 1-2 fatality accidents at our small intersection of Stafford and Newland. Every month there is a car accident on our road. At night we hear cars racing down Stafford. It makes me so nervous having 3 teenage drivers and their friends traveling back and forth from our home.

The implementation of the tolling on 205 will force MORE people to not take the freeways and take our sweet country backroads...furthering the amount of traffic we currently have on them and increasing accidents. PLEASE DO NOT FORCE OUR COMMUNITY TO CONTINUE TO HAVE THIS HAPPEN. Tolling is not the answer!!!

**ODOT I-205 Toll EA - RECORD #295 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** James

**Last Name :** Swan

**Affiliation :**

**Submission Method :** Letter

**Q3. Comments :** Dear Ms. Putnam:

Enclosed is the email I intended to send yesterday afternoon. Turns out Windows 10 is worst than the pony express.

Thank you for your time here.

---

DEAR ODOT: Hi! I just wanted to offer up my opinion on the proposed I-205 tolling project. I would agree with Mayor Buck of Lake Oswego that this tolling project will create high levels of congestion and over crowding on the nearby side roads, particularly Highway 43 which is currently overburdened.

I would like to propose a mechanism that the State of Washington implemented back in 2003. The State imposed a temporary nickel gas tax to fund a multitude of major infrastructure projects throughout the State. Google/2003"nicke" funding package/WSDOT for the details.

I'm thinking that a temporary gas tax imposed on those counties most likely to benefit from the bridge projects. This would sidestep the congestion and over crowding issues. Thank you for your time.

**Attachments :** 205 Tolling Project\_03-20-23 from Cornell and Pat Ullman.pdf (1 mb)  
205 Tolling Project\_04-05-23 from James Swan.pdf (370 kb)

Mr. and Mrs. Cornell L. Altman  
11830 Payson Ln  
Oregon City, OR 97045

PORTLAND OR 972  
21 MAR 2023 PM 5 L

MAR 24 2023

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

97224-767099



Project

to the tolling project as outlined for the following reasons.

south side of the Willamette River have extremely few road options to  
and I-5 corridor. We will be forced onto roadways and communities which  
unprepared to carry that kind of traffic.

of all the roundabouts and road improvements in surrounding areas and  
the bridge and freeway widening?

with a limited budget and visiting our family in Tualatin will be prohibitively  
resources.

to vote on issues with such major financial impact to themselves and to

include our opposition to others so opposed.

ent analyzed potential short- and long-term effects of the I-205  
topics, including the transportation system, local communities, the  
ment, along with possible solutions to address negative effects. These

zed, please select those that best represent the topic of your

**ed, Goals and Objectives**

**ortation system** - including rerouting/diversion to local streets,  
fic flow on I-5 and I-205, traffic safety, active transportation, biking,  
freight

**natural environment** - including air quality, climate change, noise,  
azardous materials, vegetation and wildlife and wetlands and water

**uilt environment** - including land use, visual quality and historic and  
ces

**munities** - including household finances, the regional economy,  
ce and the combined effects of the improvements and tolling

**or solutions developed to reduce adverse impacts identified in the  
w process**

**cs you selected above, what comments do you want to share with the  
lysis, effects and potential solutions to negative impacts (also called**

A. J. FORTNEY  
5  
56-2389

Email:

Affiliation (leave blank if none):

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

JAMES M SWAN  
878 10th STREET  
LAKE OSWEGO, OR 97034

PORTLAND OR 972  
5 APR 2023 PM 4 L

APR 10 2023

**Mandy Putnam, Project Manager**  
**ODOT Urban Mobility Office**  
**18277 SW Boones Ferry Road**  
**Tualatin, OR 97224**

97224-767099





34-1712



here.

intended to send yesterday afternoon. Turns out Windows 10 is worst

ect

Manager  
Office  
Road

ct  
878@gmail.com>

Just wanted to offer up my opinion on the

illing project. I would agree with Mayor Buck of

this tolling project will create high levels of

ver crowding on the nearby side roads, particularly

is currently overburdened.

pose a mechanism that the State of Washington

k in 2003. The state imposed a temporary nickel

multitude of major infrastructure projects

ate. Google/ **2003 "nickel" funding**

for the details.

n temporary gas tax imposed on those counties

ent from the bridge projects. This would sidestep

d over crowding issues. Thank you for your time.

M. Swan

ake Oswego

<b>ODOT I-205 Toll EA - RECORD #296 DETAIL</b>
--

**Submission Date :** 4/10/2023  
**First Name :** Devon  
**Last Name :** Rohlfing  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Hello,

I strongly oppose the proposed tolls on I-205. These measures will cause undue cost on small businesses in the area and will not have the hoped impact of reducing road use. Instead, they will drive many of the businesses which we rely upon to close or move.

Both as a commuter and as a Clackamas County resident I strongly oppose these tolls.

Thank you,

**ODOT I-205 Toll EA - RECORD #297 DETAIL**

**Submission Date :** 4/10/2023  
**First Name :** Devon  
**Last Name :** Rohlfing  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** NO TOLLING ON I-205!

**ODOT I-205 Toll EA - RECORD #298 DETAIL**

**Submission Date :** 4/10/2023  
**First Name :** Mishayla  
**Last Name :** Richardson  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** I would like to oppose the proposed tolling on I-205. Tolling on I-205 in the west linn/oregon city area alone is unfair to the residents of those areas whose taxes have paid for numerous other road projects but when something needs to be done in their area now are having to pay extra taxes. Additionally, it'd force many people on to side streets trying to find alternative routes to avoid the tolls. One of those alternative routes would place numerous cars on a side street by my house that is already struggling to deal with the current traffic levels. Clackamas County Commissioners, the Mayor of West Linn, Mayor of Oregon City, and former ODOT official, just to name a few, are all against the tolling. At a very minimum, it should be put to a vote to the people impacted.

**ODOT I-205 Toll EA - RECORD #299 DETAIL**

**Submission Date :** 4/11/2023

**First Name :** Keith

**Last Name :** Huffstutter

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** To whom it may concern  
I'm opposed to tolling on I205 / I5. Tolling will destroy local neighborhoods by endangering the safety of residents through excessive local traffic.  
Thank you for the consideration  
Keith Huffstutter

**ODOT I-205 Toll EA - RECORD #300 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Michael

**Last Name :** Harrison

**Affiliation :**

**Submission Method :** Paper form

**Q3. Comments :** Hello,  
Bicycle pathways (large, maybe 15 feet wide for each lane) along I-205 during construction phases certainly helps. Imagine reaching Oregon City from Division St, along I-205 entirely on your e-bike!  
Supplementary info on my website [bikeskyway.org](http://bikeskyway.org) including images + video.  
Make sure you put a roof on any new bicycle paths, perhaps.

**ODOT I-205 Toll EA - RECORD #301 DETAIL**

**Submission Date :** 4/11/2023

**First Name :** Christopher

**Last Name :** King

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** We do not want tolls. No one wants tolls!

ODOT's lack of transparency and answers regarding tolling has left many residents frustrated, and rightfully so. One West Linn Resident, Josh Carter, stated he only knew about the ODOT comment section meeting "because KOIN news posted it on their website."

The lack of information on tolling shared with residents is appalling, we requested ODOT extend the public comment period an additional 30 days.

Have a great day!

Oh by the way...Thank you for keeping me in mind. I'm never too busy for any of your referrals!

**Attachments :** Picture (Device Independent Bitmap) 1.jpg (3 kb)



**ODOT I-205 Toll EA - RECORD #302 DETAIL**

**Submission Date :** 4/11/2023

**First Name :** KIRK

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Tolling on the 205 in the proposed areas will be a hardship, both financially and timewise with all the residents on the 205 corridor. Furthermore, the city streets will become clogged endangering. Our students who still use the city streets to go to and from school.  
Totaling on the 205 will also cause congestion on I5 the main corridor north and south. If the proposed improvements cannot be covered by current road tax maybe a new tax on electric vehicles can cover the cost. Or maybe taxing bicycles, which uses roadways off the freeway, which will be also more likely to be injured and accidents caused by heavy traffic no usin the 205 freeway.

<b>ODOT I-205 Toll EA - RECORD #303 DETAIL</b>
--

<b>Submission Date :</b>	4/10/2023
<b>First Name :</b>	Lynne
<b>Last Name :</b>	Hamilton
<b>Affiliation :</b>	
<b>Submission Method :</b>	Letter

**Q3. Comments :**

[Transcription of the attachment]

Dear Mandy Putney:

Thank you for the opportunity to provide comments on the Environmental Assessment (EA) on Tolling and Improvements 1-205 in Oregon.

According to Sec. 1.2, page 1-2, the full project is the Oregon Toll Program and includes tolling on 1-5 and 1-205. It notes that FHWA approved a categorical exclusion (CE) for the improvement portion of the project on I-205 before tolling was considered part of the project.

This raises some issues. 1) the entire project includes tolling other locations on I-5 and I-205 and possibly elsewhere on interstates in Oregon; 2) the EA is for a portion of the entire project and is based on a CE approval without tolling; and 3) tolling of the Interstate Highway system must be approved by the Federal Government. That approval has not yet been granted.

The entire project, tolling interstates in Oregon, requires an Environmental Impact Statement (EIS) prepared by FHWA. What ODOT has done is segmenting the project. Overland Park vs Volpe (1971) requires a hard look at all of the agency's actions. All of the ODOT actions under the direction of the Oregon legislature involve improvements and tolls on Oregon's interstate highways. Therefore an EIS should have been prepared. While an outcome of an EA may direct the preparation of an EIS, the portion of the project under the EA is still a segment of the whole.

Another failing is the consideration of only two alternatives. There are other alternatives that should be considered. The underlying issue is a lack of sufficient funds to maintain and improve Oregon highways. Thus, other ways of raising funds besides tolls should be considered. Since gas taxes may decline due to electric vehicle use, an annual tax on electric vehicles could be imposed. A cost per mile has been mentioned elsewhere; how this would be applied to Oregonians' travel out of state and to visitors eludes me. The Oregon legislature could place funds from other departments to supplement dedicated highway funds. House bill 5045 includes \$70 million for ODOT. ("The Oregonian", Sunday, April 2, 2023, p. A5) Dropping tolls when the improvements are paid off is another possibility.

P3-11. The statement under the proposed action that induced demand is less likely to occur because of strong State land use laws should be reconsidered if Senate Bill 4 becomes law. This statement is contradicted by p.3-74 where expected future growth would occur under the no build alternative.

P3-31. That mitigation measures would be included in a revised EA implies a need for an EIS.

There are several concerns under the proposed action for the potential for traffic diverting to local roads that are not discussed. The EA assumes there will be very little diversion to avoid tolls and only addresses improving certain local intersections as a solution. There will likely be considerable avoidance of I-205 toll locations. Local streets and land uses could be severely impacted by heavy traffic. There are businesses and residences along these local roads. People will have problems getting into and out of businesses and homes. Air pollution is likely to increase. Access to parks and historical sites may be affected. One historical site not mentioned is the municipal elevator in Oregon City which was added to the National Register of Historic Places in 2014. The access to this feature is the lower end of 7th street, just beyond the narrow historic bridge. Traffic avoiding I-205 will go this route to Oregon City and Milwaukie. (I already go this way as I don't like I-205.) Other features and park accesses may also be adversely affected by traffic. The Legacy Meridian hospital will likely be adversely affected by traffic avoiding I-205. A more realistic estimate of traffic avoiding tolls and the direct and indirect impacts of this traffic must be considered.

P. 3-112. Cumulative impacts of the entire project also need to be addressed.

Tolling is expected to be a part of the new I-5 bridge over the Columbia River. If tolling the Oregon Interstate Highway system is approved, there will likely be other tolling locations. Someone driving across Oregon could be hit by tolls many times. These would have cumulative impacts and direct impacts to other local areas. Has the cost of mailing toll bills to all of Oregon's out of state visitors been considered? Out of state travel does not seem to be considered by this project.

P. 3-120/123. This section fails to discuss the expected impacts of future tolls or impacts of traffic avoiding tolls. The proposed action presents an economic advantage for EVs using the tolled sections over otherwise fueled vehicles. Operators of gasoline and diesel vehicles will be paying both the gas tax and the toll. An increase in the costs of goods and services related to these additional costs seems likely. Long-distance travel, heavy vehicles, and electrical outages necessitate other forms of fuel which will have to be paid for in addition to tolls.

P. 3-127/128. The final paragraph is questionable. That "some traffic" would divert vastly underestimates reality. A thorough analysis of traffic diversion is required.

There is another cultural impact not mentioned, perhaps not considered by younger generations. Tolling, especially throughout the State, contributes to another loss of privacy. Once tolls are in place the State will have a toll record of every car and every mile travelled. Toll booths instead of transponders and cameras would remedy this issue.

An EA, traditionally, is a brief document. This EA requires extensive review, more appropriate for an EIS.

**Attachments :**

L Hamilton\_Letter\_2023.pdf (134 kb)

Mandy Putney  
ODOT Urban Mobility Office  
18277 Boones Ferry Rd.  
Tualatin, OR 97224

16750 SW King Charles Ave.  
King City, OR 97224  
April 4, 2023

Dear Mandy Putney:

Thank you for the opportunity to provide comments on the Environmental Assessment (EA) on Tolling and Improvements I-205 in Oregon.

According to Sec. 1.2, page 1-2, the full project is the Oregon Toll Program and includes tolling on I-5 and I-205. It notes that FHWA approved a categorical exclusion (CE) for the improvement portion of the project on I-205 before tolling was considered part of the project.

This raises some issues. 1) the entire project includes tolling other locations on I-5 and I-205 and possibly elsewhere on interstates in Oregon; 2) the EA is for a portion of the entire project and is based on a CE approval without tolling; and 3) tolling of the Interstate Highway system must be approved by the Federal Government. That approval has not yet been granted.

The entire project, tolling interstates in Oregon, requires an Environmental Impact Statement (EIS) prepared by FHWA. What ODOT has done is segmenting the project. *Overland Park vs Volpe* (1971) requires a hard look at all of the agency's actions. All of the ODOT actions under the direction of the Oregon legislature involve improvements and tolls on Oregon's interstate highways. Therefore an EIS should have been prepared. While an outcome of an EA may direct the preparation of an EIS, the portion of the project under the EA is still a segment of the whole.

Another failing is the consideration of only two alternatives. There are other alternatives that should be considered. The underlying issue is a lack of sufficient funds to maintain and improve Oregon highways. Thus, other ways of raising funds besides tolls should be considered. Since gas taxes may decline due to electric vehicle use, an annual tax on electric vehicles could be imposed. A cost per mile has been mentioned elsewhere; how this would be applied to Oregonians' travel out of state and to visitors eludes me. The Oregon legislature could place funds from other departments to supplement dedicated highway funds. House bill 5045 includes \$70 million for ODOT. ("The Oregonian", Sunday, April 2, 2023, p. A5) Dropping tolls when the improvements are paid off is another possibility.

P3-11. The statement under the proposed action that induced demand is less likely to occur because of strong State land use laws should be reconsidered if Senate Bill 4 becomes law. This statement is contradicted by p.3-74 where expected future growth would occur under the no build alternative.

P3-31. That mitigation measures would be included in a revised EA implies a need for an EIS.

There are several concerns under the proposed action for the potential for traffic diverting to local roads that are not discussed. The EA assumes there will be very little diversion to avoid tolls and only addresses improving certain local intersections as a solution. There will likely be considerable

avoidance of I-205 toll locations. Local streets and land uses could be severely impacted by heavy traffic. There are businesses and residences along these local roads. People will have problems getting into and out of businesses and homes. Air pollution is likely to increase. Access to parks and historical sites may be affected. One historical site not mentioned is the municipal elevator in Oregon City which was added to the National Register of Historic Places in 2014. The access to this feature is the lower end of 7<sup>th</sup> street, just beyond the narrow historic bridge. Traffic avoiding I-205 will go this route to Oregon City and Milwaukie. (I already go this way as I don't like I-205.) Other features and park accesses may also be adversely affected by traffic. The Legacy Meridian hospital will likely be adversely affected by traffic avoiding I-205. A more realistic estimate of traffic avoiding tolls and the direct and indirect impacts of this traffic must be considered.

P. 3-112. Cumulative impacts of the entire project also need to be addressed. Tolling is expected to be a part of the new I-5 bridge over the Columbia River. If tolling the Oregon Interstate Highway system is approved, there will likely be other tolling locations. Someone driving across Oregon could be hit by tolls many times. These would have cumulative impacts and direct impacts to other local areas. Has the cost of mailing toll bills to all of Oregon's out of state visitors been considered? Out of state travel does not seem to be considered by this project.

P. 3-120/123. This section fails to discuss the expected impacts of future tolls or impacts of traffic avoiding tolls. The proposed action presents an economic advantage for EVs using the tolled sections over otherwise fueled vehicles. Operators of gasoline and diesel vehicles will be paying both the gas tax and the toll. An increase in the costs of goods and services related to these additional costs seems likely. Long-distance travel, heavy vehicles, and electrical outages necessitate other forms of fuel which will have to be paid for in addition to tolls.

P. 3-127/128. The final paragraph is questionable. That "some traffic" would divert vastly underestimates reality. A thorough analysis of traffic diversion is required.

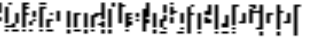
There is another cultural impact not mentioned, perhaps not considered by younger generations. Tolling, especially throughout the State, contributes to another loss of privacy. Once tolls are in place the State will have a toll record of every car and every mile travelled. Toll booths instead of transponders and cameras would remedy this issue.

An EA, traditionally, is a brief document. This EA requires extensive review, more appropriate for an EIS.

Cc: Sen. Wyden

Sincerely,

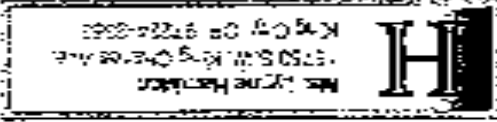
  
Lynne Hamilton



87224-767399

Graydon Polymers  
18777 Brownberry Rd  
Crestview, FL 32114

4 APR 2023 PM  
PORTLAND OR 97211



**ODOT I-205 Toll EA - RECORD #304 DETAIL**

**Submission Date :** 4/11/2023

**First Name :** Judith

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Willamette Falls Dr in West Linn is already badly congested with traffic from I205. West Linn School District is in the process of building a new middle school on Willamette Falls Drive that will open in fall 2023. I believe the increased traffic that tolls would create would be a safety issue for the children. Frequently drivers speed and fail to stop for individuals attempting to cross the street along Willamette Falls drive. Side walks along Willamette Falls Drive are spotty for children walking to school and there are no bike lanes on Willamette Falls drive in that area. We do not want to make this street more dangerous than it already is for our children. In addition it is discriminatory to those living on fixed incomes or low incomes in West Linn because it limits their access to their community, and the greater metropolitan area. I strongly oppose the tolls for these reasons. The size type you use for comments is way too small and discriminates against older individuals who may wish to comment.



<b>ODOT I-205 Toll EA - RECORD #305 DETAIL</b>
--

**Submission Date :** 4/12/2023  
**First Name :** Trent  
**Last Name :** Wilson  
**Affiliation :** Clackamas County Coordinating Committee  
**Submission Method :** Letter

**Q3. Comments :** Hello Mandy and ODOT Team:

Attached is the comment letter on the Environmental Analysis for the I-205 Toll Project from the Clackamas County Coordinating Committee (C4). Please provide confirmation that this letter was received at your earliest convenience. And please also feel welcome to reach out if you have questions.

Thank you,

**Attachments :** 2023\_04\_10 C4 Comment Letter on I-205 EA.pdf (195 kb)



April 10, 2023

Mandy Putney  
Oregon Department of Transportation  
Urban Mobility Office  
355 Capitol Street NE, MS 11  
Salem, OR 97301

*Via email*

Dear Ms. Putney:

Thank you for the opportunity to comment on the I-205 Toll Project Draft Environmental Analysis (EA) published by the Oregon Department of Transportation (ODOT) in February 2023. The Clackamas County Coordinating Committee (C4) hosts representatives of communities from across the county, including the proposed toll area and areas of impact. Our comments represent a unified voice on the proposed project from the County, cities, special districts, and community representatives who comprise C4.

C4 has commented on the progress of the I-205 capital and toll project since 2017. The primary reason our communities have long advocated for a solution to the bottleneck created by the last two-lane segment of I-205 in Oregon, which was that it caused highway drivers to reroute into local neighborhoods for years.

We have major concerns with ODOT's modeling, analysis, proposed mitigations, and overall process related to the development of the toll project and Draft EA. Many of our jurisdictions are providing detailed technical comments in separate letters. Our comments are intended to highlight our most significant issues in the Draft EA.

**First, ODOT has not adequately demonstrated how the Build Alternative would reduce diversion from the highway onto local streets, and thereby improve traffic safety both on and off the tolled system.** Currently, traffic diverts off I-205 onto the local system due to the bottleneck created by the last remaining two-lane section of I-205 in Oregon; tolling would induce additional diversion as drivers make an economic choice to avoid the toll.

The Draft EA presents multiple goals relating to diversion and safety, including "limit additional traffic diversion from tolls on I-205 to adjacent roads and neighborhoods."<sup>1</sup> However, ODOT's analysis shows alarming traffic changes at multiple arterial locations, including increases of 86.5-114.5% along routes that

---

<sup>1</sup> I-205 Toll Project Environmental Assessment, Oregon Department of Transportation, February 2023; page 1-7

are popular for diversion today.<sup>2</sup> The comparison of daily traffic volumes shows a 25% decrease in traffic on I-205 under the build scenario and a corresponding 31% increase on SW Borland Road east of SW Stafford Road as well as an 11% increase on OR-99E through Canby.<sup>3</sup> Additionally, ODOT failed to study several intersections that already see significant diversion today.

ODOT has suggested that drivers would change their mode of travel due to tolling, using transit or active transportation as an alternative. However, our communities face a severe lack of transit, both in terms of convenient access and frequency. We understand that there is a restriction in the Oregon Constitution on the use of certain funds for transit—we have not received a clear response from ODOT whether improved transit would be an allowable use of tolling revenues. Furthermore, the EA studied how tolling would affect transit times for the existing system, but did not perform a comprehensive evaluation of the needed transit system to make it a viable alternative to driving.

Amalgamating tolling (a financial mechanism new to the region that will create diversion) with a capital project (to relieve a bottleneck and reduce diversion) conceals the impacts caused solely by tolling, particularly in light of those two components being fundamentally at odds with each other in terms of diversion. **We conclude that a suite of alternatives, including construction of the capital project without tolling, would be the best mechanism for affected communities to understand both the bifurcated and comprehensive impacts of ODOT's proposal.**

**Second, economic impacts on our communities have not been fully addressed.** The economic analysis is fraught with assumptions, as ODOT places great emphasis on the creation of short-term construction jobs but fails to consider impacts to local small businesses on a sufficiently granular and localized scale.<sup>4</sup> As representatives of urban, suburban, and rural communities in Clackamas County, we are deeply concerned that the plan as proposed would economically disadvantage our communities while communities in Washington and Multnomah counties continue to prosper.

ODOT claims that “additional business revenues and employment in nearby commercial areas [will result] from projected changes in traffic volumes due to vehicles rerouting off I-205.”<sup>5</sup> We are concerned about economic impacts spreading across the region and state as two things happen simultaneously—businesses raise prices to build the cost of tolling into their bottom lines, and toll-payers reduce spending on goods and services to balance their personal budgets.

Yet the residents and business owners we talk to have expressed deep concern about diversion resulting in gridlock on local streets. Small businesses, in particular, are concerned about financial detriment from customers choosing not to traverse the tolled corridor or gridlocked side streets. Residents are concerned

---

<sup>2</sup> I-205 Toll Project Environmental Assessment Transportation Technical Report, Oregon Department of Transportation, February 2023; page 64

<sup>3</sup> I-205 Transportation Technical Report; page 73

<sup>4</sup> I-205 Toll Project Environmental Assessment Cumulative Impacts Technical Report, Oregon Department of Transportation, February 2023; page 26

<sup>5</sup> Environmental Assessment; page 3-124

about safety for kids and seniors as well as the potential for property values to decrease in high diversion neighborhoods.

In fact, because modeling has only been performed at 'peak' hours, there is no way to understand how tolls would affect economic or tourism activity in the evening or on weekends. **Therefore, it is essential that the economic analysis must be more localized and potentially add further mitigations, particularly along local main streets in Oregon City, West Linn, and Canby where diversion is expected to be highest.**

Our concern extends to the broader economic impacts to individuals who need access to work, school childcare, healthcare, and other fundamental needs and cannot change their schedule to access off-peak toll rates. We also are concerned about the localized air quality and noise impacts for nearby neighborhoods and schools.

**Third, there is a continued lack of financial transparency from ODOT.** Local jurisdictions have asked ODOT repeatedly for comprehensive, transparent financial information. It was only after a community group submitted a public records request that ODOT shared the Level 2 Traffic and Revenue Study with impacted jurisdictions. The Level 2 Traffic and Revenue Study shows that projected tolling revenues would finance \$500-800 million in construction funding.<sup>6</sup> That amount is insufficient to complete the capital project and construct NEPA-required and locally preferred mitigations.

**We cannot accurately evaluate the adequacy of mitigation proposals without a complete revenue picture, including an understanding of how ODOT plans to pay for the complete project and share revenue with local jurisdictions to address costs associated with diversion including future mitigations, local capacity projects, and increased maintenance.**

**Finally, the Draft EA fails to fully consider cumulative environmental impacts, particularly in light of ODOT's parallel project, the Regional Mobility Pricing Project (RMPP), which proposes congestion pricing along the same corridor as the I-205 Toll Project.**<sup>7</sup> We believe RMPP should be considered a Reasonably Foreseeable Future Action, as its environmental review is underway with a Scoping Comment Period held from November 18, 2022 to January 6, 2023.<sup>8</sup> ODOT should analyze the impacts of all proposed projects within the Urban Mobility Office to develop an implementation strategy that has the least impacts on the local system.

---

<sup>6</sup> Fact Sheet: I-205 Toll Project Level 2 Toll Traffic and Revenue Study, Oregon Department of Transportation, December 16, 2022; page 4

<sup>7</sup> Regional Mobility Pricing Project: Proposed Action for NEPA Analysis, Oregon Department of Transportation, November 2022; pages 1, 5

<sup>8</sup> Regional Mobility Pricing Project Scoping Comment Period, Oregon Department of Transportation, <https://www.oregon.gov/odot/tolling/Pages/RMPP-Scoping-Comment-Period.aspx> (accessed March 27, 2023)

Furthermore, ODOT staff has stated the I-205 Toll Project would fund the back office for statewide tolling projects, including RMPP and the Interstate Bridge Replacement.<sup>9</sup> Shifting this statewide financial burden to our local communities is unfair.

Noting the above comments, in conjunction with the additional technical comments from local jurisdictions, the C4 members request a full Environmental Impact Statement for the I-205 Toll Project alongside FHWA direction to coordinate the I-205 Toll Project alongside the Regional Mobility Pricing Project for the purposes of comprehensive environmental analysis.

As our jurisdictions and technical experts weigh in on the substance of the EA, C4 reserves the right to supplement our comments.

Thank you again for the opportunity to comment.

Sincerely,



Paul Savas, Commissioner  
Clackamas County  
C4 Co-Chair  
R1ACT Vice Chair



Brian Hodson, Mayor  
City of Canby  
C4 Co-Chair  
R1ACT Member

CC: Kris Strickler, ODOT Director  
Keith Lynch, FHWA

**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

---

<sup>9</sup> Mandy Putney, Oregon Department of Transportation Urban Mobility Office Strategic Initiatives Director, via email to Clackamas County staff, January 5, 2023

**ODOT I-205 Toll EA - RECORD #306 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** Jerry

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I feel this project needs to be decided by the people. Put it on the ballot.

**ODOT I-205 Toll EA - RECORD #307 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** Cindy

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Me and my family are having to pay more on everything right now, more rent, higher cost for food, gas is higher, clothes and furniture prices are higher etc. and etc. My pay check is all spent before I ever get it. We do not have money to pay for toll to drive our vehicle on the roads that now have so many pot holes that I have to buy new tires. You are terrible for even coming up with this terrible idea. Please for the love of people and God do not do this or at least put it out for a vote. You will start seeing alot more people having to find a new place to live as we just can't afford this. STOP what you are doing and do not do this, please.

**ODOT I-205 Toll EA - RECORD #308 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** Sally Jo

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** STOP THIS RIDICULOUS TOLL PROJECT!! PEOPLE WITH GAS CARS  
HAVE TO PAY TWICE. TOTALLY NOT FAIR! TOLL LANES HAVE  
WORKED FINE IN CA, AND OTHER PLACES FOR MANY YEARS



**ODOT I-205 Toll EA - RECORD #311 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** Gertrude

**Last Name :** Hunt

**Affiliation :**

**Submission Method :** Paper form

**Q3. Comments :** More stop signs through Willamette Dr, and crosswalk blinking lights. It's bad on Willamette Dr, it sometimes takes 2 hours from 11th St + Oregon City/West Linn bridge. Traffic just increases. We don't take the roads during peak traffic.

Maybe residents of West Linn could have a discount because it is not fair for West Linn to have to pay two tolls. We're slammed.

West Linn should have a good discount. Not all of us are wealthy out here.

The road over Peace Mountain + Johnson Road will be worse also. Willamette is the melting pot of those shortcuts.

Taxes need to go down too.

**ODOT I-205 Toll EA - RECORD #312 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** Douglas

**Last Name :** Richardson

**Affiliation :**

**Submission Method :** Paper form

**Q3. Comments :** Extend Hwy 224 over Selwood to I-5! Selwood-Milwaky missing link?

This will divert traffic from I-205 to I-5 MORONS! IDIOTIC!

And the lightrail goes by EMPTY! Brilliant!

Salem only has 1 bridge How many are there North of Salem?  
Live in McMinnville, work in Tualatin - gas \$ poor

White but Latino activist who scrubs BLM graffiti!

A toll is the wrong way to fund this project

A property tax on any property over \$499,999.00 would probably do the trick!

Charbonneau bridge is too small. Wilsonville I-5 not enough

The rich have left Portland + moved South creating this bottleneck. Now instead of this being taken care of by property taxes they want to place it on the backs of the poor ethnic communities who can no longer afford to live here and have to commute Lake Oswego to Sherwood to Wilsonville to Oregon City. This bottleneck on I-5 between Bridgeport + Wilsonville + on I-205 Oregon City to Tualatin is unacceptable - created by the mass exodus of the wealthy who don't want to pay for the infrastructure development needed to accommodate them. Salem lost its bridge to "zero carbon footprint Portland activists." There is no road on bridge from Woodburn to MacMinville just a tiny back road + a ferry @ ??????. And countless other rural projects that go unfunded so we can sink state funds only into Metro projects so the rich get richer + rurals stay where they belong. "The Woodburn should pay to pass toll" is racist + keep Salem cut off from the whole region. Make the rich pay their own way!

A toll is not the answer

**ODOT I-205 Toll EA - RECORD #313 DETAIL****Submission Date :** 4/12/2023**First Name :** Michele Mey**Last Name :****Affiliation :****Submission Method :** Accessible form**Q3. Comments :** I live on the main alternate route, Willamette Falls Dr. I am worried that I will not be able to get to and from my home. It is already difficult when there's a back up on the freeway. My home value has already gone down with the idea of the toll and I know it will go down drastically if the toll is put in place. In addition, those of us that live right near the toll booth will have to pay to go anywhere.

<b>ODOT I-205 Toll EA - RECORD #314 DETAIL</b>
--

**Submission Date :** 4/12/2023

**First Name :** Andrea L

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** People who regularly utilize this portion of the freeway will look for alternative routes to avoid further taxation and fees. This complicates the local roadways and neighborhoods.

**ODOT I-205 Toll EA - RECORD #315 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** Gary and Joyce

**Last Name :** Bonds

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** We want this to be voted on by the people!!!! There is no usable public transit available so it will not ease congestion! We don't want to be like back east where there are so many toll roads. That's why we live here where the roads are free. The ones who it will really hurt are the elderly and low income! I thought government was supposed to be of and for the people so lets vote!!!!!!

**ODOT I-205 Toll EA - RECORD #316 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** Jason

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I already pay more than my share in taxes that a portion of is supposed to go towards road upkeep. Where is that money? Why do we have to pay even more when you don't even keep our roads up now. The congestion is because you let more and more people move into Oregon and let them work out jobs and not pay their taxes.

**ODOT I-205 Toll EA - RECORD #317 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** James

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I have a daughter that commutes to northeast Portland from Tualitan. She makes just enough to survive in her apartment. This would add either \$120 a month to her expenses or another 40 minutes a day if she avoids the toll. Ridiculous.

Secondly, as a West Linn resident I am amazed this has been planned for so long (the toll). without getting public input until now. The traffic jams each day on HWY 43 are very long. Add hundreds of cars each day, at least, trying to avoid tolls and West Linn would come to a standstill, as well as vehicles speeding through residential neighborhoods to attempt to save time and get around the congestion. I suppose the same will happen in Lo, Wilsonville and Oregon City. The Governor and other politicians should figure out priorities so that working people aren't continually being put upon due to system failures and poor planning.

<b>ODOT I-205 Toll EA - RECORD #318 DETAIL</b>
--

**Submission Date :** 4/12/2023

**First Name :** Beth

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I am concerned about non-residents using local side streets to bypass the toll.



**ODOT I-205 Toll EA - RECORD #319 DETAIL****Submission Date :** 4/12/2023**First Name :** Tony**Last Name :****Affiliation :****Submission Method :** Accessible form**Q3. Comments :** The underlying theme that I have seen through all of this is the project trying to reduce the traffic by simply tolling and requiring vehicles to pay. If all vehicles that currently travel pay the toll there would be no reduction in traffic. I understand tolling to pay for something but I don't see what that something is here. Perhaps add a lane with the toll for use during peak hours and collect a toll for its use.

**ODOT I-205 Toll EA - RECORD #320 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** Nora

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I object to tolling on any of our public roads. We pay sufficient taxes - if more revenue is needed, taxes should increase accordingly. Some sort of taxation on EV's should be considered.

**ODOT I-205 Toll EA - RECORD #321 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** Daniel

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I believe an appropriate amount of work has been done to address the needs of this project including correct goals and objectives- to raise much needed money and to Ave a direct effect on traffic control. The factors regarding mitigation have also been well thought and addressed to my satisfaction. I hope ODOT precedes quickly and efficiently with plan to set tolls!

**ODOT I-205 Toll EA - RECORD #322 DETAIL****Submission Date :** 4/13/2023**First Name :** Gordon**Last Name :****Affiliation :****Submission Method :** Accessible form**Q3. Comments :** ODOT cites a 26% reduction in accidents on I205 but tolling will push a SIGNIFICANT amount of traffic onto a major bike route that currently has no shoulder or sidewalk (Borland Rd from Ek Rd to Fields Bridge Park and Willamette Dr from 10th St to Willamette Dr). Tolling will result in a net increase in accidents and pedestrian fatalities.

**ODOT I-205 Toll EA - RECORD #323 DETAIL****Submission Date :** 4/13/2023**First Name :** Juliette**Last Name :****Affiliation :****Submission Method :** Accessible form

**Q3. Comments :** The transportation analysis needs to consider how cars using other roads to avoid tolls could slow down buses, particularly along the arch bridge that connects Oregon City to West Linn. We live just off of Sunset, and already without tolling happening the intersection by the arch bridge and exit 8 freeway entrance are backed up, especially in the evenings during rush hour time. I am concerned I won't even be able to get down the hill from my house to go anywhere at that time of the day.

I am also concerned about the cost of tolling. My husband commutes to Vancouver daily and the cost of him paying the toll daily is going to add up rapidly. Will there be any kind of discounts for people who are regular commuters?

**ODOT I-205 Toll EA - RECORD #324 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Carol

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** To burden those in the direct area proposed is an unfair use of the roadway. Elderly residents of West Linn are being imposed upon by charges and even more so with additional traffic in their local area. More research and evaluation should be considered before applying the proposed usage of 205. This additional cost factor for use of 205 by local residents is unfair and unjust.

**ODOT I-205 Toll EA - RECORD #325 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Matt

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** It is not the will of the community members. and this is a punitive TAX

**ODOT I-205 Toll EA - RECORD #326 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** m.

**Last Name :**

**Affiliation :** votebeforetolls!

**Submission Method :** Accessible form

**Q3. Comments :** The traffic diversion to side streets like Willamette Drive, will **NEGATIVELY** impact the liveability of W. Drive & associated streets in WL.



**ODOT I-205 Toll EA - RECORD #327 DETAIL**

**Submission Date :** 4/13/2023  
**First Name :** Cheyenne  
**Last Name :** Weil  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Hello,

Please accept yet another letter expressing some concerns about the upcoming localized toll section of the 205 freeway.

The most obvious and immediate concern as someone who lives in Willamette is that already Willamette Falls dr through the Willamette downtown has gotten horrible in the past few years with people cutting off the freeway to try to beat the traffic, and the most aggressive cars further dodge this by driving the parallel residential streets to bypass the downtown. This is an extremely isolated neighborhood that is entirely car dependent--there is no train obviously, the bus does not run on the weekends, there are few sidewalks/bikepaths/bike lanes, and no safe way to get out of this neighborhood without using a car. It's already difficult enough to access or get out of Willamette if you live here, if you have to get to the middle or high school to pick up/drop off kids, etc. I fear drivers bypassing the toll section by driving through Willamette will increase in the extremes, adding even more vehicles to a neighborhood already bogged down and made miserable by traffic dodgers.

It also places an unfair burden upon people who do not have the luxury to work from home and who live or work in any of the areas between the Stafford & Abernethy bridge exits, facing tolls not only to get to school, to buy groceries, but to get to and from work as well. I hear the tolls will vary in amount based upon timing, which is even worse as it further affects those who cannot choose their work or school hours. Creating discounts for low-income people sounds great in theory, but it also places the burden entirely upon them to always be trying to prove their low income status (by what arbitrary metric? Then will they need to re-apply for renewal? Every 6 months? Every year?. What if English is not the first language?) How are you going to reach everyone who is eligible?

Transient traffic is never very conscientious about the neighborhoods it cuts through and it feels stressful and oppressive already. I hate to think that there will be even more extreme traffic in our neighborhood, on the streets when I'm trying to go running, making me worry more about the kids riding their bikes around. Having to pay \$2.50 or whatever every time I need to leave my neighborhood just adds insult to injury.

<b>ODOT I-205 Toll EA - RECORD #328 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Jim

**Last Name :** Baucom

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Regarding tolling input from taxpayers, I heartily disagree with the need for tolling and additional taxes for resources that are currently built and whose maintenance are already provided under law from gas taxes.  
I'm truly tired of being an experiment for more Ivy league theories that burden the populace with more taxes to pay for pers benefits that are overly generous.  
I'm also tired of the war on cars, since you do not provide a safe viable alternative.  
Why do you insist on burdening the metro area with a regressive toll tax?  
How does this improve traffic?  
I don't see it as beneficial, since autos will need to slow down to enter and exit toll plazas.  
I may think differently if we were actually building roads and not toll plazas.

<b>ODOT I-205 Toll EA - RECORD #329 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Judy

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Charge bike riders a tax to rider all the places they go. We who drive half to.

<b>ODOT I-205 Toll EA - RECORD #330 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Kevin

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** it would create more headaches for people in Washington and cause more backups and traffic constation

**ODOT I-205 Toll EA - RECORD #331 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Kouka

**Last Name :**

**Affiliation :** Citizen

**Submission Method :** Accessible form

**Q3. Comments :** An idea that will put more hardship on struggling families and push traffic to go other routes.

**ODOT I-205 Toll EA - RECORD #332 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Ann

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I'm concerned that bridges be safe in case of seismic events. Taxes should be used to pay for upgrading. Tolling is inefficient financially; collection costs are high.

**ODOT I-205 Toll EA - RECORD #333 DETAIL**

**Submission Date :** 4/13/2023  
**First Name :** Catherine  
**Last Name :** Bennett  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** I have traveled extensively in France on Autoroutes, highways, and byways. I would be confronted with three signs, one for the autoroute that indicated that there would be tolling stations, one would be the national route, and the last would be regional. I don't think there is anywhere in France that would not offer these three routes. Now, let us examine I-205. When it was built these not so many years ago, it forsook the path of what would be "the national route", i.e., Highway 99 (Canby, Aurora, Oregon City.) Instead it snaked across the virgin fields of Stafford and over the sleepy Willamette settlement of West Linn. Between I-5 and West Linn, there is no secondary route such as a highway 99 or even a state route, such as 224. NO HIGHWAY GOES THROUGH THAT AREA. You have streets and roads. You have to be pretty knowledgeable to avoid the freeway at that point. It is clear that there is no secondary route. If you have figured one out, please mail it to me so I can see how long that takes. Tolling needs necessarily to have ALTERNATE ROUTES. I really hope we can avoid tolls on the bridge over the Columbia, but at least the Glen Jackson Bridge does provide an alternate. In tolling this particular section of this highway you are ignoring fair governance. People have used this section, once deemed the prettiest freeway in Oregon, since the road was built. ODOT has not provided an alternative that would work. Therefore this decision is discriminatory.  
Bad idea! No wonder people are upset.

**ODOT I-205 Toll EA - RECORD #334 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Lori

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** This will cause a huge problem for people trying to get to the airport on time,  
pick up kids on time and get to work and time  
Cost more in gas and just an overall burden on the community



**ODOT I-205 Toll EA - RECORD #335 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Jen

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Tolling across 205 is just going to cause traffic to increase for people avoiding the toll. It would be unaffordable to go over to portland to go shopping etc. it would force people to keep their money in Washington.

**ODOT I-205 Toll EA - RECORD #336 DETAIL**

**Submission Date :** 4/14/2023  
**First Name :** The  
**Last Name :** Kelleys  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** We do not want toll's. This is wrong.

**ODOT I-205 Toll EA - RECORD #337 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Neil

**Last Name :** Branze

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** NO TOLLING OF I 5 or I 205. We are seniors on a limited fixed income and with current inflation plus the possibility of \*.00 round trip toll on those two bridges it makes life even more difficult for us. Our Drs Dentists are all in Oregon so mandatory bridge crossing for us. This is an added expense we CANNOT AFFORD!!!!

**ODOT I-205 Toll EA - RECORD #338 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** James

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Please consider the tax prayers above all. We are getting destroyed by inflation and reduced return on investments at the same time Oregon income tax hammers us all harder than most every state in the nation! PLEASE stop with the tolls! Please STOP! Please.

<b>ODOT I-205 Toll EA - RECORD #339 DETAIL</b>
--

**Submission Date :** 4/14/2023

**First Name :** Cathy

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** The transportation analysis seriously needs to consider how 1000's of cars daily using other roads to avoid tolls will be a deterrent to the communities surrounding I205 & I5.

<b>ODOT I-205 Toll EA - RECORD #340 DETAIL</b>
--

**Submission Date :** 4/14/2023

**First Name :** Judith

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** This is very expensive for those that use this corridor daily, including taxpayers, companies. The use of funds does not have a clear direct impact. Taking funds for a "test" project has no demonstrated benefit

**ODOT I-205 Toll EA - RECORD #341 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Tatiana

**Last Name :** Shevchenko

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling doesn't eliminate traffic congestion, it merely changes where it occurs. It will cause tens of thousands of vehicles to DIVERT on to side roads to avoid the tolls. ODOT estimates at total of 130,000 vehicle diversions when all Portland area freeways are tolled. That is equivalent to every vehicle that crosses the Interstate Bridge on an average day, suddenly using side roads and making the neighborhood roads more congested and less safe. When added up, a round trip costs \$28.10 on I-5 or \$31.60 on I-205 each day. That means up to \$158 per 5-day week, and over \$600 per month and over \$7,000 per year. TOLLS are hugely inefficient with the "cost of collection" running 30-60% in many areas. Washington workers already pay over \$300 million a year in Oregon Income Taxes. We're already paying more than our "fair share".

**ODOT I-205 Toll EA - RECORD #342 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Natalia

**Last Name :** Shevchenko

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling doesn't eliminate traffic congestion, it merely changes where it occurs. It will cause tens of thousands of vehicles to DIVERT on to side roads to avoid the tolls. ODOT estimates at total of 130,000 vehicle diversions when all Portland area freeways are tolled. That is equivalent to every vehicle that crosses the Interstate Bridge on an average day, suddenly using side roads and making the neighborhood roads more congested and less safe. When added up, a round trip costs \$28.10 on I-5 or \$31.60 on I-205 each day. That means up to \$158 per 5-day week, and over \$600 per month and over \$7,000 per year. TOLLS are hugely inefficient with the "cost of collection" running 30-60% in many areas. Washington workers already pay over \$300 million a year in Oregon Income Taxes. We're already paying more than our "fair share".



<b>ODOT I-205 Toll EA - RECORD #343 DETAIL</b>
--

**Submission Date :** 4/14/2023

**First Name :** Alex

**Last Name :** Maier

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** You are greedy! I do not support charging tolls when the city cannot even manage the budget it has now. Clean up Portland first!

<b>ODOT I-205 Toll EA - RECORD #344 DETAIL</b>
--

<b>Submission Date :</b>	4/14/2023
<b>First Name :</b>	Blaine
<b>Last Name :</b>	Ackley
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	You should have one toll free lane.

**ODOT I-205 Toll EA - RECORD #345 DETAIL****Submission Date :** 4/14/2023**First Name :** Vera**Last Name :** Shevchenko**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling doesn't eliminate traffic congestion, it merely changes where it occurs. It will cause tens of thousands of vehicles to DIVERT on to side roads to avoid the tolls. ODOT estimates at total of 130,000 vehicle diversions when all Portland area freeways are tolled. That is equivalent to every vehicle that crosses the Interstate Bridge on an average day, suddenly using side roads and making the neighborhood roads more congested and less safe. When added up, a round trip costs \$28.10 on I-5 or \$31.60 on I-205 each day. That means up to \$158 per 5-day week, and over \$600 per month and over \$7,000 per year. TOLLS are hugely inefficient with the "cost of collection" running 30-60% in many areas. Washington workers already pay over \$300 million a year in Oregon Income Taxes. We're already paying more than our "fair share".

**ODOT I-205 Toll EA - RECORD #346 DETAIL****Submission Date :** 4/14/2023**First Name :** Paul**Last Name :** Long**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I would like to see government serve the people for once, instead of treating us like disposable slaves. It's immoral what you're doing...tolling a bridge that's 40 years old, fully paid for, and which is used primarily by family breadwinners in their daily commute. GO AWAY.

<b>ODOT I-205 Toll EA - RECORD #347 DETAIL</b>
--

**Submission Date :** 4/14/2023

**First Name :** Michael

**Last Name :** Taggart

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** No tolling in Oregon. ODOT continues to ignore substantial objection from citizens, tax payers, local city councils, local mayors and local county commissioners to the point the citizens have to create a ballot initiative to force a statewide vote to circumvent this.

**ODOT I-205 Toll EA - RECORD #348 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Galina

**Last Name :** Kararush

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling doesn't eliminate traffic congestion, it merely changes where it occurs. It will cause tens of thousands of vehicles to DIVERT on to side roads to avoid the tolls. ODOT estimates at total of 130,000 vehicle diversions when all Portland area freeways are tolled. That is equivalent to every vehicle that crosses the Interstate Bridge on an average day, suddenly using side roads and making the neighborhood roads more congested and less safe. When added up, a round trip costs \$28.10 on I-5 or \$31.60 on I-205 each day. That means up to \$158 per 5-day week, and over \$600 per month and over \$7,000 per year. TOLLS are hugely inefficient with the "cost of collection" running 30-60% in many areas. Washington workers already pay over \$300 million a year in Oregon Income Taxes. We're already paying more than our "fair share".

**ODOT I-205 Toll EA - RECORD #349 DETAIL****Submission Date :** 4/14/2023**First Name :** Ruslan**Last Name :** Kovtun**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** It will be a regressive tax that most hard working families can't afford. ODOT will truly be creating "roads for the rich. We have plenty of poverty and homeless in the city, how about instead of finding another way to suck more money out of hard working citizens who already pay above and beyond enough, brain storm this hard how to help the mentally ill and homeless families that are camped out along the sides of the freeways, you are creating more stress and anxieties for our communities who are already struggling with depression and suicide. Tolling will not eliminate traffic it'll just create congestion else where, because citizens who take these freeway daily to commute to work to pay your outrageous taxes, will be forced to take alternative routes.

**ODOT I-205 Toll EA - RECORD #350 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Bryan

**Last Name :** Kelly

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** \$15 each way TOLLS will harm all but the wealthiest families. It will be a regressive tax that most hard working families can't afford. ODOT will truly be creating "roads for the rich". Tolling doesn't eliminate traffic congestion, it merely changes where it occurs. It will cause tens of thousands of vehicles to DIVERT on to side roads to avoid the tolls. ODOT estimates at total of 130,000 vehicle diversions when all Portland area freeways are tolled. That is equivalent to every vehicle that crosses the Interstate Bridge on an average day, suddenly using side roads and making the neighborhood roads more congested and less safe.



**ODOT I-205 Toll EA - RECORD #351 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Karina

**Last Name :** Kararush

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** It will be a regressive tax that most hard working families can't afford. ODOT will truly be creating "roads for the rich. We have plenty of poverty and homeless in the city, instead of finding another way to suck more money out of hard working citizens who already pay above and beyond enough, brain storm this hard how to help the mentally ill and homeless that are camped out along the sides of the freeways. you are creating more stress and anxieties for our communities who are already struggling with depression and suicide. Tolling will not eliminate traffic it'll just create congestion else where, because citizens who take the freeway daily to commute to work to pay your outrageous taxes, will be forced to take alternative routes. Less people will be driving on your freeways, less people will be working in Oregon, less tax money for you and then you'll be left supporting your homeless all by your self.

<b>ODOT I-205 Toll EA - RECORD #353 DETAIL</b>
--

<b>Submission Date :</b>	4/14/2023
<b>First Name :</b>	Chris
<b>Last Name :</b>	Lucia
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	No tolling!

**ODOT I-205 Toll EA - RECORD #354 DETAIL****Submission Date :** 4/14/2023**First Name :** Ashley**Last Name :** Lewis**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I live on the county lines of Multnomah and Clackamas; however I work in Tigard. Public transit does not go near my work location, so I would continue driving to work. The goal to get people to take public transit won't work for people like me. I also cannot afford to pay nearly 10 dollars a day back and forth commut so I would in turn go through Sellwood, thru Sellwood bridge, which is already jam packed as it, only to add to the congestion. Increase the gas tax, or propose a new tax for roads, although the taxes we pay are already extremely high.

<b>ODOT I-205 Toll EA - RECORD #356 DETAIL</b>
--

**Submission Date :** 4/14/2023

**First Name :** Jill

**Last Name :** Ross

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling impacts people with middle and lower incomes the most. It also negatively impacts neighborhoods because drivers who can't afford, or who want to avoid the tolls, will be forced to use service streets.

**ODOT I-205 Toll EA - RECORD #357 DETAIL****Submission Date :** 4/14/2023**First Name :** Robert**Last Name :** Lemon**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** People using the freeways to commute to work already pay Oregon income taxes. Adding an additional \$20-30 to a round trip to work is outlandish. Fuel, road use and other taxes already in place eat up our income. Retired folks do not have an option to avoid this tax. Nor alternatives to increase income. Most of the monies received by this additional tax is used up in the process and maintenance fees to collect the tax.

<b>ODOT I-205 Toll EA - RECORD #358 DETAIL</b>
--

**Submission Date :** 4/14/2023

**First Name :** Joshua

**Last Name :** Bradley

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** These proposed tolls will place undue hardships on my family and my local communities. Both Economic and quality of life. I do not support tolling our existing freeways in the United States period!

**ODOT I-205 Toll EA - RECORD #359 DETAIL****Submission Date :** 4/14/2023**First Name :** Vanessa**Last Name :** Huffman**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am opposed to the tolling of the 205 and other portland freeways. I am a vancouver wa resident. If you want portland to succeed and to not go down in flames even more you will want Washington residents to continue to come across the 205 into oregon to work, shop, eat etc... to help support the city. The families who actually work hard to make an honest living and don't just rely on the government won't be able to afford to pay the high tolls. All businesses will be hurt by this decision. REJECT

**ODOT I-205 Toll EA - RECORD #360 DETAIL****Submission Date :** 4/14/2023**First Name :** Anna**Last Name :** Haynes**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I would like to never have a toll on any bridges connecting OR and WA. It is already taxing trying to get home every day that tolling it would create a grid lock like no other that would waste time and money. OR would loose so much income tax as people would never work in OR and since Portland is feed significantly by WA residents the impact would only lessen their chances of providing services to the community.



<b>ODOT I-205 Toll EA - RECORD #361 DETAIL</b>
--

**Submission Date :** 4/14/2023

**First Name :** Chris

**Last Name :** Williams

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The area has such limited options for alternate routes. Traffic already diverts through our neighborhoods when I-205 has an accident or is slow. A toll will just make this a daily occurrence and much worse. We like our neighborhood and we don't want to see it become an alternate thoroughfare for what's intended to be traffic along I-205. Tax us in our counties & communities rather than tolling the I-205. It's much fairer and everyone shares the burden.

**ODOT I-205 Toll EA - RECORD #362 DETAIL****Submission Date :** 4/14/2023**First Name :** Lowell**Last Name :** Sochia**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I have lived in Oregon for the majority of my life and have watched patiently and not spoken up about items that Oregonians have to just watch lawmakers do and endure the changes. This change affects so many people on so many levels and lawmakers just do not care at all. This is going to impact families income which with inflation is already struggling to make ends meet, this tolling project needs to be stopped, and seriously need to look at how much money you already are getting. This state is starting to lose people because of how high taxes are getting. It's absolutely ridiculous that we see this kind of Tolling project even being considered. I will be seriously considering my stay here in Oregon to be coming to an end and you can expect more like me who have this exact same feeling. What needs to happen is other money needs to be diverted from other areas. What about the homeless taxes that we are doing for these tiny homes? Why even does the state have to do this and tax the people for these things. We should be using this money for the roads. Let's consider the tolling project going through though. I can say for a fact that many people I have talked with will avoid going through the tolls and are considering using alternate routes, which means neighborhoods, which means more pedestrian accidents. I will never pay your toll, even if that means moving out of the state of Oregon.

<b>ODOT I-205 Toll EA - RECORD #363 DETAIL</b>
--

**Submission Date :** 4/14/2023  
**First Name :** Besim  
**Last Name :** Hodzic  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

<b>ODOT I-205 Toll EA - RECORD #364 DETAIL</b>
--

**Submission Date :** 4/14/2023

**First Name :** Heather

**Last Name :** Lagaso

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** You know you're just dumping traffic into the areas where back roads will exist. This is irresponsible. You wouldn't dream of doing something like this to the dunismore area, or the more affluent areas of lake o.

**ODOT I-205 Toll EA - RECORD #365 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Davin

**Last Name :** Petersen

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Oregon and Washington citizens pay enough taxes. Better state and county financial decisions and prioritization are all that is required to fund initiatives like this. Tolling is not required and needs to be removed from the environmental assessment discussion.

<b>ODOT I-205 Toll EA - RECORD #366 DETAIL</b>
--

**Submission Date :** 4/14/2023

**First Name :** Rachel

**Last Name :** McGuire

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** People who use this route twice daily for work will not be able to afford this toll. Perhaps a cheaper monthly pass could be considered.

<b>ODOT I-205 Toll EA - RECORD #367 DETAIL</b>
--

**Submission Date :** 4/14/2023

**First Name :** Christine

**Last Name :** Defendorf

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I live in gladstone and work across the river in west linn I am a mother of three and am working two jobs to help support our family. With continued costs of basic necessities going up tolling feels like a tax on the poor. There is not another viable route across the river for so many of us who use the bridge. The historical bridge in oregon city is beautiful, but will crumble with the added traffic, as it is barely a drivable bridge now.

**ODOT I-205 Toll EA - RECORD #368 DETAIL****Submission Date :** 4/14/2023**First Name :** Denise**Last Name :** Serafin**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling doesn't eliminate traffic congestion, it merely changes where it occurs. It will cause tens of thousands of vehicles to DIVERT on to side roads to avoid the tolls. ODOT estimates at total of 130,000 vehicle diversions when all Portland area freeways are tolled. That is equivalent to every vehicle that crosses the Interstate Bridge on an average day, suddenly using side roads and making the neighborhood roads more congested and less safe. Portland economist Joe Cortright revealed the information (here). There would be DOUBLE, variable rate tolling, one for a bridge and a second "per mile" toll for driving I-5 or I-205. During congested travel times, it could cost \$15.80 to use I-205 driving from Vancouver to Wilsonville.



<b>ODOT I-205 Toll EA - RECORD #369 DETAIL</b>
--

**Submission Date :** 4/14/2023

**First Name :** Gerald

**Last Name :** Cox

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** No to tolling. The mitigation you propose are ridiculous and will hurt businesses large and small with increased costs, which will be passed on to customers. This is another idiotic bureaucratic scheme that is inflationary and will hurt. Stop wasting gas taxes and transportation \$\$ on bike paths, mass transit and other boondoggle and use. It for our higheays.

**ODOT I-205 Toll EA - RECORD #370 DETAIL****Submission Date :** 4/14/2023**First Name :** Chris**Last Name :** Toh**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** My concern is that I don't want to pay a toll To go anywhere around the metro area. The state government already takes so much from its hard working citizens. This is just another way to take even more money out of our pockets. I notice there's no foreseeable end to the tolling. I won't be surprised that once they go up they won't come down. Even after it's served it's purpose for paying for the seismic improvements and road repairs and lanes of traffic, I'm sure the state will leave the tolls in place to just generate more revenue. Nobody wants this. Nobody wants to surrender even more income to the government. Nobody wants to have to deal with the severe traffic congestion that will result from these tolls. I say leave the idea of tolling our bridges to a popular vote, you will see that Oregonians are heavily against toll project.

<b>ODOT I-205 Toll EA - RECORD #371 DETAIL</b>
--

**Submission Date :** 4/14/2023

**First Name :** Kathy

**Last Name :** Kiaunis

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Local streets, in Stafford and West Linn, will bear the burden of interstate traffic diverted by toll avoidance. It will be a significant impact negatively affecting the livability of those communities. Singling out one section of interstate in a metro area for tolling is not an equitable taxation strategy.

**ODOT I-205 Toll EA - RECORD #372 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Dave

**Last Name :** Yang

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** What are the purposes for more taxes and fees? What have you done to eliminate current waste of taxes/fees? Exorbitant tolls will only drive commercialization in Clark County so Oregon businesses will lose sales revenue from Washington residents. Will tolling fees be included for light rail riders? If yes, this could dampen ridership of Washington residents to Jantzen Beach, so then why would light rail be needed on the new I-5 bridge? Will your evaluation include a truly unbiased consideration of this or will your desired conclusion drive what is included in your study of this topic?

<b>ODOT I-205 Toll EA - RECORD #373 DETAIL</b>
--

**Submission Date :** 4/14/2023

**First Name :** C.

**Last Name :** Brown

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The costs and tolling that takes away our freedoms and privacy. The impact of the costs of tolls to people who have to commute, and the damages to businesses affected by people who will find another route. That this is the "camel's nose under the tent," for more tolling of our freeways.

**ODOT I-205 Toll EA - RECORD #374 DETAIL****Submission Date :** 4/14/2023**First Name :** Jon**Last Name :** Maia**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** While I understand the need for funding for these projects, this toll proposal will have the most impact on low income Oregonians who must travel the tolled route for work or personal reasons. Additionally shifting the traffic onto community roads that are already themselves overburdened will increase congestion, noise, and air pollution plus accelerate wear and tear on those surface streets.

**ODOT I-205 Toll EA - RECORD #375 DETAIL****Submission Date :** 4/14/2023**First Name :** Daniel**Last Name :** Henrickson**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I do not like the idea of a toll being added anywhere in oregon. Literally anything but tolling. Or if you do the tolling. No more than 25 cents each pass. Don't charge as much as your projected. That is the biggest slap in the face to so many people that commute. Now everyone down south that commutes this way is going to want to move because of these tolls effecting there finances. Don't toll these streets!

**ODOT I-205 Toll EA - RECORD #376 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Summer

**Last Name :** Reichow

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I live right off of 205 in West Linn where you are planning on putting TWO tolls within a mile of each other. I cannot believe you think that this is feasible to have two tolls at West Linn exits. This means that residents daily drive around town will be heavily impacted by people avoiding tolls, and who can blame them when it could be \$4 a day minimum. You aren't expanding the freeway, how do you think tolls will help ease congestion? By diverting traffic! Disgusting



<b>ODOT I-205 Toll EA - RECORD #377 DETAIL</b>
--

<b>Submission Date :</b>	4/14/2023
<b>First Name :</b>	Patricia
<b>Last Name :</b>	Bellamy
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	NO!!

**ODOT I-205 Toll EA - RECORD #378 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Tina

**Last Name :** Nelson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I, and a number of my colleagues who live in Clark county, work for Head Start in Multnomah County. We work to support the children and families of the lowest income neighborhoods in Oregon. We do not do this work because it pays well (it does not). We do it because we care for the community. We pay taxes to support the residents of Oregon and the families we serve even though we do not live there ourselves. Tolling us as well is unfair and greedy. We shouldn't be charged to bring our talents, expertise, money and resources to the community. We are facing a staffing crisis as it is and unable to fill needed positions to serve the infants, toddlers and preschoolers. Imposing a toll will drive away top talent that will not be able to afford tolls. Non-profits will not be able to subsidize tolling for their workers. And the public transit system is not an option for people who conduct home visits. Please, if you must toll, consider exemptions for non-profit workers that are serving low income populations.

**ODOT I-205 Toll EA - RECORD #379 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Dave

**Last Name :** Costanzo

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Portland is already a difficult choice to frequent business. A toll on Wa. residents will only erode business even more. Wait at least until the economy stabilizes. This is an over all bad idea for all!

**ODOT I-205 Toll EA - RECORD #382 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Alise

**Last Name :** España

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Add more financial burden to already strained households and creating situation to limit the go between places due to extra costs will hit the local economy , local families and benefit only the idiots that run these states . I for one am one of those people who often travel these routs not for work but for ventures to see family and to shop different areas. That will stop for me if this is done and would put a huge financial burden on us as a result of my husband who commutes from Vancouver to Portland having to drive this daily . Portland is already going down the toilet with people leaving in mass from multnoma county specifically this last year....this would just increase that . Not to mention that this would crowd up city streets that are not made for heavy traffic flow . How about you put your focus on actually cleaning up the shit hole this area has become rather than sucking your residents dry.

**ODOT I-205 Toll EA - RECORD #383 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** William

**Last Name :** Sinclair

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** An unfair tax on struggling families that have the misfortune of living in Washington and working in Oregon. Then being taxed by an unfair income tax and now a road toll. Criminals are running our country.

**ODOT I-205 Toll EA - RECORD #384 DETAIL****Submission Date :** 4/13/2023**First Name :** Ryan**Last Name :** Lester**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** We already have paid for these roads and the state of OR receives federal taxes to maintain these roads. Additional taxes only hurts the middle an lower class trying to get to their jobs. Also, any surface streets that would be a diversion have already had their lane reduction for.bikes and busses.

<b>ODOT I-205 Toll EA - RECORD #385 DETAIL</b>
--

**Submission Date :** 4/13/2023  
**First Name :** Ryan  
**Last Name :** Lester  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

<b>ODOT I-205 Toll EA - RECORD #386 DETAIL</b>
--

<b>Submission Date :</b>	4/13/2023
<b>First Name :</b>	Jacqueline
<b>Last Name :</b>	O'Riley
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	No tolls! We already pay enough taxes to fund any repairs and improvements.



**ODOT I-205 Toll EA - RECORD #387 DETAIL****Submission Date :** 4/13/2023**First Name :** Meg**Last Name :** VL**Affiliation :** registered nurse**Submission Method :** SurveyMonkey**Q3. Comments :** Wasting tax payer dollars looking into all these mitigation issues. We pay so many taxes already. There is already plenty of money to make the necessary road and bridge repairs without tolling. The tolling with negative affect business, school bus routes, bike riders, pedestrians because people will take the side streets. Completely ridiculous.

**ODOT I-205 Toll EA - RECORD #388 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Lauren

**Last Name :** Colas

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Who in their right mind is going to be in favor of and can afford a \$30 round trip toll during rush hour traffic? I know of no one who's going to get a \$7,000 raise from their employer to cover the annual cost of this tolling. WHAT A HORRIBLE IDEA TO DO THIS MONEY GRAB WHEN INFLATION THE LAST 2.5 YEARS HAS BEEN OVER 8%!!! Just keep gouging Washington residents. Portland has already turned into a cesspool of drugs, graffiti, homeless camps, and crime. People will just move to states they can afford to live in.

**ODOT I-205 Toll EA - RECORD #389 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Tod

**Last Name :** Paladeni

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This would be a huge mistake for our families that can barely make it pay check to pay check besides then all the side roads that would get used and create more chance of neighborhood accidents and or death and basically to a severe hardship for people to afford something g else mandatory to pay Besides the back up in traffic and harder for emergency vehicles to reach their destination

**ODOT I-205 Toll EA - RECORD #390 DETAIL****Submission Date :** 4/13/2023**First Name :** Tanya**Last Name :** Pasimio**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** While I do not oppose tolls on their own merit or benefit, many major cities which use toll highways such as Philadelphia (where I'm from) toll only one highway, leaving travelers with the choice of a slower highway or a faster one, essentially. This does not force people onto surface streets to get to work or elsewhere. Perhaps funds could come out of county taxes in Multnomah County and potentially a Clark County tax.

**ODOT I-205 Toll EA - RECORD #391 DETAIL****Submission Date :** 4/13/2023**First Name :** Michael**Last Name :** Weisman**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I own a home at "ground zero", right off of 43 in West Linn. On a good day, 43 is bumper to bumper from Lake Oswego to the Oregon City Arch Bridge from 3pm to 6pm. I can't even imagine what tolling 205 will do to the congestion on 43 and that narrow, ancient bridge. Visit WL during this time and you'll quickly understand. The additional air & noise pollution will be an added bonus for my quiet little city. Also, my wife is an essential worker in Multnomah County. She commutes to Gresham on 205 every day. Tolling is the last thing my family needs right now in this economic environment. The plan to toll 205 was clearly rushed and not thought out. The fact that residents didn't get a chance to vote on this is deceitful and, with any luck, should result in a lawsuit against ODOT.

<b>ODOT I-205 Toll EA - RECORD #393 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Christopher

**Last Name :** M Hansen

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** There is zero, logical, proof of need for what we have existed forever without-tolls. Working people will disproportionately and unjustly be discriminated against and reparations will need to be made, further making this a money pit. Local communities of color will be discriminated against with dangerous traffic increases since they disproportionately live near existing freeways and people will overrun these neighborhoods to escape unaffordable daily tolls.

**ODOT I-205 Toll EA - RECORD #394 DETAIL****Submission Date :** 4/13/2023**First Name :** Tyler**Last Name :** Badinger**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I live in Oregon city and love our downtown a toll on the bridge will gridlock our city and make it dangerous for pedestrians and bikers (like myself). We can not rearrange a 100 year old city. Also my family lives in West Linn and LO with this proposal I will have to pay anytime I want to see my family. This isn't an improvement project it is a attack on the people of Clackamas county.

**ODOT I-205 Toll EA - RECORD #395 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** MARJORIE

**Last Name :** RHINE

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Seems that 205 users are being double billed for something all other local users have received for no add'l charge. There are no mass transit options for those traveling from clackamas co to washington co regularly for work. Add only one toll location on 205 & keep the cost reasonable.



<b>ODOT I-205 Toll EA - RECORD #396 DETAIL</b>
--

<b>Submission Date :</b>	4/13/2023
<b>First Name :</b>	Tony
<b>Last Name :</b>	Adams
<b>Affiliation :</b>	concerned citizen
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Concerned about multiple crossing of multiple toll bridges daily and weekly. Just adds another burden to the family budget.

**ODOT I-205 Toll EA - RECORD #397 DETAIL****Submission Date :** 4/13/2023**First Name :** Allan**Last Name :** Moore**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** As a substitute teacher for a wealthy community I cannot afford to live near my place of work. I commute across the 205 bridge to get to work. The nature of my employment does not guarantee full time work so I struggle financially, but due the amount of money i could potentially earn if i had work everyday, I do not qualify for income assistance. I worry that I will no longer be able to afford to get to work. I would also like to hear more about mitigation for the bridge between Oregon city and west linn.

**ODOT I-205 Toll EA - RECORD #398 DETAIL****Submission Date :** 4/13/2023**First Name :** Steve**Last Name :** Filter**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** My current commute takes me approximately 30 minutes to get from West Linn to NE Glisan St for work. This commute involves no freeway driving as I depend on Hwy 43 and eventually Macadam before crossing the Sellwood bridge. This route is already congested when returning home. I could only imagine with the toll fee it would further create more congestion from the diverted traffic from avoiding the tolls. This is not the way. Please consider our neighbors, bicyclists, and any other pedestrians on foot- I'm sure they too will experience congestion and not enjoy their outing. The main reason I do not drive freeways is beachside of aggressive behavior and I experience less of this with my pleasant non-freeway drive.

<b>ODOT I-205 Toll EA - RECORD #399 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Tina

**Last Name :** Petersen

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls will affect my place of business. We are a small company that will be affected by the tolls.

**ODOT I-205 Toll EA - RECORD #400 DETAIL****Submission Date :** 4/13/2023**First Name :** Jennifer**Last Name :** Heine-Withee**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Simply put, my husband and I can't afford to pay tolls. My husband works in Hillsborough and if he has to pay tolls just to go to work he will need to consider quitting his job. My niece also works in Portland and tolls would financially hurt her worse than my husband and I. She lives in an Oxford house for women who are recovering from substance abuse. She is doing so good and got a really good job in Portland. She will soon be learning how to weld. Having this added financial burden will greatly hinder her ability to save up for her future. A new bridge across the Columbia without light rail would solve the congestion problem and would be the most practical and cost effective solution. Financially punishing the public for driving on roads we've already paid for is heartless and evil.

<b>ODOT I-205 Toll EA - RECORD #401 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Joseph

**Last Name :** Ortis

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The entire toll proposal is completely unacceptable. There are many commuters who can't afford this! There are also many drivers who will think twice before visiting local businesses in the toll area so they don't have to pay it. Those business will without a doubt lose a LOT of revenue. Increase local gas taxes by a couple cents. Make it easier to stomach for your constituents who have, technically, already paid their part with income taxes, state gas taxes, vehicle registration fees, DEQ screenings, and the like. NO TOLLS!

<b>ODOT I-205 Toll EA - RECORD #402 DETAIL</b>
--

**Submission Date :** 4/13/2023  
**First Name :** Alycia  
**Last Name :** Barlow  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #403 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Shane

**Last Name :** Lee

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We already pay taxes for infrastructure repair and improvement and that money should be used to fund projects. People cannot afford to pay more taxes, fees, and tolls. Use what you've already been collecting more efficiently and effectively like anyone else would have to do.. Budget!!!! People are already fleeing the state in droves due to rampant crime and failed policies like this... This will only expedite that.



**ODOT I-205 Toll EA - RECORD #406 DETAIL****Submission Date :** 4/13/2023**First Name :** Mark**Last Name :** Forbes**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The proposal by Oregon Department of Transportation to Toll the I-205 corridor is without merit, negatively affects residents near the highway, and will ultimately bring less consumer money into the Oregon economy. But the biggest issue is this is an extremely unfair, regressive tax. More than 75,000 residents of Washington cross the I-205 bridge and use the FEDERAL highway to commute to-and-from work. At \$10 each way for 49 working weeks per year is \$2450 per year. Yes, a HUGE portion of the income of many low-income people who are struggling to make ends meet. Portland has a massive unaddressed homeless problem and this has the very real potential to add to the problem. The purpose of the U.S. Interstate Highway System is to provide rapid safe highways for all citizens. One could make a very educated guess that a large portion of those 75,000 Washingtonians commuting to work in Oregon (and paying Oregon income taxes) will bypass the tolled part of the Federal Interstate highway and use surface streets...I know I will. The resulting negative effect on streets, neighborhoods and businesses could be enormous. Imagine how people living near I-205 will experience 100%...200%...500% more traffic...that's unbearable. Oregon Department of Transportation estimates even more diversions when they implement their goal toll areas. HOW IN THE WORLD does causing this level of traffic diversion and congestion correlate to the Interstate goal to provide just the opposite? I cannot find other references to it, but Oregon may be chopping off its nose to spite its face. Hundreds of thousands of trips by Washingtonians are made every year to shop, dine, and recreate in Oregon. Washingtonians account for 25%-35% of all retail revenue in Portland. One significant reason is that Oregon has no sales tax. But, with these exorbitant tolls, any benefit of no sales tax is obviated. Oregon businesses WILL lose significant revenue if this toll is authorized. Finally, we are currently in a position where there are not enough workers to staff many, many business and governmental jobs. I have no doubt that a large percentage of Washingtonians who work in Oregon will re-evaluate paying even more taxes to Oregon without any benefit and seek work in Washington or other states. The result: Oregon will suffer even worse when trying to fully staff its businesses. To sum up, the toll proposal is totally REGRESSIVE and will amplify the hardships on lower income families. The entire purpose of the Interstate Highway System to provide a safe outlet for large volumes of traffic. Causing tens of thousands of travelers to divert to surface streets is diametrically opposed to the very purpose the I-205. Finally, Oregon will lose retail revenue as well as a significant supply of much needed workers should this toll be approved. Please, deny this request for unnecessary and economically unfeasible tolls.

<b>ODOT I-205 Toll EA - RECORD #407 DETAIL</b>
--

<b>Submission Date :</b>	4/13/2023
<b>First Name :</b>	Elizabeth
<b>Last Name :</b>	docea
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	This will effect mostly struggling families.

<b>ODOT I-205 Toll EA - RECORD #408 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Abby

**Last Name :** Mathias

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Our household can not afford to be tolled for commuting to work.

<b>ODOT I-205 Toll EA - RECORD #409 DETAIL</b>
--

**Submission Date :** 4/13/2023  
**First Name :** Nathan  
**Last Name :** Barnes  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #410 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Shawon

**Last Name :** Neal

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I can already barely afford to live here anymore and now you're going to nickel and dime me just so I can get to work at my third job. I moved away from Chicago years ago because of this exact same stuff. Maybe divert money from that useless police budget and put it into roads

<b>ODOT I-205 Toll EA - RECORD #411 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Stephanie

**Last Name :** Breuner

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The proposed toll fees are concerning. Many families would not be able to afford them. The potential \$15 each way TOLLS will harm most families who are already stretching their budgets or cutting costs from them. To avoid these fees, people will do everything they can to avoid them, including diverting to side streets causing traffic and congestion in neighborhoods. As we have seen in Washington, who has had to be bailed out with more taxes, tolling is an inefficient means of drumming up revenue. With the "cost of collection" running from 30-60%, and we all know that government projects almost always cost more than they should due to inefficiencies

**ODOT I-205 Toll EA - RECORD #412 DETAIL****Submission Date :** 4/13/2023**First Name :** Amy**Last Name :** Strickland**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I-205 Toll Project Environmental Assessment an land space The transportation analysis needs to consider how cars using other roads to avoid tolls will impact the other road systems, the amount of people who will move out of the area, the amount of those people who will move to Washington, decreasing tax dollars, the amount of people from Washington who will refuse to go onto Oregon because of possible influxes in traffic due to people avoiding the toll areas as well as these same people refusing to go to Oregon decreasing tourism, tax dollars from revenue. These are legitimate concerns that need to be addressed before implementing yet another tax/burden upon people; especially when homelessness/drug use is so high and trash along the road systems. Clearly money is not being spent appropriately and THESE factors need to be addressed first before we force American taxpayers to pay yet another "Government incentivized tax" to programs that don't properly utilize the funds. Gas, taxes(all), inflation, are all on the rise and instead of helping the citizens, the Government wants to add to it, only increasing the distrust American's have with our Government and Politicians. We need to bridge the gap and become unified, forcing us to bend to your will, will not accomplish this. The Pacific Northwest is known for it's beauty, wide open spaces, diversity, cleanliness, and livability. When you keep building on every viable space without utilizing the land, (See above adjectives) you turn us into the Cities of California and New York, faceless, nameless, parking lots with no natural beauty. Protecting the land and making it front and center for ALL future building projects needs to be priority just as much as getting rid of the idea that tolls need to be implemented. Stop raping the land and the people for the inadequacies of the people working within the many government agencies.

<b>ODOT I-205 Toll EA - RECORD #413 DETAIL</b>
--

**Submission Date :** 4/13/2023  
**First Name :** Frank  
**Last Name :** Corbin  
**Affiliation :** Traveling Citizen  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**



**ODOT I-205 Toll EA - RECORD #414 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Dinh

**Last Name :** Le

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We don't need to spend more money for all the nonsense expensive. You guys blocked on Lane on 102nd, ect. for bicycles and I never see more than 50 people ride bicycles on those lanes each day. Do you know that is very bad for the inviroments? Cars have to spend more times on the roads during the peak hours and the bicycle lanes are empty? ALL THE IDEAS YOU GUYS HAVE IN THE LAST 20 YEARS ONLY CAUSE MORE HARM AND HELP AND WE HAVE TO PAY FOR YOUR STUPID IDEAS

**ODOT I-205 Toll EA - RECORD #416 DETAIL****Submission Date :** 4/13/2023**First Name :** Michelle**Last Name :** Belkot**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling doesn't eliminate traffic congestion, it merely changes where it occurs. It will cause tens of thousands of vehicles to DIVERT on to side roads to avoid the tolls. ODOT estimates at total of 130,000 vehicle diversions when all Portland area freeways are tolled. That is equivalent to every vehicle that crosses the Interstate Bridge on an average day, suddenly using side roads and making the neighborhood roads more congested and less safe. TOLLS will harm all but the wealthiest families. It will be a regressive tax that most hard working families can't afford. ODOT will truly be creating "roads for the rich".

**ODOT I-205 Toll EA - RECORD #417 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** SUMIR

**Last Name :** VARMA

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** NO TOLLS - PERIOD! WE WILL MAKE SURE TO GET THIS ON THE  
BALLOT AND VOTE AGAINST IT!!

<b>ODOT I-205 Toll EA - RECORD #418 DETAIL</b>
--

**Submission Date :** 4/13/2023  
**First Name :** Ben  
**Last Name :** Hillebrand  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #419 DETAIL****Submission Date :** 4/13/2023**First Name :** Brendan**Last Name :** Casey**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I live in Canby and all this will do is make me change my driving habits, driving to Salem instead of Portland. I will be one of the many problem drivers willing to spend more time burning gas on back roads and impacting the environment as I believe any funds collected will be mismanaged if not out right stolen. I have no faith in you! Its a bait and switch. You won't fix the roads and will make more useless bike paths for the homeless to shoot up drugs on. SE Portland safety bike lanes program is a perfect example of how the money will be waisted. Less cars and drivers being made as miserable as possible to try and make people drive less while also causing more accidents. Its not a taxing problem its a spending problem. If you look at money and a drug and the government employees as drug addicts. Everything makes a lot more sense. You are waisting resources and time.

<b>ODOT I-205 Toll EA - RECORD #420 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Kevin

**Last Name :** Cook

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The proposed toll will have a direct negative effect on households and may ultimately keep even more people from traveling to Portland.

<b>ODOT I-205 Toll EA - RECORD #421 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Anna

**Last Name :** Miller

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Working families are hit the hardest with expensive tolls. How much more can be piled on our backs! The wealthy folks will not feel it but many others will do anything to avoid them, making a real mess of the roads. Voters have said no to tolls every time they have been given the opportunity!

<b>ODOT I-205 Toll EA - RECORD #422 DETAIL</b>
--

<b>Submission Date :</b>	4/13/2023
<b>First Name :</b>	Eleanor
<b>Last Name :</b>	Addison
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	I don't think roads should have toll fees.



<b>ODOT I-205 Toll EA - RECORD #423 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Jeffery

**Last Name :** Ivy

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We are headed down a slippery slope with tolls. Being from Texas we wanted to get out of a State that tolled people to death. I remember when the first one started. We were all told it would be easy to avoid the tolls but eventually it got to a point where you couldn't avoid using them and it became an ever increasing part of your monthly budget. If this one goes through many many more will follow. My guess is the monied interests in the State have already decided to ram this down everyone's throats so I'm probably wasting my time here.

<b>ODOT I-205 Toll EA - RECORD #424 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Joanie

**Last Name :** O'NEAL

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Please do not add tolls to our freeways. It will make things go slower and it already goes to slow. Please use funding that is already on the books.

<b>ODOT I-205 Toll EA - RECORD #425 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Kimberly

**Last Name :** Crabtree

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The tolls will negatively impact household income as well as income to the Portland area as people will not cross over for shopping needs.

<b>ODOT I-205 Toll EA - RECORD #426 DETAIL</b>
--

**Submission Date :** 4/13/2023  
**First Name :** James  
**Last Name :** McCormick  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

<b>ODOT I-205 Toll EA - RECORD #427 DETAIL</b>
--

<b>Submission Date :</b>	4/13/2023
<b>First Name :</b>	Sheden
<b>Last Name :</b>	Crabtree
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	No tolls

**ODOT I-205 Toll EA - RECORD #428 DETAIL****Submission Date :** 4/13/2023**First Name :** Matthew**Last Name :** Criscione**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I work in Wilsonville Costco at the Gas Station. I talk to folks all the time about this toll idea. Not one person has said they intend to pay that toll. They will just drive on the surface streets. I myself don't necessarily go that route, except for ski season where I'll make 80 passes going up and down to the mountains. I will NOT be paying this toll. I already pay for a snow park.

**ODOT I-205 Toll EA - RECORD #429 DETAIL****Submission Date :** 4/13/2023**First Name :** James**Last Name :** Maciokas**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The environmental data appears flawed. CO2 emissions will go up due to diversion and less efficient operating speeds on local roads. The administrative cost to manage the tolling appears to be more than the maintenance and construction of the roads. There are better more efficient ways to pay for this. I understand that a citywide tolling system (all lanes, I5, 205, 217) is the first of its kind in our nation. The people should have a vote on this.

**ODOT I-205 Toll EA - RECORD #430 DETAIL**

**Submission Date :** 4/13/2023  
**First Name :** Sara  
**Last Name :** McClurg  
**Affiliation :** Clackamas County Sheriff's Office  
**Submission Method :** SurveyMonkey

**Q3. Comments :** While I understand the need to mitigate the ever increasing burden to I205 and need for earthquake retrofitting to the Abernethy Bridge, there are those like myself who do not have other alternatives other than driving as a lone driver on this route in order to get to and from my place of work. Car pooling is not an option, as I have a different schedule than co-workers and often need to work an unpredictable late/early shift. TriMet is not a reasonable alternative, since I would have to drive first to the Bridgeport Transit Station, board a bus to downtown, transfer to the Max, and then either walk about 15 minutes from the Clackamas Town Center to my office, or take another bus to drop me off a couple of blocks from work. This trip would take me approximately 2 hours each way. Other than that, I could reroute to the Sellwood Bridge, which I assume will be severely impacted by others taking this alternate route. Since public transit is not currently adequate for my travel to work, I feel this unduly forces me to pay the toll, even though I would be willing to use public transport as an option. My other concern is for those less fortunate than myself who must travel the I205 toll route to get to and from work. Since I have not seen any proposals regarding a sliding scale for those who can least afford it, or some sort of tax write off, this smacks of a regressive tax. While those making 150K plus may barely feel this increase to their finances, I cannot imagine having to bear this additional financial burden as a person making minimum wage, or working part-time. Thank you for reading my comments.



<b>ODOT I-205 Toll EA - RECORD #431 DETAIL</b>
--

<b>Submission Date :</b>	4/13/2023
<b>First Name :</b>	Jamie
<b>Last Name :</b>	Zimmerman
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	No. We are tired of being nickel and dimed for everything. Many do not have the money for this!

<b>ODOT I-205 Toll EA - RECORD #432 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Cristy

**Last Name :** Murray

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Putting tolls on the I-205 at the Abernethy bridge is going to cause unbelievable traffic from people diverting to avoid paying. Additionally, working families cannot afford this extra expense. The whole thing is a bad idea, extremely poorly planned and completely unfair to the community.

**ODOT I-205 Toll EA - RECORD #433 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** C

**Last Name :** D

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I would like to see some sort of concessions made for local residents that need to use the i-205 to get to work. Specifically I would like to see some sort of cut rate for those working in Wilsonville. Especially considering the lack of public transportation nearby going that way. I also think we need to not forget about low-income residents and others (including those that live in rental properties) in the area. I do agree there needs to be some funding for ODOT projects but I feel our little pocket of West Linn, being almost 100% reliant on I-205, makes it to be an unfair burden for established residents and potential new residents.

**ODOT I-205 Toll EA - RECORD #434 DETAIL****Submission Date :** 4/13/2023**First Name :** Gretchen**Last Name :** Swiers**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am not against tolling completely, but I am against where the gantries are going to be. The traffic and financial burden for West Linn is huge, especially for those of us near Fields Park. We already have high PM traffic on Borland/Willamette Falls due to drivers avoiding the 205 bottleneck and now we are getting a junior high school. The Tualatin River gantry for north bound traffic needs to be before Exit 3 and the Abernathy gantry for northbound traffic needs to be before Exit 6. With the gantries at the bridges West Linn is going to pay more than anyone else in the area in tolls and traffic. But it is a bridge toll so you can not toll before the bridge, you say. Yes, you can. The report keeps talking about passive/indirect benefits of the project. Even if a driver does not take the bridge making them pay for the bridge is fair since they are still benefitting from the bridge being there!

**ODOT I-205 Toll EA - RECORD #435 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Bryce

**Last Name :** Gruba

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls impacting residents' finances living along Hwy 43 and other areas of West Linn that have no other routes other than to commute via I205. Surface streets are not a viable option as they already take much longer. If tolls must be implemented to fund project (where is my tax money going?), consider exemptions for local residents or implement a toll lane, like that of King County WA.

**ODOT I-205 Toll EA - RECORD #436 DETAIL****Submission Date :** 4/13/2023**First Name :** Jim**Last Name :** Rudnick**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Hello, I support the need for bridge and road improvements with particular support for proposed earthquake protections. However, I opposed the use tolling as a funding mechanism. Oregon can do better than tolling. This experiment is not welcome. I am concerned about adverse surface road traffic and community impacts in West Linn and Oregon City. I am concerned that ODOT seems to be ignoring the elected leaders for these communities. This aspect of the project seems to go against the spirit of inclusiveness expected from a State agency. Please do not proceed with the implementation of tolls. Thank you,

**ODOT I-205 Toll EA - RECORD #437 DETAIL****Submission Date :** 4/13/2023**First Name :** Kalene**Last Name :** Clancy**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** There should be an environmental impact study done by the state to see what the impact the neighboring communities are going to have. People will tackle the back country roads which will affect wild life, neighborhoods, and air/noise pollution and devaluing of their homes and property. Downtown Oregon City will be nothing more than a constant traffic jam as will West Linn with accidents and pedestrians and bicyclists g hit and killed. This is a HORRRIBLE IDEA! There are other ways to fund the bridges than to destroy local communities. Whoever is pushing for a toll in this area needs to be FIRED!

<b>ODOT I-205 Toll EA - RECORD #438 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Christine

**Last Name :** Boatman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls are going to make neighborhoods near the freeway unbearable due to people diverting off the freeway to avoid paying tolls. Tolls are bad. Don't add them to 205.



**ODOT I-205 Toll EA - RECORD #439 DETAIL****Submission Date :** 4/13/2023**First Name :** Dave**Last Name :** Trotter**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** To be clear, I'm happy to pay a toll when required to do so. Seismic improvements have intense value, and creative pay schemes can target the burden appropriately. With that said, the specific locations of proposed toll gates means that drivers will be able to skip part of the toll section by exiting I-205 in West Linn or Oregon City and then using the Hwy 43 bridge and surface streets (including Hwy 99) in Oregon City to bypass the gate. Because these are the only two bridges over the Willamette River between Wilsonville and Sellwood (a distance of more than twenty miles), there are no real alternatives to this arterial intersection. My commute, which sees me travel from Oregon City to Lake Oswego on Hwy 43 - not on I-205 at all - is potentially going to get much longer, as traffic normally on I-205 clogs up Hwy 43, Main Street in Oregon City, Willamette Falls Drive in West Linn, and the I-205/Hwy 43 interchange. ODOT's publicly available Environmental Assessment claims that while traffic will increase up to 50% across the Arch Bridge and in downtown Oregon City, this will all happen at "off-peak travel times". How on earth can that claim be made? And has this report ignored the fact that "off-peak" hours on that stretch of road are dwindling anyway? My conversations with Oregon City staff have revealed that they have felt left out of the decision-making process by ODOT and are also frustrated with these potential impacts to our downtown and community. This missed opportunity to foster a collaborative environment with local stakeholders is highly disappointing and does not inspire confidence in ODOT's leadership.

<b>ODOT I-205 Toll EA - RECORD #440 DETAIL</b>	
--	--

**Submission Date :** 4/13/2023

**First Name :** Timothy

**Last Name :** Hattan

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The proposed tools are backbreakers to most families financially that travel this area freeway. Additionally many people will be seeking alternate routes and causing massive congestion on arterial streets. There are other ideas that seem to have more merit such as taxing per mile of electric vehicles or increasing gasoline taxes slightly in the metropolitan area which would have a much lower impact per individual, at least in terms of finances. There is also the consideration of taxing snow tires each season of their applied to a vehicle. The damage from snow tires causes damage that leads to a tremendous expense that could be mitigated through this fee. This could have even more economic impact by driving people northward to Vancouver as is already happened. I'm certain you already thinking about replying or confident that you have a plan in place to deal with those of lesser means, however this really doesn't address the overall impact to those of us that cannot avoid driving when the tolls are at the highest.

**ODOT I-205 Toll EA - RECORD #441 DETAIL****Submission Date :** 4/13/2023**First Name :** David**Last Name :** Guzman**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** We live in West Linn near highway 43 and the on ramp to highway 205. While I have seen mention of mitigation that will be offered to the residents in the area, the mitigation seems to be vague and unbalanced seeing as the amount inconvenience in the immediate area around our home will be impacted. Of concern are the following: - Traffic congestion in the area of highway 43. I say this because when there is a backup on the Abernathy Bridge, we experience traffic snarls in the area. Fortunately, this has not happened a lot recently however, once tolling begins people will find other ways around the toll booths which includes using highway 43 and Willamette Falls Drive. This is both a safety and congestion problem. - The mitigation currently planned does not go far enough to address the impact of the project. The small pedestrian projects are just a small portion of what needs to be done. There does not appear to be significant traffic or transit solutions for the traffic that will be diverted. - The plan puts an unfair burden on the communities that surround the tolling areas and contradicts years of precedent which has allocated the cost of major transportation projects to all drivers in the state. I have consistently commented on the above areas of concern both in person and online and yet, I have not seen an adequate solution being proposed. I believe this plan is unfairly placing a disproportionate burden for funding these upgrades on the West Linn residents who, because of otherwise insufficient transportation and transit infrastructure, must utilize the facilities on a daily basis.

**ODOT I-205 Toll EA - RECORD #442 DETAIL****Submission Date :** 4/13/2023**First Name :** Kate**Last Name :** Erickson**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am strongly opposed to ODOT's plan to implement tolls on Interstate 205. Tolling will have several negative consequences for the community, the environment, and the safety of our citizens. Tolling I-205 will cause drivers to divert onto surface roads in search of alternative routes. This will lead to increased traffic congestion on West Linn's roads. Of primary concern are Borland Road and Willamette Falls Drive, which are already struggling to handle existing traffic levels. The resulting congestion will endanger pedestrians, bicyclists, and especially children attending the schools located on these roads. I-205 tolling also places a disproportionate burden on the West Linn and Oregon City downtown areas, as drivers seek to avoid the tolls, and the diverted traffic inevitably heads through these high-pedestrian corridors. The implementation of a toll on I-205 would place an undue burden on these already congested areas, and make pedestrian safety even more challenging. Increased traffic on local roads will lead to more frequent and costly infrastructure damage, and will exacerbate pollution levels from idling vehicles. If you've ever driven on Highway 43/Willamette Drive at 5 p.m. on a weekday, you know the idling and infrastructure damage I'm talking about. Tolling I-205 will disproportionately affect West Linn residents, who have no option but to use the Abernethy Bridge for essential daily activities, such as taking their children to sports practice or going grocery shopping. Another concern regarding the tolling proposal is the use of a third-party operator. This short-sighted idea speaks to the overall absurdity of this project. With this plan, significant portions of the toll revenue will be directed to a private company, rather than being invested into our state's infrastructure improvements. The taxpayer has already paid for I-5 and I-205. It's preposterous that we have fronted this investment and now a tolling company will collect profits from infrastructure it didn't even pay for. Private toll companies are motivated by profit, they do not operate in the interest of the public, and they are not held to the scrutiny and accountability necessary of an entity that holds this level of power over our daily lives. ODOT should explore alternative methods of raising revenue and managing traffic that do not involve tolling I-205. Look into other sources of funding such as federal and state grants, public-private partnerships, maybe even an increase in the gas tax. Taxation, while unpopular, has a far lower administration cost than tolling, meaning that the bulk of the revenue it generates can be put toward Oregon transportation projects rather than lining the pockets of toll-company shareholders. Investments in public transportation infrastructure could alleviate traffic congestion while reducing our collective reliance on single-occupancy vehicles. If you were to solve the crime and violence problem on MAX and bus lines, you might encourage more of your citizens to use them. And finally, build more roads and add more lanes. We cannot pretend that the population hasn't increased. It's time that our roadways reflect that. Thank you for your time.

**ODOT I-205 Toll EA - RECORD #443 DETAIL****Submission Date :** 4/13/2023**First Name :** MICHAELA**Last Name :** MILLER**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am concerned about the impact of traffic rerouting or diverting onto Stafford Road to avoid tolls. Stafford is often backed up at intersections during high-traffic hours and unable to handle more traffic. Additionally, Johnson Rd. is used as a way to get from Stafford Rd. to West Linn and is not equipped to manage additional traffic. There are two safety concerns here. The intersection of Stafford and Johnson Rd is already challenging to maneuver and a safety hazard when entering traffic on Stafford from Johnson Rd. during high-traffic hours. It needs more than a stop sign on Johnson to regulate and facilitate a safer way for traffic to merge onto Stafford. Also, Johnson Rd. is a frequently used route for runners and cyclists. There are no shoulders along most of the road and there are no bike lanes or sidewalks to accommodate non-motorized traffic. It is also a common location for cars to test their speed, disregarding speed limits and the presence of bikers, runners, and walkers. Because of its rural location, it is common for large wildlife to be hit while crossing to access the river. Increased traffic will likely increase accidents due to deer crossing the road.

<b>ODOT I-205 Toll EA - RECORD #444 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** James

**Last Name :** Koll

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is a Federal Interstate needing expansion. Funding it with tolls increases the existing local problem we already have due to the inadequate interstate capacity of clogged surface streets and will incentivize more local use. There is no mitigation possible, your own study suggest a > 50% increase in volume. This should not be our local communities' problem. This is an INTERSTATE HIGHWAY! If we do not have enough funding to do this project, increase the fuel taxes, using Tolling for this inequitable.

**ODOT I-205 Toll EA - RECORD #445 DETAIL****Submission Date :** 4/13/2023**First Name :** Samuel**Last Name :** Russum**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This tolling project disproportionately impacts those with residence in and around the tolling area in multiple ways. We now have to deal with increased surface street traffic (just from construction impacts already), all the related impacts of that, and then put up with paying to use the roadway already built with tax payer funds that we really have very little alternative options for circumventing without massive detours. Anyone who drives on I205 DAILY can easily see where the additional traffic causing congestion is coming from and its not from those in-state. A good percentage are daily commuters from WA state that do not contribute to our state road funds unless they happen to purchase gas in OR. The other major group is commercial trucking that uses I205 to bypass the I5 Portland area when passing through the metro area. Why not only tax out of state license plates for the necessary toll area if a primary purpose is to control traffic congestion? The technology and systems exist and are in place in other states for tolling efforts to be done by license plate photos autonomously - see how Texas handles their tollways for example. This would then at least appease those in-state that have to otherwise be subject to this ridiculousness. The impact to those that this will affect the most will see the least benefit from the supposed benefits being touted. Those who primarily use I205 (where the tollway is to be located) do not regularly drive (if ever) on the other bridges in Portland and are only more upset by the fact that these additional taxes on them will be used for other locations that they don't use. Why not toll all those other bridges to pay for their own individual improvements instead of an interstate passage 10+ miles away from the nearest of these other bridges? This is more akin to taxing one group of residents heavily to fund another group of residents in a non-neighborhood area for the sole purpose of funding needs at little to no additional expense to those receiving the funds. IE: theft. The only people that support this are those who are not impacted by it. When it was voted on by the state, there was only supposed to be a single tolled express lane to be added and only that lane would be tolled with the other two existing lanes continuing to be freeway. This is a far cry from that and those who voted for it were lied to with the direction being taken and forced upon us by others that are likely not affected or minimally affected.

<b>ODOT I-205 Toll EA - RECORD #446 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Anna

**Last Name :** Daniels

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Do not till the road. You have billions of dollars. We can not afford these tolls unless you guys are purposely trying to push people into poverty! No on the tolls !!!! The government especially Oregon wastes billions a year but needs to tax us to death! No tolls !!!



<b>ODOT I-205 Toll EA - RECORD #447 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Bj

**Last Name :** Bruce

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Housing prices are already out of control. By having to pay 4 tolls everyday to go to work essentially makes us all take a pay cut that makes it more and more difficult to provide housing and food for our families. It will just drive our entire cost of living even higher. Our metro area will just continue to get worse and worse for anyone that isn't high income.

<b>ODOT I-205 Toll EA - RECORD #448 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Greg

**Last Name :** Bell

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I'm against tolling. It won't help traffic congestion much by adding one lane, and just hurts everyone that lives in these communities by making them pay every time they leave their community. We do need to improve our roads, but we should look at other funding sources.

**ODOT I-205 Toll EA - RECORD #449 DETAIL****Submission Date :** 4/13/2023**First Name :** Tim**Last Name :** Kemper**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This approach seems to punish people that live in this area. To date from my understanding road improvement come from either state or federal coffers. Meaning my taxes have been used to improve roads throughout the state. Now it feels like we are changing this business model and targeting a specific population for the raid use in their neighborhood even though people from throughout the state and country use these roads. If we need a tax to improve these roads add it to the gas tax so all people in Oregon or any other people visiting the state will have an impact on updating our roads which is more inline with what has happened in the past. This unfairly puts a burden on people commuting that live along the I205 corridor. Many people will also leave the freeway in order to avoid the tolls which will jam up the traffic even more in already congested areas. This will create many more logjams and can actually slow the commute more than what we already experience. It feels like most people are against this in Oregon, why not for once listen to the people that pay the taxes and vote for the people in office and utilize one of the different options available to the state to generate revenue.

**ODOT I-205 Toll EA - RECORD #450 DETAIL****Submission Date :** 4/13/2023**First Name :** Barbara**Last Name :** Roach**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Last month, ODOT published its environment assessment of the Abernethy and Tualatin River bridge tolls. It's a real eye-opener.

ODOT estimates the average household will pay \$575 a year just for its first phase of tolls. That's \$575 that Oregonians won't be able to spend on other things, with restaurants and retail establishments the hardest hit. Imagine putting years into building your restaurant or store, only to find that road tolls have driven away your customers and forced you out of business. You don't have to imagine— because ODOT estimates that its tolls will cause more than 750 people to lose their jobs and reduce wages by about \$3 million a year.

The transportation department projects that it will collect \$132 million a year in tolls: \$93 million a year from households and \$39 million a year from freight carriers. At the same time, ODOT estimates that reduced traffic on I-205 will produce only \$105 million in economic benefits from reduced congestion, environmental improvements and economic activity. That means Oregonians will be \$27 million worse off every year these tolls are collected.

<b>ODOT I-205 Toll EA - RECORD #451 DETAIL</b>
--

<b>Submission Date :</b>	4/13/2023
<b>First Name :</b>	Rolf
<b>Last Name :</b>	Damon
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Stop wasting money on the homeless. No need for tolls.

**ODOT I-205 Toll EA - RECORD #452 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Scott

**Last Name :** Atkins

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** 1. At least one lane should be left as not tolled, 24/7/365. This mitigates some of the financial issues while letting you tax companies or individuals who can afford it. 2. With a 3.9 billion dollar kicker (estimated) and this at 26 million in revenue it is less than 1% why isn't this just part of the planned budget? It feels like this is an end run around our tax laws and violates the spirit of our existing laws. I work in Tigard and live in Canby. Your plans here and on I-5 look to be a direct attack on those living outside of Portland to cover changes that will not be used frequently by those being targeted. If I'm not using the interstate bridge, why am I paying more than people who actually use the bridge? Why isn't the burden the same for everyone?

<b>ODOT I-205 Toll EA - RECORD #453 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Lois

**Last Name :** Haag

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Will cause chaos on the side streets, neighborhoods and adjoining areas. Many people are financially struggling these days. Adding tolls will effect lower income residents disproportionately.

**ODOT I-205 Toll EA - RECORD #454 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** LORY

**Last Name :** EVANS

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I do not see that the toll will accomplish anything except giving MORE money to ODOT - and they really do not accomplish anything. We have lived in West Linn for 25 years - the roads just keep getting worse. And yes, "The transportation analysis needs to consider how cars using other roads to avoid tolls could slow down buses and cause traffic jams - people will exit on Stafford Road and "The transportation analysis needs to consider how cars using other roads to avoid tolls could slow down buses, and cause traffic jams in neighborhoods - people will exit at Stafford Road or 10th St - take the back roads, which are already too congested. This toll will serve no purpose except to cause drivers to become more irritated - and they already are driving crazy. PLEASE DO NOT REQUIRE THE TOLL. If anything, it should be set up at the Washington/Oregon border - for all the people who live in Washington and work in Oregon - like the New York/New Jersey tolls.



**ODOT I-205 Toll EA - RECORD #455 DETAIL****Submission Date :** 4/13/2023**First Name :** Jayne**Last Name :** Scheckla**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling this road is a ridiculous idea; one that should be put before the taxpayers. I will never drive that section of road so I will be one of thousands who avoid it. Poor Oregon City roads will bear the brunt of people avoiding 205 and congestion in Oregon City is already almost unbearable. And this poll is ridiculous. It's like you don't really want people's input; you are just putting this poll out there to satisfy people's complaints. The public shouldn't how to tell you how to do your jobs. That's what our tax money is for. Put this on a ballot to really find out what the public wants. And shame on the committee for going over taxpayers' wishes. Hopefully you will all have different jobs when this starts and the whole project can cease. I pity the poor citizens of West Linn and Oregon City who will have their streets totally destroyed by the local traffic that avoids 205 with a toll.

<b>ODOT I-205 Toll EA - RECORD #456 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Joe

**Last Name :** Van Winkle

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Other ways are needed to raise the needed money instead of a toll. People will avoid taking that route to save money. That includes side streets. A tax on all the electric cars would be the way to go. They are rich, can afford an electric car and aren't paying anything into the gas sales tax!

**ODOT I-205 Toll EA - RECORD #457 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Andrea

**Last Name :** Hansen

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Having tolls on 205 will cause financial Burden in people who do not have means to afford much more than rent and food. This will also affect traffic in negative ways, look at states that have tolls. When I lived in IL there's been a few times I was stuck in toll lines for over a hour this will cause more congestion.

<b>ODOT I-205 Toll EA - RECORD #458 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Barbara

**Last Name :** Erlich

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The tolls should be on the people who come from Washington. They are here to work and avoid sales taxes. They are causing the increased congestion and have been for decades. Be realistic and have the solution fit the problem. Toll the two bridges, I 5 and Glenn Jackson.

**ODOT I-205 Toll EA - RECORD #459 DETAIL****Submission Date :** 4/13/2023**First Name :** Tim**Last Name :** Christner**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I went from two incomes to one. I would have to pay to go to work? How was the 3rd lane paid for from I5 to Stafford Rd? Federal money should pay for this project. Hold off on other projects and make this project the priority. When this project is completed, then start on another one. I live on the east side and work on the west side. I only drive to the west side for work. Twenty three years now. I will have to leave earlier to get the lowest toll and come home a back way to avoid the high cost. Rich people probably don't care, but i'm on a fixed income and ODOT is creating another expense for me. Some of the funds should come from the high vehicle registration fees that Oregon has now....Thanks.

**ODOT I-205 Toll EA - RECORD #460 DETAIL****Submission Date :** 4/13/2023**First Name :** Traci**Last Name :** Lande**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Gas prices are rising again and are higher than they have been in years. housing costs like rent are climbing higher thanks to inflation. taxes got raised to combat inflation. inflation itself. all of these things are putting a massive financial stress on even middle class families and communities but especially the working class. Now you are asking us to pay a toll on top of inflation on top of paying more than \$4.00 a gallon for gas. Just to be able to get back and forth to work everyday. Because let's just be honest here the reason so many people are on the road during rush hour and the morning rush is they are traveling back and forth to work. These are people like myself who already struggle to pay our bills and put gas in our car. The long term effects you are neglecting to see about this tolling proposition is people will no longer be able to afford to get to work they will lose their jobs either by not being able financially to pay the tolls or being late too much due to congestion on the city streets they will inevitably try to use as a bypass. In return not only will you not actually get the funding you expect because people will just get off the freeway before the toll stations but also unemployment rates will go up more people will either have to move or become homeless due to not being able to afford another \$20 they don't have weekly just be able to travel back and forth to work. If you want to toll something toll the highways people drive for pleasure not out of necessity. The people you will hurt with this toll are already stretched too thin.

**ODOT I-205 Toll EA - RECORD #461 DETAIL****Submission Date :** 4/13/2023**First Name :** Shannon**Last Name :** G**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Tolling I-5 and 205 will have a devastating impact for my family's finances as well as my community of Canby. There will be a direct increase in traffic, damage to roads, pollution, noise, and pedestrian safety. There will be thousands of vehicles diverting through side streets and 99E all day and night. Everyone I have spoken to about this agrees. Oregonians should not have to pay for the mismanagement of funds by policymakers and politicians.

**ODOT I-205 Toll EA - RECORD #462 DETAIL****Submission Date :** 4/13/2023**First Name :** Samantha**Last Name :** Reddick**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** As my employer has me travel around and going up and down 205 it would unpack me as currently they are no plans to reimburse/ assist with the pay for traveling to patients who are actively passing. I need to be able to get there in a timely manner and Chas going the rout I drive through neighborhoods not only makes it harder to get my my patients who need assistance it will impact the quality of life I have due to not being able to afford to spend my own money to reach my patients.



**ODOT I-205 Toll EA - RECORD #463 DETAIL****Submission Date :** 4/13/2023**First Name :** Wesley**Last Name :** Sand**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The plan being presented places an undue burden on the local communities for an Interstate system that serves the economic needs of the entire state. Local community members will be forced to pay tolls for commuting within their own community - and will face the likelihood of frequent peak pricing, potentially disproportionate to their use of the freeway simply because they live in West Linn, Stafford or Wilsonville. The alternative to paying excessive tolls will be to divert onto a number of locally maintained, small surface streets. Exiting at Stafford and take Rosemont into West Linn or Borland/Willamette Falls Drive into Old West Linn. This will create significant traffic onto these smaller streets and create risks for the children and families that utilize them for local travel, bike commuting, or walking. Note: The ball fields on Willamette Falls/Borland are already a significant risk to children at peak hours and this proposal will elevate that to an around the clock risk. In addition, a new elementary school is on that route. This freeway serves all of Portland and Oregon - the disproportionate impact to the local community is unacceptable.

**ODOT I-205 Toll EA - RECORD #464 DETAIL****Submission Date :** 4/13/2023**First Name :** Carolyn**Last Name :** Miller**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** My concern as a resident of Oregon city is financial. If I have to pay a toll to get out of Oregon city for work or errands, it feels like we are being financially punished for where we live. I leave on a small street that the workers, etc use to bypass to get to Moalla st. Many of them speed and many of us have lost pets to these speeders, who just want to get to where there going, no consideration of the neighborhood. I imagine the traffic will be worse for people and pets when it hits their finances.

**ODOT I-205 Toll EA - RECORD #465 DETAIL**

**Submission Date :** 4/13/2023  
**First Name :** Don  
**Last Name :** Kunstel  
**Affiliation :** dkunstel@gmail.com  
**Submission Method :** SurveyMonkey

**Q3. Comments :** The effects of diverted traffic from Stafford Road (or Nyberg Rd from I-5) will have a tremendous impact on our local roads. In addition, the economic impact for local families needing to enter or exit the interstate system from Oregon City and West Linn is extremely disproportionate from other Metro Area communities who will benefit from revenue raised by these tolls. Please come up with another solution for highway maintenance and construction that does not burden our community for the benefits of other drivers. Thank you.

**ODOT I-205 Toll EA - RECORD #466 DETAIL****Submission Date :** 4/13/2023**First Name :** John**Last Name :** Grammel**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** My wife and I live at Mary's Woods, a CCRC. We use the MW shuttle and MW cars to shop and go to medical appointments. Most residents also use this service which makes probably 8 to 10 separate trips /day. This can get expensive so these cars and buses would most likely us the OC bridge with a result of more congestion than what is on 205 now.

**ODOT I-205 Toll EA - RECORD #467 DETAIL****Submission Date :** 4/13/2023**First Name :** Susan**Last Name :** McPhee**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** West Linn tolling. We live and walk, drive in downtown Willamette, West Linn. It is already overcrowded, and from a pedestrians point of view, quite dangerous from excessive traffic. Willamette is surrounded by the Willamette, the Tualatin and I205. We already have limited access to leave our downtown and tolling will make a challenging situation much worse. Plus, why us?

**ODOT I-205 Toll EA - RECORD #468 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Stuart

**Last Name :** Willcuts

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** As a frequent user of 205, if a toll system is implemented, I would seek alternative routes. Thus, utilizing other roads will cause congestion, slow other transport systems, in West Linn and Oregon City, and negatively contribute to air quality and safety. Can DOT access the recent Federal Gov infrastructure funds for DOT stated needs?

<b>ODOT I-205 Toll EA - RECORD #469 DETAIL</b>
--

**Submission Date :** 4/13/2023  
**First Name :** Zuleyma  
**Last Name :** Barron  
**Affiliation :** no  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #470 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Scott

**Last Name :** Hanks

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Not only will the tolling effect local households in the Gladstone, Oregon City and West Lynn areas by diverting traffic into those neighborhoods but will also put a monetarily strain on them since they will be the most directly effected. This will also effect businesses as many no doubt will try to find a way around the tolls.



**ODOT I-205 Toll EA - RECORD #471 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Kirsten

**Last Name :** Woolley

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Climate change is a load of bull! It is the latest LIE to drain "we the people" dry! Any so-called carbon tax will NOT save the world, it will just line greedy politician's and corporate shell's pockets! Carbon is FOOD for plants, which then produce MUCH needed OXYGEN DO! Do NOT institute tolls! I repeat do NOT institute tolls! The department already has enough \$! YOU MUST be fiscally responsible. STOP taking our money due to the department's inability to properly budget the inordinate amount of money you already possess! Do NOT institute tolls! Tolls are UNACCEPTABLE! I REPEAT DO NOT INCORPORATE TOLLS!!!! YOU need to trim your extraneous and superfluous spending! Do NOT use tolls for this or any other road projects! I will do my best to use every other possible route on side streets if you impose SENSELESS tolls! Do NOT institute tolls! Period!

**ODOT I-205 Toll EA - RECORD #472 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** James

**Last Name :** Small

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** To fully understand the need for tolling: 1. I would like to see the entire revenue stream to ODOT as well as past budgets with increases for each year over the past 30 years. I would like to see any studies the State Of Oregon or ODOT has paid for addressing the yearly State's population growth as well as increase traffic from neighboring States. 2. I would like to see the reasons provided to Clackamas County and City of both West Linn and Oregon City as to why the Southern part of I-205's 3rd lane was discontinued at the South end of Abernathy Bridge to I-5. 3. The traffic results Study of before and after on the Additional 3rd Lane Impact on the I-205 system from Stanford Rd. south to I-5 on South bound lanes as well as the impact of the recent 3rd lane addition at the I-5/ I-205 Interchange Northbound lane to Stafford Road? Where can these documents be found and available for study?

<b>ODOT I-205 Toll EA - RECORD #473 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Jeremy

**Last Name :** Schumacher

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I don't like taxation/tolling in more areas of my life that I daily interact with.

<b>ODOT I-205 Toll EA - RECORD #474 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Maria

**Last Name :** Justel

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am extremely concerned about neighborhood traffic gwttting worse. We live off of hwy 43 and traffic is already unbearable during rush hour.

<b>ODOT I-205 Toll EA - RECORD #475 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Brandon

**Last Name :** Works

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We've survived in Oregon since inception without tolling, and as we've all seen in CA, it's a pain for everyone, it's ugly and unnecessary. It will force a lot of traffic onto other roadways, causing congestion and unsafe conditions. This is all a ploy to raise more revenues which, if necessary, can be done in other ways.

**ODOT I-205 Toll EA - RECORD #476 DETAIL**

**Submission Date :** 4/13/2023  
**First Name :** Gino  
**Last Name :** Barberini  
**Affiliation :** resident of West linn  
**Submission Method :** SurveyMonkey

**Q3. Comments :** I am against the proposed tolling on the highways in the city of West Linn and the surrounding areas. As a resident of West Linn, I share the common concerns of the city views and are listed on their website. This proposed action seems rushed to implementation and is not following precedent. I would like to see this or any proposed change put to a democratic vote for the residents it impacts rather than a bureaucratic decision. Tolling with no bypass makes sense for large bridges and other impassable areas that have a higher maintenance cost like the San Francisco bay area bridges. Tolling when you can simply go around the toll makes no sense, as it will impact the neighborhoods used for the bypass. Sending more cars into neighborhoods makes those neighborhoods less safe for families and kids especially at commute times. How many of these current and future bypasses go by or near schools? I would like to pose a simple question- Who can be ultimately responsible if one child or family is hit by a car of a commuter using any bypass trying to get home in a hurry? This city resident would appreciate a name to be put in a future lawsuit along with the driver of the car. Surely the ODOT commission responsible for sending more commute cars into neighborhoods would share that responsibility and be additionally named. Assuming safety is the priority, it is not represented by this current short sighted plan. What will be formal process for legal protest?

**ODOT I-205 Toll EA - RECORD #477 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Richard

**Last Name :** Miller

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The intersection of Johnson and Stafford can be dangerous, particularly during morning and evening commutes. Placing a toll on I-205 without addressing the additional traffic pushed to Stafford and Johnson will result in a significant number of accidents and long delays. I understand the desire for toll revenue. I also see the increase in vehicles on Johnson whenever there is a back-up on I-205, so we know the toll plan will impact Johnson and Borland -- roads not adequately addressed in the impact study. Please consider (immediately) adding a traffic circle or other means of flow control to Johnson and Stafford. This is a matter of public safety.

<b>ODOT I-205 Toll EA - RECORD #478 DETAIL</b>
--

<b>Submission Date :</b>	4/13/2023
<b>First Name :</b>	Matt
<b>Last Name :</b>	Dela Pena
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Installing tolls on that segment is FOOLISH.



<b>ODOT I-205 Toll EA - RECORD #479 DETAIL</b>
--

<b>Submission Date :</b>	4/13/2023
<b>First Name :</b>	Tom
<b>Last Name :</b>	Marick
<b>Affiliation :</b>	Tom Marick Excavation
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	This will cause a huge negative impact to my business and services provided to my customers. I will not support the toll and will not provide services to potential customers that would force me to utilize the toll roads. Putting a toll on roads to and from Washington would be a much better option.

**ODOT I-205 Toll EA - RECORD #480 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Kenneth

**Last Name :** Roberts

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The estimated congestion pricing toll of \$2 during peak hours amounts to a \$90 a month, or \$1080 a year tax on working class citizens who are employed and have to make the trip during hours their employers set. How many people will divert onto local streets to save \$1000 a year? The answer is a lot of them. That is not an inconsequential amount of money to most working class families. This is going to create a traffic and quality of life nightmare for the local communities along these alternate routes, and a financial nightmare for those who pay the toll.

<b>ODOT I-205 Toll EA - RECORD #481 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Melanie

**Last Name :** Magno

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** In the day and age of google maps, people will find a way to avoid tolls.

<b>ODOT I-205 Toll EA - RECORD #482 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Chris

**Last Name :** Aronson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This will divert traffic into local communities. If we need funding for roads we should be taxing the billionaires for it.

**ODOT I-205 Toll EA - RECORD #483 DETAIL****Submission Date :** 4/13/2023**First Name :** Maria**Last Name :** Harvey**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** The toll road is setting a new precedent in Oregon. Oregon city and surrounding areas are about to get a lot of traffic. Traffic on 43 will be back up to Lake Oswego. I-5 traffic will increase. Is the plan to place tolls on all the roads? The economic report expect an increase of \$600 transportation cost raise per family. The report is planning to use the bridge to make money for ODOT.

<b>ODOT I-205 Toll EA - RECORD #484 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** William

**Last Name :** Starr

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Put the toll booths on the exits or entrance of I-5 and I-205 so that the people of Portland who caused the problem pay for this and not everyone else in the USA.

<b>ODOT I-205 Toll EA - RECORD #485 DETAIL</b>
--

**Submission Date :** 4/13/2023  
**First Name :** Hoang  
**Last Name :** Nguyen  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

<b>ODOT I-205 Toll EA - RECORD #486 DETAIL</b>
--

**Submission Date :** 4/13/2023

**First Name :** Lydia

**Last Name :** Greenlee

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Anyone familiar with the area will simply use side streets. The impact will be enormous on all of these alternate routes. I-5 will become even more ridiculously crowded. As a resident of Clark county, I will simply choose to avoid the toll by taking one of the many alternate routes when my trip takes me that way. This actually feels like an additional tax on Oregon City. Everyone will simply click "avoid tolls" on their Google map.



**ODOT I-205 Toll EA - RECORD #487 DETAIL****Submission Date :** 4/13/2023**First Name :** Devon**Last Name :** Keas**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I have significant concerns about equitable access to the 205 if there are tolls. Many of our neighbors are experiencing poverty and would not be able to afford to pay the tolls, preventing them from accessing work, school, etc. except through side streets. Tolling roads sends a clear message that faster, easier local travel is only for those who can afford to pay.

<b>ODOT I-205 Toll EA - RECORD #488 DETAIL</b>
--

**Submission Date :** 4/12/2023

**First Name :** Jason

**Last Name :** Louttit

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** With the current economic downturn and people barely able to afford necessities, raising the cost of their commute will harshly affect their lives. Adding a use tax on newly purchased vehicles, new or used, would be less impacting and still generate the revenue.

**ODOT I-205 Toll EA - RECORD #489 DETAIL****Submission Date :** 4/12/2023**First Name :** William**Last Name :** Whittemore**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I think one the biggest arguments against tolling is the inequity it creates to those who live in the surrounding areas. Toll fees add up quickly and disproportionately affect low-income individuals who may have to use toll roads as part of their daily commute. This can also create a barrier to access for those who may not have the financial means to pay the tolls. The funding and implementation of the entire tolling project and providing for low income provisions, has to be a logistics and cost nightmare compared with using existing meaning of funding these type of projects. Have the costs of implementation of these tolling booths, continued maintenance and ongoing collections of fees been assessed? When we could choose to use existing methods. Some studies have also shown an actual increase in traffic congestion and air pollution. When toll roads are implemented, some drivers may choose to avoid them and instead use alternative routes that may be longer and more congested, leading to more traffic and increased air pollution. Furthermore, tolling roads may not always be an effective way to fund transportation infrastructure. Some studies have shown that tolling revenue may not be enough to cover the costs of road construction and maintenance, and that other funding mechanisms may be more effective. While tolling roads can provide a source of revenue for transportation infrastructure, it may also create financial burdens, increase traffic congestion and air pollution, and may not always be the most effective way to fund infrastructure. I think there are much more effective ways to fund infrastructure that are already in place. ODOT is trying to reinvent the wheel with this tolling project with poor planning and implementation with other options that would be much more equitable to all Oregonians.

<b>ODOT I-205 Toll EA - RECORD #490 DETAIL</b>
--

**Submission Date :** 4/12/2023

**First Name :** Paul

**Last Name :** Ellison

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The impact on the surrounding communities is unacceptable, no thought has been given on traffic diverted. Also the toll impacts many senior and others unable to afford additional transportation costs. We should be tolling the I205 bridge rather than just Clackamas County

**ODOT I-205 Toll EA - RECORD #491 DETAIL****Submission Date :** 4/12/2023**First Name :** Katrina**Last Name :** Raetz**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I would like to see how Clackamas County plans to provide alternative outlets to Hwy 99, Gladstone, and Hwy 43 to Oregon City residence. The plan to toll traps most Oregon City residence and forces them onto the freeway to gain access to anywhere other than Oregon City. The local government has closed the road that allowed drivers on Hwy 13 access to McLoughlin using the road that led to the backside of OC shopping center and over to Gladstone. Downtown Oregon City doesnt offer the capacity to have the volume of vehicle passing through to Hwy 99, Hwy 43 or to Gladstone. What is going to be done in the next year to change alternative routes besides trapping residents or forcing them to be tolled to go one exit? How does the plan handle low income family members wanting to visit Oregon City residence or even to live in Oregon City when they cant afford current rent, utilities, etc.? How will the Oregon City handle no sidewalks on Washington Street, which will have increased traffic with drivers diverting through downtown OC to by pass the freeway toll? Will OC government allow for Costco, large box stores, and other services to be built and ran in OC so that residents don't have to leave Oregon City or pay toll to obtain these resources?

**ODOT I-205 Toll EA - RECORD #492 DETAIL****Submission Date :** 4/12/2023**First Name :** Holly**Last Name :** Crocker**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This toll will hurt the working class the hardest. People are already struggling just to pay for rent and food. Traffic from the 205 will naturally go to 82nd street, a high traffic corridor. This is a disaster in the making for anyone living near 82nd st. There is already terrible traffic, accidents, crime, and pedestrians hit by cars. The transit system is simply not advanced enough to make up for driving in a car. Working parents don't have an extra hour to pick their kids up from daycare. Disabled people can't stand at bus stops, or risk falling getting onto the bus. And don't mention Lyft to me, they dropped a blind choir member on street corner, far away from the church entrance, refusing to help her. Regardless of all that, the working class can't afford the tolls. Meanwhile, it is the trucks carrying goods for corporations that clog the road and do the damage. Maybe tax the corporations instead of the people. This toll is reprehensible.

**ODOT I-205 Toll EA - RECORD #493 DETAIL****Submission Date :** 4/12/2023**First Name :** Debra**Last Name :** Smith-Hirschmann**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Deeply concerned about the negative financial impact on individuals and businesses who cannot absorb the impact of financing the described improvements by tolls. I personally am considering moving out of the area and will be forced to leave my job of nine years. I am a homeowner and taxpayer and feel this project excessively impacts financial stability, not just for me but for countless other citizens as well.

**ODOT I-205 Toll EA - RECORD #494 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** William

**Last Name :** Black

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I don't see why spending money on an expensive toll system that has to be maintained and managed is better than acquiring the funds through increasing already existing taxes. Wouldn't increasing gas taxes discourage people from driving as much as a toll road? This is going to needlessly increase the costs of goods and services in a state that already has obscenely high cost of living in comparison to wages. I realize that increasing gas taxes won't make you any friends, but this is just inefficient comparatively. Inefficiency is usually if not always expensive.



<b>ODOT I-205 Toll EA - RECORD #495 DETAIL</b>
--

**Submission Date :** 4/12/2023

**First Name :** Truc-mai

**Last Name :** Lam

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls create burden to the surrounding areas. Also not many alternate routes therefore will create more hazards to the surrounding communities with increased diverted traffic. Please no tolls!

**ODOT I-205 Toll EA - RECORD #496 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** Rick

**Last Name :** Wilson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I don't see how it's possible for the intended diverted traffic to all be crossing Arch Bridge to the elevator. There are no other options. It's not anything that building better sidewalks or adding 100 more Trimet busses will mitigate. It's obvious that ODOT doesn't understand the topography in this region. This project will be a disaster for OC, WL, and Willamette. ODOT should be paying us for the disruption that is already happening.

<b>ODOT I-205 Toll EA - RECORD #497 DETAIL</b>
--

**Submission Date :** 4/12/2023

**First Name :** Jeffery

**Last Name :** Bennett

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This toll will cause a financial hit on the people of West Linn and other surrounding towns. I would have to pass this toll every day to get to work.

**ODOT I-205 Toll EA - RECORD #498 DETAIL****Submission Date :** 4/12/2023**First Name :** Sarah**Last Name :** Kusyk**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I currently live off Johnson Road (Stafford Rd end) and the non local traffic that already diverts themselves because they are trying to avoid 205 and want to bypass the section to be able to get on at 10th Street is a constant flow, but especially from 3-6 pm. Placing tolls will only worsen the current back street traffic that is already blocked and backed up. It is not an option until you have someone look at what is currently going on in the rush hour in West Linn back streets - Rosemont, Stafford Rd from roundabout, Borland Rd, Johnson Rd, downtown Willamette. Please do your research before going ahead with tolls as it is going to affect the residents of West Linn in a bad way.

**ODOT I-205 Toll EA - RECORD #499 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** Ian

**Last Name :** Brown

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** First: For people in my neighborhood, there's a toll in each direction on I-205. If I pick my child up from school to take him to an eye appointment and come home, I would pay four tolls, one on the way to the school, two on the way to the eye doctor, and one on the way back home. The region benefits, and the financial burden is inequitable. Second: the alternative routes through neighborhoods will become congested with folks avoiding the tolls, getting off at Stafford, driving through West Linn and across the Arch Bridge into Oregon City.

<b>ODOT I-205 Toll EA - RECORD #500 DETAIL</b>
--

**Submission Date :** 4/12/2023

**First Name :** Kevin

**Last Name :** Bodin

**Affiliation :** doesn't matter

**Submission Method :** SurveyMonkey

**Q3. Comments :** I shouldn't be taxed to go to work everyday to provide for my family. I'm deeply concerned about the extensive traffic increasing in West Linn. My kids can't cross the road to get to and from school already and we haven't even started tolling. The potential environmental impact speaks for itself. Just because i chose to live in West Linn doesn't mean I should bare this burden daily.

**ODOT I-205 Toll EA - RECORD #501 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** Vern

**Last Name :** Pearson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** A TOLL WILL SIGNIFICANTLY ADD TRAFFIC TO OTHER STANDARD ALREADY CROWDED STREETS SUCH AS 1-82ND AVE NE 122 ST ! 5 IMPACT TV HWY BECAUSE BRIDGE IN NEWBERG WILL BE USED SOLUTION TO TOTAL TOLLING GOVT IS PUSHING FOR TOTAL ELECTRIC CARS- ADD REGISTRATION FEE FOR ALL ELECTRIC CARS SINCE A SOLUTION WILL HAVE TO BE FOUND BECAUSE - OF LOST GAS TAX REVENUE.

<b>ODOT I-205 Toll EA - RECORD #502 DETAIL</b>
--

**Submission Date :** 4/12/2023

**First Name :** Robert

**Last Name :** Insley

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls disproportionately affect lower income people. Also no matter what you do, this is going to clog the nearby non-toll roads because people are going to take other roads to get around the tolls.



**ODOT I-205 Toll EA - RECORD #503 DETAIL****Submission Date :** 4/12/2023**First Name :** Brandon**Last Name :** Raymond**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This is related to tolling on I205 between Oregon City and Tualatin. I commute 5 days a week from Milwaukie to Wilsonville. I will not pay the tolls if they are enacted. I will take surface streets instead because I cannot afford this additional tax for just commuting to work. There are no reasonable and time efficient alternative ways for me to get to work and my spouse and I already pay enough in taxes to the state of Oregon for our roads to be upkept and improved but the state and Metro has continued to put off the necessary improvements and mismanaged tax dollars for so long that they have resorted to tolling to try play catch up. The tolls are supposedly to pay for these projects but once these projects are paid for will the tolls go away? I doubt it. The state will find somewhere else they have wasted money and divert the funds to that new cause. John Fogerty sang "and when you ask 'em "How much should we give?" Hoo, they only answer "More, more, more, more". I say no more. Everyone I've talked to my area facing this dilemma has said they will take surface streets. This will be a catastrophic failure that creates horrible congestion on surface streets and fails to raise the desired funds. No tolls on I205.

<b>ODOT I-205 Toll EA - RECORD #504 DETAIL</b>
--

**Submission Date :** 4/12/2023

**First Name :** Dawn

**Last Name :** DiGregorio

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We pay enough for roads and tolls will be a burden to those who have to drive to work daily and our employers will not allow us to adjust our hours or work from home. Nor is there public transportation from our area to Washington County.

<b>ODOT I-205 Toll EA - RECORD #505 DETAIL</b>
--

**Submission Date :** 4/12/2023

**First Name :** Troy

**Last Name :** Wolfe

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Financial impact to West Linn residents and increased traffic on side roads, including Hwy 43

**ODOT I-205 Toll EA - RECORD #506 DETAIL****Submission Date :** 4/12/2023**First Name :** Kirsten**Last Name :** Solberg**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** For low income citizens, the tolls are going to add a burden that will be hard to overcome. It will limit access to jobs, childcare, medical care and more. For people already having trouble affording gas, food and basic necessities, adding a toll will in many cases be completely unaffordable. The tolling is going to result in terrible congestion on roads, including many small back roads roads through Stafford, northern Oregon City and southern West Linn. Downtown historic Oregon City and the Oregon City Arch Bridge will be so backed up with traffic that local downtown businesses will suffer.

<b>ODOT I-205 Toll EA - RECORD #507 DETAIL</b>
--

<b>Submission Date :</b>	4/12/2023
<b>First Name :</b>	Aaron
<b>Last Name :</b>	Macdonald
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Taxes are already paid for the roads. Use that money.

**ODOT I-205 Toll EA - RECORD #508 DETAIL****Submission Date :** 4/12/2023**First Name :** Kathy**Last Name :** Fisher**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** As a senior citizen soon to be on a fixed income, I will plan to avoid the tolls by going around the tolls. I will plan on mostly using the Highway Bridge that connects West Linn (from Willamette Drive), to Oregon City (dropping at Main Street and turning into 7th Street). Normally, I hop onto the 205 from Willamette and cross the Abernethy to go anywhere north. But what is so bad about that plan is that the Highway Bridge is so narrow and scary that I usually try to avoid it currently. Plus it is already so backed up when people are trying to get home from work. But how much extra gas will I spend and extra pollution put in the environment by trying to avoid the tolls anyway? And it is much more dangerous to travel on those small streets that are not meant to regularly handle diverted highway traffic. The Highway Bridge (after turning into 7th Street) empties into a street named Railroad Avenue in Oregon City that feels like an alley rather than a street. There should be research that addresses all these issues to understand these impacts. This tolling is targeting people that live in West Linn unfairly and those with a zip code of 97068 should have a waiver for the fees. But that still does not help the environment for all the other people trying to avoid fees. There will be so much negative impact to our lives with all this new traffic in our neighborhood.

<b>ODOT I-205 Toll EA - RECORD #509 DETAIL</b>
--

**Submission Date :** 4/12/2023

**First Name :** KELLY

**Last Name :** DOERING

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** the Oregon city bridge will be over used by people bypassing the tolls

<b>ODOT I-205 Toll EA - RECORD #510 DETAIL</b>
--

**Submission Date :** 4/12/2023

**First Name :** Heah

**Last Name :** Meir

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Already living paycheck to paycheck due to high taxes and cost of living. Having to pay to drive to work and back will take money from my family needed for living expenses. It is going to negatively affect those that live in the area much greater than anyone else. If you were going to provide an express lane and charge those that want to move through traffic more quickly, that would make sense.



<b>ODOT I-205 Toll EA - RECORD #511 DETAIL</b>
--

**Submission Date :** 4/12/2023

**First Name :** Duane

**Last Name :** Funk

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** How much traffic will be diverted into city streets? Looking at the map it appears to me that traffic will divert onto Borland and then Willamette Falls Dr then right through the Willamette historic district. Freeways are suppose to take traffic off city streets, to add to it.

<b>ODOT I-205 Toll EA - RECORD #512 DETAIL</b>
--

**Submission Date :** 4/12/2023

**First Name :** Rhonda

**Last Name :** Cramer

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Those that can pay will - those that can't will reroute through neighborhoods/business areas where we're not wanted. Makes our trips longer and causes unnecessary diverted traffic.

**ODOT I-205 Toll EA - RECORD #513 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** R

**Last Name :** Be

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Placing tolls on only the two west Linn freeway access points will result in more traffic congestion on west Linn roads as people will quickly learn alternative routes through west Linn to avoid the tolls. This will inevitably raise west linn's road maintenance costs, add time to our commutes just to get to the freeway, and endanger more west linn pedestrians and bicyclists with the excess traffic. A third freeway lane to improve traffic is great. But tolling is the wrong approach to paying for it. The recently passed infrastructure bill should pay for it.

**ODOT I-205 Toll EA - RECORD #514 DETAIL****Submission Date :** 4/12/2023**First Name :** Ian**Last Name :** MacGillivray**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Congestion on Stafford, Willamette and Rosemont is already becoming a giant problem at peak hours considering they are one lane roads. Not only are people not going to be able to afford the tolls, but they WILL be using exit points that are going to become intolerable with hundreds, if not thousands of vehicles inundating our local community. The inadequate mitigation plans provide no actual traffic or transit solutions planned for expected diversion traffic volumes on local streets. This project is being pushed through and upending decades of precedent which has allocated the cost of major transportation projects to all interstate users. Stop!

**ODOT I-205 Toll EA - RECORD #515 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** Rob

**Last Name :** Vance

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling an existing freeway is wrong. If ODOT wants to eliminate traffic on I-5, I-205, and the existing I-5 bridge between Portland and Vancouver build a new toll freeway which goes from Ridgefield,WA , travels through Western Washington Co and reconnects with I-5 in the Wilsonville area. No need to build a new bridge at Hayden Is, plus no need to widen I-5 near the Moda Center. Start thinking out of the box ODOT

**ODOT I-205 Toll EA - RECORD #516 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** Laury

**Last Name :** Bean

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I have a son who will have to pay 2 tolls to get to work and 2 tolls to get back to work. A daughter who will have to pay toll to work and back. This is insane. I don't want to have to pay more money to see my kids either. ODOT needs to learn to spend only what the gas receipts are provided. Look at the money spent on the Columbia Crossing mess. Maybe if you didn't have so many people making over a \$100,000 a year then you would have enough money. Thank God I live in Roseburg

<b>ODOT I-205 Toll EA - RECORD #517 DETAIL</b>
--

**Submission Date :** 4/12/2023

**First Name :** Clifford

**Last Name :** Spencer, MA, MS

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling on the 205 is among THE WORST ideas so far. Maybe the toll advocates should go back to the East Coast? Diverting traffic on to other streets will have added smog impacts, effect small town (i.e. Oregon City, West Linn, Lake Oswego) quality of life by adding more traffic to "side streets".

**ODOT I-205 Toll EA - RECORD #518 DETAIL****Submission Date :** 4/12/2023**First Name :** Chris**Last Name :** Sprando**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** This is just wrong! We do not need tolling in Oregon, let alone in my city. This will be a financial burden on families as well as diminished property values. Who would want to move into an area where it costs money everyday to use the freeway?! Please reconsider this horrific plan.



**ODOT I-205 Toll EA - RECORD #519 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** Christopher

**Last Name :** Owens

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** 1. The lack of alternative routes in the area will lead to hazardous conditions on OR 43, Stafford Road, Willamette Falls Drive and others. Some, like OR 43 through West Linn and across the Arch Bridge are already beyond capacity at busy times; others like Stafford Road are unsuitable for additional traffic due to curves, blind intersections and lack of shoulders. 2. I object to a funding system that will consume at least 40% of revenue just to operate. Having lived in northern VA as tolling increased, I know that administrative costs can total nearly 100% of revenue, with most or all going to private contractors. 3. As a resident of West Linn, most of our shopping opportunities, and many employment opportunities are in the Oregon City/Gladstone area. The tolls constitute a regressive tax on lower income people, and a disproportionate impact on local residents as opposed to through-drivers.

**ODOT I-205 Toll EA - RECORD #520 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** David

**Last Name :** Buzza

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** There are to many vehicles already diverted through my neighborhood both from Hwy 43 and the I-205 project. I use I-205 daily between Hwy 213 and Stafford. If the toll plan moves forward I'll be spearheading/funding an effort to place plate readers at west linn exits and sending "tolls/usage tax" bills to vehicles not registered in west linn using west linn surface roads to avoid the toll. Let's talk equity. You want the property owners in west linn and lake oswego to fund odot projects in less advantaged communities through tolling? Just think of the backlash of that failed practice. My neighborhood is already less livable by a bunch of clowns pretending to be champions. You want real change? Then let's start from the top. Governor Kotek is kicking ass! Holding individuals, agencies and organizations accountable. Loving it!

<b>ODOT I-205 Toll EA - RECORD #521 DETAIL</b>
--

**Submission Date :** 4/12/2023  
**First Name :** Christopher  
**Last Name :** Owens  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

<b>ODOT I-205 Toll EA - RECORD #522 DETAIL</b>
--

**Submission Date :** 4/12/2023

**First Name :** Christopher

**Last Name :** Contreras

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I live on Willamette Dr (43) and am concerned about the increase in traffic tolling would cause. Also. Many of the closest amenities to me (pharmacy, food, etc) are on the Oregon City side of the bridge, so I will essentially have to pay a "tax" for basic goods.

**ODOT I-205 Toll EA - RECORD #523 DETAIL****Submission Date :** 4/12/2023**First Name :** John**Last Name :** Ley**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The I-205 project promises to CUT traffic congestion from 14 hours to just two hours. What ODOT refuses to inform people about, is how much of that 12 hour reduction is due to the 50 percent increase in lanes on I-205. It is the added vehicle capacity that delivers the overwhelming majority of the reduction in traffic congestion, NOT the tolls. TOLLING is not needed to improve traffic congestion on this portion of I-205. The reason you have traffic congestion is a lack of vehicle capacity. The addition of two lanes (one in each direction) will solve that problem. Finally, TOLLING is a hugely inefficient means of raising transportation dollars. In Seattle on I-405/SR-167 system, the "cost of collection" was 68 percent in 2021. That is an extremely expensive way to raise money for transportation. The gas tax "cost of collection" is less than 1 percent.

<b>ODOT I-205 Toll EA - RECORD #524 DETAIL</b>
--

**Submission Date :** 4/12/2023

**First Name :** John

**Last Name :** McMunn

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The proposal to institute tolls from Stafford to Willamette, approximately, will lead to major congestion on area residential streets by those avoiding tolls. Tolls are always a bad idea and lead to unnecessary congestion and delays. As a former resident in areas with toll roads in the East and Midwest, let me assure that this proposal - for tolls - is a bad idea. Thank you for your consideration.

**ODOT I-205 Toll EA - RECORD #525 DETAIL****Submission Date :** 4/12/2023**First Name :** Matt**Last Name :** Hartley**Affiliation :** Business Operator**Submission Method :** SurveyMonkey**Q3. Comments :** This tolling idea of the Abernathy Bridge is an unfair reverse tax on workers who already have financial hardship and risk increased homelessness. This is also a terrible idea that would lead to increased congestion on one of the states most congested interstates negatively affecting small businesses and low to middle income families.

**ODOT I-205 Toll EA - RECORD #526 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** Leah

**Last Name :** Anaya

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling will have a negative financial impact on millions of residents. There would also be a negative impact on traffic both to slow to pay for tolling and on alternate routes as people attempt to avoid tolls. NO TOLLS!



**ODOT I-205 Toll EA - RECORD #527 DETAIL**

**Submission Date :** 4/12/2023  
**First Name :** Alex  
**Last Name :** Van Hoomissen  
**Affiliation :**  
**Submission Method :** SurveyMonkey

**Q3. Comments :** In the videos I watched, they said they have looked at mitigation ideas but it does not specify what would be done for the trouble areas located. I am very concerned about people trying to avoid tolls and clogging West Linn roads. Especially Salamo which can take you from West Linn to the 43 and therefore avoid 205 depending on where you are going. There a lot of kids walking that road and a middle school on it as well. In general I feel that it is a certainty people will be using all the West Linn roads available to get where they are going so as to avoid tolls. But most of these roads are only one lane. I also feel that the financial implications are huge. I am a stay at home mom and living in West Linn means you pretty much have to get on the freeway to go anywhere in under 20 minutes. I can't just cancel my kids sports or never go to my church. If I use the freeway 4 times a day (counting back and forth) this could end up costing my family \$2000 a year. That is a huge expense.

<b>ODOT I-205 Toll EA - RECORD #528 DETAIL</b>
--

**Submission Date :** 4/12/2023

**First Name :** Damian

**Last Name :** Barron

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** There is no need to add rolling to 205 or I5 in the metro area. This is ridiculous and just another tax in an already highly taxed area. Do not do this!

<b>ODOT I-205 Toll EA - RECORD #529 DETAIL</b>
--

**Submission Date :** 4/11/2023

**First Name :** Victoria

**Last Name :** Ferrer

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We the people have voted more than once that we do NOT want a toll bridge and when I talked to many Clark County residents, they stated they did NOT want the Light Rail either. I had to move from Portland after they brought in the Metro because it brought many homeless and drug addicts near my home. They made the neighborhood unsafe for my children and myself. We were therefore forced to move. I request you not place tolls nor the Light Rail.

**ODOT I-205 Toll EA - RECORD #530 DETAIL****Submission Date :** 4/11/2023**First Name :** Barbara**Last Name :** Embry**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** While I do understand the need to bring in more funds for needed improvements, this will just force traffic on to other routes including I-5, which already suffers from congestion. Citizens are already suffering from inflation and this will exacerbate the pain people are feeling. Why is Oregon not using monies provided from the new Infrastructure Bill passed by Congress to fund these improvements?

**ODOT I-205 Toll EA - RECORD #531 DETAIL**

**Submission Date :** 4/11/2023

**First Name :** Patrick

**Last Name :** Mallory

**Affiliation :** West Linn resident

**Submission Method :** SurveyMonkey

**Q3. Comments :** 1. We expect adverse financial impact of tolls on low & fixed income residents of West Linn at a time when both Oregon and Clackamas County regularly raise taxes and assessments. Access to West Linn is either 205 Borland/Willamette Falls Drive. Tolling between Stafford & Hwy 43 will likely increase traffic on the local in this span creating dangerous conditions on a main artery between Fields park and the businesses of old town WL. There is no other community as adversely impacted along 205 as West Linn as access to West Linn is geographically limited by terrain and rivers.

**ODOT I-205 Toll EA - RECORD #532 DETAIL**

**Submission Date :** 4/11/2023

**First Name :** William

**Last Name :** Brown

**Affiliation :** Tax payer

**Submission Method :** SurveyMonkey

**Q3. Comments :** First, my taxes, both gas and federal, have already paid for the freeway and double taxation is ILLEGAL. Second, by tolling EVERY lane, people will jump off the freeway and use surface streets, I know I will. Third, the poor and POC will not be able to afford the tolls and that is racist and classist. Fourth, people are sick and tired of always being the scapegoat for the shortfailing of funding PERS. We ALL know that this project, as every other fee and tax in Oregon, goes to fund PERS. This is disgusting and dishonest.

**ODOT I-205 Toll EA - RECORD #533 DETAIL****Submission Date :** 4/11/2023**First Name :** Dave**Last Name :** Leslie**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Toll dodgers will use surface streets which are already very busy during rush hours. Specific streets include Borland Road, Johnson Road, possibly Rosemont Road. The old bridge over the Willamette, already at or beyond capacity will be used by many toll dodgers, leading to gridlock in downtown Oregon City and the West Linn approaches. This project is horribly ill conceived. If tolls are indeed necessary (I'd choose just about any other way to fund needed improvements if up to me) the entire I5-I205 corridor should be tolled simultaneously. As it is those of us who get to live in the 'guinea pig' area will get to pay the price.

**ODOT I-205 Toll EA - RECORD #534 DETAIL**

**Submission Date :** 4/11/2023

**First Name :** Travis

**Last Name :** BLAKE

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Absolutely sick of ongoing tax increases. It doesn't matter how much money government has it will never be enough. Manage your money, like civilians do. Your breaking people. Why you think people are leaving? Taxes is so high already and you adding more. Tax isn't even going to our horrible roads. Its a bad joke



**ODOT I-205 Toll EA - RECORD #535 DETAIL**

**Submission Date :** 4/11/2023

**First Name :** Laura

**Last Name :** Guillen

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I live in between the two West Linn toll gantries, meaning I will now pay tolls no matter what direction I drive now, every day of every year. This is an unimaginable expense! Why on EARTH would you put both toll gantries in one town? The mitigation team should MOVE at least one of these toll gantries to another town altogether, so ODOT isn't punishing us for no reason. Imagine your home surrounded by tolls on either side! I have to pay dollars each day just to leave my house, and all to save city commuters 5-15 minutes a day? We have highways - widen them. We have taxes - raise them. We do NOT WANT TO PAY TOLLS EVERY DAY! I did not vote for this! Why are you putting this permanent burden solely on West Linn? I literally beg you to reconsider the plan - put yourself in our shoes. It is untenable- both directions are tolls! Every single time I need to leave West Linn I have to pay! WHY does every neighboring town get out of this? Lake Oswego has no tolls! Tigard and Tualatin - no tolls! Wilsonville - no tolls! Why have TWO in West Linn? ??????

**ODOT I-205 Toll EA - RECORD #536 DETAIL****Submission Date :** 4/11/2023**First Name :** Steve**Last Name :** Underwood**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** You haven't really taken into any consideration for the impacts this is going to cause. Traffic will divert to I-5 causing more congestion there. Traffic will also divert to side roads, since there are no required bypass highways around toll areas. This will not alleviate traffic during heavy usage periods as you blindly suggest. What are you doing with the taxes/fees that we already pay for roads? You are getting federal funds, you raised gas taxes, added fees to license vehicles and drivers license and put a tax on vehicle sales. These increased and new fees/taxes should be more than enough to pay for road maintenance. Lastly the method the you have chosen to implement payment for tolling isn't a nationwide standard/accepted system. I don't agree with this tolling and will vote against it when we get it on the ballot. Not sure why the lies in trying to push this through without a vote of the people.

**ODOT I-205 Toll EA - RECORD #537 DETAIL**

**Submission Date :** 4/11/2023

**First Name :** Heidi

**Last Name :** Michelson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Families cannot afford this toll. It is going to create a hardship. Peoples will end up going around causing traffic in family neighborhoods and create unsafe conditions for children in the surrounding communities.

<b>ODOT I-205 Toll EA - RECORD #538 DETAIL</b>
--

**Submission Date :** 4/11/2023

**First Name :** Kathleen

**Last Name :** Chiocca

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I live in Charbonneau. If the proposed toll are extended to the Charbonneau exit, EVERY trip I need to make will cost me money. It will cost me \$ to go to the nearest grocery. It will cost me \$ to go to the library. It will cost me \$ to go to the dentist. It will cost me \$ to access healthcare. It will cost my children and grandchildren \$ to visit me. My husband and I are on a fixed income and it will impact us greatly. There is no other way to cross the river to access ANY services. The people of Oregon DO NOT want these tolls.

**ODOT I-205 Toll EA - RECORD #539 DETAIL**

**Submission Date :** 4/11/2023

**First Name :** Maryann

**Last Name :** Sullivan

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** 1. It makes more sense to toll at the north end and south end of 205 to be equitable to all. 2. I am retired and shouldn't have to cover the burden of tolls. I drove to work into Vancouver for over ten years, there wasn't any other transportation. It's an unfair practice to toll our community. 3. People tend to drive fast as it is and the safety and congestion on local West Linn roads used by those routing around the proposed two (2) toll gantries planned in West Linn will create negative impacts to local business districts and community members. 4. Inadequate mitigation plans to reduce negative impacts of tolling I-205 in West Linn (currently ODOT has only identified two (2) small pedestrian projects, no actual traffic or transit solutions are planned for expected diversion traffic volumes on local streets). 5. Plans to begin tolling before limited mitigation measures are in place. 6. Inequitable burden for community members that don't have the option to shift work hours or travel times to avoid peak tolls. Added layers of bureaucracy for low income or marginalized persons to be aware of and apply for low-income toll programs. 7. Unfairly placing 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. 8. Upending decades of precedent which has allocated the cost of major transportation projects to all interstate users.

<b>ODOT I-205 Toll EA - RECORD #540 DETAIL</b>
--

**Submission Date :** 4/11/2023

**First Name :** Richard

**Last Name :** Zack

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We are opposed to the tolling projects and will petition to allow Oregon residents to decide rather than ODOT arbitrarily deciding. Thank you.

<b>ODOT I-205 Toll EA - RECORD #541 DETAIL</b>
--

<b>Submission Date :</b>	4/11/2023
<b>First Name :</b>	Victor
<b>Last Name :</b>	Mack
<b>Affiliation :</b>	Republican
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	It will place an unnecessary strain on citizens

**ODOT I-205 Toll EA - RECORD #542 DETAIL****Submission Date :** 4/11/2023**First Name :** Amanda**Last Name :** Kreitzberg**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The tolls are being assessed and placed primarily on the people of Oregon City and West Lynn, but the 205 corridor benefits all of the Portland area. It's unfair to have a couple communities bear the brunt of these when everyone benefits from road improvements. Payment for this project should be handled in the same manner as past road projects. Also, the 'wait and see' approach to traffic issues caused by people avoiding the tolls isn't acceptable. Anyone can tell that there will be issues, ODOT needs to be assessing what they will be and taking action now, rather than waiting to address whoever is loudest in complaining about problems. Nobody thinks government is quick, having a wait and see approach just puts traffic issues on communities for years before it's fixed and by then some permanent damage to neighborhoods (to the roads and to the community) may not be able to be rectified.



**ODOT I-205 Toll EA - RECORD #543 DETAIL**

**Submission Date :** 4/11/2023

**First Name :** Joshua

**Last Name :** Hoch

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I object the State's plan that to create a new tax to use the roads that we are paying for in gas tax, registration fees, federal taxes and other state taxes. This will only divert the traffic on top the side streets and create a mess of traffic around those areas. The entire reason we created the freeways was to get most of the traffic out of the neighborhoods. This tax that you are calling a toll might alleviate traffic on the interstate at the expense of more traffic were people are walking and biking. This will lead to more pedestrian and biking deaths. I also understand that in a democracy you have to listen to our input on projects that will affect our lives, but we all know that this is just procedural and you've already made up your mind. You will regret installing all this new equipment when a State measure banning tolling goes on the ballot!

**ODOT I-205 Toll EA - RECORD #544 DETAIL****Submission Date :** 4/11/2023**First Name :** Ashley**Last Name :** Morrow**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** They say putting in tolls will help with congestion...in reality these tolls will only add to our already congested and heavily used city streets. Both Oregon City's Main Street from 99E to the old arch Bridge and West Linns Willamette Falls Drive are already very popular thoroughfares to avoid 205 congestion. The congestion in all of these areas will get worse, causing small local businesses to lose more customers due to the inconvenience that will be caused by bringing additional traffic at all hours because of drivers trying to avoid the polls. This is a terrible solution and will not solve any problems. The placement of the booths/toll readers is ludicrous and will decimate business in these two thriving local cities. After the hell our state went through with over the top lock downs and restrictions that very few other states endured, we are just now FINALLY getting our economy, jobs and businesses back on track. To then bring things back to a halt with such a terrible plan that 90% ++++ of the community DOES NOT SUPPORT makes no sense. Shame on ODOT for ignoring the people of this state, watch the numbers of people leaving Oregon in mass again after they do this. And they'll claim traffic is down because of their tolls, when in reality it'll be people are fed up with this state and it's ridiculous policy's and ignoring the people who fund all their projects and failed plans.

**ODOT I-205 Toll EA - RECORD #545 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Lindsay

**Last Name :** Mantell

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Placing this toll road in the planned location is paralyzing to anyone living in the West Linn community. You are unfairly placing the burden of tolls on the families of West Linn. While for some a toll is only a blip on the radar, for most who are living pay check to pay check and still struggling from the impacts of covid will now struggle even more. You will be bringing in an obscene amount of traffic to already congested side roads such as willamette drive, 43 and the bridge to Oregon City due to people trying to avoid the tolls. Due to the rise in city traffic, our streets will no longer be pedestrian safe not only due to traffic concerns through local roads but also the transient traffic this will bring. Along with all of this home values will plummet, punishing families and the community. West linn does not have ample opportunity for public transportation access within the city. It is not right to put the burden of a toll road upon a single city when there are alternate options that more fairly spread the burden of a toll road.

**ODOT I-205 Toll EA - RECORD #546 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Erin

**Last Name :** Jones

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am worried about added traffic that the tolls would cause on our local streets in West Linn that surround the areas that my family and I walk and play often. With added traffic, it brings environmental and health issues for all those in our community. The new Athey Creek middle school location near the suggested toll areas must be taken into consideration. This area new Fields Bridge already suffers from increased traffic. I have concerns about the financial impact these tolls will have on my family and many families in our community that rely on I205 but cannot adjust their work times. I would like to see more mitigation plans that address traffic. I'm also concerned about the unfair funding practices that place a heavier burden on our community in West Linn.

**ODOT I-205 Toll EA - RECORD #547 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Erin

**Last Name :** Kays

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I would like to suggest that part of the function of tolling is encouraging the use of public transportation. The proposed toll areas on I 205 around West Linn do not have access to public transportation. There is not a way to get from Wilsonville to West Linn, or to travel around West Linn via public transportation. As such, my only option is to use my personal vehicle. Local residents will effectively be charged by the toll or by travel time on increasingly congested backroads where we do not have another option for mode of transportation. Families of all economic groups are already navigating inflation, and rising costs of living & raising children without the toll costs. The burden of the state's mismanaged budget should not fall on the shoulders of people who have already paid taxes to the state, in part for infrastructural improvements. Additionally, there is not enough mitigation to support the back roads surrounding I 205 in the proposed tolling region. Those cannot support the level of diverted traffic that will result from the tolling. The transportation analysis needs to consider ways to mitigate new traffic and increased risk to drivers & local residents on back roads which lack the infrastructure requires. Stafford road will become overburdened, causing delays to commuters and school buses traveling through West Linn-Wilsonville School District. The impact of tolling to people who call Stafford Road home has been inadequately analyzed and needs to be revisited.

<b>ODOT I-205 Toll EA - RECORD #548 DETAIL</b>
--

**Submission Date :** 4/10/2023

**First Name :** Adrian

**Last Name :** Butler

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I'm am writing to convey my absolute disdain for the tolling project. You have disregarded the communities voice and have rammed this down our throats despite our concerns. This will cripple the local businesses, the neighborhoods will be swamped by people avoiding the tolls... I'm seriously thinking of having to move. I'm a housekeeper. I don't make much at all. Covid nearly killed off small businesses and adding a toll on top of rising gas, food and a stagnant economy will finish any still holding on. The only thing left will be big corporations that can afford this nightmare. We the People do not consent to this!

**ODOT I-205 Toll EA - RECORD #549 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** C

**Last Name :** Ballaris

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We already pay at the pump for roads and road maint. As EV do not use gas stations, they should be expected to pay a portion as well through licensing fees or an EV purchase tax. I have also not seen anything about reversing taxation at the pump for those who drive gas cars. If we must pay to just drive a few miles on individual roads, the road maint taxes that we pay at the pump should be removed. This is also going to create hardships on people who travel these roads 2x a day or more for travel to and from work when they may only be making minimum wage or slightly above. How are they to come up with \$100 or more for tolling fees? I have not seen anything capping this toll so it could potentially suffer frequent and/or steep rate hikes without limits set.

**ODOT I-205 Toll EA - RECORD #550 DETAIL****Submission Date :** 4/10/2023**First Name :** Jeremy**Last Name :** Rower**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** If the goal is to increase revenue, it would seem that a better placement for tolling would be in a place without communities nearby that would be negatively effected but still have significant traffic and also have no good immediate alternatives to exit and attempt to avoid the tolls. Somewhere on I-5 maybe between Woodburn and Salem would have significant traffic without the negative community impacts. Placing it at the bridge where not only will multiple communities be negatively affected by those attempting to avoid tolls but also will only serve to increase traffic and congestion in an area that has significant issues with traffic already. Most toll roads have at least three lanes and currently this section of 205 has two. There just seems to be very little logic applied to the location of the tolling aside from "let's roll the folks back the bridge we want to repair". While those living near the bridge use it often, it is also used by thousands of cars and trucks from Washington, so why not put a toll at the bridge over the Columbia after the airport? There are many lanes and you would capture a lot of volume. Again it seems logic has failed to be applied if the goal was to increase revenue. This would be much more profitable a location than low down on 205. The other issue is that traffic would avoid 205 and just pack I-5, which is already congested without the added traffic from those avoiding 205 in the future. It is hard to believe also that a true study was done and found the communities of Oregon City and West Linn to have sufficient side roads to handle the increased traffic of those avoiding 205. There is already major traffic congestion now on the major side streets any time there is congestion on 205. There are no alternatives for those living in the communities affected and the negatives are significant with businesses that will close and families that will move away. The potential to turn prosperous small communities into ghost towns is significant. My hope is that someone decides to actually do a thorough study and sees that tolling this part of 205 makes no logical sense and the harm by placing tolls in this area vs a different area with less families and mor current highway lanes makes more sense with less local harm and the same revenue generation.



**ODOT I-205 Toll EA - RECORD #551 DETAIL****Submission Date :** 4/10/2023**First Name :** Patricia**Last Name :** Douglas**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I'm against tolls for existing highways and roads. Since electric vehicles don't pay as much in road taxes, I suggest they have a higher registration fee. If you replace the I-5 bridge, I am in favor of a toll for the new bridge.

**ODOT I-205 Toll EA - RECORD #552 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Tilda

**Last Name :** Hoffberg

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am concerned that Willamette Drive(Hwy 43) will become very congested and cause backups that harm those that live and work along this route. Willamette Drive is already in disrepair and needs to be addressed before more traffic flows through it. I also worry that all our side streets, Borland, Stafford, Johnson, Willamette Falls Drive will become more congested. If tolls must happen they need to not single out one community for the majority of impacts. I fear that I won't be able to get to work in a reasonable amount of time because the roads I have to take will be filled with thousands avoiding the tolls.

**ODOT I-205 Toll EA - RECORD #553 DETAIL**

**Submission Date :** 4/10/2023  
**First Name :** Megan  
**Last Name :** Goldsborough  
**Affiliation :**  
**Submission Method :** SurveyMonkey

**Q3. Comments :** I am concerned with the effects the tolls will have not only on the traffic, but on my family's budget. If the tolls (at Stafford & at Abernathy) go in then I fear some traffic will reroute to hwy43 to avoid the one or more of the tolls. This would significantly increase local traffic where I live. Hwy43 is already heavily congested and will get worse if it becomes an even more attractive alternate route. I am also concerned about the impact the tolls will have on my family's budget. I am a West Linn resident and I use I-205 between the OR13 & Stafford roads exits quite a bit in my daily driving. It is sometimes unavoidable to use I205 to run errands in my community for example. West Linn is divided in half by I205 and adding tolls creates an unfair financial burden on West Linn residents. Although, I appreciate the seismic improvements and the additional traffic lane being added, the tolls are a part of this project I wholly disagree with. To me, tolls are meant for commuter traffic and not for local traffic. I find it upsetting that just based on where I live, I will not be excessively tolled. If toll gantries are to be built on I205 then there should be exceptions made for those who live in West Linn. An exception could be that we are provided a free or reduced rate toll tag (something you stick to your cars that get automatically scanned as you drive through a gantry). There should be a plan in place to reduce the cost burden on West Linn residents. I do not want to have to pay a toll every time I drive around the town I live in. If there must be tolls, please find a way to make it more fair to those who live in close proximity to those tolls. Thank you.

**ODOT I-205 Toll EA - RECORD #554 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Jayd

**Last Name :** Saucedo

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Your environmental assessment is flawed in that it claims that communities will experience improved access because of less congestion. Communities will in fact experience less access and more congestion because tolling will be avoided as much as possible. This means that the community will take byroads and cause congestion or be forced to forgo their needs. The only people that will benefit are those that rarely take the toll road, those that are wealthy enough that it is inconsequential, and those profiteering off the tolls. This will affect me personally because I cross the Willamette river 4 times a day from Oregon City to West Linn so that I can access childcare. I cross the bridge during peak times at the start and end of my work day. Our childcare cost would raise substantially. Switching providers is difficult because of the specific needs of my children. I view the tolling of the bridge as unnecessarily cruel segregation of communities. After the tolling has taken place and congestion on byways has increased, there will be no reasonable alternative for the two communities to access one another and people will suffer. Consider alternatives such as a tolled express lane on the bridge, expanding the Oregon City bridge to support the increased local congestion, or covering the cost of the bridge with a Metro tax. This toll is wildly unpopular. It says a lot about those involved with the project and the state representatives involved.

**ODOT I-205 Toll EA - RECORD #555 DETAIL****Submission Date :** 4/10/2023**First Name :** Beth**Last Name :** Staus**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The transportation analysis should consider how often families in west linn travel to Oregon City and how much it will cost us to go from hwy 43 to downtown Oregon City. This tolling will impact the economy of Oregon City negatively. We will not pay tolls just to cross the bridge and go 1 exit. Currently I use services in Gladstone, Milwaukee, and Oregon City, but if I have to pay a toll to go such a short distance from my home and go 1 exit on 205, I will not. I will go somewhere else. It is disappointing to see tolling impact things that include what I consider to be local trips. I would love to continue to support and be a part of the greater Clackamas county area, but tolling the Abernathy will destroy that sense of community.

**ODOT I-205 Toll EA - RECORD #556 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Jonathan

**Last Name :** Dinelli

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling the 205 freeway would have several unintended negative consequences and should not be undertaken. As a resident of West Linn the thought of having all the local thoroughfares clogged with commuters and other motorists avoiding the tolls would be horrible for our small residential neighborhoods. Our local roads are already at capacity with all the overbuilding that has been done and adding even more vehicles to those roads would create congestion and lower the overall quality of life for all local residents. The person who uses that section of freeway to commute to work pays the toll however is not otherwise impacted by imposition of the toll while the same person who lives alongside that stretch of highway is now not only forced to pay the same toll but has a disproportionately negative impact on their local roads and neighborhoods the non-resident doesn't have. In addition, tolling is regressive tax to lower and middle wage workers. For a family making less than 100k/year a fee that is paid daily could add up to well over \$1000/year which represents the equivalent of having to pay an entire new utility bill for the year. For a family with several hundred thousand in income this fee would amount less than 1% of disposable income but for the vast majority especially in the face of substantially higher inflation already, this toll could represent a significant overburden to those using the freeways to commute to already lower paying and less lucrative jobs. Roads should be paid for through government raising taxes on its citizens. Using tolling as a backdoor to avoid taking a more traditional route to raising taxes seems like the wrong way to go about it and somewhat of a disingenuous approach by the very entities entrusted to maintain the public roads for the citizens who already pay proportionally with their income taxes. Thank you for your consideration.

<b>ODOT I-205 Toll EA - RECORD #557 DETAIL</b>
--

**Submission Date :** 4/10/2023

**First Name :** Sandra

**Last Name :** Barton

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Before tolling, at baseline, there are already horrible traffic diversion problems in West Linn whenever there is an accident on I-205 (about once a week).

<b>ODOT I-205 Toll EA - RECORD #558 DETAIL</b>
--

**Submission Date :** 4/10/2023

**First Name :** Paul

**Last Name :** Pankratz

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** No more hidden taxes. Every time Oregon puts there hand in my pocket they find more ways to spend my money. I'm frankly tired of it.



<b>ODOT I-205 Toll EA - RECORD #559 DETAIL</b>
--

<b>Submission Date :</b>	4/10/2023
<b>First Name :</b>	Brandon
<b>Last Name :</b>	Singer
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	No tolls

**ODOT I-205 Toll EA - RECORD #560 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Brian

**Last Name :** Singer

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Please reconsider the tolls. As someone that crosses this area every morning and evening I can first hand say that the expansion of third travel lane will do wonders for traffic. Tolls will create so much traffic on local roads from drivers trying to avoid it. Furthermore, we're dealing with so many new state taxes already and inflation is just adding to the expense of living in OR. Thank you

**ODOT I-205 Toll EA - RECORD #561 DETAIL****Submission Date :** 4/10/2023**First Name :** Todd**Last Name :** Rooney**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Very few if any want a toll. You don't know how to manage the current taxation now. Do what the people want and stop what you are doing. Even if it takes longer most will waste fuel, time and create more dirty air to avoid paying additional tax because of you. Once again failed government and lack of common sense.

**ODOT I-205 Toll EA - RECORD #562 DETAIL****Submission Date :** 4/10/2023**First Name :** Mark**Last Name :** Wadsworth**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I would like the state to repurpose state funds to pay for the project. The state has the funds to pay for it, it's a matter of priority. It's always easier to put the burden on the people vs. funding the project where the state is held to completing the project with state resources. Stop with the meaningless, crazy, spending and devote state funds to our infrastructure that impacts the daily lives of those to whom pays the State's taxes!

<b>ODOT I-205 Toll EA - RECORD #563 DETAIL</b>
--

<b>Submission Date :</b>	4/10/2023
<b>First Name :</b>	Don
<b>Last Name :</b>	Kemp
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Toll everything, or toll nothing.

**ODOT I-205 Toll EA - RECORD #564 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Hans

**Last Name :** Tschersich

**Affiliation :** Member Clack. Co. Ped-Bike-Advis.Com. (PBAC)

**Submission Method :** SurveyMonkey

**Q3. Comments :** As a bicyclist using the Willamette Falls Drive, Hwy.43 and Pacific Hwy 99E I fear that tolling of I-205 will increase car traffic on the above mentioned roads which are now already very dangerous for non-motorized users because of fast car traffic on 2 narrow lanes without any safe paths or corridors for pedestrian and bike traffic. Tolling of I 205 will increase car traffic on these streets. Therefore widening and safer paths for active transportation on these roads should a be high priority and part of the package of road improvements in this area.

**ODOT I-205 Toll EA - RECORD #565 DETAIL****Submission Date :** 4/10/2023**First Name :** Brenda**Last Name :** McCarthy**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** These highways have already been paid for by tax payers. The excessive financial burden on residents of tolls will push traffic to other roads, slowing down traffic and increasing environmental impact to our local communities. It will also decrease property values as residents move out of these areas to avoid tolls. Portland Metro does not have enough highways or alternative roads to mitigate toll roads. Toll roads will incentivize residents to work from home to save money when Portland is struggling for employees to return back to the office.

<b>ODOT I-205 Toll EA - RECORD #566 DETAIL</b>
--

**Submission Date :** 4/10/2023

**First Name :** Kelly

**Last Name :** Cheney

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling creates a financial hardship for people who make the lowest wages. Do not toll individuals. Instead, have the larger businesses and corporations in the immediate area fund the project along with federal and state highway improvement money.



**ODOT I-205 Toll EA - RECORD #567 DETAIL****Submission Date :** 4/10/2023**First Name :** Amie**Last Name :** Ellis**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** There seems to be a complete lack of transparency in how you will provide assistance for low income households to be able to afford approximately \$600 per year (this is the only figure I could find that addressed the NEW TAX). Your information pamphlet simply says "Read on for more details about a Low Income Toll Program in development" but then it does not provide any real answer. Additionally, the amount of \$600 per year (as a best "guess" on your part, since the information provided, does not provide for true or accurate amounts, as of this date), is an astronomical amount for low income households. I can not image having to come up with that amount of money (approximately 1/2 a months rent) just to drive to work. Most low income earners have ZERO ability to adjust their schedules (maybe it has been a while since you have "clocked in" at a lower paying job, but if you can't get to work at your designated 8:00 am start time, you don't get paid, and you probably will not have a job). Furthermore, your usage of this NEW TAX money (because it absolutely IS a NEW TAX that was not in existence before you added it), simply indicates "Tolls on I-205 are needed to fund future I-205 improvements". I am not sure what \$600 per vehicle travelling I-205 per year will NET, but I bet it is a MUCH, MUCH greater amount than will ever be put into I-205 (how many pockets will this line during the next several years?). As far as reducing traffic, even your information sheet was covered with inaccuracy or "spinning" of the truth (comparing "some areas" of I-205 will see only 2 Hours of congestion after the project as compared to "some other areas" will see up to 14 hours of congestion without ... nice attempt to try and compare two completely different areas without addressing the entire project as one. All-in-all, I would say this is one of Oregon's finest examples of fleecing the poor to line the pockets of politicians and their friends (and I would expect the general population will also see it as such and a great migration AWAY from Portland will be the end result).

<b>ODOT I-205 Toll EA - RECORD #568 DETAIL</b>
--

<b>Submission Date :</b>	4/10/2023
<b>First Name :</b>	Manuel
<b>Last Name :</b>	Lucero
<b>Affiliation :</b>	Rosweood neighborhood, btw the 5 and 205.
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Is there a reason you're only planning to toll West Linn area? If you want to just generate income, why not toll the entire PDX area including the bridges? These neighborhoods are not ATM machines. We are keeping the economy alive as downtown PDX empties out.

**ODOT I-205 Toll EA - RECORD #569 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** David

**Last Name :** Jeske

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The affects of tolling not only the I-205 but potential future stretches of local throughfares has many anticipated consequences as wekk as unintended consequences. It will unfairly financially burdon local redidents who use this stretch of I-205, sometimes many times per day. It will drive traffic to local streets which are not designed for the increased traffic. It will drive business away from Oregon City as potential visitors or shoppers will not want to deal with the expense and hassle of local tolling. State and county taxes are already very high. I do not feel that additional taxes (ie tolls) are fair nor necessary. This project is a huge waste of our tax dollars and has only undesired consequences. There are no benefits. please scrap the whole project.

<b>ODOT I-205 Toll EA - RECORD #570 DETAIL</b>
--

**Submission Date :** 4/10/2023  
**First Name :** Gary  
**Last Name :** Warren  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

<b>ODOT I-205 Toll EA - RECORD #571 DETAIL</b>
--

**Submission Date :** 4/10/2023

**First Name :** LYNN

**Last Name :** HATFIELD

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We generally travel I205 every day to and from work. If a toll road goes in there will be many people, like us who will just take alternative routes adding more traffic to smaller, local roads

**ODOT I-205 Toll EA - RECORD #572 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Joseph

**Last Name :** Lau

**Affiliation :** City Of Tualatin

**Submission Method :** SurveyMonkey

**Q3. Comments :** The intent is to ease traffic on the interstate; however, no other infrastructure has been created prior to deal with higher volume of through put in surrounding communities. This creates more of a burden (of cost and time to travel) on the lower, to middle, class while creating additional wear and tear on local, collector, and arterial roads. Additional traffic will statistically lead to more accidents in local communities, to include possible deaths, and will drive down home prices as those who once had a quiet community would be burdened by the onslaught of additional traffic. If additional infrastructure was set into place first, such as additional bridge (even if those added where bike/walking bridges) built across the river or more transit lines to outlying communities (Even to Salem), then this could be feasible. More analysis is needed to the amount of traffic used on buses and trains, along with bike usage; coupled with reasons preventing citizens from using these rather than driving. Then drive change through that input.

<b>ODOT I-205 Toll EA - RECORD #573 DETAIL</b>
--

**Submission Date :** 4/10/2023  
**First Name :** Robert  
**Last Name :** Donnan  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

<b>ODOT I-205 Toll EA - RECORD #574 DETAIL</b>
--

**Submission Date :** 4/10/2023  
**First Name :** Mark  
**Last Name :** Punzel  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**



<b>ODOT I-205 Toll EA - RECORD #575 DETAIL</b>
--

**Submission Date :** 4/9/2023

**First Name :** Deanna

**Last Name :** Mulder

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am concerned with the double tolling of people traveling between Oregon City and areas south such as Salem, Wilsonville and Meridian Park. I just don't think it is fair to charge people twice. Once they get on the freeway they really don't have a place to go onther than the two toll areas.

**ODOT I-205 Toll EA - RECORD #576 DETAIL****Submission Date :** 4/9/2023**First Name :** Daniel**Last Name :** Saltee**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** We live off of Borland and Willamette falls drive. This is currently used when traffic from the 205 gets backed up by people and trucks that are not from our local community. Our children will be walking along side this road to the new Athey Creek middle school. This is a small rural community. Creating a toll will create a condition where instead of using the 205 people/commercial vehicles will use our small street as a way to go around the toll road road. You are creating a condition where people will use local roads for vehicles instead of the 205. I also work across the Willamette in Oregon City so I am very familiar with the traffic patterns there as well. Instead of finding the resources to pay for your freeway expansion, you are using our local roads to fund your large scale state wide vehicle corridors. This plan is an unprecedented East Coast solution to a funding problem.

<b>ODOT I-205 Toll EA - RECORD #577 DETAIL</b>
--

**Submission Date :** 4/9/2023

**First Name :** Serena

**Last Name :** Hasworth

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I would like to see a discounted toll rate for residents who live in the areas most effected by the tolls. Not only will we have more traffic moving through our community to avoid the toll, we will bear the greatest burden of the cost. It would be great if local residents could pay less AND have a maximum amount per month,

**ODOT I-205 Toll EA - RECORD #578 DETAIL**

**Submission Date :** 4/9/2023

**First Name :** Josh & Melissa

**Last Name :** Phillips

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Why hasn't anyone thought about doing what the states like North Carolina do in keeping the people who travel on our roads safe by performing annual in depth vehicle inspections. The state could probably make more money in doing this instead of tolling and it would be a consistent income and help keep our roads safe. Bald tires, duct tape bumpers, badly broken windshields to point you can't see out of them all traveling on our roads. So unsafe! Please consider this option instead of the target group of people who will be tolled. Thank you for reading this.

**ODOT I-205 Toll EA - RECORD #579 DETAIL**

**Submission Date :** 4/9/2023

**First Name :** Diana

**Last Name :** DeMaria

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Include local resident tolling exemptions and increase the research and proposed mitigation measures for local neighborhood impact, especially during school days when congestion is already at a maximum for drop off and pick up.

<b>ODOT I-205 Toll EA - RECORD #580 DETAIL</b>
--

**Submission Date :** 4/9/2023

**First Name :** Jeremy

**Last Name :** Reber

**Affiliation :** Concerned Resident

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is a huge added cost to families who live anywhere on the east side of Portland. It is criminal to toll a road that has already been funded. The added cost to the daily commute is devastating to families financially and totally reverses any progress made in wage increases. Shame on ODOT , money grabbing hypocrites!

<b>ODOT I-205 Toll EA - RECORD #581 DETAIL</b>
--

<b>Submission Date :</b>	4/9/2023
<b>First Name :</b>	Leita
<b>Last Name :</b>	Baker
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Just no. NO

**ODOT I-205 Toll EA - RECORD #582 DETAIL****Submission Date :** 4/9/2023**First Name :** Trisha**Last Name :** Copeland**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Everything about this tolling is a bad joke, so where to begin? You don't have any plans in place about where you will collect the tolls, how you will collect the tolls (ez pass, cash...?) and do so without causing more congestion. No one believes ODOT about how the money will be spent and there is no proof that tolling reduces traffic, overall. It will just divert more traffic to the city streets, causing more congestion and headaches for the locals. Those of us on the westside, will avoid the area and take 26 to get to Clackamas County.



**ODOT I-205 Toll EA - RECORD #583 DETAIL**

**Submission Date :** 4/9/2023

**First Name :** Ryan

**Last Name :** K

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Fuck you assholes. Jamming this thing down everyone's throats while you sit there unaffected. Turn this shit show off and go back to your fucking little world and leave the rest of us the FUCK ALONE! You goddamned morons are killing this city and state!!

**ODOT I-205 Toll EA - RECORD #584 DETAIL****Submission Date :** 4/9/2023**First Name :** Stacy**Last Name :** James**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** To Whom It May Concern,

As a Clackamas County resident who has been required to return to office by my employer in Gresham, the idea of forced tolling from everything from my work commute to trips across the Willamette River to West Linn for grocery shopping is appalling. The Environmental Assessment released by ODOT speaks volumes. Estimates that the average household will pay \$575 a year just for phase one are probably low. What about people like my parents on retired fixed incomes? What about the whole community of Charbonneau, many of whom are retired, that will be forced to limit trips for basic services because these tolls are overwhelming to a monthly budget otherwise? What of small businesses and the money that will go to tolls instead of to them? There is already not enough public transport along this corridor. These actions will do NOTHING to truly alleviate traffic and congestion. Money would be better spent giving businesses an incentive to allow options like telecommuting when jobs can be done without commuting. Better spent on improving public transportation. Better spent addressing those already impoverished instead of making their situations worse. The economic "benefit" is simply not there and the numbers in ODOT's own study shows it! Toll that make sense are one thing. This plan is NOT it. I can only hope SB933 passes to rein in ODOT's irresponsibility in this whole endeavor, and/or the Federal Government vetoes this scheme.

<b>ODOT I-205 Toll EA - RECORD #585 DETAIL</b>
--

**Submission Date :** 4/9/2023

**First Name :** Chelsea

**Last Name :** Ausland

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I would like to see additional mitigation at the Stafford Rd exits. I believe you should add tolls on the exits to ensure people can't exit the freeway to avoid tolls. Any local residents would be able to avoid the tolls if exiting to get home.

**ODOT I-205 Toll EA - RECORD #586 DETAIL**

**Submission Date :** 4/9/2023

**First Name :** Michael

**Last Name :** McKee

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Adding another lane is great and we pay enough in taxes already to do that. Tolling lanes only create worse traffic and then you provide a solution at \$1.00 a mile. We can't afford these extra taxes you want to put on us.

**ODOT I-205 Toll EA - RECORD #587 DETAIL**

**Submission Date :** 4/9/2023

**First Name :** Deborah

**Last Name :** Burdick

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am against the I-205 Toll Project in all its aspects and mitigations. I have experienced tolling impacts in previous locations where I have lived, and it's always been negative and government promises unkept. No I-205 Tolling!!

**ODOT I-205 Toll EA - RECORD #588 DETAIL****Submission Date :** 4/9/2023**First Name :** Linda**Last Name :** Botsford**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** A month ago I drove on my first toll road in Washington state. It was the most dangerous road I've ever been on. The number of signs, flashing lights and other distracting things intended to explain the toll to people was ridiculous. The information needed to explain was far beyond what people should be reading while driving on a freeway. I do not ever want to drive on a toll road again. I would much rather much much rather pay additional taxes, then deal with the toll road. Please do not install dangerous, confusing, and unnecessary toll roads, or bridges in Oregon!

**ODOT I-205 Toll EA - RECORD #589 DETAIL****Submission Date :** 4/9/2023**First Name :** Jacqueline**Last Name :** Gutierrez**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** It's hard to understand the report the way it is written. I think what most people are looking for, me included, is how this will impact me and my family. There is an estimated annual increase of \$600 for my family based on our annual income, but where did you get those numbers? Also, what are the 'peak hours' of congestion? This report is too long, and difficult to follow. I saw Mandie's interview on the news today, and she skirted giving real answers to questions and presented as very well-rehearsed but gave no real specifics. I may not be immediately affected because the tolls are not being put in the path I am required to take daily, but it will not be far behind, and I have already begun to anticipate the different travel routes I would rather take to avoid paying a toll twice daily 6 days a week in order to travel 2 exits away from my home to my work less than 5 miles away. My husband who works a 4 minute drive away before the implementation of 212 truck route project that closed off the main travel at the bottom of our hill to obtain entrance to the 224 expressway, is now required to drive out of the way, and travel one exit away on the freeway to get to his job. This was all for a project that was supposed to divert semi traffic off of 205, and yet the only people who seem to use the 'new' lanes are not semi drivers. How is this report showing what people will 'actually do' compared to what you 'think' they will do? Additionally, your explanations that people will be able to use bike and multi-use paths, discounts and credits will be applied to people with low income, etc... What reality do you live and work in? The multi-use path from our area to Foster Road is commonly unable to be safely traveled by pedestrians and bike riders due to the drug addicts, mentally unstable and transients who choose to make it their residence now, and the tri-met/max system are not only often times unsafe but take much longer time to travel as well as have an expense. Will monies from the toll project go toward funding additional law enforcement, security upgrades, and transportation expansion to make these alternative travel options more usable for everyone? How many low-income earners do you align yourself with, and know that can afford a vehicle to even travel to and from their places of work? I work with several people who make 'more than' minimum wage, but still struggle and a car is a luxury for them, thus the reason I carpool with whoever I can, and help my coworkers when I can. Why are other options suggested by the mayors from West Linn and Oregon City not being considered as alternative measures and where is the information on the studies you may have conducted to show they are not feasible?

**ODOT I-205 Toll EA - RECORD #590 DETAIL**

**Submission Date :** 4/9/2023

**First Name :** Brian

**Last Name :** Bainnson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The toll plazas should be located before you get to Stafford Road coining form I5 and before the Willamette River Bridge in Oregon City. I drive 205 numerous times a week and sometimes several times a day for my job as well as visiting clients in the Stafford Road, West Linn and Oregon City Areas and if you want there to be a significant impact to traffic at peak travel times you need to deal with a much longer section of 205 for tolling. If not the impact to traffic will be minimal the impact to the local road systems will be significant.



<b>ODOT I-205 Toll EA - RECORD #591 DETAIL</b>
--

**Submission Date :** 4/9/2023

**First Name :** Jeff

**Last Name :** Hamm

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I fully support the project's use of variable rate tolling as a necessary means of being able to fund the range of proposed improvements, managing congestion and reducing negative environmental impacts. The marketplace is a legitimate and American way to provide mobility for citizens and policies can be put in place to ensure equity for low income and underprivileged cohorts.

**ODOT I-205 Toll EA - RECORD #592 DETAIL****Submission Date :** 4/9/2023**First Name :** Jacquelyn**Last Name :** Smith**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I believe this is inappropriate and it feels like extortion. I have lived with toll roads and highways and the system is often corrupt. You would not believe what I had to go through to disengage my fathers' toll pass in Florida even after providing his death certificate. The proposed costs that I have heard are ridiculously high. As if we all have extra. Have any of you noticed how expensive everything has become since covid? And the idea that this is going to reduce traffic during rush hour by raising the cost. As if companies that people work at will flex their hours? I do not support the toll roads here, I resent that we were not asked to vote on this.

<b>ODOT I-205 Toll EA - RECORD #593 DETAIL</b>
--

**Submission Date :** 4/9/2023

**First Name :** Roberto

**Last Name :** Baturoni

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Adding tolls in one specific area specifically when the budget is not planned is not fair. You should toll highway 26, I-5 and 217 to collect the necessarily resources to distribute efficiently. Tolls in West Linn is atrocious and won't stop traffic or benefit the environment.

**ODOT I-205 Toll EA - RECORD #594 DETAIL****Submission Date :** 4/9/2023**First Name :** Karen**Last Name :** Kelly**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I am concerned about the effects communities, the Community's ability to low income residence, ability travel to, and from work. I believe that whole project will have a negative impact on all of these elements. In addition, the toll will increase traffic on local streets, making it more difficult for communities transportation systems. This will also impact pollution in the general communities. As well as on the communities general infrastructure.

**ODOT I-205 Toll EA - RECORD #595 DETAIL****Submission Date :** 4/9/2023**First Name :** Ashley**Last Name :** Hass**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The tolling for me is very frustrating as someone who just moved here the last few years. It is already quite expensive in many ways and Oregon has nearly the highest, if not highest tax rate in the country for the middle class. On top of inflation right now, it's just getting out of hand to even try to buy groceries that are a little healthier. Where are all of these taxes going? This should be funding our roads and transportation, not an additional cost to community members. Especially for those in marginalized communities this would also be an issue for accessibility. And then to subsidize this, I feel like it would just cause more issues than it's worth. The bridges need to be fixed, but the funding should come from elsewhere, not the communities who pay a high rate of taxes.

**ODOT I-205 Toll EA - RECORD #596 DETAIL**

**Submission Date :** 4/9/2023

**First Name :** Carolyn

**Last Name :** Wirthlin

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The committee should not move forward with ANY tolling implementation! There has got to be further analysis and mitigation efforts to alleviate the financial burden on local families that will bear the brunt of the tolling costs just to take care of daily travel! I urge the committee to: \* Realize the large effect multiple tolls each day will have on household and business finances, even for those not typically considered low income. \* Not begin any tolls on I-205 until the Regional Mobility Pricing (Toll) Project is completed, so full view of regional tolling in Oregon can be assessed. \* Conduct an Environmental Impact Statement (EIS) for the tolling project, which would require additional analysis and more public outreach and community involvement; and \* Extend the public comment period for an additional 30 days (for a total of 90 days) and conduct another public hearing during non-working hours so people who work a standard work schedule are able to participate \* Include funding for real mitigation measures in West Linn to handle I-205 diversion traffic.

<b>ODOT I-205 Toll EA - RECORD #597 DETAIL</b>
--

**Submission Date :** 4/9/2023

**First Name :** Becky

**Last Name :** Jensen

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Please consider how these tolls are forcing residents of certain cities to use them as we have no other way to cross the rivers. Using public transportation multiples per day just simply isn't an option for everyone.

**ODOT I-205 Toll EA - RECORD #598 DETAIL**

**Submission Date :** 4/9/2023

**First Name :** Brian

**Last Name :** Jensen

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The premise of this project is sound. We need infrastructure upgrades on the southern part of 205. However, as a resident of the Willamette District of West Linn, we literally have no alternative to access other communities without using the 10th street exit of the 205. Millions of portlandians use this stretch of highway but we have no alternative causing undue financial hardship. We also already see increased and unsafe traffic through our residential streets and historic downtown by people avoiding the 205 congestion. This will only be amplified by people avoiding the tolls. Side streets will be in more need of repair and necessary infrastructure upgrades because of the increase in traffic. How does this project allot for that?



<b>ODOT I-205 Toll EA - RECORD #599 DETAIL</b>
--

**Submission Date :** 4/9/2023

**First Name :** Jen

**Last Name :** Hazen

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This will unfairly burden those with less resources

<b>ODOT I-205 Toll EA - RECORD #600 DETAIL</b>
--

**Submission Date :** 4/8/2023

**First Name :** Melanie

**Last Name :** Jeske

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This will burden the middle class unfairly. I would cross these two bridges 8 times a week. I would not get a discount as I am not low income but I am not high income either. I will have to allow extra time to commute on side roads so that I can pay for groceries. I do not get welfare or food stamps. This was not fairly brought about and it makes citizens realize govt is not by the people for the people. We see that govt is only for themselves. Citizens are just being robbed to line the pockets of the lawmakers and politicians.

<b>ODOT I-205 Toll EA - RECORD #601 DETAIL</b>
--

**Submission Date :** 4/8/2023

**First Name :** Clair

**Last Name :** Klock

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I support the toll fee for the improvements in construction that decrease traffic slowdowns, safety improvements and protection of environment. The toll should definitely have a sunset clause.

<b>ODOT I-205 Toll EA - RECORD #602 DETAIL</b>
--

**Submission Date :** 4/8/2023

**First Name :** Tanya

**Last Name :** Boss

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am concerned about the traffic this will create on Willamette Falls Drive as people use this road and Borland to avoid tolls. I'm also concerned that I will be forced to pay a toll every day to get to work. I'm a teacher and I work at a rural school and will not be able to use carpool or any other public transportation to get to work. This toll unfairly impacts local residents both financially and also will also increase already congested surface streets.

<b>ODOT I-205 Toll EA - RECORD #604 DETAIL</b>
--

**Submission Date :** 4/8/2023

**First Name :** Rick

**Last Name :** Heuchert

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling should occur on all bicycle lanes and make them pay their fare share for their special use lanes. Having motorists pay so they can have a special lane is ludicrous. Bicycles should also be licensed and be held to the same standards as vehicles, up to and including traffic violations.

**ODOT I-205 Toll EA - RECORD #605 DETAIL**

**Submission Date :** 4/8/2023

**First Name :** James

**Last Name :** Kenney

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** 1) The transportation system benefits ALL of us and so should be paid for by ALL via general taxes, not user fees. The toll will most negatively affect those least able to pay the toll. If the current gas tax (and electric vehicle charging tax?) is not currently enough, then raise that tax. That would more evenly spread the tax burden and help with all state roads. 2) The toll MAY reduce freeway congestion (though I have my doubts) but certainly WILL increase congestion on surface streets. People MUST travel by car to most places. Mass transit is not good enough for most needs. The toll will NOT reduce the trips but will reroute the trips.

**ODOT I-205 Toll EA - RECORD #606 DETAIL****Submission Date :** 4/8/2023**First Name :** J**Last Name :** T**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am a severely disabled person who is unable to use public transportation without triggering severe neurological symptoms/deficits. My healthcare team had advised me to avoid public transportation at all costs and to ensure I limit travel and do my best to make my trips as short as possible. This advice was given prior to the pandemic. Due to my high risk for severe complications from COVID-19 exposure, they have advised that I also continue to isolate, making even medical transport inaccessible as there are no mask mandates. My only mode of transportation is with a caregiver in my car. I am extremely concerned about the cost impacts to my household finances. We have to ensure the ride is as short as possible to prevent more severe adverse effects from the travel, which means we will have to use the toll roads. I also have to pay my caregiver to give me rides. How are you planning to mitigate these kinds of financial impacts to the low income, disabled population? Is there any way to ensure that folks like myself do not have to pay the tolls or pay at a very reduced rate? Caregivers have to commute to their clients' homes and there is a severe caregiver shortage in Oregon - this will make it even harder for folks who rely on in-home caregivers to find caregivers as the costs will continue to be passed on to the caregiver and then the disabled person. Being a person who has to rely on delivery services, this will also impact this and increase the costs to me. There has to be something done to mitigate the impacts on my marginalized and vulnerable communities.

**ODOT I-205 Toll EA - RECORD #608 DETAIL**

**Submission Date :** 4/8/2023

**First Name :** Season

**Last Name :** Wilcox

**Affiliation :** My family's interests

**Submission Method :** SurveyMonkey

**Q3. Comments :** Widen I-205 to four lanes in each direction. Problems solved. Tolling is a complete waste of money and unjust to all of us who have been paying into the system for decades only to have the State and ODOT squander or divert the funds away from their intended purpose.



<b>ODOT I-205 Toll EA - RECORD #609 DETAIL</b>
--

**Submission Date :** 4/8/2023

**First Name :** Doug

**Last Name :** Walker

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Why is there NEVER an option to live within the budget? Every proposal costs money that we don't have because you never intend to live within the budget. Always comes with a tax increase or in this case a toll to finance it. We MUST learn to live within the budget like everyday citizens do every day. Because if we don't the consequences are dire. So figure a way to cut costs elsewhere to finance this improvement to our highway system.

<b>ODOT I-205 Toll EA - RECORD #610 DETAIL</b>
--

**Submission Date :** 4/8/2023

**First Name :** Lacy

**Last Name :** Province

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Diverting traffic to surface streets will do more harm to the small towns (Oregon City, West Linn, etc) around and close to the proposed tolling area.

**ODOT I-205 Toll EA - RECORD #611 DETAIL****Submission Date :** 4/8/2023**First Name :** Sarah**Last Name :** Clifford**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This tolling project unfairly burdens the citizens of West Linn. We are geographically isolated and will essentially be forced to use the tolls to leave our city. Our community streets, which are already overcrowded, will be overwhelmed by people attempting to avoid the tolls. The argument that it will force people to use public transportation is ludicrous. The infrastructure is just not in place for that. There are very large areas of West Linn that have zero public transportation. If the tolls are going to be put in place, the citizens of West Linn should be compensated for the undue burden placed upon them.

<b>ODOT I-205 Toll EA - RECORD #612 DETAIL</b>
--

**Submission Date :** 4/8/2023

**First Name :** Dustin

**Last Name :** Dickson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I didn't see short term or long term impact studies on the roundabout at Stafford and Rosemont or Rosemont and Salamo. These areas of West Linn are going to be heavily impacted by traffics due to tolls diversion in both the short and long term.

<b>ODOT I-205 Toll EA - RECORD #613 DETAIL</b>
--

**Submission Date :** 4/8/2023

**First Name :** marvin

**Last Name :** von renchler

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Local Gov keeps pork spending and wasting millions while continuing to raise our taxes and propose things like tolls. How much work would the millions wasted on the jail that was never used pay for? Im to the point where I can hardly pay property tax and gas is SO expensive, yet you want to take more while NEVER doing your jobs well enough to use what you already take. I dont care if 205 caves in on itself.

<b>ODOT I-205 Toll EA - RECORD #614 DETAIL</b>
--

**Submission Date :** 4/8/2023

**First Name :** Yvonne

**Last Name :** Crowe

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We own a small dump truck business and daily go back and forth on this strip of 205 as we pick up or drop off rock. It will increase our costs significantly without any way of recouping this cost while still having remaining competitive with dumptrucks from other areas.

<b>ODOT I-205 Toll EA - RECORD #615 DETAIL</b>
--

**Submission Date :** 4/8/2023  
**First Name :** Gail  
**Last Name :** Parnell  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #616 DETAIL****Submission Date :** 4/8/2023**First Name :** stan**Last Name :** sylvester**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am against tolling in Oregon. With the exception of the Portland/vancouver bridge and that the toll be removed after the bridge is paid for as was done with the Astoria/Megler bridge. This is just a money grab for revenue to be passed without a vote. Every community on any freeway will follow suite and eventually the entire length of all freeways will become toll roads. You are following the instructions of the tolling company for your "cut of the action revenue. I recently visited Texas for a weekend and rented a car. We were lost and the cell phone app kept telling us to get back on the toll road. it cost us \$40 for the weekend. Also, this will cause all the back roads to be loaded with traffic to avoid this graft charge.



<b>ODOT I-205 Toll EA - RECORD #617 DETAIL</b>
--

**Submission Date :** 4/8/2023

**First Name :** Cristy

**Last Name :** Murray

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Adding tolls is going to cause an unmitigated mess in the surrounding communities from people trying to avoid the tolls and an expense that will cause hardship to families who need to use the tolled route to get to work. The whole plan was very poorly thought out.

<b>ODOT I-205 Toll EA - RECORD #618 DETAIL</b>
--

**Submission Date :** 4/8/2023

**First Name :** Xj

**Last Name :** Dong

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I drive to Oregon city and work 3 days of the week, it would be very inconvenient to pay for toll. Not to mention slowing down the already slow 205. I strongly against toll.

<b>ODOT I-205 Toll EA - RECORD #619 DETAIL</b>
--

**Submission Date :** 4/8/2023

**First Name :** Herman

**Last Name :** Walter

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** ODOT has studies that show tolling will have a significant detrimental impact on Oregonians. Instead of tolling, ODOT should focus on becoming efficient. As a native Pennsylvanian, PennDOT was the epitome of ineffectiveness. ODOT make PennDOT look like a world-class operation! GET YOUR ACT TOGETHER!

**ODOT I-205 Toll EA - RECORD #620 DETAIL**

**Submission Date :** 4/8/2023

**First Name :** Perry

**Last Name :** Elliott

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am opposed to tolls on the I 205 bridge and only support tolls on the I 5 bridge if 100% of the revenue is used to pay for construction of a new I 5 bridge! You are penalizing WA citizens that work in Oregon and already pay income taxes to the state of Oregon!

**ODOT I-205 Toll EA - RECORD #621 DETAIL**

**Submission Date :** 4/8/2023

**First Name :** Scott

**Last Name :** Beyer

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** For a project of this unprecedented scope, with such long lasting negative impacts to the livability and financial well being of the communities of West Linn, Oregon City, Lake Oswego and potentially Tualatin, the simple Environmental Assessment is woefully inadequate. Performing an EIS should be a bare minimum requirement and more engagement with the cities and people in the impacted communities is imperative. The Environmental Assessment fails to adequately evaluate the impacts that tolling will have to both the diversion of traffic onto West Linn local roads and the financial impacts to residents who are essentially blocked from local trips and work commutes to the southwest and southeast without significant personal financial impact. ODOT has long ignored West Linn residents' needs, from the original construction of I-205 splitting the community, to the poor interchange at 10th Street, the terrible maintenance and upkeep of HWY 43 and, most recently, the burden of the cost of the waterline replacement as part of the Abernethy Bridge construction. It is time for ODOT to stand up and do what is right to preserve, protect and support the livability of the communities it cuts through by engaging with the communities in meaningful ways, including the full costs to improve connected roadways and establishing tolling rules that substantially reduce the financial burden for all residents in the impacted cities.

<b>ODOT I-205 Toll EA - RECORD #622 DETAIL</b>
--

**Submission Date :** 4/8/2023

**First Name :** carrol

**Last Name :** smith

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** no consideration or mitigation of the impact on west linn and oregon city has been done. This is going to drastically increase traffic on our surface streets to an unsustainable level

**ODOT I-205 Toll EA - RECORD #623 DETAIL**

**Submission Date :** 4/8/2023

**First Name :** Rhande

**Last Name :** Ainslie

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I live off 10th Street exit in Barrington Heights. 2 significant issues. •Traffic diversion- vehicles cutting thru my neighborhood causing safety issues on our streets for pedestrians and speeding, reckless drivers. Also making it impossible to get off our hill which is already an issue with the OC folks from usually 3ish to 6ish almost every week day by the Arch Bridge. Very worried about this impact. •The most concerning issue is living right in the middle of the 2 tolls. WL lacks amenities so the residents would have to pay tolls for getting groceries; going to the doctors office, needing to buy necessities, getting to work. No where else in the city would residents be penalized or locked into needing to go thru a toll in either direction for basic life amenities. WL and OC residents should get a pass on the tolls so our property values don't drop, to accommodate for the traffic diversion in our neighborhoods, safety on our streets, etc. This toll project significantly impacts the local residents; consideration should be given for these impacts on our daily living. To give these residents a significant discount or pass for the toll fees should definitely be included in the toll plan.

<b>ODOT I-205 Toll EA - RECORD #624 DETAIL</b>
--

**Submission Date :** 4/8/2023

**First Name :** Chris

**Last Name :** Brandt

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** While there will be some financial burden on our household as we live in the exact center of the proposed toll district my main concern is in traffic diversion. As the design stands now there will be a seismic shift in the traffic volumes past fields bridge park and through old Wilamette. The impact of the increase in traffic will be magnified exponentially by the new traffic patterns that are part of the New Athey Creek School at Fields Bridge. A tolling system that can be bypassed by sending traffic over a two lane bridge (Fields) around a School access traffic circle (New Athey Creek) then through a tight downtown core (Old Willamette), is ridiculously dangerous. Assuming tolling is necessary for revenue generation and traffic deterrent reasons the zone needs to be expanded to the I5/205 exchange on the West boundary and two to three exits to the North-East of the 205/43 exchange. This zone expansion keeps bypass traffic out of the New Athey Creek School patterns as well as Wilamette and the Historic Oregon City area.



<b>ODOT I-205 Toll EA - RECORD #625 DETAIL</b>
--

**Submission Date :** 4/8/2023

**First Name :** Richard

**Last Name :** Yeoman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** As a resident of West Linn I am deeply concerned by the impact to residents of the town. There are too few routes that are available to avoid tolls for necessary commutes (work commute to a hospital). There are no public transportation options. All this does is reduce our quality of life. I cycle for recreation (one of the big draws moving to the area) and this will force much more traffic on to the side roads where I ride, making it much more dangerous.

**ODOT I-205 Toll EA - RECORD #626 DETAIL****Submission Date :** 4/8/2023**First Name :** Joseph**Last Name :** Wagner**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Tolling a highway that is already built and paid-for adds zero value to the highway. It is nothing more than a money grab. Tolling also a regressive tax that disproportionately hurts the poor. The location of the tolling is likely to increase traffic problems by redirecting more traffic into downtown Portland. If tolling is done it all, it should be I-5 side; this would incentivize traffic outside of the already congested downtown area.

<b>ODOT I-205 Toll EA - RECORD #627 DETAIL</b>
--

**Submission Date :** 4/8/2023

**First Name :** Jackson

**Last Name :** Hurst

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I have reviewed the I-205 Toll Project Environmental Assessment and I support the findings in the Environmental Assessment for ODOT's I-205 Toll Project.

**ODOT I-205 Toll EA - RECORD #628 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Kay

**Last Name :** Lynch

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Consider this: I live in Oregon City - work in West Linn- doctor, dentist, gym and music lessons in west linn. I use the Oregon city Bridge it's backed up for an hour now during rush hour- what will happen when commuters try to avoid tolls on 205! Main Street in Oregon city and willamette falls drive are already route alternates/ this is going to cause far bigger traffic issues on surface streets. Will I have to pay a toll to drive from Oregon city to west linn and back to work to drop kids at school and pick them up to go gi go the gym? \$2 per crossing : \$4 per day fir work is \$25 plus Music lessons \$4 plus gym \$12 \$41 per week for "normal " travel within MY community. This is NOT okay. There MUST BE a residents discount. You will hurt working class even more and damage small business. We pay more taxes than most states as it is!! We pay for roads already. The STATE has a surplus freaking use it!!! Or how bout those lottery dollars! Where do they go? This is infuriating!!! I'm a native Oregonian- but we are looking to leave after 57 years due to this greed.

**ODOT I-205 Toll EA - RECORD #629 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Myron

**Last Name :** Peng

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** if the toll occurs our residential roads would be used more frequently therefore needing more maintenance. Who's going to pay for that? Taxes of WL by their residents. Those most impacted daily by the tolls are the citizens of WL, having to pay to get on the free way and then for a return trip. That's like a double wammy for those in WL What about taxing those that use the 1-5 bridge between OR and WA? That's heavily used on a daily basis.

**ODOT I-205 Toll EA - RECORD #630 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Michael

**Last Name :** Nolop

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** There are many other ways to fund Oregon road improvements. Tolls will only have negative impacts to Oregon residents who rely on our roadways. Please seek alternative long term options to fund needed improvements to our transportation system. Per trip fees will not solve all the inefficiencies of ODOT.

<b>ODOT I-205 Toll EA - RECORD #631 DETAIL</b>
--

**Submission Date :** 4/7/2023

**First Name :** Anthony

**Last Name :** Markey

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Please consider the impact the tolls will have on local neighborhoods and the traffic it will cause.

<b>ODOT I-205 Toll EA - RECORD #632 DETAIL</b>
--

**Submission Date :** 4/7/2023

**First Name :** Kevin

**Last Name :** Williams

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** While I fully support the tolling idea I have concerns about my neighborhood traffic being impacted by vehicles tryinv to evade tolls. We already see huge faster traffic impacts on our local arterial street when I-205 southbound is backed up to Clackamas.



<b>ODOT I-205 Toll EA - RECORD #633 DETAIL</b>
--

**Submission Date :** 4/7/2023

**First Name :** Christy

**Last Name :** Russell

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am concerned about increased congestion on local roads and the impact on family finances and the effects on livability and property values in our communities. I am frustrated that this toll would be levied on a public road funded by taxes, which are already among the highest in the nation.

<b>ODOT I-205 Toll EA - RECORD #634 DETAIL</b>
--

**Submission Date :** 4/7/2023

**First Name :** Marty

**Last Name :** Hale

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** These tolls are going to be a hardship to everyone. They will absolutely keep me and my family out of the area for recreation and shopping. I am up a creek for the work portion and will be taking the financial hit.

Impacts to local communities and side streets are going to be incredibly impactful. You would think with all the smart people involved they could learn by looking at projects like light rail taking up half of Interstate Ave. In NE Portland and the traffic jams it has caused on side streets.

**ODOT I-205 Toll EA - RECORD #635 DETAIL****Submission Date :** 4/7/2023**First Name :** David**Last Name :** Stein**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This Environmental Assessment is fatally flawed. The first indicator is the focus on tolling for funding construction - this prevents true congestion pricing from being implemented which detaches congestion relief from the need for revenue. ODOT will likely be overcharging due to a need to pay for an oversized project instead of focusing on responsibly managing congestion when it's needed. Second, there was no alternative examined where tolling was implemented with seismic upgrades complete WITHOUT increasing lane miles. The lane miles being added will at best be net neutral when paired with tolling and is more likely to increase Vehicle Miles Traveled (VMT) which is bad for emissions (carbon and others), safety (direct link between VMT and serious crashes/deaths), and society by diverting ODOT resources to freeway expansions instead of truly safety focused projects. Finally, one of the listed goals of the project "Support safe travel regardless of mode of transportation" is unlikely to be successful given ODOT's repeated failures to build infrastructure that is useful for people walking, biking, and using transit based on everything that ODOT has done to impede these modes in most every other project in the last decade and those planned in the coming decade. By focusing on throughput and congestion relief people outside of cars will suffer rather than be prioritized and given short crossing distances, physically protected infrastructure, and low speeds of motor vehicles.

**ODOT I-205 Toll EA - RECORD #636 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Shauna

**Last Name :** Walters

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The proposed \$15 each way TOLLS will harm all but the wealthiest families. It will be a regressive tax that most hard working families can't afford. ODOT will truly be creating "roads for the rich". Tolling doesn't eliminate traffic congestion, it merely changes where it occurs. It will cause tens of thousands of vehicles to DIVERT on to side roads to avoid the tolls. ODOT estimates at total of 130,000 vehicle diversions when all Portland area freeways are tolled. That is equivalent to every vehicle that crosses the Interstate Bridge on an average day, suddenly using side roads and making the neighborhood roads more congested and less safe.

**ODOT I-205 Toll EA - RECORD #637 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Wendy

**Last Name :** Harmon

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am not in favor of tolls on I205. Studies show you lose money. It will increase off freeway traffic in my neighborhood as people will try to cut around the toll area. My children will have to pay a toll to go for short errands or will clog up the OC bridge to avoid them. PLEASE DO NOT TOLL

<b>ODOT I-205 Toll EA - RECORD #638 DETAIL</b>
--

**Submission Date :** 4/7/2023

**First Name :** David

**Last Name :** Fredrickson, AIA

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I feel it would be easier to toll all bridges (over water) in Portland as well as the return trip to Washington State. "WELCOME TO OREGON!, but returning home will cost you." . . . and make it scanner electronic/automatic and only about 10 cents per axil. It would add up. Seismic upgrades are expensive and necessary. The first rule in architectural design + development is, transportation + parking solutions w/o causing more problems.

<b>ODOT I-205 Toll EA - RECORD #639 DETAIL</b>
--

**Submission Date :** 4/7/2023

**First Name :** tami

**Last Name :** panichello

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Aside from their inefficiency, tolls make roadways less safe by disrupting traffic patterns. Traffic diversion is a serious problem, crowding secondary roads near toll facilities. This would contribute to 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 safety concerns. Tolls increase the cost of delivering goods and services, put local businesses at a competitive disadvantage and increase the cost of living for residents.

**ODOT I-205 Toll EA - RECORD #640 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Theodore

**Last Name :** Labbe

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Please don't just roll this short section of I 205! Please also roll all of I5, I 205, I 84 and Highways 26, 30, and 217. We need folks to think twice before jumping in the car and clogging our highway system! We need folks to carpool more, bundle their trips, take fewer trips by car, and consider alternative to driving like bike, walk, transit, and work from home. Tolling helps start this conversation and force the change!!



<b>ODOT I-205 Toll EA - RECORD #641 DETAIL</b>
--

**Submission Date :** 4/7/2023

**First Name :** Don

**Last Name :** Klingman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I fully support the tolls to fund these projects and future developments as needed.

**ODOT I-205 Toll EA - RECORD #642 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Danielle

**Last Name :** Leckband

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** You need to consider people who live in Oregon City and work on West Linn. I will have to pay both directions to go to my work as a teacher serving my community. Is that helping me? NO!!! I am serving our community and now being charged to get there daily. This is unfair and then you are taking about closing west linn oregon city local bridge??? Unheard of!!!!

**ODOT I-205 Toll EA - RECORD #644 DETAIL****Submission Date :** 4/7/2023**First Name :** Mike**Last Name :** McCarthy**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I think tolling is a terrible idea that should be taken off the table. Setting up a toll program would cost hundreds of millions of dollars for planning and infrastructure that would bring no public benefit. It would then cost millions of dollars per year to administer the program. While some seem to think that tolls would cause people to magically start walking, biking or riding transit, this is just not the case - a) origins and destinations in this corridor are too far apart to make walking viable; b) distance, topography, Oregon rain, and thousands of diverting vehicles on bike routes make cycling not viable; and c) the lack of adequate transit, and development patterns not conducive to transit, keep transit from being viable options. This means tolls will only create diversion (not mode shift), with resulting increases in crashes, pollution, and traffic racing through neighborhoods and town centers, resulting in less (not more) mode shift. It is estimated that the diversion caused by current congestion and future tolls on I-205 would cause an additional fatal or serious-injury crash per month. The safest place for freeway drivers to be is on the freeway, and it should be improved to accommodate traffic demand, with improvements funded by gas tax (I would support an increase) or other existing funding means, rather than wasting hundreds of millions of dollars on a toll program. Tolls would hit the poor, BIPOC, and non-english speakers harder than the rest of society, as many need to commute by vehicle to their jobs due to time, shift, family, multiple jobs, and other reasons. I believe tolls will just cause increased pollution due to diversion, effects in neighborhoods and town centers, and increased crashes, and would actually move us backwards away from our climate change and safety goals.

**ODOT I-205 Toll EA - RECORD #645 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Gary

**Last Name :** Haynes

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Unfair since we already paid for I-205. We are being taxed again. Too bad that I-205 was not built as originally planned with 4 lanes. Why the new max line to the airport? Why the walkway near Benson High? Is highway tax money being spent for these projects? Where does our Oregon & local gas tax go? Not only will we pay a toll, but as a consumer we will be paying a higher cost for our products due to this toll by transportation. This toll appears to be a double taxation with tolls, gas tax and vehicle registration fees. Will there be tolls on I-84, I-5, US26 in the future?

**ODOT I-205 Toll EA - RECORD #647 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Ann

**Last Name :** Carlton

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I don't feel that tolling on I-5 or I-205 is of any benefit to the "out of town" traffic that needs to use these highways. Nearby "out of town" traffic will avoid the toll situation by utilizing local streets (more congestion) or avoiding doing business in Portland/Oregon. Tolling on I-205 in the area indicated is of no benefit to "out of town" traffic that might utilize that stretch of road.

**ODOT I-205 Toll EA - RECORD #648 DETAIL****Submission Date :** 4/7/2023**First Name :** Melinda**Last Name :** Wilde**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I oppose this project in its entirety. It is unfair to impose this additional tax in the form of tolling on this stretch of I-205. There is inadequate public transportation in this area so that residents traveling to work will be disproportionately taxed while having no alternative to paying this toll tax. I-5 corridor will suffer from increased traffic traveling north to avoid the tolling. This project should be cancelled, not reconsidered.

<b>ODOT I-205 Toll EA - RECORD #649 DETAIL</b>
--

**Submission Date :** 4/7/2023

**First Name :** Josh

**Last Name :** Hess

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Don't waste our money! People will go to side streets.

**ODOT I-205 Toll EA - RECORD #650 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** rod

**Last Name :** bond

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Everyone I talk to indicate their dissatisfaction with the potential of tolling. ODOT is not listening. LISTEN OR FILE A MEASURE FOR A STATEWIDE INITIATIVE TO CONFIRM OR DENY PUBLIC APPROVAL OF TOLLING



**ODOT I-205 Toll EA - RECORD #651 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Carole

**Last Name :** Lukas

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The tolling will have an impact on my fixed income. This will cut off my social involvement with family and friends. Also contribute to surface streets having deteriorating due to excess traffic, and putting the burden of repairing on local cities.

<b>ODOT I-205 Toll EA - RECORD #652 DETAIL</b>
--

**Submission Date :** 4/7/2023

**First Name :** steve

**Last Name :** martin

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I'm completely against tolling. The project should be funded on taxes alone.  
No project is better than a project with tolling.

**ODOT I-205 Toll EA - RECORD #653 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Jennifer

**Last Name :** Murphy

**Affiliation :** 5034491592

**Submission Method :** SurveyMonkey

**Q3. Comments :** I have to use the West Linn exit as my most direct route home in Oregon City from work. The toll will force me to use alternative routes, increasing my commute time, and will also force me to pay to pick up my son from West Linn high school on my pickup days. This is forcing an entire community to pay a toll just to get home. I have vehemently against the tolls. This is also an extra payment we will have to budget when inflation is incredibly high, and wages are not matching that inflation. Food goes up, rent goes up, wages stay the same, and now we have to pay just to go home?

**ODOT I-205 Toll EA - RECORD #654 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** David

**Last Name :** Wilbur

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** As West Linn resident with aging parents in Oregon City this will add a layer to going over there daily to check on their needs just to cross the river. No additional routes will be improved to avoid the tolling creating unsafe neighborhoods with added congestion that already exists.

<b>ODOT I-205 Toll EA - RECORD #655 DETAIL</b>
--

<b>Submission Date :</b>	4/7/2023
<b>First Name :</b>	James
<b>Last Name :</b>	Eide
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	No tolls. Stop this project.

<b>ODOT I-205 Toll EA - RECORD #656 DETAIL</b>
--

**Submission Date :** 4/7/2023

**First Name :** Donald

**Last Name :** Nearhood

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Based on everything I have read and heard about the tolling project I totally support full implementation of tolling effort.

**ODOT I-205 Toll EA - RECORD #657 DETAIL****Submission Date :** 4/7/2023**First Name :** Jennifer**Last Name :** Dennis**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am a resident of the Willamette neighborhood in West Linn, and my family lives 1 block off Willamette Falls drive near 10th street. I understand the need for the bridge updates and lane addition. I understand this needs to be paid for. I also believe driving is a privilege. My concern is where tolling takes place and how driver's will divert to our local roads, like Borland which becomes WFD. Our greater neighborhood will be overrun and become dangerous for pedestrians and bicyclists to use our local roads. My solution is to toll all of 205 to make the tolling more equitable and disincentivize driver's from using local roads to escape from paying the toll. Our neighborhood streets already become unsafe to walk or bike when 205 experiences a traffic accident or major back up. Help our neighborhood stay safe and usable - if you're going to toll - toll all of it.

**ODOT I-205 Toll EA - RECORD #658 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** John

**Last Name :** Nason

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Very concerned about additional traffic on Willamette Falls drive due to this project. Also the financial cost to our family due to tolls. I already pay enough taxes and did not get an opportunity to vote on this



<b>ODOT I-205 Toll EA - RECORD #659 DETAIL</b>
--

**Submission Date :** 4/7/2023

**First Name :** Roy

**Last Name :** Perez

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Will there be a disabled veterans program or discount? Thank you for your consideration and time with this question.

**ODOT I-205 Toll EA - RECORD #660 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Megan

**Last Name :** Fulton

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I'm asking that ODOT not use West Linn and Oregon City as the guinea pigs in their tolling experiment and instead complete the Regional Mobility Pricing (Toll) Project BEFORE tolling one part or the metro. That way a full view of regional tolling impacts can be properly assessed. I'd also like to see more community involvement and public outreach. I'm frustrated by how ODOT is steamrolling this effort forward without actually listening to impacted community members concerns. To address this I'd like to see ODOT conduct and Environmental Impact Statement for the project and extend the public comment period for an additional 30 days and have public hearings during non-working hours so the average 9-5 working citizen can attend.

<b>ODOT I-205 Toll EA - RECORD #661 DETAIL</b>
--

**Submission Date :** 4/7/2023

**First Name :** Megan

**Last Name :** Fulton

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The project does not seem to fully take into account the diversions to local streets. The impact study seems incomplete and not using up to date traffic data. ODOT needs to include funding to local cities to pay for mitigation efforts since it's become increasingly clear ODOT does not care about it and does not have the will to address it.

**ODOT I-205 Toll EA - RECORD #662 DETAIL****Submission Date :** 4/7/2023**First Name :** Amber**Last Name :** Markey**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am write in regards to the 205 toll project. As a resident in West Linn I am extremely concerned about the cut thru traffic that will impact us. We often walk our dog along hwy 43, which is already increasingly busy but will be worse with the toll project. The other concern is my 13 year old son rides his bike along there to go to his friends house. The increased risk with the traffic change will make it so we can't allow him to do so. Thank you for your consideration to look for new solutions to the toll project.

<b>ODOT I-205 Toll EA - RECORD #663 DETAIL</b>
--

**Submission Date :** 4/7/2023

**First Name :** Arlene

**Last Name :** Kraft

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The 205 tolls will divert so much traffic on the windy little country road that are in the West Linn, Stafford areas. There is no viable mass transit alternative. The future tolls on I-5 in Wilsonville will totally isolate the Charbonneau community where I live. This is a community with a high proportion of seniors, and while not low-income, many are on fixed incomes. There are no alternative routes for access to basic services.

<b>ODOT I-205 Toll EA - RECORD #664 DETAIL</b>
--

**Submission Date :** 4/7/2023

**First Name :** Ron

**Last Name :** Heberlein

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I would like to recommend using a vehicle mile tax in lieu of tolls to fund the transportation system in Oregon. Implementing tolls without adequate mass transit alternatives will just place an additional burden on low and medium income families.

**ODOT I-205 Toll EA - RECORD #665 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Pam

**Last Name :** Haley

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Financial impact on people in poverty. I have \$1 left over from my paycheck and can not afford the toll nor the time to circumvent the toll road. Tolls negatively impact my ability to thrive in Oregon. The State of Ohio is over-run with tolls that have created a socio-economic boundary restricting the movement of people in poverty into communities with economic opportunities. Poverty in Ohio is so rampant people sometimes do not have \$1 left over from the paycheck to pay a toll. How many people will be in debt collections having their lives negatively impacted Again by the rich controlling people in poverty? Tolls are enacted to control socio-economic movent of people. Tolls are a form of digital tracking of American citizens, photographing all citizens regardless of being innocent of a crime. I will intentionally circumvent the tolls and honk my horn in audible protest of the local's choice of restricting the freedoms of American citizens.

**ODOT I-205 Toll EA - RECORD #666 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Christen

**Last Name :** Murray

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is going to cause congestion in the local area of Willamette/10th street. Also the financial impact on the residents of this neighborhood who have to use this section of 205 not only to go to work daily but for any other needs 205 to leave the community we will be charged just to leave our neighborhood.



**ODOT I-205 Toll EA - RECORD #667 DETAIL****Submission Date :** 4/6/2023**First Name :** Graham**Last Name :** Clancy**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** It seems wholly unnecessary for two separate tolling locations on one short stretch of I-205. The psychology of drivers trying to avoid tolls is only going to be exacerbated by the duplicative nature of the double tolls on this stretch. This will eventually lead to more frustrated drivers opting to avoid the tolls (notably not their required driving trips) by finding alternate routes through West Linn on arteries that are not prepared for that level of traffic. The specific impact in and around school zones on Stafford Rd, Salamo Rd, and Willamette Dr need to be better addressed than the wait and see approach that is being taken. Ultimately this experiment in tolling would be better served in another heavy traffic location on I-5 first to understand the impacts on traffic patterns before considering expanding around the region.

**ODOT I-205 Toll EA - RECORD #668 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Nate

**Last Name :** H

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** What funding funding considerations have been made for mitigation measures in West Linn to handle I-205 diversion traffic. I believe the answer is none.

Have there been considerations made for the large effect multiple tolls each day will have on household and business finances, even for those not typically considered low income? Are West linn, Oregon City and Lake Oswego having to pay the brunt of the cost? Why is that?

Has the Regional Mobility Pricing (Toll) Project been completed, so full view of regional tolling in Oregon can be assessed? If not, why not wait until that is done? Please conduct an Environmental Impact Statement (EIS) for the tolling project, which would require additional analysis and more public outreach and community involvement. Extend the public comment period for an additional 30 days (for a total of 90 days) and conduct another public hearing during non-working hours so people who work a standard work schedule are able to participate. This is a reasonable request considering the impact you are forcing on us.

<b>ODOT I-205 Toll EA - RECORD #669 DETAIL</b>
--

**Submission Date :** 4/6/2023

**First Name :** Lana

**Last Name :** Stevens

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I feel this will add to congestion on alternative routes to avoid tolls.

<b>ODOT I-205 Toll EA - RECORD #670 DETAIL</b>
--

**Submission Date :** 4/6/2023

**First Name :** Erica

**Last Name :** Delashaw

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Before activating tolls, a comprehensive mitigation plan to deter congestion from local streets of West Linn and Oregon City must be established so as to not unjustly harm local communities.

**ODOT I-205 Toll EA - RECORD #671 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Kate

**Last Name :** Jaspers

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am particularly concerned about the effects of tolling on the Willamette area of West Linn, highway 43 in West Linn, and the stafford Hamlet area (stafford, rosemont, and mcvey) areas of West Linn and Lake Oswego. Many of these roads are narrow, with 1 lane each direction. There are already a considerable number of people who cut through these areas to get to/from inner Portland and southern areas such as Oregon City, Wilsonville, Canby, etc. Significant improvements would need to be made to the local roads to handle the additional traffic safely. This project also disproportionately impacts residents of Oregon City and West Linn, who have limited options other than the tolled areas.

<b>ODOT I-205 Toll EA - RECORD #672 DETAIL</b>
--

**Submission Date :** 4/6/2023

**First Name :** Susan

**Last Name :** MacKinnon

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am concerned about the effect of tolls on lower income people who must commute on the roads, as well as the additional congestion on side streets that may result from those trying to avoid paying tolls.

<b>ODOT I-205 Toll EA - RECORD #673 DETAIL</b>
--

**Submission Date :** 4/6/2023  
**First Name :** Susan  
**Last Name :** MacKinnon  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #674 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Kenneth

**Last Name :** Rice

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Why is there money for the current improvements on highway 217, but we need tolls for work on 205? Why is there no talk of tolls on highway 26 even though it is congested every day? Why is there only tolls proposed for the working class areas of Oregon city and not the rich people in the West hills? A toll on 205 will effect people of color more than a toll on 217 or 26. If there will be tolls there should be tolls everywhere and not just on the less fortunate people.



**ODOT I-205 Toll EA - RECORD #675 DETAIL****Submission Date :** 4/6/2023**First Name :** Joe**Last Name :** Maston**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I live in Charbonneau and have to cross the Boone Bridge just to go to the store, I also go to Clackamas for work often. Placement for tolls is really bad. I am guessing Canby is going to be hit hard by traffic because I am guessing others besides myself will simply drive thru Canby and OC to avoid the tolls but it will be a terrible traffic issue for Canby. There are too many tolls in too many places. The newspaper recently did a survey and 90% of people are against the tolls. Hopefully they will be reconsidered or people are going to lose their jobs. You had better do a referendum on this or there is going to finally be a big change in Salem.

**ODOT I-205 Toll EA - RECORD #676 DETAIL****Submission Date :** 4/6/2023**First Name :** Vasily**Last Name :** Safin**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I figured you get mostly anti-tolling comments, and while I'm not necessarily pro-tolling, I do think it's essential that congestion is reduced. I would hope that there are alternatives to driving that are explored and developed. I also have heard a lot of concerns about tolling being very costly to families living paycheck to paycheck, and I am sympathetic to that, but I think it's worth weighing that against the time lost and extra risk of accidents that those families experience during high congestion events. It is ultimately a game theory problem where some will gain and others will lose. I think people adversely affected can feel better about it knowing they have other options and improvements to roads are being made.

**ODOT I-205 Toll EA - RECORD #677 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Maegan

**Last Name :** Tedmus

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I live on the back roads between the stafford rd exit and 10th street exit. There is currently so much traffic and putting in a toll will only increase the traffic. Additionally, with the building of the new west Linn middle school, there will be even more traffic on the backroads. The congestion and traffic will make it nearly impossible for our kids to play in the front yard. Additionally, residents in the area are not going to switch to alternative modes of transportation, they like driving their kids around. It's a family town. So all this is going to do is cause more traffic on residential neighborhoods as people try to escape the tolls. Our backroads are not supportive to this.

<b>ODOT I-205 Toll EA - RECORD #678 DETAIL</b>
--

**Submission Date :** 4/6/2023

**First Name :** Erik

**Last Name :** Herbrand

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I first want to say that I support tolls to help mitigate and lower the costs of maintenance on public roads if there are alternative routes. This project would force an undo tax on clackamas county as the only alternatives are residential neighborhoods. These neighborhoods would incur additional road traffic including maintenance passing the burden mainly to clackamas county residents.

**ODOT I-205 Toll EA - RECORD #679 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Lisa

**Last Name :** Piccuta

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling where purposed will boot strap west Linn residents. Significantly. Accessing simple needs like a full Walmart or target means we must leave west Linn. The alt route through Oregon city is very busy already and very slow to maneuver through. Tolling will cause further delays there, and will really impact the ability to get basic goods & services for west Linn residents. Please consider the small population here, whom sadly many may not speak up to comment here but I assure you they would be burdened significantly of tolling goes into motion. Grandmas & grandpa's who aren't able to comment but living on meager budgets. Please consider the wider impact in already very hard economic times. Thank you.

**ODOT I-205 Toll EA - RECORD #680 DETAIL****Submission Date :** 4/6/2023**First Name :** Jennifer**Last Name :** Bingham**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am most definitely OPPOSED to the I-205 tolling. What we definitely don't need is another tax, especially with the economy in the toilet! Last year was a record year for gas prices, as well as groceries and other items. For those of us struggling to make ends meet, which is the greater majority of Oregonians, the politicians decided to dump on another huge penalty. We already pay taxes for roads on every gallon of gas, along with Tri-Met imposed taxes other road taxes! I have heard the proposed toll is \$6 each way, per day, for an additional \$60 per week, and approx \$240 per month. Of course more if you must travel that way on weekends for errands, Church, sporting events such as OSU or OSU. Those of us living in the Gladstone, Clackamas, Oregon City, Willamette and West Linn areas are very limited on secondary roads to take. I-205 is almost our only option, and most assuredly our most direct option. Proposed tolling in our state has been consistently opposed by Oregonians. Why wasn't this particular project put to a vote by its citizens? Most likely because they already knew it would be soundly defeated. Not only is the toll cost prohibitive, it will cause a HUGE backup on surrounding side roads for the hundreds of vehicles trying to detour from the toll. Hwy 43, Willamette Falls Dr., and Blankenship Rd are just some of the roads that will be flooded with vehicles, causing long lines of cars. Numerous side roads will also be impacted by drivers trying to get around the backup. These roads were not built to withstand constant daily traffic flow, which in itself will cause additional road damage. Over a lengthy period of time I can even see the need for additional traffic lights or other control methods needing to be installed, such as roundabouts, etc. The neighborhoods will also have to deal with the increased noise, pollution and the effects this will cause to their health. Home values will also be affected as people prefer not to buy homes on heavy traffic roads. I traveled 205 to I-5, as well as Hwy 43, for many, many years and from experience I assure you the traffic will increase through neighborhoods and side roads. I have family in the Willamette area that will be greatly impacted by this. I'm sure they will even find it much harder to get out of their driveway. This will also impact bikers and pedestrians who will find it harder to maneuver in their once quiet neighborhood. I am wondering why this particular section of highway was even chosen? And what has happened to the proposed Wilsonville section of I-5 being tolled? Politicians are elected because they are to give voice to their communities. This proposed tolling is a prime example of politicians who want to go their own way and don't give a flip about what their voters want! If you were listening, you'd hear a resounding NO, NO, NO on this!

**ODOT I-205 Toll EA - RECORD #681 DETAIL****Submission Date :** 4/6/2023**First Name :** Marie**Last Name :** Hart**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I am against tolling as it will undoubtedly greatly increase traffic on surface streets and in neighborhoods. The financial burden is much greater for working class people. Road and infrastructure projects should be funded by mileage charges, not gas taxes, so everyone pays their fair share. That would be a much better way to fund roadway improvements.

<b>ODOT I-205 Toll EA - RECORD #682 DETAIL</b>
--

<b>Submission Date :</b>	4/6/2023
<b>First Name :</b>	Nate
<b>Last Name :</b>	Brogan
<b>Affiliation :</b>	overburdened taxpayer
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Ridiculous, asinine idea. NO TOLLING!!



**ODOT I-205 Toll EA - RECORD #683 DETAIL****Submission Date :** 4/6/2023**First Name :** Elza**Last Name :** Hart**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I am going to Winco and fried mayer for buying food with deals, discount or cheaper in Winco. To go from west linn to oregon city across 205 bridge or small bridge going across the wallamete river. You can do toll where it possible to find alternative roads but here only option avoid 205 toll it is go throw old bridge wich is nearrow, and it always have traffic specially rush hours.

**ODOT I-205 Toll EA - RECORD #684 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Deanna

**Last Name :** Peiravi

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** At this point the out cry of people AGAINST the tolls has been documented greatly. The Willamette falls drive commute is already difficult due to high traffic, near by schools, and the addition of businesses and community activities in main Willamette. With the additional Athey Creek school and traffic being routed through Willamete Falls drive and side streets like Dollar, Oatman, and Blankenship it will add extra traffic in times that are already congested. Tolling will only cause more stress on these roads. The area is locked in and families will be forced to face a high price to leave our city. The cost of living is increasing, insurance is increasing, and this added cost to just drive out of our city is abhorrent during these times. Continuing with the tolls during this stressful time without addressing the base problems first, and ignoring the community it is affecting is moving the problem as well as adding to it and not solving anything besides greed.

**ODOT I-205 Toll EA - RECORD #685 DETAIL****Submission Date :** 4/6/2023**First Name :** Sharon**Last Name :** Tucker**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The planned tolling will redirect local traffic on Hwy 43 and Hwy 99. Hwy 43 has been neglected by the state for decades. There are not enough lanes, turn offs, cross walks, or safe walk paths/bike paths as it is. This extra traffic will gridlock 43 and create additional risk for those living in the area. Tolling will be disastrous to the areas immediately surrounding them. Tolling heavy truck traffic at the weigh stations during peak hours could help mitigate heavy traffic. With the turn off still there south bound it could be a much more suitable solution.

**ODOT I-205 Toll EA - RECORD #686 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Sarah

**Last Name :** Milligan

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We live in Willamette, with 5 children in our household. Our children play in our neighborhood, and often need to cross Willamette Falls Drive to get to local parks and friends homes. Having additional traffic in our neighborhood and along our streets will add unnecessary risks as people try to avoid the tolls. We also will not be able to leave our town without being forced to pay for ever doctors visit, trip to work, visiting family or trips to a store. My children should be able to walk to Willamette primary, or Athey Creek middle school without us worrying about a flood of new traffic beyond what is already here when the freeway backs up. We are vehemently opposed to these tolls and the financial as well as safety burdens they will add to our lives.

**ODOT I-205 Toll EA - RECORD #687 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Sue (Susan)

**Last Name :** Conachan

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling those sections of I-205 will cause the traffic to re-route to surface streets. I don't go that way very often but I would go another way to avoid paying toll. Too expensive. Already pay taxes for the roads. Tolling to add lanes to I-205. Let's talk about how many billions over and over you have spent on 217. 217 has no tolling. Equality!

**ODOT I-205 Toll EA - RECORD #688 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Desiree

**Last Name :** Grande

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I have spoke with several Odot representatives and not 1 has given a solution for traffic on Willamette Falls Drive and 43. I live on Sunset Ave and can't even get onto Willamette Falls Drive during rush hour times. The traffic impact to our community would be devastating with people using our residential streets to avoid the 205 Tolls.

**ODOT I-205 Toll EA - RECORD #689 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Susan

**Last Name :** Milstein

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I'm concerned about what I see as lack of mitigation addressing local street impacts. I'm particularly concerned about Rosemont, Stafford and 43. I also see the rolling as being at least somewhat regressive as lower wage jobs have less ability to work from home or modify any work hours. Thank you for your consideration.

**ODOT I-205 Toll EA - RECORD #690 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** John

**Last Name :** Esquivel

**Affiliation :** IBEW

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is a bad deal for the people of Oregon not only in the Portland area but the entire state. you leave us with no alturnet route to get from the Willamette valley on interstate 5 and 205 to washington. build more roads . before even thinking of tolling the only two we have



**ODOT I-205 Toll EA - RECORD #691 DETAIL****Submission Date :** 4/6/2023**First Name :** Josh**Last Name :** Toothman**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** In the Environmental Assessment Report on page 3-10, there are estimated reductions in traffic volumes that is an inaccurate representation of the potential future outcomes. Should these results not be achieved, I request the tolling be discontinued at once. Specifically in the Environmental Assessment and it showing estimated rates at a 20% to 30% reduction in traffic volumes due to tolling is a false statement. "Compared with the No Build Alternative in 2027, tolling only the Abernethy Bridge prior to its completion would result in 10% to 15% lower total average daily traffic volumes on I-205 in the API, with the highest reduction on the Abernethy Bridge. Tolling both the Abernethy Bridge and Tualatin River Bridges prior to their completion would result in 20% to 30% lower average weekday traffic volumes on I-205 in the API, with the largest reductions occurring between OR 99E and OR 43, and between 10th Street and SW Stafford Road." A new alternative should seek the funding for ODOT and any seismic improvements by other measures, as the cost to implement tolling and the labor and infrastructure improvements alone outweigh the benefits Please do not ruin Oregon and make it another California, by implementing tolls. Do not do this!

**ODOT I-205 Toll EA - RECORD #692 DETAIL****Submission Date :** 4/6/2023**First Name :** Matthew**Last Name :** Rocha**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** As a regular driver on Oregon roads I already pay extensive per-gallon fuel taxes to fund road improvements, including capital projects. Adding a toll increases my tax burden. ODOT needs to clearly detail how all gas and weight-mile tax dollars are currently and historically spent, to provide taxpayers justification why additional travel taxes (tolls) are required to complete projects which are supposed to be paid by existing travel tax revenues. I am very concerned the true effect of the I205 project will be to increase local congestion, accelerate deterioration of local roadways not funded by ODOT, and increase tailpipe emissions. Drivers will self-divert off I5/I205 to neighborhood and city arterial streets. Increased congestion here causes stop-and-go driving that increases tailpipe emissions as compared to constant-velocity driving. The extra money raised by tolling only pays for roadwork on ODOT managed roads. But the increased wear-and-tear caused by both construction and tolling is on non-ODOT roads. My city and county will see dramatically increased maintenance costs. Your new revenue does not fund this. My local taxes will increase even more than the increased travel tax caused by tolls. This needs to be considered in the evaluation but it is completely ignored. It is highly inequitable to levy a road toll because it disproportionately affects people with jobs that require in-person work at the company facility. Such jobs, including warehouse, travel/tourism, food service, construction, consumer services, and manufacturing, also tend to be the lowest wages. This is also completely ignored. Or, the attitude espoused is "we will create a program to make tolls low or free based on income." That is inequitable against higher wage earners and people with jobs that permit remote work. People not using the roads should not be taxed even more to pay expenses for people that do use the roads. Your entire method of "economic justice" is fundamentally flawed. Therefore the results are erroneous. Please reevaluate economic impacts using real economics, not meaningless pseudo-methods like "equity-driven economics". You cannot provide evaluation of effects to "environmental justice" unless you explicitly define what you mean by "environmental justice." Revise the report to add the explicit definition. Then ensure that matches to what you actually analyzed. Then report factually.

**ODOT I-205 Toll EA - RECORD #693 DETAIL**

**Submission Date :** 4/6/2023  
**First Name :** fred  
**Last Name :** press  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :** NO TOLL. Things are expensive enough.

**ODOT I-205 Toll EA - RECORD #694 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** David

**Last Name :** Brown

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This will have a bad effect on the Oregon economy. The current folks in power are drunk with getting their hands into our pockets for more money. I am against it.

**ODOT I-205 Toll EA - RECORD #695 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Sara

**Last Name :** Hall

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling I-205 is an asinine idea. Your tolls will only increase the amount of time people spend on the other roads, which also increases the amount of exhaust going into the air (and anger people have while driving.) Not to mention how much MONEY you are wasting on other projects (i.e \$15 million to provide abortions to residents of other states, \$200 million for houseless services, none of which has done anything to solve the problem of homelessness at all.) There is plenty of money to widen and strengthen this corridor without a toll. Get your priorities straightened out.

**ODOT I-205 Toll EA - RECORD #696 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Meagan

**Last Name :** Lawler

**Affiliation :** retired

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am a senior on a modest fixed income. I can't afford this...it is in my neighborhood. It will lead to terrible congestion on the side roads. Why are you taxing suburbia and why the west side? This is really not well thought out. But a toll between Portland and Vancouver not here

**ODOT I-205 Toll EA - RECORD #697 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Larissa

**Last Name :** Tashchuk

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I believe it is unfair to the Tualatin and West Linn area residents to impose a toll on a road that previously did not have one, and is essential for their work commute. If ODOT wants to create a new bridge, or create the on-ramp to I5 in Tualatin at Norwood, fine, make it a toll road. But It is unjust to these residents to impose a toll on existing roads. This will cause many of these people to use alternate routes, and likely will back up I5 in Tualatin to avoid it, or even worse, Borland. We don't need to create a TOLL to cause less traffic, we need new roads that connect these areas. There is so much traffic in willsonville, there should be a plan to connect willsonville to west linn aside from 205. 205 is essential, and restricting access to those who can pay is unfair to residents.

<b>ODOT I-205 Toll EA - RECORD #698 DETAIL</b>
--

**Submission Date :** 4/6/2023

**First Name :** Lee

**Last Name :** Trautman

**Affiliation :** TRIMET

**Submission Method :** SurveyMonkey

**Q3. Comments :** I think this is a great idea. We should have instituted tolling along time ago to alleviate the horrible congestion on I205.



**ODOT I-205 Toll EA - RECORD #699 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Dieter

**Last Name :** Weber

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Throughout the history of Portland-area's highway infrastructure, traffic flow problems such as the one ODOT seeks to resolve here has often involved expanding/adding lanes with costs from gasoline taxes and elsewhere but never from toll systems. ODOT's plan suggests gas tax would not fully fund building additional lanes as needed due to the advent of electric vehicles. Why do tax payers subsidize electric vehicles? This is not fair to motor vehicle drivers who would pay gasoline tax AND tolls. It is also not fair to ignore tax payers the right to vote before such an extreme change adds to our cost-of-living (property tax, gasoline, groceries, and more -all are going up.)

<b>ODOT I-205 Toll EA - RECORD #700 DETAIL</b>
--

<b>Submission Date :</b>	4/6/2023
<b>First Name :</b>	Robert
<b>Last Name :</b>	Hatton
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	No tolls

**ODOT I-205 Toll EA - RECORD #701 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Terry

**Last Name :** Voorhis

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Adding tolls to 205 is only going to result in cars consuming more gas & creating more pollution from slowing down, idling in toll lines, & getting back up to speed, in an already bottleneck area.

**ODOT I-205 Toll EA - RECORD #702 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Nicholas

**Last Name :** Drum

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I strongly oppose this tolling proposal for several reasons. First, the affect on West Linn and Oregon City residents will be dramatic. Unlike the rest of Oregon, the people from these two communities will not be able to commute their local highway without incurring daily tolling charges that will cost thousands of dollars, per year, per family.

Second, it is quite clear that people who commute through this area of the highway will divert onto local roads around West Linn, creating a traffic volume that our roads were not designed to handle.

Third, congestion between Tualitan and Gladstone isn't bad. If ODOT truly wanted to address congestion, it would implement tolling around the downtown corridor. Clearly, it knows that the resulting pushback from voters would be severe. Accordingly, it is targeting the small under represented communities of West Linn and Oregon City. The affect on our community will be severe, the economic impact on our families will be substantial, and the downstream impact to our roads and environment will be significant.

**ODOT I-205 Toll EA - RECORD #703 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Kirk

**Last Name :** Ellison

**Affiliation :** Resident

**Submission Method :** SurveyMonkey

**Q3. Comments :** The study looks at Tolling+Improvements vs No Tolling+No improvements. This is a false choice. I'm happy to pay more taxes if needed to pay for the improvements, but please do not start tolling in our state! I grew up in Oregon but have also lived in Chicago, San Francisco, and Pennsylvania where I have had to put up with congestion and wait times due to tolling. Tolling is inherently inequitable and there are no public transit alternatives. Please do not bring tolling to Oregon, this would be a big mistake with long-term harm to the character of our state that would be difficult to undo. I also find it suspicious that the location selected for tolling is not near Salem or any ODOT offices.

**ODOT I-205 Toll EA - RECORD #704 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Jayme

**Last Name :** B

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Oregonians, like myself, already pay some of the highest taxes in the nation. Costs of gas, groceries, utilities, etc. have risen dramatically over the past year, yet many of us have not seen a salary increase. The aim of this project is to reduce traffic, yet the people it affects are those of us that have to drive to our jobs and cannot avoid that. We will be the ones footing this bill, and many individuals such as myself will be forced to pay 4 toll fees each day. This should absolutely be put to a vote, this is not a dictatorship where those in positions of power make final decisions that affect peoples livelihood.

<b>ODOT I-205 Toll EA - RECORD #705 DETAIL</b>
--

<b>Submission Date :</b>	4/6/2023
<b>First Name :</b>	Tim
<b>Last Name :</b>	Andrews
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Totally in favor of tolling on 205. Make it happen

**ODOT I-205 Toll EA - RECORD #706 DETAIL****Submission Date :** 4/5/2023**First Name :** Juliann**Last Name :** Johnson**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** One thing I've read multiple times is the hope that the tolls will help prevent traffic congestion by getting people to either not drive during peak times, use public transit, or use another route to avoid the toll. It is communicating that the people who NEED to go to work to live are causing traffic problems and are being put in the spotlight. If they use an alternative route and not causing traffic on I-5 and I-205, they're still causing a problem in an existing neighborhood. The public can't win in this narrative. This is putting the blame and punishment in the wrong place. We are also in a time where our buying power is lower than it's been in decades, but we're expected to pay another bill to travel... TO WORK. I would pay some additional taxes instead, as at least the bill would be more easily distributed and not hitting the people who can't afford it the hardest. People can't always afford to live where they work, they're going to be some of the hardest hit citizens. Speaking of having to pay to travel, the US has terrible public transit, so we are forced to buy cars and insurance, as well as pay for the upkeep. I would take public transit if it was a more valid option than relying on others for a ride or having my own vehicle. The fact of the matter is, we need better public transit in the metro area. At one point, I lived 20 minutes via car from my job, but it would've taken me an hour and a half to get there via public transit. That's an insane increase in time. If ODOT really wants to help relieve congestion on the roads, give the people an actual legitimate option instead of putting the blame and work on us AGAIN. This cannot continue! If you admit you're just using tolls for money, and don't actually care about solving congestion, well... I still despise the idea and my previous note regarding it being a poor tax are my response. The community is being failed. I'm sure this sounds dramatic to all of you reading this, but it's not. You're making this my (and the rest of the community's) problem, I'm putting it back on you. Stop this toll project.



<b>ODOT I-205 Toll EA - RECORD #707 DETAIL</b>
--

**Submission Date :** 4/5/2023

**First Name :** Neil

**Last Name :** Ferguson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This project will make those who must commute suffer financially more than wealthier city dwellers. It will also likely divert traffic to surrounding communities which already suffer from congestion and poorly maintained roads. Lastly, traffic on 205 isn't that bad to warrant such drastic measures.

<b>ODOT I-205 Toll EA - RECORD #708 DETAIL</b>
--

**Submission Date :** 4/5/2023

**First Name :** Amy

**Last Name :** Estimada

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I imagine Hwy 43 will become a parking lot during peak traffic hours. I have no other option than using 43 for at least part of my commute to work. I don't want to leave my house at 4 am. Besides there being no mass transit by my house, I have to bring at least a large crate to work every day and can not use mass transit.

**ODOT I-205 Toll EA - RECORD #709 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** RAFAEL

**Last Name :** KAUP

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The tolling may cause issues for businesses on one side or the other, equity issues for locals that have limited options to cross the river. Would a better option be to toll 205 and 5 bridges across the Columbia (smaller amounts <\$1.00) to pay for metro area interstate projects?

**ODOT I-205 Toll EA - RECORD #710 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** An

**Last Name :** Bui

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** With regards to the implementation process, I would like to see continued community outreach and sharing to provide direct feedback on how the money should be spent post road-widening and bridge repairs. In particular, with the goal of providing transportation alternatives in the region to reduce long-term congestion, and/or incentives to promote positive behavior like carpooling, biking, low driving mileage use, etc. The money should be informed by locals and spent locally since the local residents will experience an outsized negative impact. With regards to the financial impact, I would like to see a different rate for local populations living in the county affected, as well as a higher income ceiling for the discount program of at least 300% of Oregon poverty level. Signing up for the discount program should not require income verification and be implemented in good faith. As someone who is not local, and will use the road infrequently, I would like to be able to pre-pay or pay within 24hrs for the toll online. And the mail requesting toll should be translated to multiple languages.

**ODOT I-205 Toll EA - RECORD #711 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Trang

**Last Name :** Le

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Thu phí công s không giải quyết vấn đề giao thông vì dân số tăng nhanh sẽ gánh nặng thêm cho dân trong hoàn cảnh lạm phát hiện nay

[Google translation]

"Toll collection will also not solve the traffic problem because of the increase in population but will burden people more in the current inflationary situation."

**ODOT I-205 Toll EA - RECORD #712 DETAIL****Submission Date :** 4/5/2023**First Name :** Thuy**Last Name :** Le**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** The toll to get funding to maintain safe road not only on freeway but also inside road is fine with me. But I don't see the inside roads have been fixed, and or safe. Some areas, homeless people occupied the sidewalk, as a female pediatrician, I don't feel safe. I go to walk, pay a lot of tax and willing to pay toll but don't feel safe, this is totally unfair. I'm wondering how the findings can fix this issue

**ODOT I-205 Toll EA - RECORD #714 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Eric

**Last Name :** Petterson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am concerned that tolling on I-205 will push traffic to I-5 and potentially Hwy217 which are both already overcrowded. If tolling is subsequently implemented on I-5 as well, then Hwy217 will be left to carry unacceptable levels of traffic. After having recently driven tollways in the L.A. area I was happy to pay the toll at times when I needed to save time. However, there are many other options to go around tollways there. Portland does not currently have that luxury. I do not see this as reducing congestion, only causing people to pay for using roads that they are forced to use anyways. Mitigations to my concerns would be to implement tolls on I-205, I-5, I-84 Banfield and Hwy217 all at the same time, based on distance traveled on those routes. Additionally, further efforts need to be made to both communicate as well as insure that any monies collected via tolls, would be used directly for road improvements and congestion remediation efforts with less than 15% of those monies going to administrative or 'studies' expenses and at least 85% of the collections going to actual improvements in the traffic system.

**ODOT I-205 Toll EA - RECORD #715 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Leslie

**Last Name :** Drentlaw

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Placing toll bridges would significantly and negatively affect traffic and congestion on the freeways. Side roads would become congested and become unsafe for bicyclists, walkers, and local traffic. The cost to each household to just visit a grocery store would negatively affect all people of every economic background. Some like myself would be paying 4 tolls a day to go to work and come home. This will affect me economically very significantly. It will cause my trip home to increase by hours each day due to the slow downs it will cause on the roads and back roads. It will negatively affect home values as people will be less likely to purchase a home in an area where there are numerous tolls just to go to work and back. I am against this! Please reconsider this plan. It does not work for anyone that lives and works in the areas affected.



**ODOT I-205 Toll EA - RECORD #716 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Susan

**Last Name :** Winkelman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The impact on the financial status of persons using this route to get to and from work can not be 'mitigated'. You certainly are not going to require employers to improve wages or pay for tolls. The impact on the ability to live and survive will be felt by the most vulnerable of our communities. ODOT MUST find a way to fund these projects WITHOUT creating a greater burden on those already struggling to survive. It is WRONG that such a burden can be forced upon the people without a vote. ODOT's rhetoric regarding the inability for these projects to happen without tolls is ridiculous. The job of the planners is to FIND an answer that does NOT jeopardize the financial strain on the vulnerable members of the work force, or increase the pollution (from the slow down and stagnation of traffic), or effect the local communities safety by forcing more vehicles into areas never intended to carry commuter traffic. YOU MUST DO BETTER.

**ODOT I-205 Toll EA - RECORD #717 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Morgan

**Last Name :** Langley

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The transportation analysis doesn't consider the local communities abilities to pay these tolls to avoid the congestion caused on our surface streets by people trying to avoid the tolls. I cross this bridge 2-6 times per day driving my kid to/from school and to after school activities. I'm on the freeway for less than 2 miles, but I will pay the same rate as someone who drives from Vancouver to Wilsonville. Or I can cross the Oregon city bridge and cause more congestion on that bridge. The analysis talks about encouraging public transportation, but we don't have reliable public transport out here. It would take my kid an hour and require a bus transfer to go 3.5 miles. There are also no bike lanes on McLoughlin or in downtown Oregon city to make that a safe option. How are all of the people who live directly near this bridge supposed to afford the extra cost? This toll needs to be at the I-5 bridge to capture the commuter traffic on 205. Tolling just the Abernathy bridge places an undue burden on the local communities.

**ODOT I-205 Toll EA - RECORD #718 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Frances

**Last Name :** Pixley

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** How did ODOT get all this power to decide this project?? Why isn't our Legistration listening to the people about not wanting this project?? We have three Majors that don't want this project and nobody is the right fields are responding to them?? Where is all the taxes going from the weed sales??? You talk about the environment and road projects, but I believe this is away to get more money out of the people of these three counties. We have enough money, you people don't know how to budget it right!

**ODOT I-205 Toll EA - RECORD #719 DETAIL****Submission Date :** 4/5/2023**First Name :** Kristin**Last Name :** Odell**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am very concerned about traffic increasing on 99E. Currently the intersection of 99E and South End road is difficult at times to get from South End to head towards Canby. The more traffic that is attempting to avoid the tolling bridges will cause more difficulties and potential accidents. I would like to see that a traffic light be considered for the intersection of 99E and South End road. It is already very dangerous and increase in traffic will just make it worse. There has been many times that traffic has been backed up past our house on South End rd as traffic was so heavy that cars could not enter 99E.

**ODOT I-205 Toll EA - RECORD #720 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Jenni

**Last Name :** Hutteball

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I keep hearing that a toll will reduce congestion, but I do not believe this to be true. Folks still need to travel within that corridor. You are not reducing congestion, but rather moving it to surface streets. You're just changing the problem, not fixing it. As an Oregon City resident who works in Clackamas, you are going to limit my ability to get to work. I live in an area that does NOT have trimet bus service. My car is my only option. Telling me the toll is between \$0.55 and \$2.20 is a huge range when added on a daily, monthly, yearly basis. More transparency on the actual cost of the toll is needed for the public to be better informed on the decisions.

**ODOT I-205 Toll EA - RECORD #721 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Katie

**Last Name :** Hart

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I don't believe that our infrastructure for trimet will support an increased use of public transportation. It seems that increased public transportation use is being touted as a cause for part of the decreased traffic. How do we (as local citizens) know that there will be the opportunities for us to access public transportation? Currently, there are no options for my husband who starts work no later than 4 am. I start at 8 am and there are also zero options for my trip. How can I be sure that Trimet will support this? Will it be cost effective to implement tolls which should increase road maintenance fees when you will also have to increase Trimet's budget? I would like more clarity around the cost analysis. How much of each dollar collected from tolls will be used towards road repairs? Expansions? The envelope licker sitting in the office mailing toll bills? What is the initial cost expectation for implementing a new system? It seems like we have already wasted plenty of time and energy on this when we could have easily implemented a different fee or gas tax using a structure for collecting money already in place. Who will get to use the money to build and/or repair roads? Will Hwy 43 get built up since that will become a major toll avoidance route? What about Willamette Falls drive and surrounding neighborhoods? Also, where is the equitability of picking on one part of the state to establish tolls? Has local traffic patterns been assessed? Has the financial impact per family been assessed? Between my family of 6 (3 teen drivers) we use the bridges frequently. We often cross the bridges on 3-5 trips per day. This will have a major impact on our monthly budget. There has not been clear communication about how this will impact budget since the toll amounts have not been decided. ODOT keeps touting the fact that tolls will be as little as \$0.50 (which probably means about \$0.20 will reach the construction budget) but I just paid \$20 in tolls to travel 5 miles in New York/New Jersey and I paid \$10 to cross a bridge in California. What actions are going to happen before toll costs increase? It seems like implementing tolls is just the state trying to write themselves a blank check from taxpayers pockets. Overall, I don't understand (yes, I have read the information provided) how tolls make sense. It seems that there are more equitable options that will provide a higher rate of return with little to no start-up costs. Are the people pushing tolls through even living in the impacted area of the state?

**ODOT I-205 Toll EA - RECORD #722 DETAIL****Submission Date :** 4/5/2023**First Name :** Justine**Last Name :** OSullivan**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Thank you now I have to quit my job 3 years before I retire because I cannot afford to pay the toll during rush hour periods. I pay enough in property taxes why dont you use that money. I normally defend Portland when others are putting it down but you really dont care about us. I think I will move back to Los Angeles after 35 years of living here.

<b>ODOT I-205 Toll EA - RECORD #723 DETAIL</b>
--

**Submission Date :** 4/5/2023

**First Name :** Tim

**Last Name :** Smith

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** High cost of living coupled with a lower standard of living is currently impacting families throughout the state, driving migration out of Oregon. I rely on driving to work and to daycare and family homes for child support. If tolls are implemented my family will be forced to relocate out of the Portland Metro area. In a state where the quality of life is severely struggling to recover from COVID, inflation, ect... it would be backwards to propose additional expenses on individuals and families trying to simply keep their head above water.



**ODOT I-205 Toll EA - RECORD #724 DETAIL****Submission Date :** 4/5/2023**First Name :** Julia**Last Name :** Hodge**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The placement of proposed tolls is an toxic burden on Oregon drivers who already pay more than their fair share of road expenses, to include under utilized crosswalks and bike lanes where no one rides bikes. This will only cause more congestion in neighborhoods and side streets because people still need to get to work, take children to school, etc--and NO, take the bus isn't a solution in the real world! If this had been a proposal to toll the bridges at the OR/WA border, I would be more than happy to support it--A lot of people choose to live in Washington to dodge taxes, but work and shop in Oregon, no sales tax. By tolling at that location, we would get a more equitable return from those who should be paying their share to use the roads in the Portland area, instead of penalizing struggling Oregonians.

**ODOT I-205 Toll EA - RECORD #725 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Bryan

**Last Name :** Townsend

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am commenting on proposed tolling on I-205. Like all user fees this is going to impact low income Oregonians the most, limiting where they can afford to move and travel. The cost of registering a vehicle has become more expensive, and now there is this proposal to charge to actually use your vehicle on some roads. People generally live where they can afford to, not where they want to, and that will leave people stuck paying to access their homes, a cost many won't be able to afford. There needs to be a way to force all area drivers to pay for this road work, not just those using it today. That will keep traffic from increasing on I5 and local roads.

**ODOT I-205 Toll EA - RECORD #726 DETAIL****Submission Date :** 4/5/2023**First Name :** Laura**Last Name :** Keith**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I have moved out of the Portland area a couple years ago, in part due to crowding and traffic. I have also used i205 as a way to get to my job that didn't allow me to work from home. Tolling is an unbalanced way to create needed funding. Those who have to drive to work to be at a store or location work are typically lower wage. The bussing system is not adequate in those neighborhoods. The traffic will still be on the roads, but you'll just force more drivers on side streets and alternative routes. This does not solve the environmental impact. I oppose the tolling on I-205.

<b>ODOT I-205 Toll EA - RECORD #727 DETAIL</b>
--

**Submission Date :** 4/5/2023

**First Name :** Erik

**Last Name :** Auf der Heide

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** While seismic improvements are a laudable goal, the funding should come from state taxes, not road/bridge tolls.

**ODOT I-205 Toll EA - RECORD #728 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Sally

**Last Name :** Miller

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** There will obviously be much diversion to local parallel streets. The tolls will not only be at the bridge location but continue along 205. The city of Portland is not able to maintain the condition of its local streets now without the additional traffic. This will come at a high cost to local city neighborhoods all along I 205. The financial hardship on low and middle income household will be severe. Those people advocating for tolls and to make the cost of driving high are the people who can't afford the tolls. Let's not alleviate the congestion, because that will just encourage more people to drive. Leave the roads like they are, don't add a lane and don't add tolls.

**ODOT I-205 Toll EA - RECORD #729 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** HANS

**Last Name :** KAPLICK

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** BAD IDEA THIS SHOULD HAVE BEEN PUT ON THE PUBLIC BALLOT FOR ALL TO VOTE ON

**ODOT I-205 Toll EA - RECORD #730 DETAIL****Submission Date :** 4/5/2023**First Name :** Jenny**Last Name :** Jameson**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I assume the fees, how much I owe for each trip, will be done electronically. If the set fees aren't too high, why couldn't we pay one fee for both bridges for one trip? It can easily be determined that you didn't get off the freeway, that you are making one trip from Portland to Wilsonville as an example, by the amount of time it took to cross each bridge. Why does that person have to be charged a fee for each bridge crossing? But again, only if the determined fee isn't too much. Say you charged a \$2.00 toll fee? Why should I have to pay \$4.00 for each bridge crossing? Could that person be charged one time? Or a reduced rate of \$3.00? I am hoping these fee examples are high, but it shows my point.

**ODOT I-205 Toll EA - RECORD #731 DETAIL****Submission Date :** 4/5/2023**First Name :** Ted**Last Name :** Culin**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The metro area didn't get this way without madly increasing the growth boundary and continuing to build more and more and more house. Just look at Hwy217. The congestion is massive, why because of all the new housing. Metro caused this and now they want to tax the people even more. Too many people don't have enough money as it is in the face of the current economy, massive inflation, a looming recession and now you want to make it worse on the people who have to traverse that zone because of work or school. This state is far from the place it was when I moved here in 1983. Tax this, tax that, waste money even faster. Tolling is just a bad idea.



**ODOT I-205 Toll EA - RECORD #732 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Chris

**Last Name :** Mann

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The tolling of lanes necessary for transportations is economically unsound and biased. The only lanes that should be tolled would be any new, or special bypass lanes. Existing travel should not be impacted and there are not timelines to the proposed lane addition. Without that guarantee and integration this is a straight money grab that will disproportionately effect lower income households. It is effectively a new tax without representation.

**ODOT I-205 Toll EA - RECORD #733 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Aaron

**Last Name :** Aab

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** You talk that tolls will reduce congestion but at what cost? Tolling the freeways is going to push people to the side streets who can not afford the tolls. The most vulnerable citizens who are barely making ends meet will now either have to face paying a fine to travel to their place of work or add time and miles to their commute. Oregon has long been a state free of tolls and this introduction of them is nothing but an attempt to raise money that should exist already if it weren't for the mismanagement of funds on projects that don't actually benefit the roadways (i.e. bike paths in the City of Portland).

**ODOT I-205 Toll EA - RECORD #734 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Jennifer

**Last Name :** Morrison

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Interesting that of the above choices for what people have concerns about doesn't include the possible financial hardship of the average commuter. Has that truly been addressed? I really am asking that question! Has the financial impact for daily commuters been considered? Because, you see, I'm worried that people won't be able to afford this and It kinda feels like we're being punished for using our rights to get to work! We, as the function of being humans on this planet, have to work to be able to have a roof over our heads, food on our tables, clothes on our bodies, and to provide for our children. Do you understand that most families have multiple people in their households so that they can afford to live? If the adults that are supporting these families are having to commute to work and back on I205, twice daily, that cost is going to add up. What about the single parent who struggles to care for their children? The daily cost of commuting to work and back adds up! And let's not forget that gas prices are high, inflation is high, rent and mortgages are high, and salaries haven't gone up to support that. Again, it all adds up! This is just not the right solution to fund infrastructure. There is already so much hardship for the majority of us. Please, for the love of seeing people succeed, don't make us pay for our survival. Don't punish us. The dollar amount daily may seem small to you, but it adds up. If a rush hour cost is \$2.00 one way and then the same amount coming back, times 5 days a week, times 4 weeks in a month, that averages out to be about \$80-\$90 dollars a month. I simply cannot afford that, and so many other families can't afford it either. I so hope you are listening. Thank you!

<b>ODOT I-205 Toll EA - RECORD #735 DETAIL</b>
--

**Submission Date :** 4/5/2023

**First Name :** Rachel

**Last Name :** Zierdt

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Many more local freeways are also a mess as well. Why single this stretch?  
Not fair to those who live nearby

**ODOT I-205 Toll EA - RECORD #736 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Kevin

**Last Name :** Public

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** What the hell? During a recession? People can't afford this. And that ridiculous comment "driving should be expensive" walk to work then, telecommute, take the bus. What a complete idiot. How dare you suggest this at this time. Glad I'm moving far away from you nuts. You've got nerve.

<b>ODOT I-205 Toll EA - RECORD #737 DETAIL</b>
--

**Submission Date :** 4/5/2023

**First Name :** Jenny

**Last Name :** Winkler

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is a horrible project that was not voted on by the public impacted. Putting in a toll at a specific area is just going to create havoc on the surrounding surface roads. Users will find any way possible to avoid tolls and in turn create issues elsewhere. Leave the highway as is and stop creating a bigger problem with traffic.

**ODOT I-205 Toll EA - RECORD #738 DETAIL****Submission Date :** 4/4/2023**First Name :** Michael**Last Name :** Dwyre**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Why is it that the response to population growth is to make it harder and more expensive to get around? When growth is encouraged, infrastructure needs to be added to accommodate the increased population. Tolls are regressive making it difficult for people that have to get to work while already paying increased gas prices. Businesses like Amazon that make deliveries or do service work will have to increase their prices. Tolls cause people to drive in neighborhoods to avoid the toll. The 205 bridge is not the only place to cross the river. When I have to go for my health care in Portland I can easily find ways around them and add to the congestion off the freeway. The toll only shifts the traffic congestion problem rather than curing it. Why should the transportation be geared for people with money over the rest of us struggling to get by? Because I will not be a frequent user I, like many others will not have a pass and will fumble for exact change blocking traffic at the toll booth. So much for helping traffic flow.

<b>ODOT I-205 Toll EA - RECORD #739 DETAIL</b>
--

**Submission Date :** 4/4/2023

**First Name :** Danny

**Last Name :** White

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** An absolute waste of taxpayer money. Unaffordable for frequent travelers for work, a burden to neighboring counties whom visit frequently, and a useless grab for money. It will do absolutely nothing to alleviate traffic congestion, and in fact will only add more. Unbelievable that this is even a bill being considered when our homelessness, housing inflation crisis, and welfare goods inflation crisis are MUCH more important issues that need addressing immediately.



**ODOT I-205 Toll EA - RECORD #740 DETAIL****Submission Date :** 4/4/2023**First Name :** Lee**Last Name :** Hall**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** You are so disconnected from the average person using this route. No one, No one joy rides across these terribly congested routes. It is utterly amazing that you think that this will reduce congestion. People are driving this route during rush hours (many hours ea day) because they have obligations to get somewhere during that time (picking up kids, getting to/from work, etc). The idea that we can just change the timing by hours is absurd and quite insensitive, insulting, disenfranchising, and disingenuous. Portland has done almost nothing to match traffic access to the population growth and that is the cause, not people loving to be in exhaust and waste hrs of their day. In fact, Portland & metro areas have done an amazing job at reducing traffic pathways, slowing traffic and making congesting worse and travel slower. Wow, you have no clue other than you want to do this and will force it regardless of how lame and baseless the support/reasoning.

**ODOT I-205 Toll EA - RECORD #741 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Danielle

**Last Name :** Conrad

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I 205 alleviates traffic on I5 for traffic passing through to Seattle. If ODOT puts a toll on this interstate it will create more traffic to I5 that will not have a toll. If there should be any tolls it should be on Washington residents clogging our Interstates daily not taxing Oregonians more money. This is just going to clogg neighborhoods and their residential streets. No tolls!

**ODOT I-205 Toll EA - RECORD #742 DETAIL****Submission Date :** 4/4/2023**First Name :** Sarah**Last Name :** Poppins**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** If you think I had time to read all 194 pages you are insane. You should have created a Cliff Note version without the fluff. What I did read isn't based on facts but opinions and studies. I have 3 possible routes to drive my 44 mile one way commute home. Your tolling will remove 2 options if/when there is an accident blocking my most direct path. My most direct path already is 1.25 hours one way to get home. Once everyone avoids the ridiculous bridge toll, they will flood 99E further creating at least a 1.5 hour one way commute home. I can't move closer as safe neighborhoods are roughly 500K due to California money destroying the metro area. So I am not moving, but that extra time behind the steering wheel is time your are keeping me from my family and community, shame on you! Seattle is NO better because of tolling, go sell this somewhere else. I have an ocean front propert in Arizona, if you know someone.

**ODOT I-205 Toll EA - RECORD #743 DETAIL****Submission Date :** 4/4/2023**First Name :** Megan**Last Name :** Fowler**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am not supportive of tolls on 205 or I5. I would like to see accountability for the money already granted to deal with environmental impacts from transportation as well as to road maintenance/bridge restoration/earthquake mitigation through already voted on or assessed other taxes and fees. Additionally, these tolls will have a disproportionate impact on selected communities and individuals. The focus should be on better mass transit options and coverage rather than disproportionately impacting those who don't have other options besides driving at this time. For once, I would like to see Oregon adopt the best practices of WA and CA versus the worst of what these states have implemented. At the very least this is a topic that should be brought to voters.

<b>ODOT I-205 Toll EA - RECORD #744 DETAIL</b>
--

**Submission Date :** 4/4/2023

**First Name :** Robert

**Last Name :** Magill

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Please consider "toll" for one lane only, NOT the entire freeway! If people want to pay to use a lane dedicated to faster traffic then ok. But enacting a toll on an entire freeway is wrong.

**ODOT I-205 Toll EA - RECORD #745 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Jonathan

**Last Name :** Till

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** NO TOLL's period! I, like many others in the area, live on fixed incomes. With the cost of everything going up, the addition of a toll to drive on the roads that our taxes already pay for is unreasonable. In my case I would have to pay a toll "twice" every time I go to my DR. at the VA Clinic in West Linn since it's located at the 10th street exit. Also, the Social Security office is located at the same exit. So by putting a toll at the Abernathy bridge you will not only be impacting senior citizens, you will also be impacting veterans. My only other choice would be to find an alternate route around the toll (assuming it exist). By doing so it will not only add additional time to my commute, but will most likely add to the congestion on the side streets and possibly even neighborhoods in the area. This is unacceptable.

**ODOT I-205 Toll EA - RECORD #746 DETAIL****Submission Date :** 4/4/2023**First Name :** Jonny**Last Name :** Bunn**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I live in west linn and commute to get to a non profit organization I coach for. Tolling is going to affect my ability to keep working this extra job. More money out of my pocket just to do the things i like to do to support our community. I also commute to other places, i will take the back routes and clog up smaller streets because i will not get on the freeway to avoid tolls everyday.

**ODOT I-205 Toll EA - RECORD #747 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Richard

**Last Name :** Chambers

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I want to travel freely, I wish to drive where and when I like. I don't want my government trying to manipulate my behavior, particularly when they claim it's for my benefit. It's not, it's for the control and fund raising for the government. Get out of the way, and leave people alone to make their own decisions. If this bridge or that route is too crowded at this time or that, it's for the citizen to decide when and where to drive. My choice, not yours. Stop the project now and save yourselves a lot of effort, it will not be going forward. "The People" don't want it.



**ODOT I-205 Toll EA - RECORD #748 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Susan

**Last Name :** Hansen

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I support tolling and believe that any environmental impacts will be overcome by stopping the huge bottlenecks that occur because 205 is not adequate to handle the traffic volumes at this time. I find it disgusting that the current Clackamas County Commissioners sent out a link to this survey with prompts trying to get people to oppose this tolling project. The very same County has failed miserably at reaching the public to get support for increased funding to fix Clackamas County roads. I am glad that ODOT and the Federal government will likely be able to improve this section of 205 via tolls since it is clear that the so-called "leaders" of our county and the voters are very naive and believe that nothing should be done and no money from taxpayers should be spent. So toll away, just be sure to find ways for poverty stricken residents to pay less in tolls. Thanks for moving the project forward via tolls!

**ODOT I-205 Toll EA - RECORD #749 DETAIL****Submission Date :** 4/4/2023**First Name :** Rick**Last Name :** Myers**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I find it unbelievable that the toll site lend themselves to bailing off the freeway onto residential roads. Pre pandemic my property on childs road was often blocked to exit because off cars pulling off I-5 to skip parts of 205. As traffic increases this will get worse. If for one second you think the toll will decrease traffic i do not concur. It will send huge amounts of traffic into neighboring streets, only because of the placement of the tolls. Why do you let the traffic avoid these by providing the ability to do so? Why not place the toll gantry before Stafford road? I use 205 in my business often. I will be obligated to charge my clientele that cost. If the bridge and the part of 205 needs upgrading why is it not part of a gas tax like other hi way costs? This is not going to be an improvement in any way to neighboring roads.

**ODOT I-205 Toll EA - RECORD #750 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** X

**Last Name :** Y

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Please re-consider polls. With expenses increasing, polls are too much for low & middle class to endure in addition to costs such as: \*Increased housing costs \*Gas costs up to approx. \$4/gallon \*Higher grocery costs \*Raised property, state & fed taxes \*Taxes; local/ARTS, lodging, gas etc \*Recently raised DMV/DEQ costs \*Increases to health care costs \*Escalating inflation/less value \*Higher service costs ie; car repair \*Raised costs of many other items Please don't add to all this. Thanks!

**ODOT I-205 Toll EA - RECORD #751 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** SF & B

**Last Name :** Wenke

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Those avoiding the toll station will significantly affect local streets. Most important, the cost to those who live on one side of the toll station and have to go daily a short distance past the toll station - the cost can be ruinous especially for those of us that are retired. It would be better to create a traffic lane specifically for those who want to pay. This is financially despicable for many of us

**ODOT I-205 Toll EA - RECORD #752 DETAIL****Submission Date :** 4/4/2023**First Name :** Paul**Last Name :** James**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I feel the best way to raise the money for infrastructure improvements along the 205 is to just tax the bridge to Washington. This tax will help raise funds by taxing the people that have moved to Washington in order to avoid paying taxes in Oregon. This will also keep from taxing the people and businesses that need the 205 to make a living. I know that if they tax the other bridges, I'll just drive the side streets there.

<b>ODOT I-205 Toll EA - RECORD #753 DETAIL</b>
--

**Submission Date :** 4/4/2023

**First Name :** Marjorie

**Last Name :** Maddison

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I believe the majority of people who live locally in Oregon City and West Linn would avoid the freeway causing the local streets to be flooded with traffic, deteriorating the roads at a faster rate. The traffic gridlock that already happens at Willamette Dr and hwy 43 during rush hour will become worse.

I also believe this will cause property owners to sell and people looking to move into the area to think twice. I myself am factoring the toll in the decision to sell my house and move from the area as I drive to Tigard often.

<b>ODOT I-205 Toll EA - RECORD #754 DETAIL</b>
--

**Submission Date :** 4/4/2023

**First Name :** Michael

**Last Name :** Snook

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The report makes it clear that all of the surrounding communities are not capable of handling the traffic that will be diverted to local roads from people trying to avoid the tolls. The local communities will suffer more traffic, and increased danger to pedestrians as a result of these tolls. The tolls use of proceeds is vague. One goal of the tolls is supposedly to reduce congestion, assumably by reducing the number of cars. But there are no parallel transit options between Stafford and the Abernathy bridge. This is a terrible concept that is overwhelmingly disapproved of by the local surrounding communities. I have no faith that any of these comments will be taken to account by this body, this is simply a check the box exercise.

<b>ODOT I-205 Toll EA - RECORD #755 DETAIL</b>
--

<b>Submission Date :</b>	4/4/2023
<b>First Name :</b>	Clark
<b>Last Name :</b>	Carey
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	This is entirely ridiculous. You buffoons.



**ODOT I-205 Toll EA - RECORD #756 DETAIL****Submission Date :** 4/4/2023**First Name :** Joshua**Last Name :** Coxwell**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** No mitigation is proposed for managing diversion traffic on Willamette Falls Drive. As a resident of the Willamette neighborhood of West Linn we already see heavy diversion during rush hours. Also, there is no safe walking or biking route between the Willamette and Bolton neighborhoods. Additional diversion traffic will make this situation worse.

**ODOT I-205 Toll EA - RECORD #757 DETAIL****Submission Date :** 4/4/2023**First Name :** Meredith**Last Name :** Nolan**Affiliation :** Agave Dogs Rescue and resident**Submission Method :** SurveyMonkey

**Q3. Comments :** I am the Director of a local nonprofit physically located in Oregon City. We rely on volunteers from all over the Portland metro area to come to Oregon City to pick up rescue dogs going to foster homes so that they can be adopted. All of our supplies are located in Oregon City and our intake center. This will be a blow to our volunteer base and we risk volunteers no longer being willing to come to Oregon City to pick up their foster dog and supplies. Additionally, my husband is a driver for UPS. He must drive to Swan Island hub from Oregon City each day and this will be an additional cost for our family. The only other UPS hub close to us is Tualatin so there would be a toll either way. Remote work is not an option when the community needs goods and supplies delivered by UPS drivers. And the chances of gaining a UPS hub near Oregon City are slim since businesses may very well opt not to start up in an area where employees will be required to pay a toll. Additionally, Portland businesses are in dire need of patronage and we will think twice before going into Portland to support the businesses there.

<b>ODOT I-205 Toll EA - RECORD #758 DETAIL</b>
--

**Submission Date :** 4/4/2023

**First Name :** Audrey

**Last Name :** Amendolara

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is absolutely ridiculous. You are telling me I could live on the side of 205 for free, but have to pay (IN ADDITION to taxes), to travel to and from work?

<b>ODOT I-205 Toll EA - RECORD #759 DETAIL</b>
--

**Submission Date :** 4/4/2023

**First Name :** Colt

**Last Name :** Steeves

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** NO. Absolutely NO! The fact that this is even being considered is laughable and a complete joke.

<b>ODOT I-205 Toll EA - RECORD #760 DETAIL</b>
--

**Submission Date :** 4/4/2023

**First Name :** Sherry

**Last Name :** Odell

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I spend enough on gas to get my groceries and other necessities needed, this is ridiculous. Traffic is already bad as it is, it will create more hazards in rural areas with the extra traffic.

<b>ODOT I-205 Toll EA - RECORD #761 DETAIL</b>
--

**Submission Date :** 4/4/2023

**First Name :** Gabrielle

**Last Name :** Amendolara

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** As a member of the Oregon City community for the past 25years- I believe this a dangerous project that will have huge negative impact on citizens, business owners, and our more rural / less traveled areas. It is asinine to have tax paying citizens pay more money just to get to work. I know I will no longer be able to support local restaurants that will require me to go through the tolled areas. It will also increase traffic in previously less traveled areas in an attempt to avoid the tolls. This is a big NO.

<b>ODOT I-205 Toll EA - RECORD #762 DETAIL</b>
--

**Submission Date :** 4/4/2023

**First Name :** James

**Last Name :** Johnston

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We already pay taxes for roads and infrastructure! When will the government stop creating new taxes and tolls. Where is the money going that so many tax payers are already paying. There is literally a tax on everything everywhere! The government is too big. We don't need anymore taxpayer jobs! Crazy how the government spends money. Can't trust the government at All

**ODOT I-205 Toll EA - RECORD #763 DETAIL****Submission Date :** 4/4/2023**First Name :** Kevin**Last Name :** Kopp**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Hi there, I am deeply concerned about the upcoming tolling on I-205 and how it will affect my commute, my finances, and my community. First off, I would like to address how it will affect my commute and my finances. The concept of paying tolls on top of the taxes that I already pay as an Oregon citizen is a bit puzzling to me. With the current breakdown of the financing behind ODOT as per the Oregon.gov website, I feel like this is an undue burden being placed on me and my fellow citizens, beyond what is already asked of us. I do understand that \$5.1 billion may not be enough to manage the projects needed, but it sure seems like you are punishing your citizenship for the sins of your past in not properly planning or executing on projects that would have mitigated your current needs. As for my commute, I will be putting a great deal of effort into avoiding these tolls, while at the same time fulfilling my obligation to my employer that has no interest in me missing my shifts, or adjusting the schedule that they expect of me. This includes the use of multiple side streets, that were never designed for the type of traffic flow that they are about to see. Not to mention how hazardous this will be for our communities due to the short sightedness of this proposal. I am also very concerned about how this will affect lower income community members that don't have the luxury or option of working from home or adjusting their schedules. They can barely afford to keep food on the table, and you are asking them to pay an extra \$20 something dollars a week just to get to work. That is wrong on so many levels, but primarily on an ethical level. Our communities deserve better. Thank you, [ ]



**ODOT I-205 Toll EA - RECORD #764 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Britt

**Last Name :** Ash

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I work in Clackamas, and live in Canby. Traffic tends to back up on 99E through Oregon City, and often in Canby. It seems this project will make that worse, and I don't seem to be able to locate the plan to mitigate this. I'm also on the Canby Bicycle and Pedestrian Committee, and would like to make sure that before tolling commences, something is done to make walking and cycling more safe, given an increase in motorized traffic. More bike trails/pathways would be helpful, including a separate path along 99E from Oregon City to Canby. From an environmental standpoint, it doesn't seem to improve things to have cars backed up on smaller roads vs. 205.

**ODOT I-205 Toll EA - RECORD #765 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Jackson

**Last Name :** Chandler

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Stafford road and Johnson road intersection is already congested, and a projected increase of 30% in traffic (Which I think we all know is an optimistic projection) is unacceptable to the residents and service providers who need to use these surface streets to live and conduct business.

**ODOT I-205 Toll EA - RECORD #766 DETAIL**

**Submission Date :** 4/4/2023  
**First Name :** Andrew  
**Last Name :** Derocher  
**Affiliation :** Resident  
**Submission Method :** SurveyMonkey

**Q3. Comments :** I was always told that the reason I pay taxes is so my government can build me nice roads to drive on. My taxes are not low, and they go up every year. So why do you need to charge a toll on a bridge to collect even more funding? Your given Answer: "It will improve the roads (more lanes, earthquake proofing, reduce commute times, population is growing and we need to expand, etc" My Response to you: 1. (More lanes/earthquake proofing) If the roads aren't good, that sounds like a you problem. As mentioned before, where exactly are the tax dollars on this? Why aren't improvements and upkeep budgeted in already? It sounds like someone should be out of a job here. 2. (Reduce Commute Times) More people work from home now than ever. Downtown offices are ghost towns, and its easier than ever to park in the city. The only reason this could possibly make sense is that more people are commuting around now because taxes are so high and the cities price controls on housing are starting to have their inevitable effect on the residential marketplace. But I digress... 3. (Population Growth) If this has anything to do with population growth and needing more lanes, then again: where exactly are the tax dollars here? More population means more taxes to fund more roads. Sounds to me again like someone on the budgeting committee should be sacked. If you're trying to 'get ahead' of the growth here, then why not take out a loan? Sell some bonds? Why should current residents subsidize new roads for incoming residents? I just moved to Clackamas county this year. And if this proposal goes through, it will be my last year in Clackamas county. This toll is a joke.

**ODOT I-205 Toll EA - RECORD #767 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** JOHN

**Last Name :** VANDERMEER

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling increases household transportation costs. At this time of high inflation and soaring costs of about everything there should be ZERO increase of transportation costs to any households pocket book.

**ODOT I-205 Toll EA - RECORD #768 DETAIL****Submission Date :** 4/4/2023**First Name :** Ryerson**Last Name :** Schwark**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** The ability to reroute around both of these bridges onto local streets makes this tolling plan a disaster to local traffic. The Arch bridge allows reroute around the abernathy and the Willamette fall road bridge allows reroute around the Tualatin river bridge. If tolling needs to happen, Then it should be at Columbia river crossings where there is no ability to reroute onto local streets and avoid the tolls.

<b>ODOT I-205 Toll EA - RECORD #769 DETAIL</b>
--

<b>Submission Date :</b>	4/4/2023
<b>First Name :</b>	Linda
<b>Last Name :</b>	Hedges
<b>Affiliation :</b>	Hector Campbell neighborhood
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Tolling to this community alone, with its resulting rat runs to avoid the toll area will increase poor air quality and unfairly tax the neighborhoods nearest to the tolls. Spread the tolls all the way to Eugene as it is often commerce relating to Salem, Eugene and further south which benefit from through traffic in the toll areas.

<b>ODOT I-205 Toll EA - RECORD #770 DETAIL</b>
--

**Submission Date :** 4/4/2023

**First Name :** Margaret

**Last Name :** Lieb

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The diversion created to local streets/roads will devastate normal day to day activities for those who live in Oregon City. The expense to us when traveling thru the toll could be too burdensome to handle.

**ODOT I-205 Toll EA - RECORD #771 DETAIL****Submission Date :** 4/4/2023**First Name :** J**Last Name :** Chambers**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am not in favor of ANY tolling for this 205 highway. A 'better transportation solution'. You've ruined Division St. with your 'new' system. How many people have I seen using the FX2 line? I've counted 6 at one time heading east. You speak of equity? It is not equitable to charge people and seniors included here who travel 205 daily as workers, grandparents or merchants. With inflation under this democratic government there is no way tolling is not equal. People cannot afford to pay extra monies for tolls when they cannot afford their grocery and house payments etc. You've already allotted monies to this project without the full vote of the people. YOU are not the people. YOU serve the people and we wish to be heard. This is where a FEW people are making decisions for the many who travel this route daily. Money, Money Money is the goal here. All your rhetoric about serving the under served. Really? People who travel this corridor are well aware of the time frame and choose this as their closest and easiest travel mode. Congestion may be reduce here, but the existing side streets will become more congested. Why are you tolling 2 areas along the same corridor? It's more money. I use this corridor frequently and I will encourage EVERYONE I know to voice their dissent against this idea. Oregon is touted as progressive??? I realize that money in one pocket is not the same as money in the other. GET your act together and take care of the downtown Portland area !!!



<b>ODOT I-205 Toll EA - RECORD #772 DETAIL</b>
--

**Submission Date :** 4/4/2023

**First Name :** Anthony

**Last Name :** Mayernik

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am concerned about the impact to Ek Road, Borland Road and Willamette Falls Drive from diversion as people work to avoid the tolling gantries. I am also concerned about the impact of the proposed toll pricing on households that commute through the 205 corridor every day during peak hours.

**ODOT I-205 Toll EA - RECORD #773 DETAIL****Submission Date :** 4/4/2023**First Name :** Matthew**Last Name :** Bancroft**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** While I somewhat agree that a third lane and seismic improvements are needed in this section of the highway I don't agree that your "false dilemma" style proposal is fair, well thought out, or even accurate. This isn't an "all or nothing", two options issue. Tolling is a terrible idea. I repeat, an absolutely terrible idea. As someone who has lived in many states with tolled highways, and many without, the better highway systems are still in the states without toll systems. Tolls are permanent, require maintenance of their own, cause congestion, create privacy issues with the information capture systems that you are proposing, and don't have any set understandable monetary return, all while the upgrades and needed improvements are very near/short term and will need reevaluating in a few short years again and again. Simple tax increases or alternative funding is a much more acceptable method of funding these improvements. The addition of tolling systems is tantamount to a permanent money grab by ODOT that has no limits and no guarantees of improvement but has definite, demonstrative ill effects on everyone using the highway or living in communities around the proposal area. Personally, both my wife and I would have to pay the toll a minimum of four times a day, five times a week while truckers who use the road intermittently but do far more damage to the road, would only be held to a much smaller percentage of the improvement funding. This is hardly fair for locals that rely on this stretch of highway everyday for their commute. In essence you are forcing a group of local users to bare the biggest burden to fund these improvements while all travelers get the "benefits". Furthermore, your assessment on traffic time reduction is not accurate and is very misleading. As you state, many people use alternative routes already to avoid the congestion that can be somewhat of a nuisance at certain times. This will certainly increase with the addition of these tolls causing further headache for local communities and ruining neighborhoods in the entire proposal area. Also, there is no guarantee that those routes will change while there is a near certainty that more traffic will fill in the new third lane as traffic apps update and redirect drivers there. Additionally, as the highway widens more freight users are likely to use this stretch adding to the local noise levels and discomfort while also adding to the increase of traffic off the highway as more drivers and freighters peel off locally into nearby communities. The claim that traffic times will be reduced is inaccurate at best. If my commute takes me twenty minutes on the highway and ten minutes on local roads, what's the difference when it takes me ten minutes on the highway and twenty minutes on local roads due to higher off highway traffic congestion? The answer is the toll. More money. It's the same commute time if not worse, PLUS a new toll cost. These proposed upgrades again can be easily funded with a creative time limited tax collection system instead of permanent, variable cost tolling upgrades. The tolls collected should therefore in part be used to fund tax breaks or returns for anyone living in the locally affected communities, effectively offsetting not just the toll costs annually, but the increased losses of livability, property value and comfort that we all face from this proposal. As far as the Variable tolling is concerned, what's the limit? What's the price cap? Is it different car to car? Who decides the toll amount? Does the public get any say at all? The mass collection of driver information as a way to collect toll fees is a terrible idea. Obviously, you are linking directly to drivers financial systems, be it a credit card, bank card or account. What are the details of this information capture system? Where is the information stored? How is it used? Who has access to it? How long is it stored? Most importantly, who is responsible when it gets hacked or compromised? Tolling is a disastrous addition to Oregon roadways no matter how you apply it. Do Better. Think Better.

**ODOT I-205 Toll EA - RECORD #774 DETAIL****Submission Date :** 4/4/2023**First Name :** Theresa**Last Name :** McGrew**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Hello, my concern is the rerouting that will come on Stafford road by Childs road. This is already an extremely dangerous intersection. I am worried that with people that are not familiar with the area and rerouting this will cause more accidents. We need a flashing light or a stop light/ turn lane to help this intersection if more traffic flow will be coming from either way.

**ODOT I-205 Toll EA - RECORD #775 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Charles & Diane

**Last Name :** Klinkenberg

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We oppose the toll proposed on 205 We are seniors that use this road all the time and this toll will be a hardship. Please please reconsider this terrible decision.,

<b>ODOT I-205 Toll EA - RECORD #776 DETAIL</b>
--

**Submission Date :** 4/4/2023

**First Name :** Lori

**Last Name :** Martell

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is not a good Idea!!!! Will not save anyone any MONEY!!!! Very bad for the People that live in the area. Because people will not use the freeway and make it bad for them!!!

**ODOT I-205 Toll EA - RECORD #777 DETAIL**

**Submission Date :** 4/3/2023

**First Name :** John

**Last Name :** Tibbetts

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I firmly oppose tolling on interstate highways - or any roadway for that matter. Tolls such as the one being considered by ODOT are extremely regressive. I believe any plan to institute tolling should provide the public with DETAILED analysis of the congestion impact on other already crowded routes that commuters and others would use to avoid tolling. The plan should include detailed impact on families living at or below the poverty line, as well as on fixed income families such as the elderly and those receiving government assistance. I strongly oppose the use of tolls. When will they end? What are they paying for or is this just another revenue stream?

<b>ODOT I-205 Toll EA - RECORD #778 DETAIL</b>
--

**Submission Date :** 4/3/2023

**First Name :** Mr

**Last Name :** Mas

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This will be an environmental disaster, of pollution from cars stuck in lines and will destroy local communities as large numbers of people clog small sides streets along the 205. Cancel this horrible tax more tax, and more taxes project. Stop spending gas tax money on all other projects other than roads for the drivers that pay the taxes and fix up roads.

**ODOT I-205 Toll EA - RECORD #779 DETAIL**

**Submission Date :** 4/3/2023

**First Name :** Rich

**Last Name :** Brooke

**Affiliation :** Willamette resident

**Submission Method :** SurveyMonkey

**Q3. Comments :** I just wanted to give my two cents on the idea of tolling I-205 from Stafford Road to the Willamette River. We live in West Linn's Willamette Neighborhood and would be severely impacted by this decision. Traffic in our neighborhood from schools, the recently remodeled Historic Willamette area on Willamette Falls Drive and current I-205 traffic trying to find back roads to already avoid 205 is ridiculous! We don't agree with tolling as it is, but this is the worst area you could possibly decide to toll that we could think of. Are there any West Linn residents on your board that actually know the traffic issues in the area, safety concerns or know that a giant middle school is being built on Willamette Falls Drive that will alone make traffic even worse? This NEEDS to be on the ballot for the public to vote on. If not, what are you afraid of???



**ODOT I-205 Toll EA - RECORD #780 DETAIL**

**Submission Date :** 4/3/2023

**First Name :** Laura

**Last Name :** Jenness

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This project will cause major congestion on local roads in West Linn. There will be horrendous gridlock and environmental pollution as a result. The economic impact of paying the tolls is totally unfair to the citizens of West Linn. Bottom line: congestion and gridlock and we have to pay to use I205 - ludicrous, stupid and infuriating!

<b>ODOT I-205 Toll EA - RECORD #781 DETAIL</b>
--

**Submission Date :** 4/3/2023

**First Name :** Robert

**Last Name :** Cope

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Totally against positioning in Clackamas County. Should be located in Multnomah County where all the traffic and use is most impactful.

**ODOT I-205 Toll EA - RECORD #782 DETAIL****Submission Date :** 4/3/2023**First Name :** Brian**Last Name :** Mayo**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** You have already started this project and it will move forward. My concern is the tolls you will be charging to those who live in West Linn and Oregon City. We live in this community and I-205 is a road we have to use to access medical centers. My elderly parents live with me in West Linn and they have several medical appointments at Kaiser Sunnyside and Kaiser Tualatin. Their medical conditions include dementia, parkinsons, cancer and hear disease. The most accessible driving routes must take us to on I-205. There is no easy way to get to Kaiser Sunnyside on side roads from West Linn. Getting to Kaiser Tualatin is doable, but will take twice as long. Residents in West Linn and Oregon City should not be required to pay tolls for these bridges.

**ODOT I-205 Toll EA - RECORD #783 DETAIL**

**Submission Date :** 4/3/2023

**First Name :** s

**Last Name :** rockne

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** My only problem with the project is tolling. I'd rather see the gas tax raised to pay for this and other projects. The residents in this area would be unfairly taxed for something that is a benefit for the entire state.

<b>ODOT I-205 Toll EA - RECORD #784 DETAIL</b>
--

**Submission Date :** 4/3/2023

**First Name :** Marianne

**Last Name :** Greer

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am against all toll roads. Our taxes are already some of the highest in the nation. Tolling our roads is just another burden to put on the people. As a voter, I ask you stop this project. Either fund it with existing funds or do not move forward. Thank you.

<b>ODOT I-205 Toll EA - RECORD #785 DETAIL</b>
--

**Submission Date :** 4/3/2023  
**First Name :** John  
**Last Name :** Nanney  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #786 DETAIL**

**Submission Date :** 4/3/2023

**First Name :** Carol

**Last Name :** Kruse

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** As a 30+ year resident of West Linn I don't know how it would be possible to mitigate the impact of two tolls on I205 as you travel through our city. Traffic will divert onto our city streets and the Oregon City West Linn bridge to avoid the tolls causing increased pollution, reduced traffic flow and hazardous conditions for pedestrians and cyclists. As seniors on a fixed income our household finances will be adversely affected. Travel in either direction on 1205 will result in us having to pay a toll. The Willamette River is not something we can avoid having to cross.

<b>ODOT I-205 Toll EA - RECORD #787 DETAIL</b>
--

**Submission Date :** 4/3/2023

**First Name :** David

**Last Name :** Wright

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Is there a projected tolling cost to individuals that cross the bridge(s)? Will there be multiple tolls along I-5 & I-205? If so why? Thank you.



**ODOT I-205 Toll EA - RECORD #789 DETAIL****Submission Date :** 4/3/2023**First Name :** Kristina**Last Name :** Chirgwin**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** This is insane. Toll the 205 at the Washington/Oregon border as well as the I5 corridor into Washington. If you put a toll where you propose people are going to congest the side roads and bypass this area and increase traffic to the surrounding communities. Which also puts dangerous vehicles close to children/neighborhoods.

<b>ODOT I-205 Toll EA - RECORD #790 DETAIL</b>
--

**Submission Date :** 4/3/2023

**First Name :** Andrew

**Last Name :** Shipman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Please tax the out of state drivers that take advantage of living out of state, instead of the current tax paying citizens.

<b>ODOT I-205 Toll EA - RECORD #791 DETAIL</b>
--

**Submission Date :** 4/3/2023

**First Name :** Steven

**Last Name :** Smith

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We are tired of not being listened to. No Tolls period. This will destroy the average working person. Just stop!

**ODOT I-205 Toll EA - RECORD #792 DETAIL****Submission Date :** 4/3/2023**First Name :** Stephen**Last Name :** Gettel**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** People already are leaving Portland because of governmental shit show that has let this town go to hell. How you think they feel about having more of their money stolen from them when ya'll can't even fix the fucking potholes every 10 fucking feet. This is overreach at its best. The money for this project has already been stolen from the community. Make big business pay their share. This is the most idiotic idea I have heard in a long time. The locals just won't have it. Ya'll got a rude awakening coming if you go through with the tolls. What a fucking shit town man, just pour some more diarrhea on it why don't you.

**ODOT I-205 Toll EA - RECORD #793 DETAIL****Submission Date :** 4/3/2023**First Name :** Stephen**Last Name :** Gettel**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This is a huge mistake. Mark my words. You want to piss off the Clackamas community, go through with ripping them off with tolls for what they already pay for. People hate the government enough already, let alone the circus clowns we have here in Portland running the show, and now this? What the serious fuck are you all thinking? What you are going to have is mass traffic issues from people avoiding the bridge. Me included. Fuck you Oregon for trying to toll this bridge. This is why people hate Oregon Government. Have fucking Nike or Intel pay some fucking taxes maybe? Ya'll gonna rape every single person who wants to cross the fucking river? That bridge there right now is already paid for. This is a no brainer. again, go through with this and there will be trouble for sure. OC folks are gonna throw a fucking fit !

**ODOT I-205 Toll EA - RECORD #794 DETAIL**

**Submission Date :** 4/3/2023

**First Name :** Cemal

**Last Name :** Richards

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I'm a Clark County resident and I'm strongly against tolls on the I-5 and I-205. The one thing to keep in mind is that there are many hard working people cross the bridge 5 days out the week who don't make a lot of money. Those individuals will have to pay more money just to go to work and there won't be any tax benefits. Furthermore, I'm concerned that many people won't want to go into Oregon and vice versa. The one thing that needs to be worked on between Oregon and Washington is a third and fourth corridor. One west of the I-5 and another east of the I-205 would relieve traffic congestion immensely. Please DO NOT put tolls on our two most widely used highways. It'll be a complete disaster.

**ODOT I-205 Toll EA - RECORD #795 DETAIL**

**Submission Date :** 4/2/2023  
**First Name :** Shannon  
**Last Name :** Brogden  
**Affiliation :**  
**Submission Method :** SurveyMonkey

**Q3. Comments :** The toll will negatively affect my community in West Linn and others. The traffic from i205 will clog side roads and cause a lot of heavy dangerous congestion. This is unsafe for school children, walkers, bikers, & cars trying to pull out of their driveways and streets. The toll is not affordable, especially for people who live in West Linn and use the freeway to get to the store, kids sports, work, schools. It isn't fair to toll residents in this area. I205 literally divides west linn. This is not equity. You are placing this toll in a more affluent area, taxing the people who live here the most. If the toll was temporary and sole purpose was to improve transportation on i205 by widening it, then I can see how it's justified. I205 always moves- never stand stills. It just needs to be wider to keep up with the vehicles and population growth. People drive! no one feels safe using the max, city buses, or biking anymore. No one has extra time to do those things. We must be realistic! The tolls are going to divert traffic to neighborhoods and communities and overwhelm them with pollution and congestion. In Oregon, we have some of the highest taxes in the entire country. The cost of living has gone up drastically. The inflation is already having a negative impact to families. Adding a toll in these tough economic times is not right. You are taxing people out of Oregon. What is this toll going to cost families with both parents taking their children to sports practice, school, work, grocery store, gym, etc? And a teen driver? I am a substitute teacher. I would not be able to sub in surrounding communities if I was tolled. Teachers already don't make much, and to have to pay to go to and from work would be a drastic pay deduction. This will only add to the sub shortage! This is the worst idea ever. You are ruining Oregon. The majority does not want these tolls but you do. I do not support this one bit. Please listen to the public.

**ODOT I-205 Toll EA - RECORD #796 DETAIL**

**Submission Date :** 4/2/2023

**First Name :** Ed

**Last Name :** Winkler

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I do not support this. With the drop in gas taxes from the increase of electric vehicles, I'd prefer to see a per-mile fee paid at vehicle renewal with a hefty impact fee from anyone moving here and introduce a vehicle from out of state. A per-mile fee captures ALL miles driven on our roads, not just from those drivers that cannot avoid the tolls. Congestion is already reduced somewhat from covid in that more people are working remotely and can further be reduced by implementing what we learned in covid: That we have the ability to adjust our lives for the betterment of the community. With that in mind, pass legislation that requires business that employ more than 3 people to stagger their start times from 7a to 9a and corresponding release times from 4p-6p. At the same time legislate that all 18 wheelers must be off the freeways during those times. A pay-per-mile program with an elimination of state tax at the pump coupled with staggered start/leave times M-F and Big Rigs off the road during peak times solve a host of problems. I DO NOT support tolls for anyone. Please feel free to reach out to me to discuss this solution and how to enforce it in more detail.



**ODOT I-205 Toll EA - RECORD #797 DETAIL****Submission Date :** 4/2/2023**First Name :** Shayne**Last Name :** Park**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling doesn't eliminate traffic congestion, it merely changes where it occurs. It will cause tens of thousands of vehicles to DIVERT on to side roads to avoid the tolls. ODOT estimates at total of 130,000 vehicle diversions when all Portland area freeways are tolled. That is equivalent to every vehicle that crosses the Interstate Bridge on an average day, suddenly using side roads and making the neighborhood roads more congested and less safe. Portland economist Joe Cortright revealed the information (here). There would be DOUBLE, variable rate tolling, one for a bridge and a second "per mile" toll for driving I-5 or I-205. During congested travel times, it could cost \$15.80 to use I-205 driving from Vancouver to Wilsonville. When added up, a round trip costs \$28.10 on I-5 or \$31.60 on I-205 each day. That means up to \$158 per 5-day week, and over \$600 per month and over \$7,000 per year. TOLLS are hugely inefficient with the "cost of collection" running 30-60% in many areas. The Washington state tolling system has had to be bailed out with other tax revenues for the past 3 years. On Seattle's I-405/SR-167 tolling system, the "cost of collection" was 68 percent of money collected, according to the most recent report to WSDOT. That's outrageously inefficient, as the gas tax has a 1 percent cost of collection

**ODOT I-205 Toll EA - RECORD #798 DETAIL**

**Submission Date :** 4/2/2023

**First Name :** Randy

**Last Name :** Kyle

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls on roads and bridges will create additional financial burden on those that work in those areas. This will only create more financial hardships on the middle class. Most will seek side roads to avoid the excessive fees creating more traffic on side streets. Side streets were not designed to handle the excessive amount of traffic. Most of the toll fees go to the collection of those fees and not cover the expense that they were intended for. Vote against this crazy idea

<b>ODOT I-205 Toll EA - RECORD #799 DETAIL</b>
--

**Submission Date :** 4/2/2023

**First Name :** Anthony

**Last Name :** Gomez

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Why does the govt need to raise taxes on the working poor? Commuters are getting hurt! For what? Taxes are higher than ever, but you need more from your taxpaying citizens.

**ODOT I-205 Toll EA - RECORD #800 DETAIL**

**Submission Date :** 4/2/2023

**First Name :** Amber

**Last Name :** Brown

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling will negatively impact those who cannot afford to move close to where they work, and who already live beyond their means. I live in Vancouver and have had to work in Portland, Hillsboro and even Vernonia. I already can't afford to pay for gas to drive- Washington residents already pay the highest gas tax. We have zero representation in Oregon. Why should we be subject to Oregon taxes or tolls? Tolling will also negatively impact local communities, as well as the environment- smaller watersheds and wetlands are often located away from main thoroughfares... diverting traffic from the highway puts traffic into the heart of our local communities and watersheds. You may argue that transitioning to electric vehicles would mitigate the impact, but you would be wrong. We do NOT need to toll our existing infrastructure, and it is highly unethical for you to even consider doing so. Instead, we need accountability for every dollar that has already been wasted, and we need to eliminate all pork and bloat. Corruption is not welcome here.

<b>ODOT I-205 Toll EA - RECORD #801 DETAIL</b>
--

**Submission Date :** 4/1/2023

**First Name :** Molly

**Last Name :** Williams

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The Oregon City Bridge as well as adjacent neighborhoods will be impacted. Sellwood bridge/Canby Ferry - horrible consequences.

**ODOT I-205 Toll EA - RECORD #802 DETAIL****Submission Date :** 4/1/2023**First Name :** Patricia**Last Name :** Iwamoto**Affiliation :** none**Submission Method :** SurveyMonkey**Q3. Comments :** Paying Oregon taxes because I live in Washington and work in Oregon should be enough. The tolls would place more financial hardship on families who already are taxed more than most. It seems that Oregon wants to put extra taxes on those who work in Oregon. Oregon continues to misspend money and the taxes the little guy to pay for the problems they created.

<b>ODOT I-205 Toll EA - RECORD #803 DETAIL</b>
--

**Submission Date :** 4/1/2023

**First Name :** Mike

**Last Name :** Coffman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Two things: first, tolling I-205 (as well as I-5) will have a significant negative impact on Oregon businesses; any money raised by tolling will be money not spent patronizing said businesses, & second, any & all funds raised by tolls along I-205 & I-5 should only be spent improving those two transportation corridors (& this includes adding more capacity) & no where else.

<b>ODOT I-205 Toll EA - RECORD #804 DETAIL</b>
--

**Submission Date :** 3/31/2023

**First Name :** Jesse

**Last Name :** Martin

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls are bad for working people middle class. It's another tax we do not want or need. Vancouver is just like any other suburb of PDX. Just like Gresham, Beaverton or clackamas. There are no plans for tolls for those cities.



**ODOT I-205 Toll EA - RECORD #805 DETAIL****Submission Date :** 3/31/2023**First Name :** Valerie**Last Name :** Duggan**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** While a 3rd lane between Stafford Rd and the Abernathy bridge is imminent and long overdue, paying for it with tolls to those who use it most; like myself a Mon-Fri commuter from Gladstone to my job in Lake Oswego is ridiculous! We pay taxes in this state and county to provide funds for this and making more profit off something people are forced to use is unacceptable. There are no good alternate routes for people in my position who are required to report to work and use said route. The interior streets and backroads to avoid the area will become extremely clogged with people attempting to avoid a toll. The environmental piece is certainly going to be a challenge since surface streets will be impacted and more heavy traffic will sit idle, spilling more oil and automotive fluids onto the street and into our storm drains. This will go right to our rivers and streams. Keeping these vehicles on the freeway produces less impact as travelers can pass through the area faster and avoid more damage to our fragile ecosystems. I am 100% against a toll and 100% for a 3rd travel lane paid for by tax payers in property and income tax! Thank you for keeping Oregon a desirable place to live. We are not California or the East coast!

**ODOT I-205 Toll EA - RECORD #806 DETAIL**

**Submission Date :** 3/31/2023

**First Name :** Albie

**Last Name :** Cruz

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** YOU PEOPLE NEED TO STOP TOLLZ ON AVERAGE YOU WILL HURT RESIDENTS 1000-2500 DOLLATS A YEAR STOP STOP STOP OREGON IS ALREADY THE 3RD HIGHEST INCOME TAX IN THE USA !!!! TOLLZ WILL HURT MINORITY AND PEOPLE OF COLOR WHO ON AVERAGE HAVE LOWER INCOMES !!! YOU SPEND MILLIONS ON HOMESLESS WHO DO NOTHING BUT DO DRUGS IN THE STREET AND ATTACK INNOCENT PEOPLE!!! PLZZZ FOR THE LOVE OF GOD STOP TOLLZ BEFORE ITS TO LATE I KNOW THERE IS STILL GOOD PEOPLE OUT THERE THAT WILL STOP THE TOLLZ THE OREGON HEALTH PLAN IS SUPPORTED BY THE TAX PAYER BUT ONLY POOR PEOPLE CAN TAKE ADVANTAGE? OREGON HAS BEEN BRAINWASHED AND OUR KIDS WILL BE THE ONES TO PAY THE PRICE IF WE KEEP GETTING TAXED !!! STOP TOLLZ STOP TOLLZ BEFORE ITS TO LATE !!!

**ODOT I-205 Toll EA - RECORD #807 DETAIL**

**Submission Date :** 3/31/2023

**First Name :** John

**Last Name :** Ley

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** There is ZERO reason for Oregon to be given one of 17 "exemptions" from federal law regarding TOLLING of ALL LANES of an interstate freeway. Portland would be the 1st place in the nation to toll all lanes, leaving poor and low income families no other options in many locations because there are no alternatives in some areas. This will create extreme harm on potentially 80,000 or more hard working SW Washington residents who only have two ways to cross the Columbia River, for work, to get to the airport, for specialty healthcare, and more. ODOT has estimated that 130,000 vehicles will divert on to side roads and into neighborhoods, once they implement TOLLING on all Portland area freeways. The I-205 project is merely the camel's nose in the tent. Citizens have begun collecting signatures for IP-4, an initiative to guarantee a Vote Before TOLLS can be put on any Oregon state freeway or highway. TOLLING is a hugely inefficient means of collecting money to pay for transportation projects. In Seattle on I-405, the "cost of collection" was 68 percent of revenues collected. The gas tax is less than 1 percent. Say NO to Oregon's request to put TOLLING on not only I-205, but all area freeways.

**ODOT I-205 Toll EA - RECORD #808 DETAIL****Submission Date :** 3/31/2023**First Name :** Lauren**Last Name :** Colas**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** A one way "tax" of \$15 to drive on already-paid for federal highways is preposterous! No one can afford this regressive tax - anyone and everyone living in Washington State will avoid at all costs ever getting a job in Portland or shopping in Portland or going to Portland for sports events, etc. I hate going there already with all the trash, illegal homeless camps everywhere, never-ending graffiti, never feeling safe, etc. - it's awful. This tax will just put a nail in the coffin for people to never go to your state.

<b>ODOT I-205 Toll EA - RECORD #809 DETAIL</b>
--

**Submission Date :** 3/31/2023

**First Name :** Bob

**Last Name :** Zak

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We (my wife and I) do not support any type of polling on I-5 or I-205. We pay taxes to support the Interstate highway program. We will reduce our shopping time in the Portland metro area if tolling goes into effect.

<b>ODOT I-205 Toll EA - RECORD #810 DETAIL</b>
--

**Submission Date :** 3/31/2023

**First Name :** Marilyn

**Last Name :** Roggenkamp

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** What part of "No tolls" do you not understand. This is only going to route the traffic to I5 by putting a toll on I205. The government is great at requiring tax payers to foot the bill for their incompetence and mismanagement. We don't trust this plan either.

**ODOT I-205 Toll EA - RECORD #811 DETAIL**

**Submission Date :** 3/31/2023

**First Name :** Richard

**Last Name :** Vermeers

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Putting a toll on I205 will solidify my resolve not to travel to Portland for any kind of business or pleasure. If you are trying to keep Washington Residents out of Oregon, a toll is the way to do it. Portland is already experiencing an exodus. You will be justifying a further exodus of workers who live in Washington. One of the positive things with Covid is that it has made it easier for professionals to work at home. That means that the people who can possibly afford to pay the toll will move to or stay in Washington. At the same time the lower paid people who must use the bridge will suffer further.

**ODOT I-205 Toll EA - RECORD #812 DETAIL**

**Submission Date :** 3/31/2023

**First Name :** Jon

**Last Name :** Anderson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Sadly, OR and WA elected political leaders and gov't agencies have proven their incompetence and broken citizens' trust. The survey does nothing to address/repair that. Tolls are simply higher taxes. What part of Biden-flation, Federal National Debt, Federal Reserve, Bank Failures, violations of oaths of office, mismanagement and malfeasance do you not understand? Do you know what a REPUBLIC is? Common sense, rule of law, justice, have been violated by all parties/stake holders. This will be yet another boondoggle tax and spend project on the backs of taxpayers. History is recording the downhill slide of the U.S.A. as shown by the ridiculous indictment of POTUS 45 by the injustice dept lead by NY Manhattan DA and others out 'to get Trump'. Only with him winning in 2024 as POTUS 47 will this project be done on time and under budget! Oregon Gov, Portland Mayor, and city gov't are disastrous socialists/communists with the levers of power in their hands. BLM riots and destructions are fresh on our minds and not soon forgotten. NO TRUST LEFT!



<b>ODOT I-205 Toll EA - RECORD #813 DETAIL</b>
--

**Submission Date :** 3/30/2023

**First Name :** Noah

**Last Name :** Harvey

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I believe this needs to go to the ballot for voters to approve. This affects a large part of the Portland metro area and they have a right to provide their decision on the ballot. The average annual cost to a household is incredibly underestimated during peak hours (\$600/year) and this will cost normal family households much more (\$2200-\$3000/year) than anticipated from their "conservative" assessment. Oregon drivers are already taxed from vehicle registration fees and commercial driving mileage to fund projects such as proposed, this is an overstep by the Oregon Department of Transportation.

<b>ODOT I-205 Toll EA - RECORD #814 DETAIL</b>
--

**Submission Date :** 3/30/2023

**First Name :** Chandan

**Last Name :** Kundapur

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Please don't impose a toll. As it is Oregon taxes us more than any other state after a specific income. This just piles on. Make better use of the money you already collect as taxes

**ODOT I-205 Toll EA - RECORD #815 DETAIL****Submission Date :** 3/30/2023**First Name :** Lori**Last Name :** Hagemeister**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am wondering if there could be more transparency as to why the 4.5 billion dollars Oregon will receive as part of the Infrastructure Investment and Jobs Act HR 3684 passed by congress in 2021, with funds being dispersed through 2026 could not be utilized for the I-205 widening project and bridge improvements, rather than tolling the FREEways. All the toll booths will achieve is creating gridlock on highway 43, 99E, 82nd ave, Stafford Rd and Hwy 213 as well as downtown Oregon City, so that drivers can avoid paying the tolls. I ask that you reconsider the tolling idea and use the money from IJA as it was intended. We are already experiencing high inflation as a result of that bill passing, along with all the others, so please don't make us pay twice. Can Oregon officials please be accountable and responsible with spending our money for once? We are not your blank check. Thank you for your time and consideration.

**ODOT I-205 Toll EA - RECORD #816 DETAIL**

**Submission Date :** 3/30/2023

**First Name :** Sydney

**Last Name :** Smith

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** "My concern is related to the cost burden to commuters. I would like the following to be included: A. 1 or 2 toll lanes and 1 or 2 no-toll lanes so drivers have options to choose cost vs time. This is implemented in Washington state already. B. Free toll lane access for carpooling drivers/passengers and motorcyclists as an incentive to reduce single-passenger car/ truck drivers' contribution to traffic congestion. C. Reduced toll cost option for low or zero emissions vehicles as an incentive to improve air quality along high traffic corridor. D. Toll-free hours outside of high traffic times E. Reduced or free access to toll lanes for moderate to low income households, so as not to further burden or punish them for earning wages at a place inconvenient to their place of residence, because an affordable neighborhood of residence may be further from a workplace than overly costly housing close enough to avoid a high traffic corridor."

**ODOT I-205 Toll EA - RECORD #817 DETAIL**

**Submission Date :** 3/30/2023

**First Name :** Christine

**Last Name :** DeVillier

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** My concern is related to the cost burden to commuters. I would like the following to be included: A. 1 or 2 toll lanes and 1 or 2 no-toll lanes so drivers have options to choose cost vs time. This is implemented in Washington state already. B. Free toll lane access for carpooling drivers/passengers and motorcyclists as an incentive to reduce single-passenger car/ truck drivers' contribution to traffic congestion. C. Reduced toll cost option for low or zero emissions vehicles as an incentive to improve air quality along high traffic corridor. D. Toll-free hours outside of high traffic times E. Reduced or free access to toll lanes for moderate to low income households, so as not to further burden or punish them for earning wages at a place inconvenient to their place of residence, because an affordable neighborhood of residence may be further from a workplace than overly costly housing close enough to avoid a high traffic corridor.

<b>ODOT I-205 Toll EA - RECORD #818 DETAIL</b>
--

<b>Submission Date :</b>	3/30/2023
<b>First Name :</b>	Greg and Malia
<b>Last Name :</b>	Kupillas
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Tolling all of the main transportation routes the the Portland Metro area is bad in many ways.

**ODOT I-205 Toll EA - RECORD #819 DETAIL**

**Submission Date :** 3/30/2023

**First Name :** Dave

**Last Name :** Cottrell

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling should NOT be done. Government is incompetent and unable to manage money. The public paid for freeway construction already and now you want us to pay to use OUR freeways! This is a regressive tax. The people least able to pay will bare the burden. People are already having difficulty in this economy! Now you are going to make it worse and harder for people to makes ends meet. You say that you are "managing traffic flow" and "reducing congestion." BALONEY. This is all about money and covering your inability to manage OUR money. You will be increasing congestion. Myself and others will be avoiding the freeway and taking side streets

<b>ODOT I-205 Toll EA - RECORD #820 DETAIL</b>
--

**Submission Date :** 3/30/2023

**First Name :** Kathy

**Last Name :** Sullivan

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** As some one lives along the 99 corridor, we see the impact already when major arterials such as I-205 are backed up due to traffic issues. If tolling is implemented this will become a daily reality as commuters and travelers work to avoid tolling. This will adversely impact our small communities and increase traffic congestion in our neighborhoods. Major arterials such as I205 are designed to handle this traffic volume. Let's continue to use them as intended by stopping tolling before it starts.



**ODOT I-205 Toll EA - RECORD #821 DETAIL****Submission Date :** 3/28/2023**First Name :** Jane**Last Name :** Wednesday**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Are you people serious?! Have you not learned yet that taxing the ever-loving s\*\*t out of us doesn't work for the city? My husband has to cross both of these proposed tolls twice a day. So now we will be out another ~\$2000 a year?! People are not just statistics in your stupid little spreadsheets — this will have a VERY real, VERY immediate effect on the majority of travelers on this road. Do you think people cruise around on 205 for fun?? And specifically at rush hour no less??! Literally everyone would rather dig their eyes out with a spoon than purposefully get within a mile of any Portland rush-hour-highway. People jam up these roads cuz y'all built them SO STUPID and so very FEW of them. There is literally one road that makes sense to get anywhere from the SE to the Lake O/tualatin area. Why is it so targeted to one area? Think you're gonna milk the rich people down in Lake O or something? People from all demographics have to travel these roads, and that area, and you people always seems to forget that not everyone in this city has the money to spend that you for some reason think they do. You set up this stupid situation for yourself and your proposed "solution" is to charge people to have to go to work. People already can't afford to live and this city!!! And people are finding out reallll quick that the value received lately in living here =/= the living costs!! You idiots are only driving people further away. And don't even get me started on the "assistance" programs for any govt-associated soul-sucking cash grab — the income limits to qualify for those things are nothing but laughable. If I want to see the govt waste on our roadways, I just need to cruise up and down SE Division and pop my freaking car up over the curb trying to fit in a freaking U-ey that was recently forced upon us... I DON'T want to see another waste of everyone's time on this stupid poll system!! Good god can whoever hires the people for Portland govt and city planning PLEASE do better!! Y'all are bad at this :(

<b>ODOT I-205 Toll EA - RECORD #822 DETAIL</b>
--

**Submission Date :** 3/27/2023

**First Name :** Brian

**Last Name :** Olsen

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** No tolls on any drivable road in Oregon. No, no, no, no, no.!

**ODOT I-205 Toll EA - RECORD #823 DETAIL**

**Submission Date :** 3/27/2023

**First Name :** Linda

**Last Name :** Abundis

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** In a horrendous economy with a state that has thee HIGHEST income tax rate I object to giving the state of Oregon any more money that will be spent foolishly ..... Other states are giving homeless bus tickets to Portland as hard working Oregonians see their state destroyed and money spent on encouraging alcoholics, drug addicts, and mentally ill . No tolls where we are forced onto city streets as we cannot afford to pay \$\$ for tolls. I use to be Proud to be an Oregonian...now I am embarrassed.

**ODOT I-205 Toll EA - RECORD #824 DETAIL****Submission Date :** 3/27/2023**First Name :** G.**Last Name :** Miller**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The tolls and costs to the public will go on indefinitely under your plan, long after the project is paid off. I've seen no mention of removing any tolls, once they have been implemented. If your objective is purely cost driven and to "reduce congestion", there are other ways, which I'm sure you are well aware of. For example, pay for the project with a bond, similar to any other bond measure. Once it's paid, it's done. No on-going costs forever, generation after generation. To reduce congestion, I've mentioned this before to you, but it was essentially ignored. If you are truly concerned about congestion, put forth incentives for work-from-home, or staggered work hours. Employers could be given a tax BREAK for implementing such policies, which of course would create incentives and reduce congestion during peak hours. ODOT, of course, is not interested in looking beyond a forever tax for practical solutions. Whatever you do, DO NOT LET THE VOTERS DECIDE!!!

<b>ODOT I-205 Toll EA - RECORD #825 DETAIL</b>
--

**Submission Date :** 3/26/2023

**First Name :** Terry

**Last Name :** Smith

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** No toll should ever be levied on any public highway, EVER! Maybe instead of using a toll ODOT should try not spending funds on lesser or almost never used things like mass transit or putting bike lanes onto our roads. It's time for the government to live within their budget and stop throwing out nonsense plans like this one. Improve I-205 but do it without levying any new fees, tolls or taxes.

<b>ODOT I-205 Toll EA - RECORD #826 DETAIL</b>
--

**Submission Date :** 3/26/2023

**First Name :** William

**Last Name :** Wood

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am opposed to toll roads. Increase taxes on the wealthy to do the project!

**ODOT I-205 Toll EA - RECORD #827 DETAIL****Submission Date :** 3/26/2023**First Name :** Paul**Last Name :** DiMilla**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The proposed tolling on I-205 may have beneficial impacts as desired in posted documentation. However, greater transparency in detailing costs to users (e.g., if specifics of pricing are not available, how can a cost to a user be identified) needs to be provided to build community support. Further, funds generated by tolling should be dedicated solely to the I-205 corridor for which the tolling is imposed and not on additional projects in the Portland Metro area and/or beyond statewide. For example, why should I-205 users be subjected to a toll used to address problems in other travel corridors? Without appropriate messaging, this project will receive significant and profound pushback, which will threaten opportunities to address transportation needs in the growing Portland Metro.

**ODOT I-205 Toll EA - RECORD #828 DETAIL**

**Submission Date :** 3/25/2023

**First Name :** Bernard

**Last Name :** Meyer

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** 1. Considering that Oregon has for years over-collected income tax creating large annual tax surpluses, an additional source of revenue cannot be justified, especially considering that Oregon imposes the highest total tax burden on the middle class of all 50 states, according to a recent CNBC analysis. 2. If the main purpose of the toll is to discourage use of the freeway, this will only divert thousands of drivers to side streets, crowding them even more than the freeways, destroying neighborhoods' quality of life, and increasing accidents and injuries as drivers struggle to make up for lost time. 3. Many people rely on the freeway to get to and from work, often from as far as 20, 30, and even 40 miles away earn low-to-modest wages. A daily toll would impose a significant new burden on their modest incomes. If the toll were to be \$8 each way, that would amount to \$320 per month! This will force many such commuters from one or two hours on the road per day to as much as twice that. 4. For those on fixed incomes, a toll would be even more burdensome, prohibitive and disruptive. 5. What a toll would amount to is a more open highway, but only for those who can afford it. The poor, low-to-moderate wage earners, and the elderly will not be worthy of that privilege. So much for "equity."



<b>ODOT I-205 Toll EA - RECORD #829 DETAIL</b>
--

**Submission Date :** 3/25/2023

**First Name :** Lloyd

**Last Name :** Gilham

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Another Oregon Tax on the citizens that already paid for this highway. Tax the EV's that pay no gas tax rather than double taxing drivers. Be prepared for an exodus from the greater Portland area due to this action. Oh wait, businesses are leaving Oregon no and this will just enrage those than are still here.

**ODOT I-205 Toll EA - RECORD #830 DETAIL**

**Submission Date :** 3/25/2023

**First Name :** Pau

**Last Name :** Hinds

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Oregon already has the highest effective state tax rate in the nation for middle income residents <https://www.cnn.com/2023/02/27/states-with-highest-income-taxes-for-people-earning-75000-dollars.html> Tolling should be limited to new highways to pay for construction (not future maintenance) of the new highway on which tolling booths are located. Even so, tolling will divert many vehicles (including mine) onto other roads, resulting in greater congestion on adjacent thoroughfares.

<b>ODOT I-205 Toll EA - RECORD #831 DETAIL</b>
--

**Submission Date :** 3/25/2023

**First Name :** Alexandra

**Last Name :** Tarpo

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Please consider my thoughtful words. This is yet another financial burden placed on the residents of this state and especially in these areas of proposed tolling. Oregon is one of the highest, if not the state with highest taxes for its residents. At some point people will not be able to live despite working hard to try. Thank you for taking the time to "hear" my thoughts.

**ODOT I-205 Toll EA - RECORD #833 DETAIL****Submission Date :** 3/25/2023**First Name :** Brandon**Last Name :** High**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I fully support these tolls. Automobile users need to pay for their expensive infrastructure in our state. These people complaining about tolls don't understand how expensive infrastructure is. Additionally, these seismic improvements need to happen as soon as possible and this is a great way to pay for them. In my perspective, all highways in the state should charge weight-based tolls to fund construction and maintenance.

<b>ODOT I-205 Toll EA - RECORD #834 DETAIL</b>
--

**Submission Date :** 3/24/2023

**First Name :** Jeff

**Last Name :** Francis

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** WE DO NOT WANT A TOLL!!! Use the gas tax and any other ways that we normally use to build/improve our states roads.

<b>ODOT I-205 Toll EA - RECORD #835 DETAIL</b>
--

**Submission Date :** 3/24/2023

**First Name :** Philippe

**Last Name :** Agnesse

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I think adding a toll on I205 or any other highways is a terrible idea. We already pay one of the highest state taxes and we don't need another one!

**ODOT I-205 Toll EA - RECORD #836 DETAIL**

**Submission Date :** 3/24/2023  
**First Name :** Raeline  
**Last Name :** Kammeyer  
**Affiliation :**  
**Submission Method :** SurveyMonkey

**Q3. Comments :** My family has already charted alternate routes to bypass the "tolling" areas. We will also figure addition amount of time that we will have to make to get to our destinations. Routing through local neighborhoods and back roads will become the norm not only for my entire family, but I foresee that there will be masse amount people that will be doing the same thing. The increase in fumes from the vehicles that will become "stuck" in the traffic jams will also increased. Many businesses that are trapped in the tolling area will most probably suffer income losses or be forced to raise prices due to lack of customers. How many businesses will give up because Oregon ODOT cannot manage their funds properly or within budget? The increase in these alternate routes will increase the wear and tear on the roads so more maintenance will have to occur. This will be a detriment to the people of Oregon. Everyone I know will thinks this is illegal because we have already paid for this road through our road taxes. I say that you need to look at your budget, just as everyone else is doing, and sharpen your pencil! This is wrong and poor management, judgement and planning. Does this toll include the state workers that will travel this tolling area or will they be given compensation? No one has answered that question. SHARPEN YOUR PENCIL!

<b>ODOT I-205 Toll EA - RECORD #837 DETAIL</b>
--

**Submission Date :** 3/24/2023

**First Name :** Craig

**Last Name :** Smith

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We the voters dont want tolling on the new bridges. There is no environmental impact



**ODOT I-205 Toll EA - RECORD #838 DETAIL**

**Submission Date :** 3/24/2023

**First Name :** Bill

**Last Name :** Mengis

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Your a bunch of ignorant thieves sucking off these poor people.Piss away money for bike paths that are not being used and nail the working transporter.Don't you make enough taxing the guy living in Washington and paying income taxes to Oregon.You should all be canned!!!!I have no dog in this except seeing the ineptitude of the government workers.Idiots!!!! Take out an add in a newspaper that nobody reads.Just smart enough to sneak that one by

**ODOT I-205 Toll EA - RECORD #839 DETAIL****Submission Date :** 3/24/2023**First Name :** John**Last Name :** Murphy**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I am sorry to say but your toll is not needed why because the system of funding has worked so far to impose this inconvenience on the driving public should not be allowed it would set a precedent for more incursive tolling on other roads also we the people have already paid for our roads and will continue to pay for them in my opinion this is not needed

<b>ODOT I-205 Toll EA - RECORD #840 DETAIL</b>
--

**Submission Date :** 3/24/2023

**First Name :** Gary

**Last Name :** Streaan

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is a project that will cause more problems than solutions, it appears to be nothing more than a way to cover ODOT failings by milking Oregonians for more money! We dont need more government spending and taxing with some of the highest taxes and fees in the nation. DONT GIVE US TOLLING ON 205, just figure out why ODOT is so incompetent and wasteful with the billions it already has!

<b>ODOT I-205 Toll EA - RECORD #841 DETAIL</b>
--

**Submission Date :** 3/23/2023

**First Name :** Rachel

**Last Name :** Evans

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I read about your proposed low income toll program and I would like to know if your plan includes having this in effect prior to the tolls going into effect. I want to be sure the local community families with low income are protected before they are forced out of their homes. When will they know more about this program and how will they be able to access it?

<b>ODOT I-205 Toll EA - RECORD #842 DETAIL</b>
--

**Submission Date :** 3/23/2023

**First Name :** raleigh

**Last Name :** vance

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling would require another level of government to collect the money. No argument re funds needed for improvements but toll road are a pain in the rear. Some toll roads may be unavoidable (new I5 bridge) but perhaps an increase in gas tax, license fees and road mileage tax for PUC vehicles might meet requirements? NOT in favor of toll roads!

**ODOT I-205 Toll EA - RECORD #843 DETAIL****Submission Date :** 3/22/2023**First Name :** Lisa**Last Name :** Nielson**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I live on the west side of the proposed project and utilize both the old Oregon city bridge and the proposed site of the toll lane to commute to work twice a day five days a week. I use highway 43/ Willamette Drive to access either the 205 bridge or the Oregon city bridge. Currently, both during the morning rush-hour in the evening, rush-hour, the entire area, including and slippery roads and back. Roads is entirely backed up. The toll will only push more commuters off the freeway onto the side roads. It doesn't matter if you are coming from Westland, Oregon city, or From, Oregon City to Westland. It is a mess either direction. The toll should not be considered in this area until the ancillary roads are able to manage the existing traffic. As the first tolling project in the state, this project sets a precedent for future projects and it is essentially a way of taxing users. It makes more sense to toll roads that are being used to a greater extent by out of state citizens. Taxing either the I-5 bridge or the 205 bridge to Washington is a much more equitable tax. Our funding of our freeway systems should be a state wide approach, not a local community approach.

**ODOT I-205 Toll EA - RECORD #844 DETAIL**

**Submission Date :** 3/22/2023

**First Name :** K

**Last Name :** Hughson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The transportation analysis needs to consider cars using other roads to avoid tolls which will impact the local communities with added traffic to already congested roadways. There is no mass transit in this area. Having a per mile tax would better distribute the cost of funding improvements needed on bridges and roadways. This would be a much more equitable way of funding rather than impacting the local communities.

<b>ODOT I-205 Toll EA - RECORD #845 DETAIL</b>
--

**Submission Date :** 3/21/2023

**First Name :** Chelsea

**Last Name :** Ausland

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I want to know that the dangerous country roads (specifically Stafford, 65th Ave & Borland) won't be further congested. These roads were not designed for the heavy traffic they already experience. This community is scared for our safety.



<b>ODOT I-205 Toll EA - RECORD #846 DETAIL</b>
--

**Submission Date :** 3/21/2023

**First Name :** Mike

**Last Name :** De Blasi

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I support the tolling. I just don't think that it covers enough of the highways in the Willamette Valley. Tolls should be enacted on I-5 from Eugene to the Columbia Bridge and all major east-west highways in between. The only way we are going to open up developed land for housing and business is to drastically reduce the space given over to cars. This will reduce pressure on development of greenfields and will result in more robust alternatives to driving.

**ODOT I-205 Toll EA - RECORD #847 DETAIL**

**Submission Date :** 3/21/2023  
**First Name :** Alex  
**Last Name :** Renirie  
**Affiliation :** Healthy Democracy  
**Submission Method :** SurveyMonkey

**Q3. Comments :** We, the Directors of Healthy Democracy, are writing to encourage ODOT to prioritize inclusive and deliberative civic engagement as it continues its work on the I-205 toll project. One innovative public engagement model, called Citizens Assemblies or Lottery-Selected Panels, is gaining popularity across the world for its ability to engage everyday people in more collaborative public policymaking. In this model, a 'democratic lottery' is used to recruit a random and demographically representative cross-section of the general public. This brings new voices into decision making, beyond just the usual loudest voices, and reduces barriers to participation for people from all walks of life through the provision of significant stipends. This cross-section of the public then learns everything it can about a complex policy topic -- often hearing from dozens of stakeholders and background experts. With the help of professional moderators and detailed process design, the group deliberates extensively in order to create clear policy recommendations on behalf of the wider community. These lottery-selected panels have transformed wicked problems and demonstrated practical solutions for more equitable engagement in hundreds of cases around the world to date (<https://www.oecd.org/gov/innovative-citizen-participation-and-new-democratic-institutions-339306da-en.htm>). The model is particularly well suited for complex transportation policy questions that benefit from well-informed but diverse public opinion. Healthy Democracy is a Portland-based nonpartisan nonprofit working to spread this kind of innovative deliberative democracy across the U.S. We would be happy to provide more information about this work should ODOT be interested in exploring new routes for inclusive and collaborative civic engagement. Sincerely, The Directors of Healthy Democracy

**ODOT I-205 Toll EA - RECORD #848 DETAIL****Submission Date :** 3/21/2023**First Name :** Heather**Last Name :** Griffin**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The implementation of the both of the tolls on I-205 will have a drastic negative impact on my family. It has been estimated that a person who drives on I-205, crossing both sets of tolls, during peak times to get to and from work will have to pay around \$2,000 a year. My husband and I live in Beavercreek and work in Tualatin/Tigard, our work schedules do not allow us to carpool, but both have us traveling during "peak times," meaning our house hold will spend \$4,000 a year to go to work. Your peak time rates only punish those who work around a standard 8-5 job and are good tax paying citizens. For many, working from home is not an option, neither is going in or leaving work at different time. While my household is not considered low income, we also can not afford an assumed \$4,000 a year to go to work. Our companies are not going to compensate us for this extra expense, because many companies are effected my this toll as well. Only difference is they get to raise their prices to consumers to compensate for the inconvenience. To avoid the tolls, our only options are to find alternative routs on roads that are not meant for heavy traffic flow and will add at least 20 minutes each way to our commutes. We have children and animals that are depending on us to get home in a timely manor for survival. These alternate routs will require us to look into baby/pet sitters that we didn't need previously. And if we can't afford your tolls, we are not going to be able to afford these other expenses either. ODOT suggests public transportation as an alternative, of which is not offered out in the country where I live. ODOT also suggests alternate routs to avoid the tolls, which will end up flooding neighbor streets with traffic they were not built for. The old down town Oregon City is going to be a place no one wants to go anymore because there will be so much traffic around the old Arch bridge (the only other bridge in Oregon city to cross the river). This stretch of I-205 was picked because there are no other viable routs for people to get to point A and B. This toll is a trap to collect more money from the middle class who quite frankly can't afford it. Toll bridges are fine in my opinion when there are viable alternate routs available to the masses, this is not the case. We also already pay taxes for the repairs that ODOT is claiming to be collecting funding for, and the tolls are not going to stop once the repairs are funded. Please consider the effects this toll is going to cause on lower-middle class families and the surrounding neighborhoods and residences. This toll is going to cause people to loose their jobs, simply because the can not afford to get to work, and businesses to go under because no one wants to face the new traffic in front of their storefront.

**ODOT I-205 Toll EA - RECORD #849 DETAIL**

**Submission Date :** 3/20/2023

**First Name :** Jamie

**Last Name :** Herbrand

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Not only am i concerned with drivers exiting the freeway at Stafford Road Exit to avoid tolls (disrupting the community, rural activities, safety issues, town of Willamette and Arch Bridge gridlock in areas not designed for that amount of traffic). I am more concerned with the fact that i will have to cross both bridges when traveling to and from work which is an added cost that I wasn't allowed to vote on to decide if this is something that will really work for our community. There is no alternate route other then my traveling the back roads until i reach Stafford to either enter or exit the freeway. A toll road is supposed to provide a faster option when in turn all you are doing is making us pay for the only freeway option we have already!

**ODOT I-205 Toll EA - RECORD #850 DETAIL****Submission Date :** 3/20/2023**First Name :** Eileen**Last Name :** Jensen**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The method of tolling by charging a toll based on the license plate is inherently unjust. I have personally experienced a situation where the vehicle we sold, went through a toll license plate reader and we were charged the toll. It cost more money and time to prove our innocence than the toll cost but I had to fight this on the basis of principle. I believe that the toll agency relies on the idea that most people won't fight it, so they can collect their money. However, this almost certainly affects people of lower incomes who do not have the time to fight something like this but also can little afford to lose their precious income. This method assumes that you are guilty until proven innocent. This flies in the face of what our justice system is predicated on. The only fair way to toll is to have people pay in person when they actually travel on that stretch of road.

**ODOT I-205 Toll EA - RECORD #851 DETAIL**

**Submission Date :** 3/20/2023  
**First Name :** Aly  
**Last Name :** Salz  
**Affiliation :** North Clackamas Chamber of Commerce  
**Submission Method :** SurveyMonkey

**Q3. Comments :** As a longt-time business owner of a small business in Clackamas County, I am concerned with the impact to my employee pool. In a post-COVID world, many potential employees prefer a WFH arrangement and it is already hard enough to get them to come into work at the office. If a toll is assessed it will create another barrier to hiring for small businesses, which are already at a disadvantage. In addition, the cost of goods to get to us will go up as all carriers will now how to pay the assessment. A more reasonable solution would be to increase the gas tax by a few cents per gallon for all fuel purchased in the Metro area so that all the bridges can eventually be upgraded with an equitable way to finance them. Do not segment a certain geographic region and tax that one thoroughfare. I have another facility in Kansas City that will be getting more of my workload over the next year, as we move jobs out of Oregon to better business climates. Thank you for reviewing.

**ODOT I-205 Toll EA - RECORD #852 DETAIL****Submission Date :** 3/20/2023**First Name :** Shelley**Last Name :** Metzler**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am most concerned about traffic being diverted onto Borland Road to avoid the tolls. This part of Stafford is agricultural and residential. School buses pass through, children cross the road to get from one house to another, biking activity heavy and farm equipment is oftentimes seen on the road. Also, the town of Willamette has grown and flourished with restaurants and shopping. The small road with people parking, trying to back up into traffic and crossing from one side to the other, not to mention church services and food pantry services, this is NOT the place to redirect traffic. Please stop this toll or at the very least save this rural community by putting the toll further down I-205 (after 10th street). I am also concerned about traffic into Oregon City through old town (taking Stafford exit to Arch Bridge). I work in Tigard and two of my co-workers mentioned separately that they will take this route if tolls are put in place.

<b>ODOT I-205 Toll EA - RECORD #853 DETAIL</b>
--

**Submission Date :** 3/19/2023

**First Name :** Herbert

**Last Name :** Knott

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Consider building a separate highway between Wilsonville and the I205 bridge. This highway will serve truck traffic only. Truck speed can be increased. The trucking industry should be happy to share the costs. Increased efficiency and better safety.



<b>ODOT I-205 Toll EA - RECORD #854 DETAIL</b>
--

<b>Submission Date :</b>	3/17/2023
<b>First Name :</b>	Richard
<b>Last Name :</b>	Waddle
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	NO TOLLS!!!!!!

<b>ODOT I-205 Toll EA - RECORD #855 DETAIL</b>
--

**Submission Date :** 3/17/2023

**First Name :** Robert

**Last Name :** Gaskin

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This tolling scheme will only result in increased traffic on the surface streets in the communities that are nearest to the tolled locations. In addition, demanding that people additional fees to travel on roads that they have already pay for via gas taxes is repugnant.

**ODOT I-205 Toll EA - RECORD #856 DETAIL**

**Submission Date :** 3/17/2023

**First Name :** Geoff

**Last Name :** Reynolds

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This tolling proposal is a terrible idea: 1. Its effects will impact the poor and disadvantage disproportionately. 2. Its costs outweigh its benefits. The Benefit/cost ratio < 1. 3. It will damage localities by transferring traffic to slower, local streets. 4. Transferring traffic to surface streets will increase pollution and increase gas usage. 5. ODOT is too lazy to collect mileage/license fees to cover maintenance and capital improvements, a much simpler, less costly and more equitable. 6. Tax electric vehicles a fair share and this tolling will not be necessary. 7. This is a tax imposed by administrative fiat not legislative action and therefore unconstitutional.

**ODOT I-205 Toll EA - RECORD #857 DETAIL**

**Submission Date :** 3/17/2023

**First Name :** Kimberly

**Last Name :** Eaton

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This plan will divert cars wishing to avoid tolls onto Salamo road and Willamette drive. This will affect a number of schools and sensitive child pedestrian crossings such as at Rosemont Middle School. Increased idling at lights will impact air quality. Local transit times are expected to increase within West Linn. West Linn will both suffer from increased traffic, increased transit time, increased cost for local errand runs and commutes as well as increased cost of goods as we will not be able to attract workers due to the high cost of traveling into and out of our tolling zone. This is a outrageously punitive burden being placed on a single community in Oregon. We pay taxes that cover all Oregon roads. Why are our primary roads the only ones to incur these fees? It is an inequitable burden.

**ODOT I-205 Toll EA - RECORD #859 DETAIL**

**Submission Date :** 3/16/2023  
**First Name :** Betty  
**Last Name :** Holladay  
**Affiliation :** City of Lake Oswego Resident  
**Submission Method :** SurveyMonkey

**Q3. Comments :** I'm afraid that this project is just not going down the right path. The intent to reduce traffic was a wise one. And it may create changes to usage that would be helpful. However it does not seem that there are enough mitigating factors or improvements that have been put into place that would help alleviate traffic congestion along other roads around Lake O. One traffic light change doesn't cut it. That was mentioned several times in the Lake Oswego City Council meeting by the city councilors. I encourage ODOT to also make corrections to I 5 and I 205 at the same time. ODOT needs to go back to the Legislature and say it is running upon severe discontent. I agree with improvements to bridges for seismic retrofits. And to some tolling but only to pay for costs, not as an ongoing practice. Again that is the Legislature. Pass the message along and do it NOW so as to avoid having fingers pointed at you. Document it. Once this project gets rolling I imagine an emergency session but do what you can to mitigate as much as possible.

**ODOT I-205 Toll EA - RECORD #860 DETAIL****Submission Date :** 3/16/2023**First Name :** Ronald**Last Name :** Klimeck-Jones**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** The plan to toll 205 is ludicrous and disproportionately effects residents of the town of West Linn. The routes connecting West Linn to the rest of the Portland metro area is so scarce that West Linn residents must use I-205 daily, in many cases multiple times a day. Tolling this segment of 205 is exploitative to this entire community. If you want to toll a road, build a new one, don't fuck over an entire city.

**ODOT I-205 Toll EA - RECORD #861 DETAIL**

**Submission Date :** 3/16/2023

**First Name :** Beth

**Last Name :** Jameson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I find it rather shocking that you admit that 70% of respondents are opposed to the project, including most low income and BIPOC respondents, and you're still charging ahead. You really don't seem persuadable at all. Governance by zombie bureaucrats. That's all I came here to say.

**ODOT I-205 Toll EA - RECORD #862 DETAIL****Submission Date :** 3/16/2023**First Name :** Dave**Last Name :** Trotter**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** As someone who commutes from Oregon City to West Linn via Hwy 43 over the Arch Bridge, my concern is that toll evaders are going to exit 205 (southbound) in Oregon City or (northbound) at Hwy 43 in West Linn and clog up the Arch Bridge and Oregon City's downtown streets. There seems to be very little in the project materials directed at this very real possibility, and in a part of the metro with very few river-crossing transportation options, the effects of any project or toll addition on local traffic and also the impact on a compact downtown such as Oregon City's need to be carefully analyzed.



**ODOT I-205 Toll EA - RECORD #863 DETAIL**

**Submission Date :** 3/16/2023  
**First Name :** Jay  
**Last Name :** Kittams  
**Affiliation :** taxpayer  
**Submission Method :** SurveyMonkey

**Q3. Comments :** My total, all inclusive opinion of DOTO proposed toll road on south I-205 is totally ridiculous. Extremely expensive with benefits for only a few taxpayers. Example includes taxpayers paying for "sound walls". Folks who bought homes along the freeway chose to buy their house so THEY should pay for improvements or changes they do not like about their property! Another of many, many, many examples includes "helping us (that is you, not me) reach our climate goals"! Give me a break... Please explain to me and other residents and taxpayers why you can not (and did NOT) hold several public meetings in every town about this proposal before it got to "explaining" what you were going to do. I could go on for hours, but I am a working man and do not have time nor do I get paid to "work" on this type of poorly thought out garbage!!! Please respond back to me by letter not only about my concerns; and I would like to know the name and phone number of the person responsible for this proposal.

**ODOT I-205 Toll EA - RECORD #864 DETAIL****Submission Date :** 3/15/2023**First Name :** Brian**Last Name :** Horab**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** The traffic pushed off the highways will congest all side surface streets. Drivers already pay a gasoline tax per gallon of fuel purchased. We need to tax electric vehicles so they can pay their part, since there is not a "tax" on them for using the roadways.

**ODOT I-205 Toll EA - RECORD #865 DETAIL****Submission Date :** 3/15/2023**First Name :** Cara Edana**Last Name :** French**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I think it's reasonable to add tolling along I-205. I think the proposed cost is too high and will encourage drivers to utilize surface streets to circumvent the toll sections. This will add to congestion, both in neighborhoods and on ramps. Also, when sections of tolling get added to sections that can't be circumvented, then the high cost will affect lower income earners. I think the cost should be no more than the cost of the bus. Additionally, the cost should be for use of the highway instead of a per mile.

<b>ODOT I-205 Toll EA - RECORD #866 DETAIL</b>
--

**Submission Date :** 3/15/2023

**First Name :** Doug

**Last Name :** Naef

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am against the toll system for several reasons. Stop and go traffic in an already congested 205 regardless of how many lanes are installed will create more pollution and noise. There are other ways to get revenue. Keep raising the gas tax. Anything but toll roads.

<b>ODOT I-205 Toll EA - RECORD #867 DETAIL</b>
--

**Submission Date :** 3/15/2023  
**First Name :** Jason  
**Last Name :** Coffey-Wolfgang  
**Affiliation :** mistereayes.jw@gmail.com  
**Submission Method :** SurveyMonkey

**Q3. Comments :** I'd love an explanation of exactly \*how\* you plan to ease the burden on the already pretty much outclassed service workers that are pretty much forced to live in east county or Vancouver if they want to maintain a job in this area. Additionally. Transit is HORRIBLY lacking in many areas of these proposed tolls. It comes across more like you figured out a way to force people to pay you money and sell it as a "green alternative" when this rightly should've just been a bloody tax on everyone. You want a new bridge....you bloody pay for it. Stop taking it out on those who already barely make enough to get by.

<b>ODOT I-205 Toll EA - RECORD #868 DETAIL</b>
--

**Submission Date :** 3/14/2023

**First Name :** Terry

**Last Name :** Ahlgrim

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The effects of street traffic in downtown Oregon City, and Highway 99 E in Oregon City. I've heard rumors that the Arch Bridge will become bike/pedestrian only. I bicycle across it often, but feel that this limited use would cause a huge "split" between the communities of Oregon City and West Linn.

<b>ODOT I-205 Toll EA - RECORD #869 DETAIL</b>
--

<b>Submission Date :</b>	3/14/2023
<b>First Name :</b>	Alice
<b>Last Name :</b>	Cascorbi
<b>Affiliation :</b>	Clackamas County homeowner
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	I and my husband are in favor of the bridge improvements and of using tolls to fund them. Most other large cities use highway tolling to pay for highway infrastructure. Without a sales tax, Oregon needs tolls to let drivers help pay for the infrastructure we depend on.

<b>ODOT I-205 Toll EA - RECORD #870 DETAIL</b>
--

**Submission Date :** 3/14/2023

**First Name :** Stephen

**Last Name :** Raher

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling is the most efficient way to fund necessary transportation infrastructure in Oregon, but direct financial assistance for low-income drivers must be part of the plan.



<b>ODOT I-205 Toll EA - RECORD #871 DETAIL</b>
--

**Submission Date :** 3/14/2023

**First Name :** Rob

**Last Name :** Adams

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** It's a given that motorists will actively seek out alternate routes to avoid paying freeway toll. This will lead to more congestion on surface streets and likely endanger even more bike/pedestrian traffic. The increased congestion will contribute to more air pollution and gas consumption. Such a huge project as this should be placed on the ballot. I fear this initial project will only be the beginning of widespread tolling. Better to increase gas tax, and to a degree, licensing fees. The state has demonstrated insufficiency and fiscal incompetence in so many other large scale projects, I and many others have very little confidence this project will be successful as well.

<b>ODOT I-205 Toll EA - RECORD #872 DETAIL</b>
--

**Submission Date :** 3/14/2023  
**First Name :** Rob  
**Last Name :** Adams  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #873 DETAIL****Submission Date :** 3/14/2023**First Name :** Richard**Last Name :** Osterman**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Tolling roads is not the Oregon I have known for the last 81 years...I don't think it's a good idea to go down this road when there are simpler ways to generate the money, and not create a traffic mess in the process...increasing the gas tax, increasing the EV vehicle license cost...these are just 2 simpler ways to solve the problem.

**ODOT I-205 Toll EA - RECORD #874 DETAIL**

**Submission Date :** 3/13/2023

**First Name :** Serena

**Last Name :** Warner

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** It seems that this open comment period is really just a guise to make the public believe their voices really matter. If the governmental entities involved in this project really cared about public opinion, then why is construction already in progress at the Oregon City location? To me, that means the decision has already been made. Rather than wait for the public to weigh in by voting the "powers that be" have already moved forward with the project by starting construction. When decisions occur like this, the public becomes less-and-less confident in our ability to have a voice that actually means something where politicians actually listen. Road conditions are a mess in Clackamas County. Perhaps those folks who use studded tires for the 5 months of the year they are legal should pay extra for the damage they do to the roads. Where is all the highway funding being spent? Have we explored how other states handle their road maintenance and adopted some of their successful methods? Finally, the neighboring streets do not have the infrastructure to handle the excessive additional traffic that \*will\* occur when people get off the highway to avoid the tolls thereby creating worse congestion and impacting livability in those neighborhoods and downtown Oregon City. I do not support tolling in the areas that are identified in this project.

<b>ODOT I-205 Toll EA - RECORD #875 DETAIL</b>
--

**Submission Date :** 3/13/2023

**First Name :** Nolan

**Last Name :** Bollier

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** If tolling the road is an opportunity to tax the users of a public roadway regardless of where they live or income bracket, we should be including a toll on the Columbia River I205 bridge between PDX and Vancouver as well. Vancouver residents utilize the zero sales tax in Portland and use our public roadways as well, without paying any taxes

**ODOT I-205 Toll EA - RECORD #876 DETAIL**

**Submission Date :** 3/13/2023

**First Name :** Nicholas

**Last Name :** Hunt

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I work at a non-profit in Wilsonville. It is already difficult to fill open positions. Many of the people who do fill those positions come from the Clackamas area. Adding tolls to 205 will further discourage potential employees from joining us. DON'T TOLL I 205! Additionally, tolls will put heavy traffic on Borland Rd. to avoid the tolls. This is the main road connecting Legacy Meridian Park Hospital to the east. Putting heavy traffic on this road will significantly delay ambulances, costing dying patients precious time in their fights for survival. Is sacrificing human life acceptable to ODOT in order to fund their projects?

**ODOT I-205 Toll EA - RECORD #877 DETAIL****Submission Date :** 3/12/2023**First Name :** Lisa**Last Name :** Uchytel**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I do NOT support tolling on I205 for 3 reasons: there was no public vote, there is a negative financial impact to Clackamas county residents who are already hurting financially, traffic is already poorly managed and adding more frustration and cost will negatively impact quality of life for Clackamas County residents. Give the people a voice - we do NOT support this project.

<b>ODOT I-205 Toll EA - RECORD #878 DETAIL</b>
--

**Submission Date :** 3/12/2023

**First Name :** Robert

**Last Name :** Green

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am opposed to implementing tolling as a means of funding infrastructure maintenance and improvements in general and feel replacement of gas tax with a per mile tax is a better approach. I'm opposed to the I205 tolling plan in particular due to the adverse impact on nearby communities from anticipated diversionary traffic and the lack of viable transportation alternatives. I'm opposed to tolling for congestion management other than possibly funding new optional express lanes as I see it as most burdensome on those with the fewest options.



<b>ODOT I-205 Toll EA - RECORD #879 DETAIL</b>
--

**Submission Date :** 3/12/2023

**First Name :** Dave

**Last Name :** Calkins

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is wrong. I do not support the tolling of the 205 bridge. We the public, through our taxes own the bridge and it's right of way. This will affect the poor the most. It will impact the average person tremendously in their ability to work and make a living. It will also impact the business community around this bridge. DO NOT TOLL OUR BRIDGES!

**ODOT I-205 Toll EA - RECORD #880 DETAIL**

**Submission Date :** 3/12/2023

**First Name :** Keith

**Last Name :** Liden

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Given the 2 choices, I favor the no build alternative because: 1. No matter how you cut it, we'll NEVER build our way out of congestion. "Fix" this problem with more capacity and another part of the system will be overloaded. 2. ODOT's consistent argument that air pollution will be less with more cars is blatantly ridiculous. Sure less idling in that location will yield less pollution, but what about all the additional driving induced by such an "improvement" that will be created overall? Electric cars have a significantly higher GHG impact coming off the assembly line than a gas-powered car so there's no free lunch. Car production and their use contribute around 40% of the GHG problem we face. Encouraging more driving is insane. 3. Put your money into a greener future by really investing in active transportation to be a viable alternative to driving instead of ped/bike/transit improvements as window dressing to make your auto solution look good.

**ODOT I-205 Toll EA - RECORD #881 DETAIL****Submission Date :** 3/11/2023**First Name :** Helen**Last Name :** L**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Please do not toll on I-205. Please budget for these improvements from the state general funds and do not force several cities and those of us who live in them to bear the brunt of these costs and destruction of our towns. I live in the Willamette neighborhood in West Linn with my small children, one of whom has a disability. It is a historic area with many historic structures, small businesses, and schools near the road people will use to avoid the tolls. It doesn't make sense to do tolls in a place with so little public transit. This means people can't choose greener methods of transport for the most part, but you will get your toll money by destroying neighborhoods by traffic re-routing. Such awful management. Why are you doing this? Traffic will destroy our neighborhood. There are schools right near Willamette Falls drive and the mitigation discussed will do nothing to stop freeway traffic from going through here. Why isn't there mitigation to put a toll on the Stafford road exit? These roads are not safe for pedestrians or cyclists. You will have a lot more accidents than on the freeway. Air quality will be terrible. There was a comment that "odot couldn't address localized air quality." Why not? If you can't do that then why are you trying to assess environmental impact locally? You can't. Clearly, living next to freeway level traffic at our house will make air quality worse. And will force us to move. In addition, we must travel outside of our area frequently to seek medical and therapeutic support for our child with a disability. These tolls will disproportionately impact those with disabilities who must seek out support that's not available close by. It will also drastically impact low income households. Also what's your plan to compensate people for their drop in property value? I worry about our neighbors, many of whom are senior citizens. Will they be compensated for their drop in the value of their homes at times when they are retiring or in retirement? The plan doesn't seem thought through and that it's a quick money grab at the expense of low income households, those with disabilities, and residents of a couple towns. Please stand down, go back to the drawing board, budget for this more generally, and make another plan that doesn't involve tolls.

**ODOT I-205 Toll EA - RECORD #882 DETAIL**

**Submission Date :** 3/11/2023

**First Name :** Christine

**Last Name :** Muckenthaler

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The proposed Tolls on Hwy 205 are discrimination to working class people who have no options but to commute to work during peak hours. And to have two tolls within 5 miles is unheard of. This will cost the average person too much when freeway access should be accessible through our taxes. Tolls should be for optional expressways, not the only means for travel. If tolls are Oregon's solution it should apply everywhere. How are you paying for HUGE 217 project? Why is this not tolled? tolling Hwy 205 is a very targeted unequitable proposal. And the project is very limited and will not reduce traffic. What will reduce traffic is the amount of commuters who will find alternate routes and are no longer on this freeway if tolled.

**ODOT I-205 Toll EA - RECORD #883 DETAIL**

**Submission Date :** 3/11/2023  
**First Name :** Carolyn  
**Last Name :** Lu  
**Affiliation :** Oregon City Resident  
**Submission Method :** SurveyMonkey

**Q3. Comments :** I have concerns that I have not seen addressed by ODOT yet, as it comes to tolling the I-205 freeway near the Abernathy Bridge. 1. Our local streets in Oregon City and West Linn are currently over-crowded. Diverting more traffic onto these streets will only reduce the ability of people to reach our local businesses on our main streets. The infrastructure of our current roads needs to be addressed PRIOR to any tolling or the attempt to divert more cars onto them. It is unfair to local businesses and ruins the beautiful main streets that Oregon City and West Linn have worked so hard to develop. 2. The people in Oregon City and West Linn who MUST use this section of the freeway to get to any job or even the grocery store should be charged a lower toll rate. To get to my closest grocery store, I have to get onto I-205. This is not "luxury driving," nor could I take mass transit to haul groceries for my family of 5. 3. Mass transit is not a viable option in Oregon City and should not be referred to as a choice or option. I would have to walk a half mile down a road without side walks to reach a bus that only comes 2 times a day. Our mass transit options don't work for getting to work or transporting my children when needed. 4. Not having a sunset date on tolling when the project costs are covered is a form of self-dealing and is lacking in self-transparency. 5. Tolling the Oregon City/West Linn area prior to other planned tolling is unfair. All tolling should begin at the same time so there is not an unfair burden on the people of this region. 6. Total cost of tolling needs to acknowledge the current wage people are earning in this area and how much this will decrease their daily income. A \$2.20 per direction charge could easily equal a tax burden of over \$1000/year for someone at or below the poverty level.

**ODOT I-205 Toll EA - RECORD #884 DETAIL****Submission Date :** 3/11/2023**First Name :** Neale**Last Name :** Dimm**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** When this highway improvement is done, the speed limit needs to be raised to 65 to 70 MPH like the rest of America. California learned that raising the speed limit allowed more cars to travel on the same highway. Time for ODOT to get out of January 2, 1974.

<b>ODOT I-205 Toll EA - RECORD #885 DETAIL</b>
--

**Submission Date :** 3/11/2023

**First Name :** Neale

**Last Name :** Dimm

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** How in this world can ODOT be using a fossil fuel backup generator for the toll reader gantry, when the state and cities are outlawing natural gas, and diesel powered cars, trucks, and home appliances. Sounds like a double standard.

**ODOT I-205 Toll EA - RECORD #886 DETAIL****Submission Date :** 3/11/2023**First Name :** Josh**Last Name :** Truini**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** It appears that traffic on Borland is expected to increase. Please analyze the roads that people will use to get to Borland (specifically 65th and Nyberg). Neither of these roads can support an increase in traffic. 65th south to Borland backs up all the way down the hill during rush hour. 65th north from Elligson is narrow and dangerous. The 65th, Elligson, Stafford intersection is already a mess at rush hour (backed up in all directions). Traffic will also take Nyberg to 50th to Wilke creating a bottleneck to turn left onto Borland. Even if you think Borland can support an increase in traffic, the surrounding roads cannot.



**ODOT I-205 Toll EA - RECORD #887 DETAIL****Submission Date :** 3/10/2023**First Name :** Tzila**Last Name :** Rozdilski**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I've seen the impact of these fees, in the rest coast. It adds stress, to already stressful life. It creates negative impact on people with limited resources. Please fund it another way.

**ODOT I-205 Toll EA - RECORD #888 DETAIL**

**Submission Date :** 3/10/2023

**First Name :** Paul

**Last Name :** Martin

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is another ill-conceived boondoggle; no one with any understanding believes that this is anything other than a wide-spread tolling scheme. The infrastructure to support tolling will cost 40% of the revenues. The gas tax, a far more equitable and efficient way of raising funds without all the side effects of increased congestion on neighborhood streets/secondary routes, operates on 5% of the revenues it provides. This idea is no more than the latest end-run around voters who would never approve it.

**ODOT I-205 Toll EA - RECORD #889 DETAIL****Submission Date :** 3/10/2023**First Name :** Marty**Last Name :** Hale**Affiliation :** NA**Submission Method :** SurveyMonkey**Q3. Comments :** NW resident for years. Work in Oregon and pay a lot of taxes without representation. Between OR and WA you guys are taxing us out of this region. Now you want more from us in the form of tolls for roads we already pay taxes on. This will crush lower income families and strain middle income families. Businesses are going to pass the cost of travel onto all of us. When will the madness stop? I sincerely hope the people in charge of mandatory taxes without a vote of the people can sleep at night.

**ODOT I-205 Toll EA - RECORD #890 DETAIL****Submission Date :** 3/10/2023**First Name :** katherine**Last Name :** lattimer**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** To help the public that this impacts the most, you might think about putting out something with less jargon and make it much easier to find. The videos are too long, for the people this would impact the most, to watch if they even have access to them in the first place. I worry that putting more requirements out there (or hoops to jump through) for poor people to prove they are poor (on top of the fact that we pushed them out of inner pdx in the first place) is another burden for people most impacted. Since this is already in motion, I ask that you would make the process for not having to pay the toll as easy as possible. I would also ask that the threshold for getting assistance would be well above ALICE or FPL levels as they usually leave out people that fall in-between these measurements, have time to fill out paperwork on top of more paperwork, or those that do not understand how to navigate the system. What about those people that aren't citizens? Are we leaving them out again despite using their labor? Are we incentivizing riding an unsafe max line where people of color are targeted by police disproportionately and it takes hours longer to get to their jobs? A bus from inner NE can take an hour to get to fairly close places such as downtown, and I can't imagine how long it would take from the outer neighborhoods. Are we worsening a pandemic and seasonal illnesses within poor communities specifically, as they will have to be the people that are packed in on public transit? Portland is becoming a place solely for the rich and those with enough free-time to engage in public comment. The diversity of neighborhoods is restricted by transportation, police, and poverty. This is not a Portland that I want to live in. It seems that Portland is now a collection of broken promises and business alliance friendly government actors that have no idea how being poor is a full time job. This is on top of raising a family, possibly working two jobs or having a language barrier. And, now they have to worry about another form to fill out or a longer commute time with less time for their family which might be their only protective factor. Please simplify the process, and make it more accessible. Thank you.

**ODOT I-205 Toll EA - RECORD #891 DETAIL****Submission Date :** 3/10/2023**First Name :** Josh**Last Name :** Smith**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** As a Clackamas resident, I am continuously disappointed in the lack of information ODOT has shared. For instance, ODOT has stated that tolling is to pay for the project. But watching the March 8th policy session at Clackamas County, ODOT representatives were asked "when the tolling pays for the project, will tolling go away?" and the representatives didn't know if tolling would go away, lessen, sunset or not. This idea is a failure of public policy and it would result in a regressive tax on people who live closest to the tolling gantries. I also thought the comparison to the gas tax in that Policy Session was a good point for more evaluation from ODOT. If the gas tax is split between state and local municipalities, why isn't revenue sharing being discussed for tolling? How does ODOT plan to lessen the negative impact of people driving on non-highway roads to avoid the tolls they didn't approve and don't want to pay?

<b>ODOT I-205 Toll EA - RECORD #892 DETAIL</b>
--

**Submission Date :** 3/10/2023

**First Name :** Randy

**Last Name :** Wolfer

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Only the wealthiest people will be able to drive on interstate freeways and pay tolls. Many will choose to use old state highways and neighborhoods to avoid the tolls, or choose to not commute and work in areas "behind" toll lines, and there is already a shortage of workers with predicted even greater tolls.

<b>ODOT I-205 Toll EA - RECORD #893 DETAIL</b>
--

**Submission Date :** 3/10/2023

**First Name :** Kathryn

**Last Name :** Kostow

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** What does ODOT plan to do to mitigate traffic problems caused by people diverting onto state HWY 43, including the Arch Bridge between Oregon City and West Linn, and HWY 99E? I've asked this question in multiple forums and I've never heard an answer.

**ODOT I-205 Toll EA - RECORD #894 DETAIL****Submission Date :** 3/9/2023**First Name :** Tracy**Last Name :** Gillespie**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Housing costs are driving people from Portland to East Counties. Many of us in the East Counties (Clackamas) are commuting to places like Beaverton. Tolls are a TERRIBLE idea and a regressive tax that are particularly burdensome to folks who have long commutes from more affordable housing to job centers. Once again, East side Clackamas County residents are disproportionately shouldering the burden for Portland infrastructure. 205 is an interstate highway as is I5 and are paid for by fuel taxes. Do not cripple interstate commerce. These would be the only tolls on the I5/205 interstate system. Lastly, I commute using 205 to I5 to 217. It takes me 1-1.5 hours each way from Estacada to Beaverton and now you want to put multiple tolls on this commute? Poor planning, indeed.



**ODOT I-205 Toll EA - RECORD #895 DETAIL****Submission Date :** 3/9/2023**First Name :** Kayla**Last Name :** Starelli**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am opposed to the addition of tolls on the I 205 hwy. we are a single income family of 5 living in the country side of Oregon city. My husband works in banks and attends school at PCC rock creek. He would be required to pay a toll multiple times a day going to and from work and school. An added expense which our family cannot afford. We also have a sick child hence the reason we are living off one income. I am the full time care giver for our 6 month old son awaiting a liver transplant. We commute the I205 hwy on a weekly basis for doctors appointments so not only would my husband be paying tolls, but so would I. I do not believe these tolls would benefit the community especially those who love of the east side of Portland and often commute to the west side.

**ODOT I-205 Toll EA - RECORD #896 DETAIL****Submission Date :** 3/9/2023**First Name :** J Patrick**Last Name :** Moore**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** It seems as if it would make the most sense to toll the two bridges between Washington and Oregon now, rather than starting with two toll stations within a short distance of one another. Also, toll in areas where there is public transportation available so that people have reasonable alternatives to being charged to drive, particularly to and from work. The currently proposed locations will simply push a lot of traffic onto alternative routes that get plugged up already during rush hour times, particularly when traffic on the interstate is already slow and when there are accidents.

<b>ODOT I-205 Toll EA - RECORD #897 DETAIL</b>
--

**Submission Date :** 3/9/2023

**First Name :** Brian

**Last Name :** Larrow

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The gas tax has not kept up with costs, it's time for users to pay their own way just as we must buy tickets to ride a bus or train. With the vast majority of funding going towards private automobile transportation, this is the one fiscally responsible option. Demand management is but a secondary benefit.

**ODOT I-205 Toll EA - RECORD #898 DETAIL**

**Submission Date :** 3/9/2023  
**First Name :** Ashleigh  
**Last Name :** Farleigh  
**Affiliation :** Fox Hills Tualatin (Borland Rd) Resident  
**Submission Method :** SurveyMonkey

**Q3. Comments :** I live in Fox Hills which is a neighborhood between Nyberg Road and Borland in Tualatin. I am very concerned about the 30-100% increase in traffic mentioned in Section 5.3.2 of Appendix C, with ZERO mitigation plans. These streets are already jammed up in peak traffic times. We are also a hospital and school zone with Meridian Park Hospital and Bridgeport Elementary. This potential increase in traffic directly violates the Safe Routes to Schools Program pushing traffic to pass a hospital and school zone and through neighborhoods. If tolling happens, I would like to see increased painted and lighted crosswalks, digital radar speed signs and SPEEDBUMPS throughout the Fox Hills neighborhood, with a focus on 57th from Nyberg to Borland, which is a direct route when 65th is backed up. 57th is also a main route to school for kids who walk. School start time falls in the morning commute peak hours. Additionally this is a very irresponsible and poorly timed project when we do not have sufficient public transportation options in the impacted communities, forcing commuters the only option to reroute to surface streets and impacting the lives of children in our neighborhoods and school zone.

<b>ODOT I-205 Toll EA - RECORD #899 DETAIL</b>
--

**Submission Date :** 3/9/2023

**First Name :** Mark

**Last Name :** Kingen

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** There are no mass transport options on the south 205 corridor. This will greatly affect side roads that are totally unable to take extra traffic. This is extortion from those who travel this highway with NO option.

**ODOT I-205 Toll EA - RECORD #900 DETAIL****Submission Date :** 3/9/2023**First Name :** laird**Last Name :** heater**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Since Sam Adam's proposal of a new Interstate Bridge, I advocated a completely new bridge going from North of Vancouver to Hillsboro and on continuing to woodburn or Wilsonville. It would be a massive project similar to the I-205. When completed, go back and do what you want with the Interstate bridge. Any 'bandaids' to the Interstate bridge or I-5 running the Portland at this point, will create so much chaos in Portland, it will literally create a 15 hr a day gridlock. Yes, this should have been initiated 13 yrs ago, but at the time Portland couldn't even fix the potholes. The population is predicted to grow, and along with it more cars and trucks. Electric, gas, hydrogen or ?, they are still vehicles. And yes, I believe going to 100% electric is irresponsible. To become so dependent on one source is foolish. Especially when so vulnerable to computer hacks and weather events. (At least in a weather outage, traditional gas stations can be powered by generators. And Waste Management, a privately owned company, has switched many of its vehicles to Natural gas at reasonable cost vs TriMet wanting an all electric infrastructure. We don't even know the true impact of an all-electric transportation system, All the do-gooders are running around trying to save the environment is one broad stroke. Let take things a little bit slower and make sure they work. In 1962, a friend of mine and I commuted to Clark College. At that time, we wondered why they didn't keep the toll on the bridge, to be set aside for maintenance and eventual replacement. But, hey, we were just kids.

**ODOT I-205 Toll EA - RECORD #902 DETAIL**

**Submission Date :** 3/9/2023

**First Name :** Thomas

**Last Name :** James

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls should be used for bridges, for all users, then once construction is complete, remove the tolls. Tolls will have a negative impact on my retirement budget, as I already avoid rush hours.

**ODOT I-205 Toll EA - RECORD #903 DETAIL**

**Submission Date :** 3/9/2023

**First Name :** Dave

**Last Name :** Miller

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** If a building can have a green roof (covered with soil & plants), can a bridge have a green edge? I challenge you to figure out a way to provide soil on or around the bridges so that native plants could be growing on or around the bridge. "On" the bridge could be planters hanging off the sides, or vines growing from the shore up wires/cables that are connected to the bridge. "Around" the bridge could be large planters floating in the water around the support pillars, planted with large shrubs/small (or large?) trees. The idea is to make the structure less sterile, and blend into its surroundings a bit. The planters might also be used for filtering runoff? By only using native plants, no irrigation would be required. And if a mix of plants (natural guild) is used, it would be self-fertile as well.



**ODOT I-205 Toll EA - RECORD #904 DETAIL****Submission Date :** 3/9/2023**First Name :** Marcia**Last Name :** Wimmer**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I would like to see additional mitigation for traffic flow around the Abernethy Bridge. The transportation analysis needs to consider how cars using other roads to avoid tolls could slow down buses and cause traffic congestion along Highway 99E in Oregon City, particularly along Main Street, in addition to Center Avenue/Telford Road and South End Road.

<b>ODOT I-205 Toll EA - RECORD #905 DETAIL</b>
--

**Submission Date :** 3/9/2023

**First Name :** S

**Last Name :** M

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We already paid for these freeways. Tolling them is unacceptable. We want the freeways we paid for expanded, not intentionally made difficult to use. We have the right to travel, and the expectation for ODOT to serve the population rather than special interests that are trying to make personal transportation as painful as possible. WE do not accept your tolling. WE will not tolerate your tolling. WE will not PAY your tolling. And WE will continue to use OUR roads.

**ODOT I-205 Toll EA - RECORD #906 DETAIL****Submission Date :** 3/9/2023**First Name :** Vince**Last Name :** Miles**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Motorists diverting off of I-205 to avoid tolling gantries will intensify traffic on secondary roadways, such as Rosemont Road, Summit Street, Skyline Drive, Willamette Drive, and West A Street. There is a substantial lack of dedicated pedestrian facilities along the roadways I identified, and dramatically increasing the presence of motor vehicles through diversionary driving will increase the risk to pedestrians who walk along these routes - those issues should have been addressed along before the implementation of tolling begins.

<b>ODOT I-205 Toll EA - RECORD #907 DETAIL</b>
--

<b>Submission Date :</b>	3/9/2023
<b>First Name :</b>	Steve
<b>Last Name :</b>	Krump
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Stop taxing Oregonians

**ODOT I-205 Toll EA - RECORD #908 DETAIL**

**Submission Date :** 3/9/2023

**First Name :** Nathan

**Last Name :** Oleson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls and congestion pricing are regressive taxes on working and middle class Oregonians who are less likely to have flexible work schedules and therefore will be forced to pay the toll or forced into far more inconvenient forms of transportation. The purpose of this tolling scheme is to establish a revenue source that can be borrowed against to the tune of billions of dollars so politicians can spend on whatever pet project will pay off their campaign donors and get them reelected. All of this when broader inflation is crushing working and middle class Oregonians. Go back to the state legislature and find a different funding source as was in the original drafts of HB2017.

**ODOT I-205 Toll EA - RECORD #909 DETAIL**

**Submission Date :** 3/9/2023

**First Name :** Andy

**Last Name :** Daniel

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** If the reason for tolling is to replace money, lost from gas tax, then you need to focus on increasing the fees to electric vehicles and the build out of the electrical charging system. Tolling will have a disproportionate negative effect on people of lower economic means as well as truckers, who will pass on the cost to the ultimate consumers. Additionally, as someone who lives in a small town, and through which the diverted traffic will flow because of the tolling, I think that it will negatively affect our roads and our community, as well as our lifestyles.

<b>ODOT I-205 Toll EA - RECORD #910 DETAIL</b>
--

<b>Submission Date :</b>	3/9/2023
<b>First Name :</b>	Steven
<b>Last Name :</b>	Smith
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	NO TOLLS PERIOD!

**ODOT I-205 Toll EA - RECORD #911 DETAIL****Submission Date :** 3/9/2023**First Name :** Jennifer**Last Name :** Gibbons**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I think these tolls are a horrific idea. Traveling on Rte. 43 through West Linn is already a nightmare. Once you toll the Abernathy Bridge, much of that traffic will go across the Arch Bridge to avoid the toll. I can't even imagine how bad the traffic jams and back log will be. It's already difficult to turn left from Willamette Drive to Rte 43; with additional traffic, it will be virtually impossible. With the Arch Bridge being so narrow I expect a dramatic increase in accidents, as more large vehicles try to cross it. One accident on the bridge will bring traffic to a complete standstill, and the effect will ripple all the way up 43.



**ODOT I-205 Toll EA - RECORD #912 DETAIL**

**Submission Date :** 3/9/2023

**First Name :** Perry

**Last Name :** Jones

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Diversion of traffic onto Highway 43 from West Linn to Portland via 43/Macadam would be a nightmare. Tolls are not the answer. Tax financing through gas and licensing fees and other tax basis is the answer.

**ODOT I-205 Toll EA - RECORD #913 DETAIL**

**Submission Date :** 3/9/2023  
**First Name :** MAUREEN  
**Last Name :** CONLEY  
**Affiliation :**  
**Submission Method :** SurveyMonkey

**Q3. Comments :** Putting a toll on the Abernathy bridge is a terrible idea. The traffic will divert onto already overtaxed local roads to avoid this. I already see much traffic on the little 3mile long road I live on, try to avoid the congestion. I understand the need for this project but the cost ought to be shouldered by the federal government, as the I 205 is a Federal highway. Also, people are minimum wage jobs, or ones that require traveling to various sites during the work day will be expected to carry the burden for costs. Business will pass the costs down to the consumer, increasing cost for goods and services, which are already being stretch thin caused by supply change trouble, staffing problems. And as with so many "good ideas" to provide revenue the cost of managing the programs end up absorbing whatever financially benefits might be gained. Lastly tolling here will open the door for this to be spread out across the Willamette Valley turning Oregon into big cities along the east coast. Nickle and diming the citizens into poverty!

**ODOT I-205 Toll EA - RECORD #914 DETAIL****Submission Date :** 3/9/2023**First Name :** Chris**Last Name :** Thomas**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The two alternatives proposed are grossly insufficient and reflect a foregone decision to establish tolls in order to support the necessary improvements to the highway infrastructure. While I agree that the highway system needs modernizing, it is inappropriate and improper to use tolls to support the upgrades. Such tolls will make the communities less livable, will increase congestion, increase greenhouse gas emissions and air pollution, lead to more noise pollution, and generally degrade the quality of life for everyone in the region. An honest assessment would have included additional options that did not rely on tolls, rather than focusing exclusively on two options: tolls to support the improvements or no changes whatsoever. The proposed mitigation efforts are wildly insufficient, the better approach would be to lessen the impacts by eliminating tolls from the proposal.

<b>ODOT I-205 Toll EA - RECORD #915 DETAIL</b>
--

<b>Submission Date :</b>	3/8/2023
<b>First Name :</b>	Keisha
<b>Last Name :</b>	Brewster
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Traffic flow and traffic experience

**ODOT I-205 Toll EA - RECORD #916 DETAIL****Submission Date :** 3/8/2023**First Name :** Saud**Last Name :** Badri**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The citizens of Oregon and of the greater metro area will see a heavy impact in toll roads. Well many think it will be a positive one, I truly believe that it will negatively impact many people. The ones I'm concerned about the most are the people in the middle class in the lower class. While lower class individuals may see some level of relief on the cost of tolls, a large amount of the burden will be placed on the middle class. Hard working Oregonians and people of the metro area who really cannot afford to be paying tens of dollars every day just to drive on roads that they've already paid for. In some situations employers have felt the burden of toll roads as they have to give stipends to workers to pay for roads to get to work. I asked how is this any better? Someone is putting the bill and it's more money taken out of the pockets of the economy in and around the city. I would love a detailed explanation on how toll roads benefit a city and a state that has gone so long without them? Why isn't a broad tax increase a better idea that way everyone is paying an equal share of the roads? Whether they are car drivers or transportation users everyone uses the roads and there shouldn't be a premium for the access.

**ODOT I-205 Toll EA - RECORD #917 DETAIL**

**Submission Date :** 3/8/2023

**First Name :** Paulette

**Last Name :** Reed

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I think it is very irresponsible to add another tax to people who are already struggling to provide for their`

<b>ODOT I-205 Toll EA - RECORD #918 DETAIL</b>
--

**Submission Date :** 3/7/2023

**First Name :** TANA

**Last Name :** PERRY

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Why would this area be the 1st one for tolling? It does seem a bit discriminatory as compared to other areas. If we need to go this route why are you not tolling I 5 into Portland? It makes no sense to have it in this area as compared to other states that have tolls.

**ODOT I-205 Toll EA - RECORD #919 DETAIL**

**Submission Date :** 3/7/2023  
**First Name :** Linda  
**Last Name :** Cahan  
**Affiliation :** Formerly from West Linn  
**Submission Method :** SurveyMonkey

**Q3. Comments :** This entire project feels like a done deal yet the impact on people's budgets and their neighborhoods will be considerable and devastating. I wonder why anyone thinks this will work to improve congestion. Why can't the (very needed) road improvements be paid for by either an additional gas/electric tax and/or the rebate kicker from our already high taxes? Seriously - this is a case of "we've put so much time and money into this already in studies, it's got to work" - yet, it won't. I lived in CT & NJ - both toll road states. CT got rid of them due to extreme pollution and horrible accidents. NJ still has them. Also, thinking that people will drive at specific times to save money is wishful thinking. Most people drive when they need to. NOTHING is going to keep cars off the road. You can't keep allowing developers to create huge housing areas and expect the people who buy or rent to ride bicycles. This is truly magical thinking. Nothing will prevent cars from going on the roads. But de-incentivizing people by charging them is going to backfire in a big way. Please, please, please don't put in tolls!!! There will be no upside to this politically or for the people of this state.



**ODOT I-205 Toll EA - RECORD #920 DETAIL****Submission Date :** 3/7/2023**First Name :** Jacob**Last Name :** Groh**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** According to Table 5-3 of Appendix C: Toll Project Transportation Technical Report, the daily traffic volume increase along Borland Rd will nearly double in both directions, even after a potential period of pre-completion tolling is completed. According to the main report, by 2045 the AM/PM volumes show a less drastic increase resulting from the build alternative. In light of all this, I would like to see additional mitigation along this arterial strongly considered beyond the two options listed in Table 3-15 of the main report, those being the Ek/Borland roundabout and the paved shoulder improvements. While the long-term traffic increase is inevitable, a short-term doubling of traffic volume necessitates maximum care here. Additionally, the first full-way stopped intersection along this arterial occurs at Willamette Falls/Ostman Rd, but this intersection was excluded from the analysis. This is where the biggest PM backups currently occur along the Borland route, so mitigation will likely be very needed here. Please consider adding this intersection to the analysis software if possible, as it seems to be more critical than the Willamette Falls/19th intersection that was included in the analysis. With regard to transit, the report assumed the existence of TriMet Line 154 which connects the Willamette neighborhood to Portland's larger transit system. However, according to TriMet's Forward Together plan, this line is set to be removed. This means that, because there will be no good alternative to driving for residents of this area, the tolling will affect Willamette residents without the potential for a reduction of driving by switching to other transportation modes. Accordingly, please consider funding multimodal improvements along the entire length of Willamette Falls Dr as part of your mitigation efforts. Also, consider recommending TriMet keep Line 154 if this is possible. Finally, with regard to sound mitigation using sound walls: Presently, sound from I-205 is one of the biggest quality-of-life detractors at my residence. Thus, I am strongly in favor of the construction of these walls, which were listed in the report as still only in consideration. With respect to the walls themselves, please make sure they are as sound-absorbent as possible to minimize reflections that could increase sound intensity in certain areas opposite them. Thank you for your time!

<b>ODOT I-205 Toll EA - RECORD #921 DETAIL</b>
--

<b>Submission Date :</b>	3/7/2023
<b>First Name :</b>	Luke
<b>Last Name :</b>	Peyton
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Do not do this it's silly NO NO NO

**ODOT I-205 Toll EA - RECORD #922 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Brian

**Last Name :** Wright

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Greetings! As a resident of Gladstone, I am very concerned about how the proposed new I-205 tolling will impact the local communities. The two concerns I have go hand-in-hand. First, Gladstone residents have one of the highest property taxes in the Portland area, but we are not by any means considered a 'wealthy' city. Per the latest census numbers, our poverty rate is 16.2% compared to Portland's 12.6% poverty rate. When this tolling goes into effect, two obvious things will happen; those that cannot afford to pay it will avoid 205 and take an alternate route around the toll. This forces these alternate routes through neighborhoods and highways like 99E which will get jammed up with traffic. Please don't start thinking "people will begin taking mass transit, biking to work, or car pooling." No, they won't. People love their cars! Watch TV for an hour, and you'll agree that we are constantly reminded through advertisements that what we have isn't good enough...but I digress. If this was a toll freeway like the 470 in Denver that provided an additional highway but was not necessary for a daily commute, go for it. 470 is great, but if you can't afford it there are other freeway options. But since 205 is the life line for Gladstone and the Clackamas county residents....this will bring about major traffic backups in the area, and reduce the quality of life for the community.

<b>ODOT I-205 Toll EA - RECORD #923 DETAIL</b>
--

**Submission Date :** 3/7/2023

**First Name :** Rob

**Last Name :** Kappa

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am in favor of tolls. They will help repair and keep our roads clean

**ODOT I-205 Toll EA - RECORD #924 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Susan

**Last Name :** Foxman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Our home is on Highway 43 north of downtown Lake Oswego. Many more large trucks and autos are already using highway 43 since our 2005 move in. It is predictable that highway traffic will increase to avoid tolls that are suggested, making it even busier, noisier and environmentally unhealthy for inhabitants who live on Hwy 43. Why solve one problem and create another?

**ODOT I-205 Toll EA - RECORD #925 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Andi

**Last Name :** Yates

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** i feel that the proposed plan will cause additional hardship to people who are already struggling to make ends meet. Imagine having to pay an additional \$15/trip because your job is on the other side of town.

<b>ODOT I-205 Toll EA - RECORD #926 DETAIL</b>
--

<b>Submission Date :</b>	3/7/2023
<b>First Name :</b>	Dale
<b>Last Name :</b>	Billups
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	NO TOLLS!

<b>ODOT I-205 Toll EA - RECORD #927 DETAIL</b>
--

**Submission Date :** 3/6/2023  
**First Name :** Tamra  
**Last Name :** Phillips  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**



**ODOT I-205 Toll EA - RECORD #928 DETAIL**

**Submission Date :** 3/6/2023

**First Name :** Amy

**Last Name :** Ingham

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** 1. Diversion traffic into my neighborhood is 100% unacceptable. Borland Rd/Willamette Falls Dr. There is no way this problem can be mitigated. There is no way ODOT can keep diversion traffic off side streets. It's already bad during rush hours, tolling will make it nearly impassable. 2. ODOT says it is to encourage use of mass transit, however a large portion of Clackamas County has no mass transit. No bus, no Max train, no transit center a lot of us can use without first paying tolls to get to. Tri-met has publicly said they have no funds and no plans for expansion. I can't even get to work in Clackamas without a long walk from a distant bus stop, if I were to use Tri-met. 3. Diversion traffic will slow mass transit in the areas that it exists, so the option of using mass transit instead of driving becomes even less feasible. 4. If tolling were to happen, the collection of tolls would be costly, the enforcement, who would do the collecting, the administration in general seems like it would not be very straightforward. 5. Tolling places an unfair burden on the communities surrounding the tolled freeways, and the people driving on them, when the entire state benefits from their use, not just the people that drive on them. 6. I would be more in favor of a toll that is limited, for instance to build a bridge and once it's paid for the tolling stops. 7. An alternative to tolls could be a pay by the mile fee, that seems far more equitable than only taxing the people that use certain stretches of freeway. Pay for what you use, not pay for what everyone in the state benefits from. 8. The roads that are used as diversion routes to avoid tolling will be destroyed from the massive increase in traffic. Who is going to pay to have them maintained and repaired? Last, in the areas that will suffer diversion traffic, there will be issues affecting air quality, real estate values will suffer, water quality will suffer, road safety, auto insurance rates will likely go up. Not to mention in our area a middle school is being built adjacent to Borland Rd, which will be creating traffic issues of its own and safety concerns for the hundreds of kids wandering around before and after school.

<b>ODOT I-205 Toll EA - RECORD #929 DETAIL</b>
--

**Submission Date :** 3/6/2023

**First Name :** Laurie

**Last Name :** McGrath

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The transportation analysis needs to consider that WL has virtually no public transportation as an alternative means of travel. Hwy 43 is already at peak travel after 3PM - I cannot turn left out of my home driveway due to traffic - I have to turn R, go to next light, and turn around in order to travel north on 43 from 3-6PM.

**ODOT I-205 Toll EA - RECORD #931 DETAIL****Submission Date :** 3/6/2023**First Name :** Jane**Last Name :** Civiletti**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Since tolling is practically nonexistent in either Or or Wash having the general driving public understand how this toll will be levied and collected when there are no physical points of collection seems to be a daunting as well as expensive task. Also, if signage on I-5 in either Wash or Wilsonville indicate a choice between a toll taking I-205 as loop around the downtown area or a 'free' road if continuing on I-5 I'd anticipate much heavier traffic flow thru the I-5 route, especially for commercial vehicles.

<b>ODOT I-205 Toll EA - RECORD #933 DETAIL</b>
--

**Submission Date :** 3/5/2023

**First Name :** aric

**Last Name :** Skjelstad

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This project is ill advised. The cost to the public is tremendous and should NOT HAPPEN.

<b>ODOT I-205 Toll EA - RECORD #934 DETAIL</b>
--

**Submission Date :** 3/5/2023

**First Name :** John

**Last Name :** Ley

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Will Clark County and SW Washington residents be eligible to receive "low cost" or "reduced rate" tolls? I have heard they will NOT. With roughly 80,000 SW WA citizens commuting to Oregon for work, the tolls will significantly impact low and middle income families. They do NOT have any other options when ALL LANES are tolled.

<b>ODOT I-205 Toll EA - RECORD #935 DETAIL</b>
--

**Submission Date :** 3/4/2023

**First Name :** Louise

**Last Name :** Rowder

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Should study impacts of congestion from other toll road examples. In Denver traffic is worse today in downtown because so many avoid tolls.

**ODOT I-205 Toll EA - RECORD #936 DETAIL**

**Submission Date :** 3/4/2023

**First Name :** Jennifer

**Last Name :** Byrne

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Oregon roads should be Toll-free! We could tax electricity generation for electric vehicles.

- Tolls set an undesired precedent. Roads are our shared responsibility.
- Tolls guarantee special contracts for specialized technology companies in the tolling industry. This is an unnecessary expense.
- Oregon and Portland could create an electric car tax for the generation of additional electricity for electric cars. This can easily offset the income losses from the current gas tax. Use registered electric cars in Oregon for your database and tax collection. This a low-tech, simple solution.
- Tax trucks that are over certain weight limits. They disproportionately erode our roads.

**Tolling and Monitoring**

- Colossal waste of money. Send bills in the mail? Make people buy monitoring devices for their car?
- Creates bureaucratic juggernaut to run this program. Can we please invest in excellent schools and reducing crime instead? Bureaucrats are expensive.
- Wastes time, energy, and money to constantly upgrade technology from the tolling industry. Creates unnecessary waste-environmental toll.
- People are already covering their license plates (if present) with shaded covers on I-5. Evasive behavior will increase.
- Tracking down and sending tickets to people in other states is difficult to enforce, another unnecessary expenditure of resources.
- The weight of trucks does the most road damage, not cars.
- I-5 through downtown will become a bigger nightmare – please do not exacerbate congestion. Have some respect for your taxpayers.

**Federal Funds should do the heavy lifting.**

- This is national-level corridor for transportation.
- Projects like these should use federal funds.
- The “Bipartisan Infrastructure Law,” is the largest long-term investment in our infrastructure and economy in our nation’s history. It provides \$550 billion over fiscal years 2022-2026 in new federal investment in roads, bridges, and mass transit, water infrastructure, resilience, and broadband.
- Might our current bureaucrats do the legwork necessary to utilize this funding?

Following a significant earthquake, we may need a new bridge and bridges anyway.

- Our focus should be on federal funds and assistance at this point.

**More traffic on small streets is dangerous.**

- Tolling will cause more people to use alternative routes. This punishes local taxpaying residents, whose parking has already been compromised by other political decisions.
- Limit congestion to school buses and residents parking outside their homes, please don’t augment it.

**ODOT I-205 Toll EA - RECORD #937 DETAIL**

**Submission Date :** 3/4/2023

**First Name :** Burton

**Last Name :** Haun

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Oregon roads should be Toll-free! We could tax electricity generation for electric vehicles. • Tolls set an undesired precedent. Roads are our shared responsibility. • Tolls guarantee special contracts for specialized technology companies in the tolling industry. This is an unnecessary expense. • Oregon and Portland could create an electric car tax for the generation of additional electricity for electric cars. This can easily offset the income losses from the current gas tax. Use registered electric cars in Oregon for your database and tax collection. This a low-tech, simple solution. • Tax trucks that are over certain weight limits. They disproportionately erode our roads. Tolling and Monitoring • Colossal waste of money. Send bills in the mail? Make people buy monitoring devices for their car? • Creates bureaucratic juggernaut to run this program. Can we please invest in excellent schools and reducing crime instead? Bureaucrats are expensive. • Wastes time, energy, and money to constantly upgrade technology from the tolling industry. Creates unnecessary waste-environmental toll. • People are already covering their license plates with shaded covers on I-5 while I commute. Evasive behavior will increase. • Tracking down and sending tickets to people in other states is difficult to enforce, another unnecessary expenditure of resources. • The weight of trucks does the most road damage, not cars. • I-5 through downtown will become a bigger nightmare – please do not exacerbate congestion. Have some respect for your taxpayers. Federal Funds should do the heavy lifting. • This is national-level corridor for transportation. • Projects like these should use federal funds. • The “Bipartisan Infrastructure Law,” is the largest long-term investment in our infrastructure and economy in our nation’s history. It provides \$550 billion over fiscal years 2022-2026 in new federal investment in roads, bridges, and mass transit, water infrastructure, resilience, and broadband. • Might our current bureaucrats do the legwork necessary to utilize this funding? Following a significant earthquake, we may need a new bridge and bridges anyway. • Our focus should be on federal funds and assistance at this point. More traffic on small streets is dangerous. • Tolling will cause more people to use alternative routes. This punishes local taxpaying residents, whose parking has already been compromised by other political decisions. • Limit congestion to school buses and residents parking outside their homes, please don’t augment it.



<b>ODOT I-205 Toll EA - RECORD #938 DETAIL</b>
--

**Submission Date :** 3/4/2023

**First Name :** Nic

**Last Name :** Westendorf

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** It seems like this is the wrong tool being applied little too late. While tolling had it's day, I am worried it won't do much more than generate some revenue while not actually reducing costs or emissions. I'd love to understand while a per-mile fee paired with registration fees based on vehicle weight wouldn't be a more equitable, effective, and less disruptive solution to generate more money, reduce vehicle trips, and reduce heavy vehicles which increase the maintenance costs of all road systems. This would be a better, easier, and more effective solution in my opinion and could accomplish nearly the same effect.

**ODOT I-205 Toll EA - RECORD #939 DETAIL**

**Submission Date :** 3/3/2023

**First Name :** Kate

**Last Name :** F

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Consider how alternate solutions can provide the same amount of environmental and traffic benefits as the project's solution that's set now.

**ODOT I-205 Toll EA - RECORD #940 DETAIL****Submission Date :** 3/3/2023**First Name :** Tim**Last Name :** Shevlin**Affiliation :** resident**Submission Method :** SurveyMonkey**Q3. Comments :** Financial impact to cross bridge 2x per day for work during peak hours.  
Additional traffic flow diverted to Willamette Falls drive that will go directly by  
new middle school. Seems like a terrible plan.

**ODOT I-205 Toll EA - RECORD #941 DETAIL**

**Submission Date :** 3/3/2023

**First Name :** Robyn

**Last Name :** Bodin

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am concerned about drivers avoiding tolls and creating traffic along the backroads of West Linn. As daily commuter on this toll route, I am concerned about the financial strain on my family. Can West Linn residents be exempt from having to pay? I heard Lake Oswego would be exempt.

<b>ODOT I-205 Toll EA - RECORD #942 DETAIL</b>
--

**Submission Date :** 3/3/2023  
**First Name :** Kevin  
**Last Name :** Bodin  
**Affiliation :** not important  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #943 DETAIL**

**Submission Date :** 3/2/2023

**First Name :** Hoang

**Last Name :** Nguyen

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I do not believe these ideal. Toll project I205 bridge is not fair! Compare to other bridges, please think to other bridges in Portland. They are heavy traffic more than I205 and people never talk about toll fee !!

**ODOT I-205 Toll EA - RECORD #944 DETAIL****Submission Date :** 3/2/2023**First Name :** Jeffrey**Last Name :** Kohne**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am opposed to the prospects of tolls on I205 and the Abernathy bridge. It's not the cost I object to, but I'd rather pay with vehicle registration, gas tax, etc. My main concern is how traffic will divert off of I205 at or near Stafford Road and onto local roads (Borland Rd which becomes Willamette Falls Drive). The increased traffic on Willamette Falls Drive will travel past a park, school, and the "Old Willamette District". This roadway gets enough diverted traffic already from I205....more traffic will negatively affect safety (for pedestrians) and livability (traffic jams) for those of us who reside in this part of town. No to tolls!

<b>ODOT I-205 Toll EA - RECORD #945 DETAIL</b>
--

**Submission Date :** 3/2/2023

**First Name :** Dave

**Last Name :** Riness

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The tolls will force more people onto surface streets, and force low income drivers to take bypass thru neighborhoods



<b>ODOT I-205 Toll EA - RECORD #946 DETAIL</b>
--

**Submission Date :** 3/2/2023

**First Name :** Timothy

**Last Name :** Rickards

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am glad that a third lane is being added! Also glad that the bridges are being updated to be safer! Thank you! Tolling that small section of road is troubling: The third lane will alleviate some bottlenecking but the toll booths are going to slow traffic down. I'm concerned about the drivers seeking to avoid tolls and going through the neighboring communities, especially Willamette Falls Drive which will impact pedestrians, bikers, and public transit.

**ODOT I-205 Toll EA - RECORD #947 DETAIL**

**Submission Date :** 3/1/2023

**First Name :** Sherry

**Last Name :** Eisenbach

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** 1) The items you list should be covered by the considerable monies that are in your budget. Poor planning on your part should not be impacting us since we've already paid the taxes for your "builds". How about dealing with the I-5 bridge across the Columbia River!!!! Sooner rather than later. I don't want to be in a car when the bridge drops into the River. How much was spent on the former bridge planning committee that never got it done and now we owe the Feds how much!!!! 2) Many many people will be avoiding your tolls and therefore will be using side streets and back ways of getting around. You say there will be a reader in people's cars to pay the toll so there will be no toll booths. What about people from out of state? Some day we hope that tourism will return to the Portland area and these people will be punished somehow for not having a toll reader in their cars, trucks, RVs or motorcycles.

**ODOT I-205 Toll EA - RECORD #948 DETAIL**

**Submission Date :** 3/1/2023  
**First Name :** Christopher  
**Last Name :** Poach  
**Affiliation :**  
**Submission Method :** SurveyMonkey

**Q3. Comments :** I would like to see ODOT not widen a highway they don't have funding for via tolling in an effort to reduce traffic and associated negative effects. I would rather them spend the money on the tolling to reduce the traffic, not widen the road (bridges still need upgrading), and spend that on regional transportation that will get more cars off the road (HCT). ||| It seems we have a hard enough time maintaining the highways and roads we use today, why do we need to add more surface area? ||| I would like to see additional mitigation of vehicle traffic over the arch bridge between OC and West Linn by converting it to a pedestrian only (& transit busses). Closed to private cars/trucks. The transportation analysis needs to consider downtown Oregon City and the traffic implications. Like Main St OC, build increased 3/4 transit times (figure 3-6). All the numbers are pretty marginal to be honest. I see some time save mostly on Stafford and Main St OC, but +/- 3 minutes for everything else. What is the margin of error here? Any clue? +/- 10 minutes? ||| I would like to see the mitigation of induced demand. Make transit better if you want less people to drive -> less traffic. Does your no build analysis include implementation of HCT or other non-car centric infrastructure? Does your analysis include how much urban land will be used by parking lot depending on build/no build? And urban heat island effects etc. 75% of API traffic is local traffic? Why widen the highway if the problem is local travel, provide better local travel options if that is the issue (3.1.1). HCT or pedestrian bridges etc. ||| It's expensive to own cars, if you'd really like to help those less well off, provide better HCT and other alternatives.

**ODOT I-205 Toll EA - RECORD #949 DETAIL****Submission Date :** 3/1/2023**First Name :** Aaron**Last Name :** Wolf**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I have too many concerns to list in a short comment. Broadly, I see tons of good-faith effort to study and consider all sorts of ramifications. I do not sense that the project has been considered from the perspective of the effects on a 50-100 year time frame despite surely having significant impacts lasting that long or further. As one tiny example, I'm concerned about irreparable effects on the Camassia Natural Area. More significantly, there's no credible basis to expect or support a situation in 30+ years where we still have the sort of traffic that private cars generate today. If tolling can be used effectively enough to seriously discourage driving, then we should be using it first before expanding the highway. Expansion only serves the goal of encouraging private car traffic. I do not see enough emphasis on building transit options for this corridor. I see acknowledgement that we're missing options for going between communities by bike and by various fast-evolving micromobility options. I do not see anything put in place to address that adequately. The biggest concern is the all-in style of all-at-once decision-making here. We cannot know today what we will need in 30+ years, and we do have immediate needs. So, make the smallest, iterative changes to address immediate needs with emphasis on seeing how it goes, leaving as much as possible to be changed later. The whole process seems to focus on having all this energy and public comment all at once and then it's done. I see people scared about diversion of traffic ruining Oregon City. I don't know if the fears are warranted. The focus needs to be not on just giving in to the no-toll cynics nor rejecting their points. The focus needs to be on smaller steps that are reversible, making this an ongoing conversation over years and generations, not something where all the decisions are made up front right now.

<b>ODOT I-205 Toll EA - RECORD #950 DETAIL</b>
--

**Submission Date :** 3/1/2023

**First Name :** Anthony

**Last Name :** Givigliano

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am not against a Toll lane. I am against a Toll road. Adding the third lane could become the new Toll lane. Changing a road built with gas tax , state and federal dollars should be voted on by the people that paid for this. This current plan will cause huge amounts of traffic on Hwy 99 through Canby and Oregon City, for people trying to avoid toll fees. While I understand money is tight, let's work on a better plan then all lane tolling on a current 'Freeway'.

<b>ODOT I-205 Toll EA - RECORD #951 DETAIL</b>
--

**Submission Date :** 3/1/2023

**First Name :** Andy

**Last Name :** Holthouse

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Many of us senior citizens who are on SSI fixed incomes cannot afford this new tax!

<b>ODOT I-205 Toll EA - RECORD #952 DETAIL</b>
--

**Submission Date :** 3/1/2023

**First Name :** Michelle

**Last Name :** Amend

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** You should let the voters decide. You will effect our household budget and this is not okay. We already paid for these roads through our taxes. If you want to build new roads and toll those then that makes sense. Enough hiding new taxes through tolls.

**ODOT I-205 Toll EA - RECORD #953 DETAIL****Submission Date :** 3/1/2023**First Name :** Lita**Last Name :** Colligan**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Oregon City Bridge will become gridlocked, affecting downtown and commuter routes on 99E. Also, with congestion pricing, I could change the time of my travel but would have to use alternate routes if all travel is tolled. I am on a fixed income.



**ODOT I-205 Toll EA - RECORD #954 DETAIL****Submission Date :** 2/28/2023**First Name :** Deborah**Last Name :** Brown**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am completely against tolling in the Portland metro area. Gas prices are already high due to gas taxes and then coupled with the increase in license tags, it is unfair to burden citizens with further transportation costs. Our family in particular can barely afford to keep gas in our vehicles in order to drive to our jobs, I can't imagine what the burden will be if we are then subject to tolls. I imagine I am not alone and like most people in our economic situation will be looking for side streets to get to our destination which will then increase congestion in those areas and reduce livability in those areas due to residents needing to deal with more traffic as they go about their daily lives, seems incredibly unfair. As a taxpaying citizen I would like a clear explanation of where all the gas taxes have gone and why they are not being used for our roads, why is there a need for tolling? If tolls are ultimately implemented will the gas taxes be reduced?

<b>ODOT I-205 Toll EA - RECORD #955 DETAIL</b>
--

**Submission Date :** 2/28/2023

**First Name :** Bill

**Last Name :** Alston

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Toll roads will do nothing but force more traffic into city neighborhoods. This will disproportionately affect people living close to the toll roads. Significantly affecting the safety of the family, their health, livelihoods, quality of life, and property values. Please do not move forward with the toll expansion.

<b>ODOT I-205 Toll EA - RECORD #956 DETAIL</b>
--

**Submission Date :** 2/28/2023

**First Name :** Lars

**Last Name :** Jefferson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling I-205 will encourage people to use surface streets. This will clog everything that is not on the freeway.

**ODOT I-205 Toll EA - RECORD #957 DETAIL****Submission Date :** 2/28/2023**First Name :** Glenda**Last Name :** Golter**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I am particularly concerned about the impact on local communities. Both my spouse and I have to commute to work. This cost would deeply impact our budget, and we aren't low income or on a fixed income. I'm concerned that the communities surrounding this project are going to be much more negatively impacted than the rest of the Oregon residents who benefit from this project.

**ODOT I-205 Toll EA - RECORD #958 DETAIL****Submission Date :** 2/28/2023**First Name :** Cheryl**Last Name :** Wyborny**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I support the plans as currently detailed in the videos. We desperately need to improve seismic safety in the greater Portland area. Tolling is a reasonable way to pay for the costs to improve the structural integrity of the bridges. I have experienced tolling in the SF Bay Area as a former resident and it was not cost prohibitive. Another reason I support the plan and the tolling is the positive effects it will have on air quality and climate. We humans need to be more thoughtful about how often and how far we use our vehicles. Using local retailers and doing multiple errands in one trip is within our capability and not difficult to do. Thanks for choosing the Abernathy Bridge to begin these bridge and highway improvements to the area.

<b>ODOT I-205 Toll EA - RECORD #959 DETAIL</b>
--

**Submission Date :** 2/28/2023

**First Name :** Andrea

**Last Name :** Smith

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Why is this project team and/or committee not listening to the people that live in these areas? Almost everyone that called in at the first meeting was opposed! Why have you not put to bed this pet project and moved on? You need to consider the low income families that have to travel back and forth, small businesses that can not afford this expense. Stop wasting our tax payers money with projects that do not benefit anyone but you!

**ODOT I-205 Toll EA - RECORD #960 DETAIL****Submission Date :** 2/28/2023**First Name :** Susan**Last Name :** Pellicano**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I live in Charbonneau. I do not agree with the proposed tolls in Wilsonville. This is a hardship: 1. I have no alternative to driving into Wilsonville other than using I-5. This is an isolated community. 2. There is NO reliable mass transit in this area. There is a small train that runs up to Beaverton to connect with MAX. It is a 15 minute drive to the train station from Charbonneau. That TRAIN DOES NOT RUN ABOUT 4 HOURS A DAY, MID-DAY. I tried it when I had to travel to St. Vincents for 6 months for chemo. Apparently the train tracks from Wilsonville to Beaverton are shared with freight trains, and there are no plans to add new tracks. The toll plans have not considered this issue. The side streets in Wilsonville were jammed when the 4:30 train arrived. It took me 45 minutes to drive back home to Charbonneau when it should only take 15 minutes.

**ODOT I-205 Toll EA - RECORD #961 DETAIL**

**Submission Date :** 2/27/2023

**First Name :** Josh

**Last Name :** Franklin

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls, like many taxes, primarily hurt those at the bottom of the income rung while doing little to improve highway infrastructure. We have two clogged freeways as is, and tolling will almost certainly make I-5 worse as people try to avoid paying for what they've already paid for with gas taxes. I-205's traffic may improve a bit, but it'll be richer people who can afford the tax. I already pay 1/3 of my income to the government, and I'd like to know where I can leave a bad Yelp review. I'm not getting my money's worth. While I'm fairly certain that this public commenting period is only to make us feel like we're being heard, it would be nice if we'd make the most of what money we already have, like every family has to. There's plenty of money available, but we're wasting it on alternative forms of transport like light rail which never runs in bad weather and inefficiently goes places few people want to go. Expand some lanes, clear snow when it falls, and then let's talk about increasing funds. This is the cart before the horse is even born.



**ODOT I-205 Toll EA - RECORD #962 DETAIL**

**Submission Date :** 2/27/2023

**First Name :** Mick

**Last Name :** Doane

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** When you put out a "survey " after the decisions have been made, and against multiple polls showing that the Public is opposed to Tolling, you further destroy trust in government. As if there is much left.

**ODOT I-205 Toll EA - RECORD #963 DETAIL****Submission Date :** 2/27/2023**First Name :** Jack**Last Name :** Straton**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** These tolls would be regressive taxes that impact the poor more than other groups. Tell the legislature to repeal their directive to toll and start using general funds for road projects. If tolling goes ahead, put the Westbound toll gate East of Oregon City to mitigate congestion that would otherwise pour onto their streets.

<b>ODOT I-205 Toll EA - RECORD #964 DETAIL</b>
--

**Submission Date :** 2/27/2023

**First Name :** Penelope

**Last Name :** Ryan

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Do not start tolls. There is not enough information for the public to make a wise decision. And unless there are additional lanes built on existing interstate highways, no benefit will accrue to the users.

**ODOT I-205 Toll EA - RECORD #965 DETAIL****Submission Date :** 2/27/2023**First Name :** Helen**Last Name :** Leek**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** First, how can anyone with half a brain comment on incomplete information provided by ODOT on this project and its outcome? You have not told me what the cost per trip is going to be. You have not provided Lake Oswego City government with how you will mitigate the traffic that will come pouring off of I-205 to Stafford Road , McVey and Hwy 43, from drivers avoiding the tolls. I want to know specifically how much money will be allocated to Lake Oswego for traffic mitigation on McVey, Stafford Rd and Hwy 43 off of the West Linn-Hwy 43 exit. I want to know how much a toll will be from I-5 and I-205 interchange to Sunnyside Rd., forinstance. You are shoving this down our throats and think we will just swallow. Do your job and give us the information we need.

<b>ODOT I-205 Toll EA - RECORD #966 DETAIL</b>
--

**Submission Date :** 2/27/2023

**First Name :** Amy

**Last Name :** Alt

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Diversion into the side streets and the cost to those of us who have to drive for work (eg home health nurse)

**ODOT I-205 Toll EA - RECORD #967 DETAIL**

**Submission Date :** 2/27/2023

**First Name :** Lilly

**Last Name :** Roe

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling in Portland sounds good but it does not mention cost. How much will it cost the locals and others driving through? I think this committee should be transparent and honest with the public. Instead of just mentioning the positives lets hear the other side... the cost!

<b>ODOT I-205 Toll EA - RECORD #968 DETAIL</b>
--

**Submission Date :** 2/27/2023

**First Name :** Charlen

**Last Name :** Pennie

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is another tax the poor scheme. The people who do the most driving is the blue collar workers, carpenters, landscapers, service providers.

**ODOT I-205 Toll EA - RECORD #969 DETAIL**

**Submission Date :** 2/27/2023

**First Name :** Daniel

**Last Name :** Williams

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Why don't you crooks just take our entire paychecks at gunpoint?



<b>ODOT I-205 Toll EA - RECORD #970 DETAIL</b>
--

<b>Submission Date :</b>	2/27/2023
<b>First Name :</b>	Arthur
<b>Last Name :</b>	Baker
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Hood River

**ODOT I-205 Toll EA - RECORD #971 DETAIL****Submission Date :** 2/27/2023**First Name :** Gary**Last Name :** Wood**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Oregonians do not not want tolling! Therefore in a democracy there should be no tolling. I know this won't change what you do because it affects your livelihood and your purpose for being. But to me the purpose of a public servant is to serve the public, who have specifically said "We don't want this." Further, don't spend my money on ads to convince me what the best use of my money is. The last time I looked at surveys of Oregonians about tolling, done by you or someone else in government, about 80% of respondents said, "NO! We really, really don't want tolling." Your conclusion was "We have not done an adequate job of educating the public about the advantages of tolling." Wrong. The conclusion is "We did not listen to the people who pay us." Please publish in detail all comments from people like me as well as those that support you.

**ODOT I-205 Toll EA - RECORD #972 DETAIL****Submission Date :** 2/27/2023**First Name :** Lynn**Last Name :** Zurcher Law**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This tolling plan is just another example of how our state government is failing the people. I understand the need for some of the studies and plans for better infrastructure, but the studies and plans did not come up with the right answer and were purposely skewed against the values of the vast majority of the population. This is real life problem for the population that uses I205. ODOT should not cause undo expense to those using this freeway when there are funds available elsewhere. I am a fourth-generation Oregon native, and am so very sad to see the government mismanagement and overreach causing our beautiful state to be unlivable for people like me. Please take a realistic step back and do what you were hired to do to find the money to make needed improvements without causing financial hardship to the public. We already pay too much in taxes to Oregon's poorly-run state government. It's time to make a change for the better not for the worse.

**ODOT I-205 Toll EA - RECORD #973 DETAIL**

**Submission Date :** 2/27/2023

**First Name :** Mark

**Last Name :** Jones

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** There is no cost or predicted out comes stated in your piece! There is no actual need beyond increased taxes on travel in and around Portland! The proposed Bridge project isn't even a sure thing or funded yet you are advocating for more taxes! We also wonder why the ODOT is doing most of the planning an execution of this proposal without transparency and in secret!! I am against the Tolling in Oregon I-205 / I-5. Oregon is among the highest gas taxes and vehicle fees as well as hidden dealer privilege taxes, in the Country, ODOT needs to start using those moneys more effeciently.

**ODOT I-205 Toll EA - RECORD #974 DETAIL**

**Submission Date :** 2/27/2023

**First Name :** Martin

**Last Name :** reagan

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am concerned with the financial impacts on older, rural residents on fixed incomes. I've read all documents and see that there is consideration with moving a toll gate to the Boone Bridge in the next year. I am 73 and my wife is 64 and we both have underlying medical conditions that require several trips across the bridge to access our doctors and clinics. There are few choices south of the bridge.

Additionally, the most cost effective shopping for us is in Wilsonville. I am required to get someone to drive me to my appointments because of short term anesthesia. The cost of fuel for us rural residents, inflation, and increased taxes is making it near impossible to afford our dreams of living in rural Oregon. Having to pay to cross the Boone Bridge twice for each of these excursions will add additional financial burden as well as make it harder to find drivers, who are typically younger. I'm sure you are all aware that the Willamette River presents an impassible barrier, other than the Boone Bridge, for a wide area of the north valley. We already schedule our appointments off hours when possible. Please at least allow us access to Wilsonville Road without having to pay tolls. I have agreed to write this for a large number of similar residents who are becoming increasingly financially stressed.

**ODOT I-205 Toll EA - RECORD #975 DETAIL**

**Submission Date :** 2/27/2023

**First Name :** Eric

**Last Name :** Cole

**Affiliation :** Citizen of Multnomah County

**Submission Method :** SurveyMonkey

**Q3. Comments :** Greetings: Let us pray, in the Holy Name of Almighty God, the Father and Creator, of Abraham, Isaac and Jacob, Who is the same in the past as He is today and will be in the future. As we ask His only-begotten Son, the Lord, Savior and Christ, Jesus, to give His righteous guidance against state-sponsored theft. Amen. It is specifically wanted to have NO TOLL tax on I-205 nor I-5. A TOLL tax on I-205 is NOT needed nor wanted. A TOLL tax on I-5 is NOT needed nor wanted. Thank you. NO TOLL tax on I-205 nor I-5. There is NO NEED for state sponsored theft.

**ODOT I-205 Toll EA - RECORD #976 DETAIL**

**Submission Date :** 2/27/2023

**First Name :** Keith

**Last Name :** Beadle

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The transportation analysis needs to strongly consider the effects to the local transportation system. State Highway 43 from Hidden Ranch to the I-205 ramp is already extremely congested does not have adequate turn lanes, lighting, bike safety or sidewalks. People who live in the area are already very negatively effected by this in safety , quality of life, environmental impact and home value. Please consider the effects that large numbers of people evading a toll will take on this already poorly engineered area. Ultimately I would strongly ask the report to recommend that expansive mitigation efforts are in place and under construction before tolling begins.

**ODOT I-205 Toll EA - RECORD #977 DETAIL**

**Submission Date :** 2/27/2023

**First Name :** Donald

**Last Name :** Lycett

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Oregon has one of the highest road taxes in the nation. Why are you adding to the cost instead of using current taxes to fix the problem instead of asking for more money? My wife and I are retired on fixed income. How is this helping us when we need money to pay for inflation and no increase in income? WHY??



**ODOT I-205 Toll EA - RECORD #978 DETAIL**

**Submission Date :** 2/27/2023

**First Name :** Mary

**Last Name :** Rigert

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Transportation with accessible and cheap energy is the BASIS of prosperity and growth. Government is to PROTECT the citizen and the citizen prosperity. Use current taxes to build more roads and keep vehicles moving. This, OF COURSE, can be done environmentally safe.

<b>ODOT I-205 Toll EA - RECORD #979 DETAIL</b>
--

**Submission Date :** 2/26/2023

**First Name :** Gen

**Last Name :** Putnam

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** No, no, no. I do NOT support any tolling in our area. Oregonians are already struggling financially. This is just an added burden. If ODOT actually managed budgets well, and if this state would finally implement a sales tax and drop the income tax, this wouldn't be needed. Can't wait to retire and move out of this state. Scrap the tolling plan entirely.

**ODOT I-205 Toll EA - RECORD #980 DETAIL****Submission Date :** 2/26/2023**First Name :** Stephanie**Last Name :** Hascall**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I live in west Linn. In a normal day I will be toll charged 2 - 6 times if I got to work, the grocery store (market of choice) and out for ice cream. What are you trying to do, charge the residents of west Linn and Oregon city? I don't understand. Will you have exempt status for us so we don't get hit so hard financially by the tolls? Please fix this problem!

<b>ODOT I-205 Toll EA - RECORD #981 DETAIL</b>
--

**Submission Date :** 2/26/2023

**First Name :** Evan

**Last Name :** Swanson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I believe congestion pricing is a great solution to encourage commuters to disperse their driving times and make traffic run more efficiently.

<b>ODOT I-205 Toll EA - RECORD #982 DETAIL</b>
--

**Submission Date :** 2/26/2023

**First Name :** Robert

**Last Name :** Pirie

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I have seen no discussion of the effects of tolling on Willamette Falls Drive, Pete's Mountain Rd., the Oregon City bridge, when all those folks wanting to avoid tolls begin using these and other alternatives. What is your plan then?

<b>ODOT I-205 Toll EA - RECORD #983 DETAIL</b>
--

**Submission Date :** 2/26/2023

**First Name :** Henry

**Last Name :** Werch

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We have no objections to the tolls nor the overall objectives. Having seen what weather and high traffic delays have done to major highway intersections, we would like to see what specific measures will be undertaken to prevent delays and congestion at toll booth feeders that would be disastrous both to the glow of traffic and the environment!

**ODOT I-205 Toll EA - RECORD #984 DETAIL**

**Submission Date :** 2/26/2023

**First Name :** Helen

**Last Name :** E Kirtley

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The toll will help the crowds on the freeways but put it all on the local neighborhoods. Local streets don't need that. Pay for the improvements in the usual ways as tax , etc. No on tolls.

<b>ODOT I-205 Toll EA - RECORD #985 DETAIL</b>
--

<b>Submission Date :</b>	2/26/2023
<b>First Name :</b>	Greg
<b>Last Name :</b>	Brown
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Tolls are a tax And should be voted on



<b>ODOT I-205 Toll EA - RECORD #986 DETAIL</b>
--

**Submission Date :** 2/26/2023

**First Name :** Mike

**Last Name :** Sloan

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling is a VERY regressive tax. It will affect lower income folks severely. Plus all the cost to collect the tolls creating another bloated bureaucracy. If this is necessary then raise the gas tax a bit to cover. Electric vehicles should pay a yearly fee when they register.

**ODOT I-205 Toll EA - RECORD #987 DETAIL**

**Submission Date :** 2/26/2023

**First Name :** Dale

**Last Name :** Guenther

**Affiliation :** Clackamas County Ped/Bicycle Committee, Happy Valley  
Transportation/Safety Council

**Submission Method :** SurveyMonkey

**Q3. Comments :** Further analysis is needed for the project goals and objectives. Your own analysis shows that 60% of current I-205 users are local. While your fact sheets explains that toll revenue will be used locally, it also says that revenue will be used state wide. You are mandating that a very small population will pay for state roads. Out of state drivers will be charged, but how? Will the tolling contract operator have access to all 50 state DMV records? That is impossible. And even if these remote drivers are charged, why would they pay? The state has no recourse to force payment. Again, a small population of local drivers are forced to pay for all state roads. This is completely unfair. Until the start of 2023 zero analysis has gone into diversion impacts. As current I-205 use now shows that when there is congestion drivers adversely impact local roads. Tolling will greatly exaggerate this, and local governments will face exorbitant costs to mitigate. Obviously the state needs to replace lost gas tax from EVs. Charge vehicle registration based on vehicle weight. The heavier the vehicle the more damage done to our roads. This is the fairest outcome to all.

**ODOT I-205 Toll EA - RECORD #988 DETAIL**

**Submission Date :** 2/26/2023

**First Name :** Martin

**Last Name :** Sobelman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** While I recognize the enormity of this fee structure component, my input is 1- for all users, the fees should be income based—your state computer systems in revenue/odot can certainly ‘work together’ to identify those who can’t pay ‘full’ amounts vs those who can among Oregon Drivers. Commercial users-businesses- can also be identified and pay based on GVW. Out of staters [commercial or private]should be charged an upgraded fee as is done on the east coast [by license plate identifiers] 2- local users in West Linn/Wilsonville/Oregon City/Lake Oswego, who perhaps, take the kids To school and pick up/go shopping/go to a medical appointment, etc, may be using I206 multiple times per day should not have to pay a per trip fee, but should have something akin to TriMet daily/monthly pass fee structure.

**ODOT I-205 Toll EA - RECORD #990 DETAIL**

**Submission Date :** 2/26/2023

**First Name :** Ritter

**Last Name :** Friedrich

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is insanity, Tolls if any should be at state borders. this is going to increase traffic all around tolls. Oregon has by far worse DOT. PLEASE STOP everything in this state is soo half baked its astonishing.

<b>ODOT I-205 Toll EA - RECORD #991 DETAIL</b>
--

**Submission Date :** 2/26/2023

**First Name :** Robert

**Last Name :** Carnagey

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling is just an excuse that hides the failure of the state to manage our states transportation needs - and to funnel ever more money into the insatiable appetite for our government for ever more money!

We have had huge surpluses in the last few years and their current next 2 year budget has still more surpluses. Get a life and fix the problem and not just force traffic onto city streets, negatively impact lower income folks who already struggle to pay for their transportation needs.

**ODOT I-205 Toll EA - RECORD #992 DETAIL****Submission Date :** 2/26/2023**First Name :** Richard**Last Name :** Osterman**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am an 80 year old native Oregonian, but now Oregon is changing in ways I don't like. City taxes that are for the wealthy, but are really for the middle income. Toll roads proposed in a state that has NEVER had toll roads and doesn't like them. This is not the state I love and grew up in. This is becoming a state that I dislike more and more with each new change. I would hate to move at this late date but I may have to move out of Oregon because of all the changes I don't like...I blame the progressive government for all these changes...a balanced government left Oregon more than thirty years ago and it's affecting the whole state now and there's a whole lot of people that don't like it...so wake up Oregon and STOP making so many bad new so called progressive changes that will drive the older generations of Oregonians out ...remember, most of the taxes are paid for by corporations, small businesses, and older higher income taxpayers...and that is what most all of these new changes are targeting...so before you drive out all of the people and businesses that do most of the supporting of the state with their taxes, think about it a little longer...just a raise the gas tax ten or fifteen cents a gallon would be a simpler way to raise the money instead of tolling, and would not have create a big bureaucracy just to do it...this is not my Oregon anymore...

**ODOT I-205 Toll EA - RECORD #993 DETAIL**

**Submission Date :** 2/26/2023

**First Name :** Jeff

**Last Name :** Fletcher

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Totally disagree with tolling It puts too much strain on the family finances. Oregon is a very heavy tax State - income tax, property tax, liquor tax, gas tax etc. A toll is just another tax. Enough is enough. Find another way

<b>ODOT I-205 Toll EA - RECORD #994 DETAIL</b>
--

**Submission Date :** 2/25/2023

**First Name :** Tami

**Last Name :** Hoogestraat

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Very concerned about it's impact to our business, increased suggestions on side streets, and the cost to those of us who need to cross the river



**ODOT I-205 Toll EA - RECORD #995 DETAIL**

**Submission Date :** 2/25/2023

**First Name :** Tracy

**Last Name :** Batchelder

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This whole plan is ridiculous as a whole ODOT mismanages our taxpayer money yet they want to add yet again another tax and not work within the budget they're given. Time after time the community has said that they don't want a toll on our highways yet you still are forcing everyone to pay the toll on a major highway and are too chicken to put it on the ballot to be voted on because you know the taxpayers wouldn't pass it again. All your doing is pushing highway traffic on already congested side roads that also won't be able to handle the traffic. You might force traffic to go through Willamette or other small towns but no one is going to stop and go shopping when they are going to be constantly stuck in traffic of people avoiding the highway.

<b>ODOT I-205 Toll EA - RECORD #996 DETAIL</b>
--

**Submission Date :** 2/25/2023

**First Name :** Sumir

**Last Name :** Varma

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** NO TOLLS on paid highways- we will make sure that this issue is referred to voters through the initiative system! NO MORE INEPTITUDE!! We need accountability!

**ODOT I-205 Toll EA - RECORD #997 DETAIL**

**Submission Date :** 2/25/2023

**First Name :** Geoffrey

**Last Name :** Bakker

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** There is currently no public transportation that will allow folks to commute their routes in the vicinity of the proposed tolls. It will take years to complete additional public transportation. Proposed solution: Reduced or free tolls for EV's with a portion of the collected tolls subsidizing EV purchase for low income commuters. This would give real environmental benefits while preserving societal equity for the low income commuters that need it. Summary of benefits: \* Reduced emissions of commuter vehicles that happens quickly as people transition to EV's. EV's emit a small fraction of equivalent ICE vehicles. \* Transition time to put in well thought out public transportation options for commuters. \* Supports EV adoption in low income communities that currently are not able to do this due to cost. This would address a neglected need for societal equity. Instead of having free tolls for low income ICE vehicles use the opportunity to help them transition to EV and lower their transportation costs. \* Sets up needed oversight to better manage EV solutions to portland's environmental issues. \* Reduced toll bypass through communities near the toll collection, helping to keep these communities safe and with high quality of life. \* Supporting the low income commuters that do not have work from home options. Allow them to make it to their in person jobs in Portland quickly and with lower environmental impact. \* Minimal impact to toll collection. Program can be phased out if goals for EV adoption are met. \* Reduce the overall size of commuter vehicles from trucks to city appropriate cars. This is a historic opportunity to accelerate EV adoption in Oregon and show leadership in enabling EV's for low income commuters. Long term benefits to communities and Portland's environment/livability. [ ]

<b>ODOT I-205 Toll EA - RECORD #998 DETAIL</b>
--

**Submission Date :** 2/25/2023

**First Name :** Z

**Last Name :** Pratchett

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** An additional third lane of traffic to the seven miles between Stafford Road and Abernethy Bridge will not reduce traffic bottlenecks/ease congestion or increase safety. Study after study has demonstrated induced demand is not a viable means of determining how roadways should be used. Continuing to push car-centric changes to roadways in Oregon does nothing to combat climate change. Focus on increasing safety and resources for public transit, biking, and pedestrians.

**ODOT I-205 Toll EA - RECORD #999 DETAIL****Submission Date :** 2/25/2023**First Name :** Jodi**Last Name :** Lee**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I live in West Linn off of highway 43. I am also a single mother who works in Clackamas. I will be unable to access 205 without paying a toll. This will clearly have an impact on my finances. The only way through without a toll would be to go through Oregon City. While Oregon City will not be able to handle additional traffic, that is what many people will do.

**ODOT I-205 Toll EA - RECORD #1000 DETAIL****Submission Date :** 2/24/2023**First Name :** William**Last Name :** Lewental**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I moved to Oregon from the state of New Jersey. Tolls do not decrease traffic. Tolls are an unfair tax on working class people. Please just fund public transportation. It has been shown time and time again to decrease traffic. We already pay enough taxes, there should be funds to do any projects the DOT wants. NO TOLLS!

**ODOT I-205 Toll EA - RECORD #1001 DETAIL****Submission Date :** 2/24/2023**First Name :** Rennie**Last Name :** Muzii**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The proposed toll locations unfairly affect the residents of West Linn. It will straddle the 10th street exit adding significantly to Old Willamette and the Oregon City traffic patterns which are already significantly bottlenecked during rush hours. It Will disproportionately financially affect residents of West Linn as there is no other way to get to 10th street without paying a toll. The proposed improvements allegedly benefit more communities than West Linn yet our community will pay most of the tolls. Finally there is a \$1 Trillion Infrastructure Bill, why not get the funds from the Federal Government.

**ODOT I-205 Toll EA - RECORD #1002 DETAIL**

**Submission Date :** 2/24/2023

**First Name :** Lynn

**Last Name :** Fredricks

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I do not know if I know any person that supports tolling in Oregon. You've seen it, but ignored it. Be aware that those that promote it will be remembered and voted out of office. Find another way.



**ODOT I-205 Toll EA - RECORD #1003 DETAIL**

**Submission Date :** 2/24/2023

**First Name :** Ben

**Last Name :** Misley

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls are not used or common in Oregon - please do not introduce a new form of taxation to our state. Please don't let this come to fruition and become the new normal. I do not want to live and work in an area or state with tolls and suggest finding another way to pay for the improvements. Is no part of the bipartisan infrastructure money going to this? Are there not other methods to pay for this? It is my belief that people would prefer paying in another way (gas tax, renewal fees, getting less of a kicker, etc), if ultimately they have to pay one way or the other. They would choose no tolls. Please find another way. It will now cost our family money to visit other family across the river, to go to church on Sundays, and see friends. People's communities and social circles are not confined to the cities in which they live. If family helps to watch our young children for childcare, it will now cost money to do so. Date night is already expensive (and too rare, haha). A toll is a tax that will discourage these activities. Plus, if electric cars are the future, does it matter as much if people are driving? People still have to get around to places. I honestly think a lot of people would rather sit in traffic than pay a toll, to be honest. I also am concerned about the impact to low income communities. These tolls could be a greater burden to those with lower incomes. Overall, I fundamentally disagree with tolling and suggest ODOT and the state find other mechanisms of funding. Please do not let tolls become the new normal in Oregon. Please find another way. I am also concerned about the negative impact to the downtown Oregon City area, one of the best main streets in America. A toll is a tax that discourages people from traveling across the river, which will impact people going to restaurants and establishments not on their side. Our communities are very much interconnected. This will hurt small businesses.

<b>ODOT I-205 Toll EA - RECORD #1004 DETAIL</b>
---

**Submission Date :** 2/24/2023

**First Name :** Janet

**Last Name :** Nelson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I don't believe toll fees will be used efficiently by the state or any other designated recipient. More taxation is NOT a solution to your problems.

**ODOT I-205 Toll EA - RECORD #1005 DETAIL**

**Submission Date :** 2/24/2023  
**First Name :** Kathie  
**Last Name :** Halicki  
**Affiliation :** Willamette Neighborhood Association President  
**Submission Method :** SurveyMonkey  
**Q3. Comments :** The traffic rerouting from 205 through West Linn, so not pay toll, cuts through the Willamette Neighborhood. There will be a new middle school on Willamette Falls Dr. thus also increasing traffic. Tolling will effect our livability, real estate prices, natural habitat, noise and air pollution. Since there is no other way to circumvent the tolling, but to go through our neighborhood, please do NOT institute tolling. This will affect the 6,000 members of our neighborhood.

**ODOT I-205 Toll EA - RECORD #1006 DETAIL****Submission Date :** 2/24/2023**First Name :** Susanne**Last Name :** Carlberg**Affiliation :** local business**Submission Method :** SurveyMonkey

**Q3. Comments :** My husband and I own and operate a local agritourism business which derives much of its income from visitors who use the I-205/Abernethy Bridge to reach us from West Linn, Lake Oswego, Tualatin, Tigard, West Portland, Beaverton and beyond. In most cases, this will require travel across two bridges now proposed for tolling. As a 20+ year-old business with hundreds of travelers (annually) using the I-205 route currently to reach us on weekends, we fear that this added expense will severely curtail travel to our destination with significant economic impact (loss.) We would appreciate consideration of exemptions, i.e. no Saturday/Sunday tolling, to avoid this impact on recreational travel and our region's burgeoning destination economy here in Clackamas County. Thank you!

**ODOT I-205 Toll EA - RECORD #1007 DETAIL****Submission Date :** 2/24/2023**First Name :** Dianne**Last Name :** Roland**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I feel tolling without an expiration date leaves open endless increases to the road users. Also it is a hardship to low income workers who have to use these corridors for work and appointments. Even middle income people will feel the effect. I feel with the federal money available along with state funds, a solution can be found without tolling during these inflationary times. As people use other roads to avoid the tolls this just puts additional pressure on surface and state highways- ie. Hwy 213 and downtown Oregon City.

**ODOT I-205 Toll EA - RECORD #1008 DETAIL****Submission Date :** 2/24/2023**First Name :** Geriann**Last Name :** Courtney**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I feel this toll (which hasn't even been determined yet) puts an undue burden on those living in the surrounding areas. It's like we are being punished for living in these communities. Now, when going to the airport, we will have to pay four tolls just to pick somebody up, or us go ourselves. Of course, people could choose to go I84, which will increase traffic along this freeway. You are forcing people an additional cost to go to work everyday, to go to doctors appointments, and to go to church on Sundays. I just feel that this is an unfair TAX added to the community. Also, I know people are going to try and get around these tolls, which is going to put added traffic onto roads that are not equipped to handle that kind of traffic. I feel this is something that should have been voted on.

<b>ODOT I-205 Toll EA - RECORD #1009 DETAIL</b>
---

<b>Submission Date :</b>	2/24/2023
<b>First Name :</b>	John
<b>Last Name :</b>	Wood
<b>Affiliation :</b>	Purple Communications Inc
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	tolls on the bridge connecting WA and ORegon would be devistating for many who work in both WA and Oregon. This is another way to take money from the American worker. Why not fix the roads or pay for our tires? Why not consider people who drive to allow access for essential resources across the bridge. For myself, and many other military, we are sick of this kind of control taking from our pockets.

**ODOT I-205 Toll EA - RECORD #1010 DETAIL**

**Submission Date :** 2/24/2023

**First Name :** Donald

**Last Name :** Perman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is not fair to collect from the selected few that use this stretch of highway . You will double the traffic on 99E through Canby that is already too busy. Why not increase the gas tax so all pay for all our roads. Electric owners pay through PGE and all pay. This is wrong to select a few. Why was highway 217 not the first to have a toll ? Its much worse then this stretch of 205. Please answer why



<b>ODOT I-205 Toll EA - RECORD #1011 DETAIL</b>
---

**Submission Date :** 2/24/2023

**First Name :** John

**Last Name :** Doe

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I will drive around the tolls or have my plate blocked. This is BS

**ODOT I-205 Toll EA - RECORD #1012 DETAIL**

**Submission Date :** 2/24/2023  
**First Name :** Ben  
**Last Name :** McKinley  
**Affiliation :** homeowner  
**Submission Method :** SurveyMonkey

**Q3. Comments :** I am very concerned about the following: - Impact on local streets as drivers seek to avoid tolling. I live on HWY 43 in West Linn. This is a woefully underfunded stretch of ODOT road that will be further stressed as drivers seek to avoid tolls. How will you address this new problem that is stacked on top of an old problem that time and again has been deprioritized by ODOT? Stafford from Hwy 43 to i205 is another road that has been under invested in. While it got repaved in the last couple years, there is no shoulder and its terrifying for cyclist. With more traffic will come more problems. - I am very worried about how fees will be levied and where that money will go. I have no interest in being the guinea pigs that over fund a system that does not exist. I have no interest in being a funding source for other projects or bloat. - I am worried about how these fees will impact commuters that both make low wages and have little no flexibility in when they are forced to commute for work or school. There seems to be an equity issue here that deserves lots of thoughtful attention. Finally, how did construction begin on this major project BEFORE funding was sorted out? This feels like a major problem as pressure is high and tensions are mounting. I would recommend against this cadence in the future. It erodes public trust in a time where we drastically need 'bridge building.' :)

**ODOT I-205 Toll EA - RECORD #1013 DETAIL****Submission Date :** 2/24/2023**First Name :** Heather**Last Name :** Williams-Downing**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I live in Gladstone and my kids go to school in West Linn. Driving back and forth daily about 10 times a day if there is a toll it will financially impact me simply trying to get across the river. The ORegon City bridge is not an option. It is already totally overwhelmed and can not handle more traffic

**ODOT I-205 Toll EA - RECORD #1014 DETAIL**

**Submission Date :** 2/24/2023

**First Name :** Melissa

**Last Name :** Juenger

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Further analysis needs to be done to consider how cars will use other roads to avoid tolls in the Willamette Drive and Stafford road neighborhoods - there is already a large amount of traffic in these areas preventing and delaying homeowners from entering roadways with the addition of tolls this will increase the traffic on these roads. With the addition of Athey Creek middle school on Willamette Drive the traffic will also be increased. Adding more traffic to these roads creates a dangerous situation for pedestrians who are choosing to use THEIR community walkways along these routes. Please reconsider tolling - this is negatively impacting and penalizing our community.

<b>ODOT I-205 Toll EA - RECORD #1015 DETAIL</b>
---

**Submission Date :** 2/24/2023

**First Name :** Laine

**Last Name :** Ewry

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling I205 will cause significant impact on many families already struggling financially. The taxes in Oregon are already too high. Use the money you already are taking from us.

<b>ODOT I-205 Toll EA - RECORD #1016 DETAIL</b>
---

**Submission Date :** 2/24/2023

**First Name :** Craig

**Last Name :** Natvig

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Don't do toll roads, especially on Interstate highways!

**ODOT I-205 Toll EA - RECORD #1017 DETAIL****Submission Date :** 2/24/2023**First Name :** Kristin**Last Name :** DeBisschop**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The monthly cost to our family will negatively impact both my husband and I because we live in west Linn and work in Milwaukie. This will force us to move from west Linn or find another route that will take longer to get to work on smaller one lane roads. Willamette falls drive traffic is already bad and will get worse and same for hwy 43 either going to lake Oswego and over sell wood to get to Milwaukie. If we are going to toll whatnot toll the bridges of those coming and going on I5 and I205 over to Vancouver, WA.

<b>ODOT I-205 Toll EA - RECORD #1018 DETAIL</b>
---

**Submission Date :** 2/23/2023

**First Name :** Laura

**Last Name :** Gano

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We live off Pattulo Way near the Shipley Bridge. My family is concerned about increased traffic on Stafford Rd from people trying to avoid tolls. Stafford already feels unsafe with very minimal / no sidewalks or bike lanes, and the unsafe intersections at Johnson Rd as well as Childs Rd. I would like safety improvements of Stafford Rd to be considered during this analysis.



**ODOT I-205 Toll EA - RECORD #1019 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** Robin

**Last Name :** Socherman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am against tolling. My understanding is that enough federal dollars have been provided to fund this project. Tolling will open the door to more tolls throughout the state. We don't need tolls. Families don't need another financial burden. The blue collar town of Oregon City will be especially hard hit. I am also very concerned about how tolls will impact our community as far as drivers diverting onto local roads to avoid tolls. Rosemont Road and Hwy 43 will be especially impacted and these roads were not designed to carry traffic. I worry that the Stafford area will be overrun with cut through traffic.

**ODOT I-205 Toll EA - RECORD #1020 DETAIL****Submission Date :** 2/23/2023**First Name :** Bruce**Last Name :** Bohman**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Tolling isn't justified by making seismic improvements to bridges, nor the third lane for 7 miles of 205. This is just another tax that will never be lifted of course, but will probably be gradually increased. Oregon's governor and legislature never sees a tacit doesn't like, more money for them to burn up.

**ODOT I-205 Toll EA - RECORD #1021 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** Shannon

**Last Name :** Hofeld

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am concerned about the impact it will make on surface roads by people trying to avoid the tolls. There are no good bypass options. This may impact school busses and children waiting for them. Increasing danger to our children. The I agree that these things do need to be improved but our surface roads are not being maintained well enough for increased traffic on them. Also the tolls will impact workers who have no choice but to travel the freeway. They also don't have a choice as to when they go to work so increasing toll cost during prime time is a further burden. I would like to see our funding come from somewhere else like the lottery funds or our very high gas taxes. Another thing you have not mentioned what the toll costs are going to look like .

**ODOT I-205 Toll EA - RECORD #1022 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** Kelly

**Last Name :** Wilson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Do NOT do tolling. I would hate driving I-205 and being tolled. And the cost would prohibitive. Long gone are the days of \$0.25 toll. I expect that you might easily charge \$5 or \$10, or more per trip. \*If\* you do tolling, I fear that it will be around permanently. You should not do tolling. Ever. There other budgetary means to pay for the cost of your projects. Look for them. Find them. You should NOT do tolling.

**ODOT I-205 Toll EA - RECORD #1023 DETAIL****Submission Date :** 2/23/2023**First Name :** Kerri**Last Name :** fiero**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Just stop the project it will do more harm than good and our Gov. does not use the funds for what they say they will. Tolling on 205 not fair to Oregon city residents at all. Streets are already bogged down clogged up and there are a few thousand Apartments and low income apartments being built on those bogged down roads 5 consecutive traffic lights to get through the one light at 213 to get across it. and no road improvements already and more apartments and homes being built other places also. so you want to add all the traffic getting off highway to avoid toll area. 2 rivers we cant get across to go anywhere you have us boxed in we don't have shopping other than Fred Meyers and wont be able to get to even Clackamas in timely manner already takes 30-45 Min's one way back log will effect busses, county workers police fire ambulance and more as there be huge amount of overflow people trying to avoid polls and only a few roads to use Traffic will be horrible and cause big delays and emergency vehicles to be slower and get back logged also county and State workers. and you want us to pay the toll also if we get on Highway. it only way across the river except the bridge down town Oregon city that gets all blocked up already and is just 2 lane blocks up down town and parts of west linn but you want to add to that. The area you picked is not appropriate with the rivers there and such small roads in Oregon city. It will cause a bottleneck accidents and so much frustration you will be trapping those who live in Oregon city. I have lived here 30 years. and don't like all the apartments going in and that Oregon City has no real shopping a motel we are not as a town equipped to handle this our roads are already filled. Just so very wrong Toll roads dont work anywhere else why do you think they will work here you are wasting more money on doing it than should be and did not make necessary road enhancements and you did not take our livability into consideration. I would move if I could but I'm disabled and Can not physically do what it takes to move nor can I afford to hire people to do it for me. and just going to doctor will cost me \$8 to go one exit and back really 1/2 on highway. That is just so very wrong. i dont even leave Oregon city. and the small bridge is always backed up as it is. It will cause people their jobs by being late due to traffic issues in our town more crime more accidents and First responders not able to get to them as our roads cant handle the added traffic and the huge influx of people. The added costs and problems will cause more homelessness, More crime when we have little police or law and order, and cause more anger outrage and frustration. The State is causing more problems to their people than good. I am so against 205 being a toll road and really believe you did not take the residents Of Oregon city being trapped into consideration. at least give us free tolls. as your toll road will cause us so many problems and heartache just with the traffic coming in our town to avoid the toll, as well as added time loss in our schedules. you Will be ruining lives already having to work 2 jobs to make it and cutting out any real family time by just adding even more travel time. Just so very wrong. Obviously the People in this area do not matter to Our Leaders or Our Government. Use a trap to get more tolls and Harm the residents that live near by. Just so very WRONG.

**ODOT I-205 Toll EA - RECORD #1024 DETAIL**

**Submission Date :** 2/23/2023  
**First Name :** Anna  
**Last Name :** Spivey  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #1025 DETAIL****Submission Date :** 2/23/2023**First Name :** Michael**Last Name :** Noble**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** There is no place for permanent tolls on Oregon Highways. I was born in Oregon over 80 years ago, we have had tolls on bridges, then removed when the bridge is paid for. If you want to repair a bridge or two on 205 float a toll for a certain amount until that work is paid for, then remove the toll. Oregon is not California, not New York, Not even Washington. Leave Oregon alone, go back where you or your father came from. Being an Oregonian is a state of mind, not just being born here. If your parents were from another state you were raise with their values and beliefs.

<b>ODOT I-205 Toll EA - RECORD #1026 DETAIL</b>
---

**Submission Date :** 2/23/2023

**First Name :** Lisa

**Last Name :** Robinson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The impact to surrounding cities/neighborhoods in regards to confetti on side streets to avoid toll. The economic impact on suburbs who are also taking the impact of increased traffic in their residential neighborhoods



<b>ODOT I-205 Toll EA - RECORD #1027 DETAIL</b>
---

**Submission Date :** 2/23/2023

**First Name :** Michael

**Last Name :** Burke

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** These tolls are going to make already bad traffic on Stafford, highway 43 and Willamette Falls drive unbearable. In particular, the intersection of Willamette Falls Dr and Willamette Dr in West Linn will make regular traffic between Oregon City and West Linn either impossible or expensive.

**ODOT I-205 Toll EA - RECORD #1028 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** Dave

**Last Name :** Williamson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Another tax on an already burdened taxpayer. You should all be ashamed of yourselves for implementing this during the worst time for all of us. Cut pay, cut jobs and expenses before you toll us. You'll just find more ways to waste money like your department already does. Piss on all of you

**ODOT I-205 Toll EA - RECORD #1029 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** Hal

**Last Name :** Payne

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** If the tolls are to finance future construction and improvements to I205 why won't the tolls be removed once the improvements are paid for? The proposal will hurt me tremendously since I am a senior citizen on a fixed income. Why are tolls not being proposed for the new construction on 217?

**ODOT I-205 Toll EA - RECORD #1030 DETAIL****Submission Date :** 2/23/2023**First Name :** Anna**Last Name :** Southards**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I live in the Willamette neighborhood off the 10th Street exit. Over the last 10 years there is a great deal of traffic taking the back roads (Stafford Rd and Borland) because they are trying to avoid the traffic on I205. I know this project will widen I 205, which will improve traffic issues, but I don't understand why there has to be tolls. I fear people will continue to take these back roads to avoid the tolls. Oregonians currently pay inflated taxes. People are downright angry about our high taxes. Use this tax money to pay for the project.

**ODOT I-205 Toll EA - RECORD #1032 DETAIL****Submission Date :** 2/23/2023**First Name :** Stephen**Last Name :** Lawson**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** 1. I haven't seen any comprehensive information regarding how the money collected from such tolling is to be spent. 2. People are likely to use residential streets to economize if tolling is enacted. This would have a detrimental effect on quality of life for those affected. 3. I am very skeptical that tolling will decrease traffic or improve safety. 4. Tolling will not transfer traffic from cars/trucks to bicycles or walking. 5. People will continue to use cars for the foreseeable future. Electric vehicles will eventually replace gasoline-powered vehicles, but traffic will inevitably increase as the population increases. This is also the reason that allowing massive apartment buildings without adequate parking is foolhardy. People won't ride their bikes or take the bus to the grocery store in the rain or herd their kids onto buses to go to after-school sports.

**ODOT I-205 Toll EA - RECORD #1033 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** Katelyn

**Last Name :** Heffernan

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I would like to see how ODOT plans to handle diversion to local streets and communities avoiding the toll on the 1-205 bridge. Specifically, the Oregon City & West Linn bridge as congestion on this bridge is already an issue and will increase. When will the tolling project end? This toll has a specific purpose in which the tolls are to be used for. There needs to be a defined timeline on when tolling will cease and clearly communicated. If not, how will Oregonians know what Net Revenue came from the tolling project went to the Keep Oregon Moving Fund which was advertised to Oregonians for congestion-reducing projects, road and bridge improvements, and transit projects around the state. We already voted for this fund and you received 5.3 billion when it passed. Tolling should not be a revenue stream for a bill that was passed years prior that citizens were and currently taxed on, specifically, to avoid tolling.

Can you provide your research on how tolling will reduce congestion on I-205? The expansion of I-205 itself improves the congestion, which should of been included in the \$5.3 billion as put forth in the bill. If tolling worsens the congestion, who will be held liable? Why did you wait till 2020 during a pandemic to reach out to Oregonians about tolling? Discussion on tolling started when HB 2017 passed, but took 3 years to address it with the public. This appears that officials took advantage of Oregonians in a vulnerable state to push this objective. Only receiving 4600 comments on this should of been a big red flag to anyone administering these public engagements.

<b>ODOT I-205 Toll EA - RECORD #1034 DETAIL</b>
---

<b>Submission Date :</b>	2/23/2023
<b>First Name :</b>	Stephen
<b>Last Name :</b>	Lawson
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Corvallis

**ODOT I-205 Toll EA - RECORD #1035 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** Chris

**Last Name :** Cunningham

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** 1. What has been accounted for from the local impact to the small community that this who will avoid the toll be causing on the already congested side streets. 2. What us to stop the funds that are generated and earmarked for the improvement of this stretch of the road being spent on other projects. Who is to be monitoring the funds and how are they spent. Will it be a 3rd party agency that has no association with the state?



**ODOT I-205 Toll EA - RECORD #1036 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** David

**Last Name :** McNeel

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** In reviewing the projects stated outcomes it is clear that your analysis is terrible flawed. Trip times will Never be reduced due to constant growth in the metro area. Diverted traffic modeling is a myth with no substantiated real time data or modeling or project solutions. Once again this is ODOT at it's worst. The entire project team needs to be fired and criminal charges referred to the attorney generals office for prosecution.

**ODOT I-205 Toll EA - RECORD #1037 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** Joanne

**Last Name :** Houseworth

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling I-205 will adversely impact all of us who live in the area. The thousands of drivers who take the side streets to avoid the tolls will devastate our communities. Please take that into consideration. Seriously, please.

<b>ODOT I-205 Toll EA - RECORD #1038 DETAIL</b>
---

<b>Submission Date :</b>	2/23/2023
<b>First Name :</b>	David
<b>Last Name :</b>	Dick
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	What part of no tolls don't you understand!!

**ODOT I-205 Toll EA - RECORD #1039 DETAIL****Submission Date :** 2/23/2023**First Name :** Erik**Last Name :** Daniels**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** While the tolling may be marginally successful in reducing some traffic during peak traffic hours, drivers WILL find their own detours through adjacent residential areas, increasing local congestion and creating substantial pedestrian safety issues and negatively impacting the liveability in these areas. The main congestion points on I-205 are because of a reduction in traffic lanes between Stafford Rd and Gladstone as well as inadequate on ramp/off ramp length, and there is ample room along most of that stretch for the addition of lanes of traffic. It's obvious ODOT's priority is to create a hostile driving environment to dissuade people from driving their cars and not to give people what they want: to be able to drive when and where they want with the least amount of delays. Quit trying to force people to live in some utopian vision where people all bike or take buses. That's not what we want nor is it viable for most people

**ODOT I-205 Toll EA - RECORD #1040 DETAIL****Submission Date :** 2/23/2023**First Name :** Micheal**Last Name :** Johnson**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am most concerned that the tolling project hasn't been put to a vote of the people. Considering that Oregon hasn't had tolling for some time and this could be a large financial burden to the regular users of the road I firmly believe that a vote of the people should be taken. I feel it would be more palatable to users if the people approve it in a vote first. I am curious as to why a vote hasn't been put forward, but my thought is that the project managers know that people would likely not approve it in a vote.

**ODOT I-205 Toll EA - RECORD #1041 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** No

**Last Name :** Way

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Stop with your environmental and social justice BS. The second you slap a higher toll on whitey is when the lawsuits will fly. Go toll the bridges to WA if you want "equitable" payment for road use.

**ODOT I-205 Toll EA - RECORD #1042 DETAIL****Submission Date :** 2/23/2023**First Name :** John**Last Name :** Phillips**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Well, first of all, this is the dumbest idea I've ever heard. This should be voted on by the public. And I would imagine that metro is behind all this BS, and I hope that at some point people come to their senses. Because all this is going to do is force people to drive on surface streets. There are many other ways to get where you need to go without going on the freeway. It may take longer, but it will be much cheaper and of course, these left-wing liberals only know how to tax people to death and then they never get the results that they're looking for. I believe that metro is just another useless level of government that should be done away with. They have no purpose whatsoever.

**ODOT I-205 Toll EA - RECORD #1043 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** Greg

**Last Name :** Ankofski

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** No one in Oregon wants tolling and with the new Federal funds that poured in during the pandemic (124 MILLION DOLLARS) which were earmarked SPECIFICALLY for highway improvement, WHY does ODOT continue to ram tolling down our throats??? Lastly... my property borders ODOT property on I-205. Instead of putting a wall up BY THE FREEWAY, they FORCED US to choose between a 20 foot wall at our property line (basically imprisoning us) or nothing. Then they try to tell us that a wall near the freeway would not be effective. REALLY? I have a degree in Chemistry with plenty of physics classes at Michigan State University and not ONLY can I prove that wrong but I'm also considering a class action lawsuit against ODOT if the noise levels get out-of-hand. This whole project is being railroaded down our throats with NO citizen input being taken seriously!!! Well make note of my comments because we aren't going to take it laying down, I can assure you!



<b>ODOT I-205 Toll EA - RECORD #1044 DETAIL</b>
---

**Submission Date :** 2/23/2023

**First Name :** Talia

**Last Name :** Arthur

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling should be put to a vote so citizens can choose whether this proceeds or whether funds should be found elsewhere.

**ODOT I-205 Toll EA - RECORD #1046 DETAIL****Submission Date :** 2/23/2023**First Name :** Kaia**Last Name :** Zednick**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** My comment on the effects of the transportation system- If a commuter doesn't want to pay for the tolls and they're traveling south, they will get off on the Oregon city exit. This means the traffic turning left onto Mcgloughlin to get to the Oregon City Arch bridge is going to be piled up starting on the off ramp. Then the commuter has to turn left and then right to Main st. to get on the bridge. Which already is a huge mess from 2-6pm everyday. This means it will be WAY more backed up. Then commuters have to deal with an extremely narrow bridge to cross to get to Willamette Falls drive which is already a huge mess everyday from 2-6 as well. Then, they travel down through Old West Linn Willamette and are met with the usual back up there as well. Then run into a NEW middle school off of Borland which creates even more of a back up. It's a trickle down effect just to avoid paying the ridiculous amounts for a toll that we didn't even get to vote on as a community. Supposedly we already pay for the roads with gas taxes and higher fees for DEQ and stickers. Does that mean that our gas taxes and sticker fees will go down? And what about when we "pay off" the bridge work and new lanes from the tolling? Will you stop tolling us? Will it be a tax write off? I would rather have my taxes slightly higher to pay for the bridge and widening rather than suffer through huge amounts of congestion in local neighborhoods to avoid paying the daily toll. Please consider having a toll- free lane on the highways. My dream is to buy a house in West Linn. This project is affecting my decision to buy a home because of all the points I just made.

**ODOT I-205 Toll EA - RECORD #1047 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** Jessica

**Last Name :** Garstka

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I live in West Linn. I am curious why this toll tracker is proposed to be installed after the Stafford Exit. Having an option for drivers to deviate to skate the toll only causes more traffic congestion on the side streets and rural roads leading into West Linn and Lake Oswego. Also for residents along this stretch of tolling do they get a cost discount since many of the drivers in the area code 97068 use this stretch of 205 several times a day. If the toll fees fluctuate residents to see a daily cost of almost \$10 per day leading to over \$300 per month on tolls. We have lived in other areas that have the flat rate all days and all times. We also received a discount pass because we lived in that specific area. I think residents of the area would be more likely to support a toll if area residents could receive discount for living in the area and if the rate stayed standard like \$1.50 toll fee

**ODOT I-205 Toll EA - RECORD #1048 DETAIL****Submission Date :** 2/23/2023**First Name :** Kelsey**Last Name :** Farabee**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I would like to see an explanation of what viable public transportation alternatives exist in the potential tolling area. To my knowledge there is no rapid highway bus system on 205 or lightrail access available in the communities most impacted by the proposed tolls, creating an inequitable burden on communities that have no viable commute alternatives. The proposed tolls will further push traffic onto already overcrowded surface streets like Willamette Falls Drive and Salamo Road. I am optimistic that the project will improve the hazardous current conditions at the intersection of Wilamette Falls, Wilamette Drive and the 205 on/off ramps near the Arch Bridge.

<b>ODOT I-205 Toll EA - RECORD #1049 DETAIL</b>
---

**Submission Date :** 2/23/2023

**First Name :** Amy

**Last Name :** Crooks

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The communities of West Linn and Oregon City are closely tied with lots of people working, schooling or churching in one town and living in the adjoining one. I would like the opportunity to buy a household annual pass for the i205 toll that allows limitless travel back and forth between these two towns. I pop back and forth because I volunteer with a local non-profit on the other side of the river. An annual pass would allow me to continue to serve as often as I am needed.

<b>ODOT I-205 Toll EA - RECORD #1050 DETAIL</b>
---

**Submission Date :** 2/23/2023

**First Name :** Robert

**Last Name :** Betschart

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** congestion tolling is just an excuse to raise money. It is a backwards way at looking at the future need for growth and road improvements. In reading your report it appears it does not matter what the people say as it is already been decided. It's been decades of wasted money just trying to get the I 5 bridge built. I do not trust you.

<b>ODOT I-205 Toll EA - RECORD #1051 DETAIL</b>
---

**Submission Date :** 2/23/2023

**First Name :** Diane

**Last Name :** Cornelius

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I would like residents of 97068 zip code to be excluded from tolling. There is no way for us to avoid multiple daily tolls for things like doctor visits, grocery shopping, Home Depot, Costco, etc. And toll avoiders will be cutting through our neighborhoods, increasing traffic on local roads.

**ODOT I-205 Toll EA - RECORD #1052 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** Tyler

**Last Name :** Stone

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I would like to see a "no-toll" option on the highways. I believe a no-toll option is the most equitable alternative to tolled roads, as it gives all travel participants the option of not paying the toll for a variety of reasons. I think tolls should only provide the option of traveling in specified fast lanes that provide a true benefit for paying an extra cost. We have already paid for these roads and bridges and therefore there should absolutely be a no-cost alternative for those that travel these roads and pay high taxes and fees in this state/region. A no-toll option would (1) alleviate cost burdens on many residents; (2) encourage less diversion to local roads; (3) provide true choice to residents (pay more for less traffic, or don't pay for regular flow). I do not understand why this option is not at the top of list of considerations for this project. It serves all constituents fairly and equitably to have a no-toll lane(s) as an alternative to tolls and this model has been used in other states with dedicated "fast lanes."



**ODOT I-205 Toll EA - RECORD #1053 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** Rachel

**Last Name :** Tillman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The inequitable effects on local communities has not been adequately explored or the impacts would have stopped decision makers in their tracks. The entire community of families and individuals who rely on public transportation for work and school will be adversely impacted as their busses and carpool will be slowed down due to a huge increase in cars on 43 and other feeder streets to 205. People will be late to work and lose their jobs. You CANT say "take an earlier bus" because these workers are also parents who must wait with their young children until school busses pick THEM up for school. If this goes through, children WILL be left at home TOO YOUNG and will be left catching busses ALONE. This is life threatening and not acceptable. Further those THAT DO drive will be negatively impacted by the tolls. Not everyone impacted will meet the threshold for free passes (if there even is such a thing) and this will keep these communities captive and unable to leave without spending more gas \$ to bypass 205. Any way you look at it, this Tolling is inequitable and will create undue burden on the communities nearby

**ODOT I-205 Toll EA - RECORD #1054 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** Darin

**Last Name :** Ingram

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Toll roads without a vote of the people is not helping local communities. What is the plan to address traffic avoiding tolls? Tolls will hurt the low and middle classes, who need the freedom to move the most.

**ODOT I-205 Toll EA - RECORD #1055 DETAIL****Submission Date :** 2/23/2023**First Name :** Tom**Last Name :** Spivey**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** We live in West Linn on a fixed income and believe that the tolling will disproportionately impact our finances. These tolls will force us onto surface streets, which will greatly increase neighborhood traffic. These tolls are NOT needed and must not be implemented. You will reap severe unintended consequences from this poorly-considered plan.

**ODOT I-205 Toll EA - RECORD #1056 DETAIL****Submission Date :** 2/23/2023**First Name :** Allison**Last Name :** Cook**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** You're taxing a specific area for something that the state did without proposing any other options. I am completely opposed to this. It will cause more traffic in other areas due to people avoiding tolls, which takes away from time with our families because we have to spend more time Commuting.

**ODOT I-205 Toll EA - RECORD #1057 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** Bryan

**Last Name :** Mumford

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** These road/bridge project initiatives are capable of being funded without the need for a toll. Oregonians are already grossly over taxed on our fuel, licensing, titling, etc. If implemented this toll would be an additional financial burden on families who are already feeling the weight of inflation and a looming recession. Please find another way to get this funding!

<b>ODOT I-205 Toll EA - RECORD #1058 DETAIL</b>
---

**Submission Date :** 2/23/2023

**First Name :** Alena

**Last Name :** Kerkmann

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I live in the Canby community. This project is going to implode an already overworked Street system of Hwy 99e. The current ecosystem of roads are already maxed out, take out a major roadway because of the added cost to drivers and the disruption will be major. You are taking one issue and trading it in for another all for the sake of money.

**ODOT I-205 Toll EA - RECORD #1059 DETAIL****Submission Date :** 2/23/2023**First Name :** Anthony**Last Name :** Vitro**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The improvements would be welcomed, as most highway projects in Oregon are, but the tolls are an unfair burden to the local community in and around the West Linn / Willamette area that relies on 205. Most daily tasks for residents here require frequent 205 travel, and with this toll system in place, I'm concerned people will take longer surface streets instead of the highway - increasing the already bad congestion on these roads, creating larger environmental concerns through increased commute times, and doing the very opposite of what the 205 improvements are looking to remedy. Please make the required safety and congestion improvements as you have with other Highway projects in the state without placing an unfair burden on the residents that live along the proposed toll area.

**ODOT I-205 Toll EA - RECORD #1060 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** Christen

**Last Name :** Murray

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** You are implementing a toll on a community who has limited options to leave there home for not resources. Anytime I leave West Linn I will have to pay a toll. This will impact me financially and many others in our community. The traffic that will increase on our community financial cost to the city to repair roads. I pay enough in taxes I should not be tolled to go to work or have to reroute myself in mass traffic congestion in west Linn while people try to avoid the section that is tolled. This toll is a abuse of power and lack of competence on the states part for not spending tax dollars properly. You have the funds use they as they were intended.



**ODOT I-205 Toll EA - RECORD #1061 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Bill

**Last Name :** Monroe jr

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I'm gonna keep this reallllllly brief here. Because, well- frankly, you made such a LONG winded pitch above in trying to come up with some not-so-compelling reasons why your "assessment" of tolls for 205 are needed, that a simple answer is warranted by members of the public like myself so you can be ABSOLUTLEY clear how we feel out here..... NO TOLLS on 205. Period. End of story. We pay SO much in taxes as is already. This is just ANOTHER way to tax us. Very unfairly. The fact YOU messed up throughout the years and couldn't figure out the fact that you screwed your HUGE budgets up, DOESNT MEAN that we have to make up for it now with tolls. Plz listen when we say NO tolls. NO. NONE. ZERO. The end. Thank you.

<b>ODOT I-205 Toll EA - RECORD #1062 DETAIL</b>
---

**Submission Date :** 2/22/2023

**First Name :** Ken

**Last Name :** Virgin

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Forces every local resident to take back roads (increasing road traffic in areas not designed for heavy traffic) and doesn't solve any traffic related issue, this is just another tax

**ODOT I-205 Toll EA - RECORD #1063 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Steve

**Last Name :** Vaughn

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The "value price" suggestion is marketing bs. Thw decision is to charge more money when more people are on the roads. People don't all wake up and think, I'm going to go for a drive at 7:30, they are on their way to work. Then, at the end of the day, they don't think, hey, I'm going to go for a drive at 5. They are coming home from work. Those who are less likely to be able to change their work schedules ro avoid high traffic volume, and high toll rates are the people with the lowest amount if disposable income, it is a tax on the poor and unacceptable. I chose to live here because of the traffic and the underdeveloped of roads like Stafford amd Willamette Falls Drive. If I wanted to live somewhere with high rates of development and roads pushed to their limits I'd move to Happy Valley. These roads are now going to be our only option to get to Wilsonville or Tualatin, it will move traffic from the designed high capacity lanes to tbe secondary and tertiary routes which is backward progress. We need the freeway to be the first option. Third, if you think adding a lane is going to help, you're delusional. Is nobody looking at the building going ok? We need to design this road for 40 years from now, not for 5 years ago. Build 4 lanes through WFD. It is a bottleneck at the basalt cliffs, so, build a bypass bridge so you don't need to widen the freeway and destroy Camasia wildlife preserve, the north and south lanes can cross over each other. And, if you uavent figured this out, mergin is where 95% of traffic starts to slow down. Start teaching people how to use the designs we are inventing.

<b>ODOT I-205 Toll EA - RECORD #1064 DETAIL</b>
---

**Submission Date :** 2/22/2023

**First Name :** Julia

**Last Name :** Hier

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The transportation analysis needs to consider how these goals will divert traffic from Stafford Road to Rosemont Road and from Stafford Road to Borland Road, along with increased traffic on Child's Road which also merges into Rosemont Road at a very dangerous intersection.

**ODOT I-205 Toll EA - RECORD #1065 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Connie

**Last Name :** Johnson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This will be a disaster for West Linn residents that live along Willamette Falls Drive. Traffic is already clogged during busy times. There are no viable alternate routes for residents to take to avoid the traffic currently it will only get worse. There are also no alternate routes for residents to avoid using the freeway to avoid tolls. My college student son drives to work in Beaverton. Public transportation is not an option. The tolls will take a huge part of his small income.

**ODOT I-205 Toll EA - RECORD #1066 DETAIL****Submission Date :** 2/22/2023**First Name :** Renee**Last Name :** Arias**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I do not support the proposed tolling, specifically for the Oregon City and West Linn residents. Not only will it divert traffic to the smaller bridge across the river between Oregon City and West Linn, but will divert an unmanageable amount of traffic onto the suffering Highway 43. Unless the tolling is scaled back for residents of these two cities, it will be financially untenable for some residents just to commute home.

<b>ODOT I-205 Toll EA - RECORD #1067 DETAIL</b>
---

**Submission Date :** 2/22/2023

**First Name :** Jessica

**Last Name :** Greenleaf

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Adding a toll to the 205 bridge when taxpayers have already paid to build this road is double dipping. It will not help anyone and only hurt the roads surrounding. Forcing those without money to go around. I oppose this proposal. Do not charge us to use a public freeway. It already belongs to us.

**ODOT I-205 Toll EA - RECORD #1068 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Danielle

**Last Name :** Leckband

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am a teacher! I serve my community by teaching its youth. I live in Oregon City and work in West Linn. I will have to pay daily just to go to work and get home. Is this right? NO! You didn't let the public vote on this. The prices are so high. How will you help those folks who are working and living in the toll area. It's just not ok!!!



**ODOT I-205 Toll EA - RECORD #1069 DETAIL****Submission Date :** 2/22/2023**First Name :** Amber**Last Name :** Duncan**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The transportation analysis needs to address the financial impact on families in this area. For me to get to work, I will have to cross two tolls. The financial impact is huge. Local residents bear an unfair burden for this project. Huge taxes are already paid to pay for transportation. If this is truly to cover the cost of the seismic updates, the toll should have an end date, rather than become an endless income for the state.

**ODOT I-205 Toll EA - RECORD #1070 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Curtis

**Last Name :** Keller

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** 205 was installed as a bypass road to divert traffic away from I-5 through Portland and now we planing to install a toll that will help route traffic back through Portland. This makes zero sense. The proposed tolling area would also direct additional traffic through the city of West Linn and place additional financial burden on the community members because our city is the only one that lies between two tolling areas. If additional funds are need to 205 improvements perhaps it is time to tax electric and hybrid vehicle appropriately instead of placing all the burden on diminishing fuel taxes. Or install tolling booths for tractor trailers drivers only this will keep the burden off of locals and pay road taxes with through state traffic. The easy way is not always the right way.

**ODOT I-205 Toll EA - RECORD #1071 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Vince

**Last Name :** Miles

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** from Portland Tribune, Feb. 22, 2023 "He (Finn) said partly due to an increase in EVs and more fuel efficient vehicles, we're seeing the electrification of the transportation system that is helping us reach our climate goals — but is also resulting in hundreds of millions in losses of gas tax revenue annually." State of Oregon and ODOT needs to replace gas tax with mileage tax so that all users contribute.

<b>ODOT I-205 Toll EA - RECORD #1072 DETAIL</b>
---

**Submission Date :** 2/22/2023

**First Name :** Katy

**Last Name :** Hiestand

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am very concerned that this will alienate low income folks. I'm not low income now but I grew up barely over the poverty line. It will have significant impact on people's finances. Additionally, I am currently a home owner off 10th street exit. I believe this will bring additional traffic to Willamette Falls Drive. Finally, we are cyclists. There are not any bike lanes on the majority of Willamette Falls Drive and Ek/Boreland Road, and those two are our main routes out of town. My husband often commutes via bike to South Portland via Trolley Trail and must take WFD to cross into Oregon City. This toll will affect our lives in many ways and I would like our government to reconsider.

<b>ODOT I-205 Toll EA - RECORD #1073 DETAIL</b>
---

**Submission Date :** 2/22/2023

**First Name :** Guy E.

**Last Name :** White

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The tolling plan should consider how homeowners and wildlife on semi rural roads will be irreparably impacted by your plan. Deer and bird life will be greatly disrupted by those attempting to bypass tolls.

**ODOT I-205 Toll EA - RECORD #1074 DETAIL****Submission Date :** 2/22/2023**First Name :** Jan**Last Name :** Tostar**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I think it's horrible and unfair that locals near the bridge that must commute to work and local stores need to pay a toll many of us can't afford. The government has budgeted for upgrades of bridges in a historical incentive, so why not use those funds. It's an interstate highway. Locals shouldn't have to take a huge hit!

**ODOT I-205 Toll EA - RECORD #1075 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Susan

**Last Name :** Wand

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am very concerned and would like to have no tolls because of the congestion it will cause in West Linn neighborhoods, including Salamo Rd, Rosemont Rd & Highway 43 & Willamette Dr. People will not use I205 if they have to ou a toll, they will use the already congested arterials roads including Hwy 43 and create more traffic jams. I think you should put a levy on the ballot & allow a vote.

**ODOT I-205 Toll EA - RECORD #1076 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Patti

**Last Name :** Obana

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** My main concerns are how this will affect traffic on surface roads including Willamette Falls Drive from old town West Linn to the OC Bridge, Rosemont Rd in West Linn, Highway 43 from downtown Portland to the OC Bridge, and every minor road from these alternative roads. And we, the people of West Linn and Oregon City, are the ones who will be severely impacted by this. What are you going to do to mitigate this traffic clusterf\*\*\* that will happen as we try to get to OUR HOMES??? What about those (like myself) who cant absorb another \$100 in expenses but will HAVE to pay since we live in the area of the tolls, and our local surface streets are going to be bogged down by those who try to skip paying...are you going to assist us in any way?? This toll will affect somany people just to line your piggy bank. FIND ANOTHER WAY



**ODOT I-205 Toll EA - RECORD #1077 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Jason

**Last Name :** Osieczanek

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Concerned of increased traffic diverting over Sellwood bridge as many clackamas commuters already use that to cross the Willamette

<b>ODOT I-205 Toll EA - RECORD #1078 DETAIL</b>
---

**Submission Date :** 2/22/2023

**First Name :** Angela

**Last Name :** Patten-Schillinger

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I don't understand how taxpayers can be asked to pay tolls on roads that we have already and continue to pay for, when ODOT employees have a history of and are currently being charged with theft of materials and equipment, and embezzlement. Where is the accounting for those funds and the repayment plan? Those issues need to be handled before the public is asked for MORE MONEY TO STEAL AND MISAPPROPRIATE!?

<b>ODOT I-205 Toll EA - RECORD #1079 DETAIL</b>
---

**Submission Date :** 2/22/2023

**First Name :** Luis

**Last Name :** Alves

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling both bridges effectively cuts off West Linn and Oregon City from the rest of the Portland Metro. I am very concerned local residents will be forced to go through Lake Oswego via hwy 43 every time we need to head to the surrounding areas. i205 is a major access route from our smaller suburb areas to the city and this will greatly reduce our quality of life and, potentially, property values. With a single toll over the Willamette, we at least have the option to take i5 when evaluating options to avoid traffic/toll when heading north.

<b>ODOT I-205 Toll EA - RECORD #1080 DETAIL</b>
---

**Submission Date :** 2/22/2023

**First Name :** Ben

**Last Name :** James

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We live in downtown Willamette and are 1) concerned about additional traffic that is generated by those bypassing tolls. It's tough enough to get home already. 2) My family travels to and from our neighborhood every day and would be subject to multiple trips with tolls. This seems like it would strain our wallets! A discounted pass for locals, or better yet a 'free pass' for residence of West Linn sure would be a nice option.

**ODOT I-205 Toll EA - RECORD #1081 DETAIL****Submission Date :** 2/22/2023**First Name :** Mark**Last Name :** Prewitt**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This tolling seems to be ignoring the second tolling project, leaving commuters who wish to go to the airport or Portland or clackamas unable to do so without, tolls. And my company recently relocated to new Portland with an on-site requirement starting this summer. This means when the toll hits, I'll have no non toll way to drive without taking 20-30 minutes of extra driving, gas, and time. These tolls are noth8ng but more anti-vehicle actions the state of oregon is renown for. Gas taxes in every other state have not risen, but their infra is more up to date as it was not spent on useless bicycle lanes and green boxes, which are confusing and serve no safety purpose for the major arteries going through portland. I5 and i205. I also believe the pitch to get 205 built was to relieve pressure on i5 and to rebuild the i5 bridge which still has not been done. Why is oregon govt demanding tolls when they get millions in gas tax revenue already!

**ODOT I-205 Toll EA - RECORD #1082 DETAIL****Submission Date :** 2/22/2023**First Name :** Monica**Last Name :** E Marcinko**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** From what I can tell your analysis does not focus on the realities of the impacts to local neighborhoods. You talk about mitigation plans for dealing with this increased traffic, however, these undefined mitigation plans seem to be focused on figuring out how to foster increased traffic, not prevent increased traffic on side streets. Turning quiet neighborhoods in commuting zones. Also, you talk about mitigating the impact on low-income households, but you do not talk about mitigating the impact to residents who need to move around the tolling zone, multiple times, daily. The financial impact and quality of life for local residents has been wholly ignored. For those residents who live in-between the bridges, it would mean having to always consider tolls for just moving about in their daily lives, while trying to deal with the increased traffic from those trying to avoid the tolls by using our neighborhood streets. Responses to our city leaders have been minimal, information on your site for those of us whose live here is uninformative and very frustrating. Even your video on the economic effects, admits that there will be increased traffic and justifies it as a boon to local businesses. While ignoring the impact to the limited parking or addressing the negative effects on the residents who live in the area. Your videos on fairness and economic justice ignores the fairness and economic justice for local residents. There are very few bypass roads in the area around the proposed tolling area. So those drivers who choose to avoid tolls will only have 1 or 2 roads as an option. These roads were not designed for the commuting traffic, and most don't have sidewalks. Your assessments point to decrease accidents on I-205 but does not take into consideration the danger to cars, bikers or pedestrians in local neighborhoods. I disagree with the environment assessment that this will decrease pollution. Increased stop and go traffic on smaller side streets will do just the opposite. Public transportation is limited to almost be non-existent in the area, so the assumption tolling will encourage commuters to use it is not based in fact. This test for tolling this section of I-205 does not seem to be well thought out and this assessment does not address alternate options that may have been considered. The justification seems to be ODOT is spending money on improvements so the budget shortfalls should come from these improvements. A better solution to test tolling and without burdening local communities constrained by transportation options might be to toll the Interstate Bridge, the Glen L. Jackson Bridge and the Boon Bridge just south of Wilsonville. There have been previous opportunities for public comment on this project. The concerns raised here are not new and have been publicly communicated many times in public forums, city council meetings and editorials. However, these concerns have never been answered with any plausible solutions or adjustments to ongoing plans. I believe this assessment is misleading and inaccurate. I do not believe it was an objectified look into the impacts. I believe it was written for the sole purpose of justifying the project and not as a true assessment as to whether or not the tolling project should be completed as proposed.

**ODOT I-205 Toll EA - RECORD #1083 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** TIM

**Last Name :** WUEST

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :**

1) It is an unfair penalty to live in the Oregon City area with the current toll plan. Why not start tolling at either end of 205 (at the Columbia river and at the i5 intersection in Tualatin. Drivers will then have a clear choice on driving options and disperse upon other driving routes instead of severely impacting the 3 areas in Oregon City, Canby, and Willamette.

2) With this tolling option, ODOT just made Willamette Drive a very dangerous biking route. Willamette Drive is the primary way cyclists get out of town to ride to Wilsonville, or take the popular Canby Ferry route. Diverting a huge number of vehicles onto this road at all hours of the day, makes this lightly traveled road a major thoroughfare with cars traveling at high speeds. There is minimal to NO shoulder space on the road now. My suggestion is to have ODOT make a wide biking lane from the Abernathy bridge on Willamette Drive all the way to Turner road, so cyclists can continue on less traveled roads.

3) Your economic impacts are just plain wrong. if a family lives on one side of the tolling area, and works in person on the other side 5 days per week (50 weeks/yr), that totals to 500 crossings. At \$1.80 per toll, that is \$1,400/year - just to go to work. Your estimate of \$500 is way off base. The authors of the Economic Technical Report are guys that have NEVER seen what an accident on 205 does to traffic on Willamette Drive and downtown Oregon City. It stops all traffic in place. Drivers trying to avoid tolls will have the same impact. The Gridlock created in Willamette and Oregon City do NOT encourage shopping, but just create very frustrated drivers. in Your report, 5.5 Local Traffic-Dependent Businesses, You have some very wrong estimates, and laughable reasoning. Oregon City, Willamette and Canby will see close to a 25% increase in traffic. The Old Oregon City Bridge is currently a bottleneck at rush hour, and the cute city of Willamette ( with very little on street parking) will not encourage drivers to shop. Stop and go driving at 2 mph does not encourage "opportunity" shopping. When was the last time you were stuck in traffic and decided to stop to do some comparison shopping??? My biggest suggestion is not against tolling, but to start the tolling further out and give drivers more options to spread out if they wanted to avoid tolls.

**ODOT I-205 Toll EA - RECORD #1084 DETAIL****Submission Date :** 2/22/2023**First Name :** Amanda**Last Name :** Case**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The proposed tolls in Oregon are shameful. They will not only put an excessive burden on low income families but you will not get less people on the roads. To say that these tolls will magically cause less congestion on the roads is unbelievably ignorant. If it was so easy for people to switch their drive times don't you think they already would have instead of sitting in long hours of traffic? Oregon does not have the public transit systems in place to give people alternatives to driving on the freeways. Instead you will force people off of the freeways and onto the local roads and neighborhoods. Increased traffic thru residential areas is going to create more accidents with pedestrians/bikes, increased traffic, frustration, noise, etc. And Oregon has yet to prove that they can use funds wisely on these kinds of projects. The track record of our government shows that this will be waste of tax payer money that makes the quality of life worse, not better.



<b>ODOT I-205 Toll EA - RECORD #1085 DETAIL</b>
---

**Submission Date :** 2/22/2023

**First Name :** David

**Last Name :** Sigafos

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** 205 is a primary route around portland and should not have a toll put on it.  
Quit taking money from us.

<b>ODOT I-205 Toll EA - RECORD #1086 DETAIL</b>
---

**Submission Date :** 2/22/2023

**First Name :** Jason

**Last Name :** Richardson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The roads in West Linn and Oregon City are already congested. The tolls will add additional traffic making it impossible to move through our community.

**ODOT I-205 Toll EA - RECORD #1087 DETAIL****Submission Date :** 2/22/2023**First Name :** Ashley**Last Name :** Makowski**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Dear Oregon Department of Transportation, I am writing to express my strong disapproval of the decision to put in a toll bridge on I-205 that passes near my house. I understand that the aim is to reduce congestion and fund transportation infrastructure, but the negative impact on my quality of life cannot be ignored. Firstly, the toll bridge will lead to an increase in traffic on surface streets, which will create a significant safety hazard for pedestrians and cyclists. According to a report by the National Highway Traffic Safety Administration, there were 6,516 pedestrian deaths in the United States in 2020 and an additional 938 bicyclist deaths. The increased traffic on surface streets will only heighten the risk of accidents involving vulnerable road users. Furthermore, the toll bridge will also contribute to air pollution, which is already a significant concern in our area. According to the American Lung Association's State of the Air report, Multnomah County (where I reside) received a grade of "C" for ozone pollution, which can lead to respiratory problems, particularly in children and the elderly. The increased traffic resulting from the toll bridge will only exacerbate this problem, ultimately impacting the health and well-being of the entire community. In conclusion, I strongly urge the Oregon Department of Transportation to reconsider the decision to install a toll bridge on the highway near my house. The negative impact on public safety and air quality in the surrounding community cannot be overlooked. Please consider alternative solutions to reduce congestion and fund transportation infrastructure that do not put the health and safety of our community at risk. Sincerely, []

**ODOT I-205 Toll EA - RECORD #1088 DETAIL****Submission Date :** 2/22/2023**First Name :** Richard**Last Name :** Yeoman**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** The analysis needs to consider the impact on the two cities with minimal alternatives - West Linn and Oregon City. A daily commute out of those cities often have limited options except to take 205. Working in a hospital (St Vincent's in our case) to provide in-person patient care is not "work from home optional" and does not provide for the ability to commute on "off hours".

**ODOT I-205 Toll EA - RECORD #1089 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Bob

**Last Name :** Pei

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** It's pretty clear from the hundreds of previous responses you've received on this topic already, the citizens that reside in these areas are vehemently opposed to the tolling under any circumstances. Given the options you've provided, it seems there is also a clear understanding from the project team on why this project is opposed. How many times do we have to regurgitate the same arguments so you can come back and manipulate wording so that our concerns appear mitigated on the surface, but ultimately the same plan moves ahead? This is outrageous. How much more specific can people be? This isn't a court of law where granular details dictate the outcome, this is a civilian population you're communicating with but seem to be ignoring. The project is not wanted. You're going to destroy our landscape, create more noise for which your sound walls will not adequately attenuate, increase pollution density in any given duration, and then force the residents living in these regions to endure exponential growth in their neighborhood arterial streets so people can avoid paying the tolls. Scrap it. Cancel it. We don't want it. End of story.

**ODOT I-205 Toll EA - RECORD #1090 DETAIL****Submission Date :** 2/22/2023**First Name :** Steve**Last Name :** Makowski**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am writing to express my strong disapproval of your decision to put in a toll bridge on I-205 that passes near my house located on 10th Street in West Linn. This decision will undoubtedly have a negative impact on my quality of life, as well as the quality of life for many others in the surrounding community. Firstly, I am concerned about the increased traffic that will result from the implementation of the toll bridge. Research shows that toll roads and bridges often divert traffic onto surface streets, leading to increased congestion and longer commute times for residents who live near these areas. This increased traffic will not only be an inconvenience, but it will also increase air pollution, noise pollution, and safety hazards for pedestrians and bicyclists. Secondly, the added air pollution from increased traffic will have a direct impact on my health and the health of my family. Studies have shown that exposure to air pollution can cause respiratory problems, heart disease, and even premature death. As someone who lives in close proximity to the highway, I am particularly concerned about the potential health risks associated with increased air pollution. Finally, I am worried about the long-term effects that this toll bridge will have on the environment. The construction and maintenance of the toll bridge will likely result in the destruction of natural habitats and the displacement of wildlife in the area. In light of these concerns, I strongly urge you to reconsider your decision to put in a toll bridge near the 10th St Exit on I-205. I implore you to explore alternative solutions that prioritize the health and well-being of residents in the surrounding community.

**ODOT I-205 Toll EA - RECORD #1091 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Deanna

**Last Name :** Peiravi

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Placing tolls in an area like West Linn prevents access to other facilities outside of the city without penalizing by charging outrageous amounts to just leave our city. West Linn is very small city and has many high cost shops and medical professionals. For those with financial difficulties to find other solutions they have to suffer with these new tolls. Going through side roads that are already clogged takes extra time that isn't always an options. It is difficult already to navigate and people attempting to go around the tolls will only cause more traffic on roads that are not designed to do so. Many streets do not have sidewalks. Most citizens do not want the tolling. It negatively impacts the city.

**ODOT I-205 Toll EA - RECORD #1092 DETAIL****Submission Date :** 2/22/2023**First Name :** David**Last Name :** Novelo**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** hello, I come from a state that has numerous tolls and have yet to see the positive effects of tolling. In particular, as a person of color who has seen the effects of tolling to low-income and minority neighborhoods it's important to me that we discuss the impacts this will have on the community. Oregon, is already an expensive place to live and tolls will create a disproportionate financial burden to those of low-income and minority neighborhoods. In addition, it's been a struggle to fill entry level careers in these neighborhoods and adding tolls to their daily commutes will make it unaffordable. Furthermore, even those in the already dwindling middle class will have an increase to their monthly costs in an already high cost of living area. Also, there are already significant problems with congestion people avoiding the 205 this will only exponentially increase the impact to these neighborhoods that will bear the burden of the re-route. Also, the timeline includes proposed benefits but doesn't say how it will help local oregonians. I don't find the current two lane system unsafe on that portion of the 205. You will create a system of those who have and those who have not to afford tolling. I'd recommend putting the measure to a vote, and if an increase in funding is needed to fund future projects i propose an increase in vehicle registration or property taxes.



<b>ODOT I-205 Toll EA - RECORD #1093 DETAIL</b>
---

**Submission Date :** 2/22/2023

**First Name :** Nicole

**Last Name :** Baker Garcia

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Placing a toll will reroute traffic through neighborhoods causing congestion on roads not intended to support such traffic. This will lead to long line of idling traffic.

**ODOT I-205 Toll EA - RECORD #1094 DETAIL****Submission Date :** 2/22/2023**First Name :** Kathy**Last Name :** Fogerty**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I am concerned about the congestion that would result in areas such as Wilsonville, West Linn & Oregon City from people diverting onto local roads to avoid tolls. All you have to do to see how this affects these towns is to drive on city roads when an accident shuts down I-5 or I 205. I envision nightmarish local congestion especially during the "peak" times.

<b>ODOT I-205 Toll EA - RECORD #1095 DETAIL</b>
---

<b>Submission Date :</b>	2/22/2023
<b>First Name :</b>	Laura
<b>Last Name :</b>	Spurrell
<b>Affiliation :</b>	live in Tualatin, and travel I 205
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	if one main objective is raising funds, what does it cost to set up and maintain tolling? Is there a way to let electric vehicles pay their share of "gas taxes"?

**ODOT I-205 Toll EA - RECORD #1096 DETAIL****Submission Date :** 2/22/2023**First Name :** Nisse**Last Name :** Peng**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Traffic will divert off from Gladstone to 99 to get around this. It also puts an undue burden on West Linn, Oregon City, Wilsonville and Tigard/Tualatin residents who will be tolled the most and unfairly.

**ODOT I-205 Toll EA - RECORD #1097 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Norman

**Last Name :** Wentworth

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The tolls need to be stopped. This will have a significant and detrimental impact to mainly two small communities due to a lack of creative funding options and poor state planning for work that has been known to be required for some time. The proposed tolling costs are massive and mainly effect West Linn and Oregon City. Other options must be considered beyond the simple "just add a toll". This is also a gateway for future tolls and an impact like this, similar to sales tax, should be voted on versus forced upon residents few residents . Do better

**ODOT I-205 Toll EA - RECORD #1098 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Kim

**Last Name :** McKay

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** It is unfair to toll the same highway twice affecting the same communities in both tolls. I am opposed to tolling but at least only toll Hwy 205 once. Oregonians already have high gas taxes which are supposed to support the highway system and we have high income taxes. The money that is currently in the transportation budget should be used for roads and not all of these fancy public transportation services that are not fully utilized. West Linn is a bedroom community that will be unfairly affected by the Hwy 205 tolls. Also people on fixed incomes should pay less.

**ODOT I-205 Toll EA - RECORD #1099 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Christopher

**Last Name :** Crotty

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Not that I think DOT will actually listen to any public input, but we keep trying: how can the plan improve traffic on 205 AND the local roads? Do you realize how stupid that sounds? DOT keeps saying variable tolling will cause folks to time shift travel. Oh really? How many folks even have that option? My father was a civil engineer specializing in roads and even helped design some famous interstates. He would find this plan ludicrous at best, dystopian at worst.

**ODOT I-205 Toll EA - RECORD #1100 DETAIL****Submission Date :** 2/22/2023**First Name :** Christina**Last Name :** Ling**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I have resided on Swift Shore Drive in West Linn for 34 years. West Linn is residential with few services offered that people take for granted since it has little commercial development and no space to add more. To obtain the services I need, I must drive outside the city to get my car serviced, medical, dental, grooming, shopping, etc. Currently I don't use the 205 Freeway if I drive south. Northern routes to Gladstone, Oregon City and points beyond do require that I use the 205 Freeway for 1 or 2 exits before getting off the freeway. If you toll this stretch of the 205, I will find ways to avoid the toll by using other roads but the northern routes are messy. For residents, the biggest relief would occur if the roads where Hwy 43 and Willamette Falls Drive were turned into a roundabout. Currently at high traffic times and when the high schoolers commute, the junction is at a dead stop. The Arch Bridge is narrow and traffic backs up at the signal on the OCty end and the cars trying to get onto 205 must make a left turn against nonstop cross traffic. Fix this intersection before you start tolling. A roundabout or signal would help immensely. Tolls should be imposed on through traffic on 205 but not on residents.



<b>ODOT I-205 Toll EA - RECORD #1101 DETAIL</b>
---

**Submission Date :** 2/22/2023

**First Name :** Mike

**Last Name :** De Blasi

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Do not place things in vacuums. They are inter-related.

**ODOT I-205 Toll EA - RECORD #1102 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Donald

**Last Name :** Mathos

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** An increase of \$600 in annual transportation costs for tolling, above and beyond all the other increasing costs of gas and living is very significant despite not likely falling into a low income category myself with a big family that lives in the unincorporated area near Stafford. This represents a significant impact to our family budget for little to no benefit--a 25% reduction in morning travel time does not justify getting tolled twice every day I pass through the area. And I have seen the proposed diversion improvements for West Linn that only include pedestrian improvements and provide absolutely no real benefit to vehicular diversion travel. I have yet to understand why we will be tolled twice in such a short distance, other than the federal government allows tolling for bridges so that's what is being done. To be the last area in the metro area to get a third lane and be punished for being last by being tolled is unfair to say the least. All tolling should be held and done as part of the Regional Tolling Project and looked at as a cohesive unit. It would seem more fair to have toll gantries possibly placed in other, more densely populated areas closer to Portland or on the Portland/Vancouver border. Placing the region's first tolls in an outlying area and 2 gantries close to each other on top of that seems unfair, just because we were last to get improvements. Work towards removing much of ODOT's red tape that causes projects to cost 5x as much as they should to free up more money for actual construction work and drop tolling as an option to take more money from residents that already pay sufficient gas and transportation taxes/fees.

**ODOT I-205 Toll EA - RECORD #1103 DETAIL****Submission Date :** 2/22/2023**First Name :** Jill**Last Name :** Monroe**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** We don't need tolling. Manage our money better. You already tax gas. These roads are paid for and you're doing a lousy job already. Don't spend gas taxes on bike lanes. Get woke, go broke. Look at the mass exodus from Portland. Wanna lose more people? Keep doing what you're doing.

<b>ODOT I-205 Toll EA - RECORD #1104 DETAIL</b>
---

<b>Submission Date :</b>	2/22/2023
<b>First Name :</b>	Kathy
<b>Last Name :</b>	Fruitt
<b>Affiliation :</b>	Jim Fruitt Trucking, Inc.
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Since we are already paying PUC rates @ .237 per mile, plus our Heavy Hwy Use taxes, plus fuel taxes, I think the trucking industry has enough to pay for let alone toll rates on top of all we do pay.

**ODOT I-205 Toll EA - RECORD #1105 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Wade

**Last Name :** Murray

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is crap. Will have a negative impact on the surrounding communities as people will opt to move to areas where they can avoid tolling/avoid those routes which will require additional funds for upgrades to side roads that you have not planned for.

**ODOT I-205 Toll EA - RECORD #1106 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Tracy

**Last Name :** Chapman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I have a serious problem with your stated goal of moving people off of the freeways and onto local community roads. How will that help anything??? People still have to get where they have to go, and either they will be unfairly targeting and charging those in certain areas who can't divert their route or hours, or unfairly burdening local neighborhoods with more traffic, longer travel times, and more pollution (both noise and air) in their communities. Of course, it won't affect those with money who can afford it and now have a "faster" freeway that they can pay for at the expense of everyone else. If we have to raise money, find another way to do it. Also, improve all of the other transportation options before forcing people through neighborhoods. I read that you actually expect and want 20,000 more cars to drive in neighborhoods around the Abernathy bridge everyday. HOW DOES THAT HELP ANYONE????? Faster freeway speeds mean slower neighborhood speeds and cars on the road longer. Just like when you added ramp signals and touted the "faster freeway speeds" and yet my commute home took 10 minutes longer while I waited on the ramp. At least that was still on the freeway and not through neighborhoods that already have enough traffic. If you absolutely have to toll to raise money, don't do it based on time of day because as I mentioned, most people don't get to control their schedules. Also, do it around the entire Portland metro region - not just a couple of spots, so that the costs are evenly distributed and you can charge less to each individual while still getting the funds in that you need. If the whole reason to do this is to "lessen the congestion and increase freeway speeds" then I am completely against it in every way because all you are doing is harming neighborhoods by diverting the same traffic. If you want people off of roads, increase public transportation, offer subsidies to people for public transportation, and make public transportation safer.

<b>ODOT I-205 Toll EA - RECORD #1107 DETAIL</b>
---

**Submission Date :** 2/22/2023

**First Name :** Steve

**Last Name :** Morris

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** No on tolls. Colorado DOT has same number of road miles with half the employees. ODOT has NOT built a new lane for private cars in 30 years. I'd like to hear about what ODOT has done for cost-cutting before we even talk about tolls. I'd also like to hear a response and some acknowledgement people do NOT want tolls to happen.

**ODOT I-205 Toll EA - RECORD #1108 DETAIL****Submission Date :** 2/22/2023**First Name :** France**Last Name :** Davis**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** All of the reasons stated to implement tolls on public highways can also be used to call for raising taxes to build these improvements. First of all, any plan to charge tolls on public highways is an admission of failure by our elected and appointed officials to accomplish one of their primary job responsibilities. That job is to raise, allocate, and spend money (from all taxpayers) to build and maintain public infrastructure (for all taxpayers). Establishing highway tolls is just a ruse to raise money from taxpayers without having to call it taxes. The legislature and governor need to do their jobs, not shove it off onto the public. Secondly, "value, or congestion" pricing is just a dishonest way of saying..."we are going to allow wealthy people to buy their way out of traffic congestion that poor people will just have to put up with". In other states and communities these are called, with good reason, Lexus Lanes! What's next, purchased Premium Library Cards that allow some people to jump to the front of the line or get a first shot at new books? Reserved lanes at public swimming pools for people who buy Value Passes? Premium picnic spots at public parks reserved for those who can afford a Platinum Parks Pass? Tolls on public infrastructure are bad public policy!



<b>ODOT I-205 Toll EA - RECORD #1109 DETAIL</b>
---

**Submission Date :** 2/22/2023

**First Name :** Paul

**Last Name :** Smith

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** No tolling, drivers already pay their fare share. of taxes. Fees to travel established freeways when no alternate routes are available, example Abernathy bridge is only way to cross the river. Captive audience without alternative routes.

**ODOT I-205 Toll EA - RECORD #1110 DETAIL**

**Submission Date :** 2/22/2023  
**First Name :** Heath  
**Last Name :** Watte  
**Affiliation :** West Linn Neighbor  
**Submission Method :** SurveyMonkey

**Q3. Comments :** This directly impacts West Linn, we pay high taxes already. To travel south, east or west this might have a rolling cost. It places an undue burden on our local roads which we also pay for and subsidize those that doing pay for the toll to use our local roads and pay to leave the house. This will cause people to leave or make it burdensome to live here with roads that will have increased traffic that causes safety and local road deterioration concerns that passes the Buck to west Linn twice by a toll and their local roads being used that don't want to pay. If you live in west Linn tooling should be exempt because the toll gantry's lock us in to paying just to leave town.

**ODOT I-205 Toll EA - RECORD #1111 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Mark

**Last Name :** Reaksecker

**Affiliation :** Clackamas County PCP

**Submission Method :** SurveyMonkey

**Q3. Comments :** This will be like the 2-16-23 Clackamas County Commissioners' meeting where their minds were already made up when they "allowed" the public only one minute to voice their opposition to project turnkey on Sunnyside Road. If you truly listen to "We the People", there would not be a toll on I-205. WE DO NOT WANT ANY PART OF I-205 TO HAVE A TOLL. Is that clear enough?

**ODOT I-205 Toll EA - RECORD #1112 DETAIL****Submission Date :** 2/22/2023**First Name :** Connie**Last Name :** Zima**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This analysis was made by those who are pushing this project through. And it seems very clear that a lack of common sense is driving this project. The project will damage the local environment, drive traffic to local roads, shifting congestion to other places. This toll will create financial strain for people who commute. Please explain why gas tax funds aren't being used for this project. Isn't that what we are told the money is used for? How about we take a public VOTE on the project rather than you pretending to consider "public comment" and then ignoring the desires of the public, who pay your salaries?

<b>ODOT I-205 Toll EA - RECORD #1113 DETAIL</b>
---

**Submission Date :** 2/22/2023

**First Name :** Patrick

**Last Name :** Plett

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** this is a total joke it holds hostage the West Linn and the Willamette areas and will create more traffic in the Oregon City and surrounding areas. Road taxes have already been collected for improvements. This is going to have the opposite effect on traffic and the surrounding areas, as well as put undue hardship on the residents and those that travel that area daily...

**ODOT I-205 Toll EA - RECORD #1114 DETAIL****Submission Date :** 2/22/2023**First Name :** Ryan**Last Name :** Packham**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** 205 needs semi trucks to be forced to stay in left lane and follow the speed limits. If this was enforced, 205 would not need a 3rd lane in places where it has only 2 lanes. Also, 205 speed limit should be increased to 65 all the way through clackamas county. We all drive 70 anyway. People who drive more than 5 mph under the posted speed limit on 205 should be ticketed as well when not going with the flow of traffic. If you add a toll, you will have all the same people traveling through west linn into downtown oregon city via OC/WL bridge to avoid the toll. This is already a seriously congested place because of current traffic trying to relieve 205 during rush hours. What we really need is another freeway that cuts through the 205/5/84 circle around the metro area. Cutting through lake Oswego and into milwaukie or Gladstone on 99. Meaning a new Willamette river bridge. Or tunnel? Many Oregonians are already in financial crisis still in the aftermath of covid and inflation. A toll could potentially put people who are already suffering more at odds with their surroundings. It doest seem fair or an opportune time to put in a toll. In fact, it seems selfish.

**ODOT I-205 Toll EA - RECORD #1115 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Tima

**Last Name :** Carlson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** 1. Tolling along I-205 will cause significant detrimental impact to the local communities within Oregon City, Gladstone whose average median income ranges from \$35,000 to \$39,000 a year. Tolling will cause adverse negative financial impacts to its low income citizens and clog streets along Main Street, Highway 43 and Mcloughlin. ODOT and the State of Oregon want to charge these commuters for projects that should be federally and state funded. 2. We have video of one of the tug boats used during construction emitting enormous amounts of smoke during the morning commute. We are not environmentalists in any sense but the amount of smoke for a tug boat doing no activity was insane. A car or truck emitting any similarity would have been pulled over and asked to stop. The fact that the Corps of Engineers has allowed ODOT and their subcontractors to construct a road within the river impacting river traffic, salmon, fishing and the sea lions in disgraceful. The hypocrisy of state government vs a private citizen. 3. Based on historic state maps, the area of development on the west side of the bridge was near a native encampment. Archeological studies I would hope are part of this. Note: title of Environmental Assessment of tolling should be changed due to similarity of Ph 1/Ph 2 Environmental Site Assessments.

<b>ODOT I-205 Toll EA - RECORD #1116 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** John

**Last Name :** Ley

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** TOLLING is hugely inefficient. In Seattle on I-405/SR167, fully 68% of tolling revenues collected in 2021 went to the "cost of collection" according to WSDOT. The gas tax has under a 1% cost of collection. The gas tax harms people less and allows more money to go for the actual transportation project!



**ODOT I-205 Toll EA - RECORD #1117 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** John

**Last Name :** Ley

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling does NOT eliminate traffic congestion; it merely changes where it occurs. In 2018, ODOT reported that 130,000 vehicles would DIVERT on to side roads and into neighborhoods, once tolls were imposed on all Portland area freeways. That is a huge SAFETY risk, not to mention a reduction in the quality of life for people dealing with the diversion.

**ODOT I-205 Toll EA - RECORD #1118 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** John

**Last Name :** Ley

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** How much of the 12 hour reduction in traffic congestion is due to the 50% increase in lane capacity on I-205? And how much is due to the TOLLS?

**ODOT I-205 Toll EA - RECORD #1119 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Angela

**Last Name :** Robinson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am fully opposed to tolling on our PUBLIC roads that we have paid for with numerous taxes. Right now those of us who work for a living barely make it. Have you seen the price of eggs? Or a gallon of gas? Now tolling? Read your audience and understand the economic crisis we face. Now tolling? Terrible idea.

<b>ODOT I-205 Toll EA - RECORD #1120 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Phuk

**Last Name :** Ngyou

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Toll cost is preposterous, unacceptable, and needs and END date.

<b>ODOT I-205 Toll EA - RECORD #1121 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Kelley

**Last Name :** Schmidt

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** ODOT has lost it's mind. I-5 will be a literal parking lot if tolls are allowed. Also, if I-5 bridge is ever replaced, tolls there will equate to a constitutional nightmare. There will be no "free" route thru Portland. A state should have no power over a federal interstate highway.

<b>ODOT I-205 Toll EA - RECORD #1122 DETAIL</b>
---

**Submission Date :** 2/21/2023  
**First Name :** Matthew  
**Last Name :** Call  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #1123 DETAIL****Submission Date :** 2/21/2023**First Name :** fred**Last Name :** warren**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** ODOT has already made it mind up already!! I have never seen the Government use the money for what said it was going to be used for. Like the Covid 19 Fed money they are just sitting on it and our taxes is another example. ODOT get 1 billion a year and when they were Audited, they could not count for the majority of it.

**ODOT I-205 Toll EA - RECORD #1124 DETAIL**

**Submission Date :** 2/21/2023  
**First Name :** Dorothy  
**Last Name :** Monte  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**



<b>ODOT I-205 Toll EA - RECORD #1125 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** David

**Last Name :** Indest

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I've lived in several places with tolls. Tolls needlessly slow traffic and increase accidents from the congestion. Explore other revenue options rather than using tolls to disrupt traffic.

**ODOT I-205 Toll EA - RECORD #1126 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Kelsey

**Last Name :** Hunt

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Why are we continuing to put the burden on the people who can least afford to pay more to live their lives? The cost of food and housing continues to rise year after year. Property taxes rise year after year. Childcare costs rise year after year. The cost of all the basics continue to rise and wages are not rising with them. This is not sustainable! Stop taxing the 99% and start taxing the 1%. The impact on their quality of life will be minimal.

**ODOT I-205 Toll EA - RECORD #1127 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Noah

**Last Name :** Cheek

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I recently moved to Oregon City in May 2022 from Beaverton. I am a Sales Manager that covers a territory including Lake Oswego, West Linn, Milwaukie, Oregon City, Gladstone, Boring, and Damascus. My job involves driving around and visiting accounts, I do not have an office, I work on the go. I am greatly concerned about the financial impact this project has to my personal household and occupation. My wife works in Tigard and would need to access this portion of the I-205 for her commute. We failed in doing adequate research into this project while going through the home buying process. If we were aware, we would have avoided moving to this area and our beautiful home. What will the impact be to housing prices? My wife is 9 months pregnant and we would have to pay a toll to have him delivered at Kaiser Sunnyside if this were in place today. Our family that intends on providing child care will be traveling from Beaverton each day and will now pay a toll to do so. I strongly disagree with disproportionately impacting a certain segment of the population in this manor. My assumption is these tolls will be put in place regardless of the impact to my home. My suggestion for mitigation is remove the variable rate component, at a minimum, as it can clearly be viewed as discriminating against a segment of the population that can afford it the least, the working class traveling to and from their place of employment. A thorough demographic study of the population that uses this corridor during peak variable times should be conducted. A flat or discounted rate for resident use should be explored as this will clearly have a negative impact on very specific communities. This is a life threatening decision for a lot of individuals in our community and I sincerely hope that the feedback being shared is taken into consideration.

<b>ODOT I-205 Toll EA - RECORD #1128 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Stephanie

**Last Name :** Weaver

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This will cause a significant amount of financial strain on a majority of Oregonians traveling to and from work just to make ends meet.

<b>ODOT I-205 Toll EA - RECORD #1129 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** David

**Last Name :** A Rice

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Regardless of our input, ODOT will go forward with taxing a freeway that has already been paid for. ODOT will continue to tax us for projects that are already being paid by our tax dollars. This is going to impact low income wage earners in a negative way.

**ODOT I-205 Toll EA - RECORD #1130 DETAIL****Submission Date :** 2/21/2023**First Name :** Angela**Last Name :** Fero**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I still have yet to see a solidified variable schedule with associated toll costs. This project will quite literally define the next steps in my life. Am I willing to continue my commute to Portland each day, face the bottleneck traffic that will occur if I go North instead of South, or will I simply decide to get a new job just to avoid the additional stress and cost. I already have to pay to park everyday, this is just another barrier for me.

**ODOT I-205 Toll EA - RECORD #1131 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Everett

**Last Name :** Virdin

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Charging toll on existing taxpayer funded roadways is wrong. When these roadways are built the maintenance of all elements surely would have been taken into to account and proportionately affected the budget(s) of the responsible department(s). A similar project was completed in Southern California, Riverside County. The 91 freeway was very congested and a fourth lane was added. The difference is that the toll was levied on those who chose to use the new "toll lane". The new lane reduced congestion, the congested period was shortened, and it had only positive effects on lower income families due to reduced travel time at no charge. Having tolls paid by all only complicates the process and slows traffic when changing to toll.

<b>ODOT I-205 Toll EA - RECORD #1132 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Wayne

**Last Name :** Overcash

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Any project funded by this tolling needs to be put to a public vote



**ODOT I-205 Toll EA - RECORD #1133 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Sam

**Last Name :** Brentano

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** If your goal is to limit traffic it will work. I'll do my business South of Wilsonville. I was a Marion Co. Commissioner and sat through several presentations on this subject. Obvious that you didn't really justify but would plow ahead. I am opposed. Sam Brentano

**ODOT I-205 Toll EA - RECORD #1134 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Stephen

**Last Name :** Clark

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls, cannot reduce traffic, unless they count those diverting to work around.  
Doesn't work, never has . prove me wrong!

<b>ODOT I-205 Toll EA - RECORD #1135 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Martin

**Last Name :** Hudson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I fully support tolling. Infrastructure should be paid for by those who use it.

<b>ODOT I-205 Toll EA - RECORD #1136 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Marcus

**Last Name :** Williams

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** People have been telling you for years that we do not want tolls, but you are going to just do it anyway. We have systems in place for road considerations. Adjust THOSE first. I do not believe you for one second that tolls are the only way to get this done. All you are going to do is create yet another expensive bureaucracy that will not function as intended. The leadership at ODOT need to take their East Coast ideas, corruption, and arrogance and leave. In the meantime, this family will continue to withhold any and all spending from the Portland Metro market.

<b>ODOT I-205 Toll EA - RECORD #1137 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Norman

**Last Name :** D Zobrist

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I just can't see this making traffic on Willamette Falls dr any better along with adding a new Middle school .

**ODOT I-205 Toll EA - RECORD #1138 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Patricia

**Last Name :** Wisener

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The transportation department simply has to stop the war on cars!!! This is the west not the east and we have freeways not tolled roads!!!!

<b>ODOT I-205 Toll EA - RECORD #1139 DETAIL</b>
---

**Submission Date :** 2/21/2023  
**First Name :** Tom  
**Last Name :** Gibson  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

<b>ODOT I-205 Toll EA - RECORD #1140 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Ralph

**Last Name :** Burton

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** It makes no sense to put the toll where you are currently planning. The best locations would be at the crossings over the Columbia river going South. Also put one in Salem on Hwy 5 both directions.



<b>ODOT I-205 Toll EA - RECORD #1141 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Jeremy

**Last Name :** Garland

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I'm opposed to additional taxing on the public. I would rather have no improvement than be forced to pay more money to commute to work and home. This toll system disproportionately effects people in Clackamas county. Better management of current funds would be a better solution.

**ODOT I-205 Toll EA - RECORD #1142 DETAIL****Submission Date :** 2/21/2023**First Name :** Lisa**Last Name :** Carter**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** It is not practical. Traffic is already terrible, there are no back roads that are suitable and it will make it difficult for people without the money for tolls to access. We are not Florida where every road is a toll road it seems. The cost of goods and services is already high now you want to do this? I say let us VOTE on it before it happens and see what the people want.

<b>ODOT I-205 Toll EA - RECORD #1143 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Maria

**Last Name :** Justel

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am concerned about traffic congestion in the already stressed neighborhood streets, particularly hwy 43.

**ODOT I-205 Toll EA - RECORD #1144 DETAIL**

**Submission Date :** 2/21/2023  
**First Name :** testT  
**Last Name :** TETSET  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #1145 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Cary

**Last Name :** Osterman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Specific concerns: 2) people cannot afford this. Why do you think otherwise???? You are limiting access to wealthy individuals. 2) Oregon already has one of the highest gas taxes in the nation. Why don't you learn to budget better like everyone else???? 3) why aren't tax players voting on this? Answer : they would vote no. 4) If tax players don't want it, why do you consider yourselves the ultimate authority in this matter. 5) if people can't afford your tolls, what options do they have?? Spending additional time and money to drive around. Burdening neighborhoods with traffic, noise. 4) we continue to vote down sale taxes, this is just another version of it. 5) you don't care about public opinion. You are just going through the motions to justify your actions. **NO ONE WANTS TOLLS. BE A RESPONSIBLE GOVERNMENT AGENCY**, put the voters and tax payers first. **NO TOLLS.** Our tax burden is already overwhelming, why can't you get that through your heads!!!!!!?

**ODOT I-205 Toll EA - RECORD #1146 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Richard

**Last Name :** Tastet

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Adding another lane from Stafford to the Abernathy Bridge will only increase traffic. I oppose tolling on I 205 because it will increase traffic on backroads and side streets.

**ODOT I-205 Toll EA - RECORD #1147 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Tatum

**Last Name :** Parsons

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Reduce congestion?! No. Many people do not have a choice but to go that route. How would anyone avoid this? Flood back roads and neighborhoods? That sounds safe. Lets just send everyone through the neighborhoods driving faster and more pissed off trying to get to work to avoid the toll making roads unsafe and causing more rage just because commute time doubled. So in a recession economy you want to put MORE strain on people. So not only will we pay for this out straight to the toll we will have to pay for all the companies raising prices to cover the toll charge they pay to go across. So now you have made inflation ever worse.. how can we as average people pass on the cost thats being passed to us? Maybe Oregon can stop robbing the people along with the government.. where is all the covid money... infrastructure money that the government printed and gave to our state... my roads arent any better.. yet you need more of my money because all the free money you were given was mismanaged? No wonder ideas like leaving Oregon are more and more appealing along with the greater Idaho plan.

**ODOT I-205 Toll EA - RECORD #1148 DETAIL****Submission Date :** 2/21/2023**First Name :** Tyler**Last Name :** Courtney**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This is unfair for those who live in Oregon city and the surrounding area. People will take the back roads to avoid the tolls and it will create unnecessary traffic which people who live here cannot avoid. It also hurts businesses around the area who no longer will have easy access and parking for customers. Why don't you toll I5 North going into Washington. So many people live in Washington and work in Portland. Toll those people to help our roads! Leave 205 out of it. We pay enough money in taxes already!



<b>ODOT I-205 Toll EA - RECORD #1149 DETAIL</b>
---

<b>Submission Date :</b>	2/21/2023
<b>First Name :</b>	Andrea
<b>Last Name :</b>	Santa Maria
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Tolling is not an appropriate solution. More infrastructure for mass transit and biking needs to be explored, not highways.

**ODOT I-205 Toll EA - RECORD #1150 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Jaclyn

**Last Name :** Buettner

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Make the city safe before forcing people to take public transportation. This will affect working class and poor people just trying to work. It will force those who don't have extra budget into public transit which is dirty, dangerous, and filled with open air drug use. Read the room.... This is not the time to pose my restrictions and fees on people already struggling to live in the squalor that is Portland during this high inflation. Please consider people and don't do this.

**ODOT I-205 Toll EA - RECORD #1151 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Sarah

**Last Name :** Alaniz

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The planned tolls will charge people who can't afford to live in the city unfairly to access transportation when current public transportation options fall woefully short. Plans for congestion pricing will most likely result in surge pricing which price gouges drivers who are required to report to work at times and days dictated by employers, not employees. Infrastructure is the states responsibility and should not be burdened onto citizens, especially with all the taxes and fees we already pay to the state. Tolls will only further through-traffic into neighborhoods and streets not designed for such use, an issue already a large problem thanks to routing by Google and other map apps. This will unfairly damage local roads which are paid for by local residents. The states mismanagement of funds and projects should be addressed by the state. Bringing in more fees and money doesn't treat the root of the disease caused by money mismanagement. We can't continue to allow the "pay to play" mentality to deepen inequity between the classes.

**ODOT I-205 Toll EA - RECORD #1152 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** mike

**Last Name :** swyter

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The impact of tolling at the points suggested will be extraordinarily detrimental to the Oregon City, West Linn and Lake Oswego communities and businesses. Drivers will avoid these tolls forcing traffic into communities- businesses will lose business by limiting cross town customers. Very, very poorly thought out.

**ODOT I-205 Toll EA - RECORD #1154 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** allan

**Last Name :** owings

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** OREGON DOESN'T NEED TOLLS ITS A WASTE OF MONEY TO DO THIS  
IT'LL DO MORE HARM THAN GOOD

<b>ODOT I-205 Toll EA - RECORD #1155 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Peter

**Last Name :** Seaman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I'm in favor of tolling. Drivers have developed a mindset that "driving is free," when clearly it is not - driving cars is the most expensive way to get around. Yet a "driving is free" mindset causes drivers to feel as though they are entitled to drive as much as possible, which is killing the planet and us with it. I'm in favor of drivers - me included - paying toward the roads we use. Thank you.

<b>ODOT I-205 Toll EA - RECORD #1156 DETAIL</b>
---

<b>Submission Date :</b>	2/21/2023
<b>First Name :</b>	Kent
<b>Last Name :</b>	Warnes
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	NO TO TOLL

**ODOT I-205 Toll EA - RECORD #1157 DETAIL****Submission Date :** 2/21/2023**First Name :** Connie**Last Name :** Ensworth**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I live on Thiessen Rd. It has already become a freeway and with the purposed tolls on the Hwy system, I am sure it will only increase traffic and issues. As well, my husband is a disabled veteran who needs to get to and from the VA Health care offices which forces us to take a tolled road. As is being on a fixed income it is already hard enough to continue to afford to live in this state. In other states back east, the tole roads are an option- the faster route-but you have an alternative Hwy to use if you choose not to want to pay the tole.



<b>ODOT I-205 Toll EA - RECORD #1158 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Ludmila

**Last Name :** Feitser

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Local's should not have to pay for tolls, this will create hardship to families who need to travel north and East of the the city. This will create localized traffic on Stafford Rd, West Linn and Wilsonville.

**ODOT I-205 Toll EA - RECORD #1159 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Elizabeth

**Last Name :** Hoffman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I don't think we should have tolling at all. It penalizes essential and service workers who often live further out due to housing costs. They do not have the option to work from home or change their hours to a time with lower tolls. Our property taxes are so high I can't believe that there is not money in the general fund to help pay for this.

**ODOT I-205 Toll EA - RECORD #1160 DETAIL****Submission Date :** 2/21/2023**First Name :** Kelsey**Last Name :** Fahlgren**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am extremely concerned about the impact on household finances in an already highly taxed region, particularly at a time in which we are experiencing significant inflation and related financial pressures. This tolling project seems to me to be a poor solution to dwindling resources for our roads. I know I for one have several doctors, a church, Bible study and family all along the proposed tolled roads, as I'm sure many others do as well. Am I supposed to stop going to the doctor, visiting family or going to church? I don't believe our income levels would qualify us for any assistance, and yet, this tolling project would have a profound impact on our finances. Bottom line, we can't afford this! And frankly I am shocked that this solution is being moved forward with seemingly little consideration given to the wishes of the people. Why are we not voting on this? It's essentially a tax on transportation. At any rate, as a taxpayer, voter and concerned Oregonian, I beg you to reconsider this tolling project and do a deep dive into other potentially viable alternatives to tolling.

<b>ODOT I-205 Toll EA - RECORD #1161 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Randall

**Last Name :** Barcus

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am in favor of tolling, and would hope that this would be the first of many tolling projects to mitigate congestion and address all of the issues explored in this Environmental Assessment.

**ODOT I-205 Toll EA - RECORD #1162 DETAIL****Submission Date :** 2/21/2023**First Name :** Glenn**Last Name :** Siegel**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** First and foremost, the premise that tolling will reduce traffic- this is base on the idea that commuters will have the ability to change their work hours to mitigate the "congestion pricing". The truth is that employers historically do not care about traffic congestion or the challenges of getting to the work site, they care about the employee being on time for their work shift. Most entry level, and most managerial positions still function on the 8-5pm or 9-6pm work shift, meaning the employee has very little flexibility to work around the "congestion" time frames. Their commute through the area will continue to be during the time that is being designated as the most expensive Tolling times. Secondly, since a larger number of better paying jobs are located off of the I-5 corridor, anyone from the east Metro area, and specifically the southern end of that part of the Metro area, will have to go through that area to get to their place of employment. These areas, with the exception of Lake Oswego and portions of West Linn, are not exactly affluent. Yes, there are some other exceptions to that, but on the whole, people are trying to improve their lives, and this would take more money off their tables and out of their bank accounts, making it that much more difficult to continue to improve, and/or meet their financial goals in the timelines they may have set up. Third, this is going to detrimentally affect all the possible alternative routes- More traffic on 99E out of Oregon City, more traffic over the old Oregon City-West Linn Bridge, more traffic on surface streets like Pete's Mountain Rd, Borland Rd, Childs Rd, Stafford Rd, etc., as people crowd those alternatives to avoid the tolls. Not only will traffic on these road worsen, but noise will increase, livability on these roads will decrease, increases in accidents on these routes, the list of detrimental affects is fairly obvious, as people look for different routes in order to save money. In addition, by using these routes, it means the tolls will not be taking in the type of revenue ODOT is anticipating, meaning there will be future proposed increases in the tolls to compensate for the revenue shortfalls, beginning a never ending cycle of toll increases and revenue shortfalls. In conclusion, while tolls may be a necessity, as more electric vehicles decrease the Gas Tax revenue, this particular model structure is not going to accomplish the stated outcomes, and is going to adversely affect a larger portion of the communities than what has been anticipated.

<b>ODOT I-205 Toll EA - RECORD #1163 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Lloyd

**Last Name :** Aucoin

**Affiliation :** Truck Driver

**Submission Method :** SurveyMonkey

**Q3. Comments :** Im a former resident of northern Virginia where toll roads are all over the place to try and reduce traffic. The toll roads have instead caused more traffic congestion in areas where the roads merge back onto the highway. I strongly suggest looking into a better option.

**ODOT I-205 Toll EA - RECORD #1164 DETAIL****Submission Date :** 2/21/2023**First Name :** Gary**Last Name :** Buckles**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Oregon is one of the highest taxed state in the nation. All this is is another tax increase. No toll improves traffic flow and stating that is dishonest. There are so many other critical issues that Oregon needs to address like repealing measure 110 and holding criminals accountable!

<b>ODOT I-205 Toll EA - RECORD #1165 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Tim

**Last Name :** Franz

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** No tolls. A transit tax is already being taken. ODOT needs to be more finically accountable. Stop spending money on non vehicular projects and build roads to move vehicles.



**ODOT I-205 Toll EA - RECORD #1166 DETAIL****Submission Date :** 2/21/2023**First Name :** Andrew**Last Name :** Holtz**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** It is well-known that paying for something means people use it more wisely. Tolling is proven to lessen traffic jams and make more efficient use of highways... which directly benefits drivers. But even more important is that tolling is one of the tools needed to mitigate the damage that transportation emissions do to our world. We must start using tolling to help protect our environment and our communities.

**ODOT I-205 Toll EA - RECORD #1167 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Dave

**Last Name :** Ganslein

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This scheme is nothing more than a thinly-veiled attempt at social engineering. Climate change is a ploy to force people out of their chosen mode of transportation and onto busses and light rail. I will travel when & where I want, without a tracking device, not only where the busses and trains go. I oppose all tolling on all highways and bridges.

<b>ODOT I-205 Toll EA - RECORD #1168 DETAIL</b>
---

**Submission Date :** 2/21/2023  
**First Name :** Eric  
**Last Name :** Burdette  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #1169 DETAIL**

**Submission Date :** 2/21/2023  
**First Name :** GL  
**Last Name :** Ke  
**Affiliation :** private citizen  
**Submission Method :** SurveyMonkey

**Q3. Comments :** You keep pushing for tolls? We don't have money for this! "Cut down on traffic"? Go back to the east coast if you want toll bridges impeding people from traveling freely. This is Oregon and like a sales tax, we shouldn't be adding insult to our already financial injury with tolls! The people of Oregon should not be prohibited from moving freely without added costs, when we already pay high taxes, bonds, levies, and a gas tax! Where did all that gas tax money go? You wasted 2 million dollars thrown at a city council that can't budget to clean up homeless camps, and what should have lasted 6 months lasted barely 1 1/2 months. Now you keep pushing to ask us citizens to shoulder a higher cost when we pay high gas price plus gas tax, high insurance which keeps rising, high property tax, and higher costs for groceries. We don't need tolls on our roads too: YOU need to budget your money better! You also impact poor and disabled people from traveling freely, and retired veterans getting to and from the Vancouver v.a. campus for medical care. People who can't afford it already! Stop making us shoulder your bad budgeting when you get enough money already, and you waste it on projects that aren't road related. Start budgeting better, and you can save money by cutting unnecessary jobs and overhead there in ODOT to save some money. Do more with less like the rest of us have been trying to do, and stop throwing money around at projects that aren't directly ON an actual roadway or bridge! No tolls!

**ODOT I-205 Toll EA - RECORD #1171 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Brad

**Last Name :** H

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I believe imposing unjust tolls and taxes upon the people of Oregon and Southwest Washington is a gross neglect of our state and local governing bodies. The citizens of our local areas are already struggling financially, and now our leaders want to impose even more costs directly onto the local communities. This will not only slow down traffic on the highways, but it will also increase hazards in neighborhoods that border the highway as traffic will spill into them and cause tremendous hazards for pedestrians, cyclists, and local businesses. Parking and local street traffic is already at an all-time dangerous level, and I believe these tolls will only increase those dangers. This is not a sustainable idea that will support our communities, but rather puts a burden on all of us.

**ODOT I-205 Toll EA - RECORD #1172 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Jenny

**Last Name :** Weller

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** It seems futile to continue to voice our opinions when no one seems to be listening or care. Tolling on this section of the hwy will have a huge impact on those of us who live in the area. 1) Side streets will become more congested and also great more noise. 2) Not everyone can flex their hours so they can travel at less peak times. 3) The inability to flex hours is especially true for people working in the service industry. 4) People in the service industry also tend to receive lower wages and will create a financial burden. Offering to reimburse part or all of the fees at the end of the year doesn't help pay the rent or buy groceries each month. I am appalled by the whole process and the continued lack of consideration for the impacted communities and our input.

**ODOT I-205 Toll EA - RECORD #1174 DETAIL****Submission Date :** 2/21/2023**First Name :** David**Last Name :** Hill**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** The toll idea is HORRIBLE. Oregon has always shared the cost of interstate improvement across the entire state. This would shift the burden of improvement on a small population driving on this corridor. Also, I have lived in states with tolls. Once they are in place they never go away and just increase the cost of travel. Keep this type of improvement and shared cost and get away from the idea of tolls.

**ODOT I-205 Toll EA - RECORD #1175 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Jeanetta

**Last Name :** English

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The tolls will affect many that cannot pay, myself and two of my children included. One is a firefighter/paramedic that does not get paid enough already. This will also divert traffic to other avenues, causing disruption to neighboring communities. The combination of the two will delay and cause disruption of emergency services to all. The federal government just supplied money for roads, is this being considered?



<b>ODOT I-205 Toll EA - RECORD #1176 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Jeanne

**Last Name :** Jardine

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am from the East coast, where there are lots of tolls. I totally support this idea as a way to fund the new I-5 bridge and other choke point improvements. You can have locals pay a little less than drive through visitors.

**ODOT I-205 Toll EA - RECORD #1177 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Patti

**Last Name :** Dorsey

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I do agree that we need to be prepared for when something will happen regarding our freeways. I have 2 questions. 1. What is the cost going to be for the everyday driver? 2. Are we using any of the millions that was part of the infrastructure bill that passed last year. Thank you.

<b>ODOT I-205 Toll EA - RECORD #1178 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** J

**Last Name :** Wieland

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am in opposition to tolling on this section of I-205. There is enough revenue gathered from gas taxes and all of the other taxes in the state to avoid the need for tolls. I am against tolls on PUBLIC roads. If private entities were to construct roads, they would be entitled to charge for people to use the road but this is a public road.

**ODOT I-205 Toll EA - RECORD #1179 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** JOHN

**Last Name :** BOWDEN

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Users of this section of freeway in Oregon overwhelmingly do NOT want tolls! No matter how well meaning the purpose is behind the tolls, we prefer the status quo on the roads to tolling. Tolls will result in countless drivers shifting to using surface streets in ways that you cannot foresee. There will be many other unintended consequences as well. NO TOLLS!

**ODOT I-205 Toll EA - RECORD #1180 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Justin

**Last Name :** Burger

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Terrible and short sided. Without question, it will limit sw Washington citizens from coming over the bridge and will directly impact low income workers. You can't explain away this reality.

**ODOT I-205 Toll EA - RECORD #1181 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Steven

**Last Name :** Gusinde

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** 1: Oregonians who drive already pay for road use through licensing fees and high fuel taxes. If the government wants to apply tolls to public roads, then the public should vote on the issue. 2: If tolls are applied to high use freeways and bridges, commuters will try to use more residential and community streets to avoid tolls. Impact to public safety (think SE PDX streets even now)? Of course.

<b>ODOT I-205 Toll EA - RECORD #1182 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Alana

**Last Name :** Bunnell

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling on this portion of the 205 will impact a lot of people who use this to get to work and family. It is a horrible idea. Add a lane. Tolling is not the answer.

**ODOT I-205 Toll EA - RECORD #1184 DETAIL****Submission Date :** 2/21/2023**First Name :** Evan**Last Name :** Gremillion**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The current proposed tolling locations seems to not address the rush hour congestion that occurs over the oregon city bridge. If you are tolling abernathy, why not put the tolling location closer to 213, that why people aren't incentivized to take all the back roads and more downtown OC ares to bypass the toll. My main concern that is follows with the above comment is the local congestion/backroad traffic. I live off of Schaeffer Rd, when traffic is bad on 205, Schaeffer becomes an almost bumper to bumper traffic scenario, then if you head into willamette, it is traffic jam central. If you put the toll at stafford and at abernathy, Scaheffer is the only option at that point that allows one to bypass all tolls. For us and our nieghbors with kids playing, this adds a huge concern to the safety and well being of our neighborhood. If you look to place the tolling location past abernathy, then you eliminate or reduce quite a bit of people trying to circumvent the toll route.



<b>ODOT I-205 Toll EA - RECORD #1185 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Brennan

**Last Name :** Aragon

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** There is going to be too much of a cost to drive on I-205. This will affect our family's finances. In addition, due to the price, cars and trucks will be utilizing the free freeways and streets causing congestion where there was none. This is not a solution that is in the best interest of clackamas or Multnomah county residents. Can we impose cost on freight and out of area commuters only? Too expensive. Too many tolls. Not sustainable.

<b>ODOT I-205 Toll EA - RECORD #1186 DETAIL</b>
---

<b>Submission Date :</b>	2/21/2023
<b>First Name :</b>	Marceen
<b>Last Name :</b>	Bloom
<b>Affiliation :</b>	retired realtor
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	The trades and delivery people will have to raise rates (time delay, expenses to them) Therefore you are forcing increased cost of living to our whole area. Really bad all the way around

**ODOT I-205 Toll EA - RECORD #1187 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Judd

**Last Name :** Lewis

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** To be clear, i am 100% against tolls. Portland is already one of the highest taxed cities in the country. Adding tolls is just another burden on the taxpayers in the metro area. The state needs to better utilize the funds it already brings in rather than looking to squeeze every last penny out of taxpayers. I would love to eventually move down to the Tualatin/Tigard area, but would no longer consider if it tolls became a part of my everyday life.

<b>ODOT I-205 Toll EA - RECORD #1188 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Joseph

**Last Name :** McGinley

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling is useful in encouraging residents to change their travel behavior. Instead of adding lanes and focusing on roadway improvements, funds should be invested in alternative transportation such as public transit, cycling, and walking. I understand these modes will not suit everyone, but without a robust multimodal system, we won't effectively reach our goal of traffic reduction. Please use funds to travel alternate travel modes in the I205 corridor and east metro region. Thank you.

**ODOT I-205 Toll EA - RECORD #1189 DETAIL****Submission Date :** 2/21/2023**First Name :** Lila**Last Name :** Dale**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Route 205 is supposed to be a traffic bypass for I5, this is the opposite of a useful bypass as now more people will use and make more traffic on I5. I highly suggest making good use of trains and end of line public transportation rather than this nonsense.

<b>ODOT I-205 Toll EA - RECORD #1190 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Michael

**Last Name :** Liddy

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** There is plenty of money being wasted in this state. Take money from the police don't rob the people trying to live their lives.

**ODOT I-205 Toll EA - RECORD #1191 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** GINA

**Last Name :** FLUHARTY

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I work in Tigard and cross the Arch bridge 2x a day. I am concerned about the cost of the toll each way. \$5 is way too much for my household finances.

<b>ODOT I-205 Toll EA - RECORD #1192 DETAIL</b>
---

**Submission Date :** 2/21/2023  
**First Name :** Noah  
**Last Name :** Baker  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**



**ODOT I-205 Toll EA - RECORD #1193 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Christopher

**Last Name :** Hillmann

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls unfairly place the burden of payment on a small subset of residents and businesses, when the entire state benefits from the infrastructures presence. It would be different if there were any other alternative path, and this was a luxury. Disequity at its finest. Further, those with less means will be forced to seek alternative routes, of which there are so very few. I know I will start diverting thru Molalla and Canby and so will all the Gresham and Sandy travelers as an example. The right way to engage funding is through general fund budgeting and allocations or county bonds for the three metro groups.

**ODOT I-205 Toll EA - RECORD #1194 DETAIL****Submission Date :** 2/21/2023**First Name :** Robert**Last Name :** Rubenstein**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I am elderly and have limited income. Bicycling and public transportation aren't viable options for me. I will choose to drive on other roads to avoid the tolls. Nothing about the plans for using funds from the tolling project will enhance the quality of my life.

**ODOT I-205 Toll EA - RECORD #1195 DETAIL****Submission Date :** 2/21/2023**First Name :** Steven**Last Name :** Smith**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I am against the whole toll scheme. Congestion pricing is total b.s! This is nothing more than an attack at the working person who has no choice but to travel in the normal commute time frame. What have we been paying taxes for? Enough is enough. Just NO!

**ODOT I-205 Toll EA - RECORD #1196 DETAIL**

**Submission Date :** 4/14/2023  
**First Name :**  
**Last Name :** ed@cornellfarms.com

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** In my opinion, tolls on I-205 will have the unintended consequences of further chasing residents who can relocate to move away, as well as exacerbate the tax and fee burden on the remaining residents. We are currently coping with the unintended consequences of the “work from home” reaction to the pandemic. City centers are empty, even of the governmental staffs that derive their compensation from taxpayers who are watching decay and crime infill their region. Business owners whose workers must travel the freeways to get to work daily will disproportionately have to bear the costs of these projects,

**ODOT I-205 Toll EA - RECORD #1197 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Michael

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** This will cause people who work in Oregon and live in Washington or vice versa to spend more of their hard earned money. Gas prices are already high enough and you want to charge people more money just to go to work

**ODOT I-205 Toll EA - RECORD #1198 DETAIL**

**Submission Date :** 4/14/2023  
**First Name :** Phillip  
**Last Name :** Gagnier  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** My wife and I as well as neighbors live in Gladstone, Oregon directly across the river from a designated open space that Oregon City allowed dirt and materials to be excavated for development of an apartment complex behind the Oregon XCity Shopping Center. The property is owned by Oregon City. Since we were told that the location was Open Spaces and an Amphitheater fit that land use. Interesting that the material that was removed from the location was used for a fill to place apartments behind the Oregon City Shopping Center so that it was raised up above flood elevations to meet design criteria in a flood zone. The Amphitheater has never been used. The wildlife which was seen across the river and many animals that would swim over to our properties are now lost or at least dislocated. What happened when the area was excavated was noise sometimes day and night for over a year. The fill got placed and the apartments were built. This has been years. The excavation took all of the noise barrier from the I 205 freeway and the visual blocking of I 205. Nothing has been done to change this noise from the freeway and the visual of the vehicles on the freeway. We bought this property in the 1980's. We are getting older and need someone to help us with some sort of noise barrier. Since the Amphitheater seems to have been a ploy for development then so be it. Only please help us with the visual and sound barrier. The apartments are going to be getting a sound wall along I 205 in the current phase of the bridge project. In the next phase which seems to encompass the area directly across from us there is not a sound wall proposed. As one knows, sound travels across the open space if unhindered. We have been listening to the sound and seeing the I 205 traffic ever since the barrier of dirt, rock and trees were removed. In the interim a temporary visual block would be helpful and then during the project upcoming phase a permanent sound and visual wall. I know that some years ago along 205 South a soundwall was raised (added to) near the 212 exit to accommodate the homes there. I know that the 205 rest area was removed to accommodate the residents of homes built well after the rest area was built. Please help us to get some relief from Oregon Cities negligent act to get a large apartment complex built for tax revenue generation.

<b>ODOT I-205 Toll EA - RECORD #1199 DETAIL</b>
---

<b>Submission Date :</b>	4/14/2023
<b>First Name :</b>	Sue
<b>Last Name :</b>	
<b>Affiliation :</b>	R
<b>Submission Method :</b>	Accessible form
<b>Q3. Comments :</b>	No Tolls !

**ODOT I-205 Toll EA - RECORD #1200 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Nancy

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** We live in WA, but my husband works in PDX. The tolls would be an increase in financial burden which his employer would not reimburse. Tolls would discourage interstate commuting unless truly necessary.



**ODOT I-205 Toll EA - RECORD #1201 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Katherine

**Last Name :**

**Affiliation :** Clackamas county resident

**Submission Method :** Accessible form

**Q3. Comments :** I agree the proposed improvements to I 205 are needed and understand how tolls are needed now that the Portland Metro area is a Big city with big city problems, however I the placement of the 1 tolling gate at the south end is not equitable. I believe tolling should have at least 2 areas of tolling including the Glen Jackson bridge over the Columbia river leading into Oregon to I 84. With two tolling areas the tolls price could be lower and more equitable. Tolling just the Abernathy Bridge burdens the residents and local streets of clackamas county more than the Washington state residents and Multnomah county residents who use it heavily. How were all the improvements financed from Stark Street to PDX on i205 without tolling ? Since i205 opened in 1980 very few changes to improve traffic flow in the Clackamas county portion and they were slow in coming. If tolling is necessary please make it equitable to all of I 205 bridges not just the single one in clackamas county where there are few alternative local roads to use. And are already heavily burdened at peak hours. Thank you

**ODOT I-205 Toll EA - RECORD #1202 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Phillip

**Last Name :** Gagnier

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** The EA assessment correctly identifies loss of household finances as an environmental issue. The loss of property value quickly escalates to household finances. At one time our home and property was sought after because of our location with no view of I205 or noise from it. (Please refer to earlier email from me regarding Oregon City creating an Amphitheater thus opening up direct view and noise from I205). We have mother in law quarters that we rented and used to rent our home through the years when we would travel or work outside of the area. The rental has been much less interesting and not sought after now by potential renters and of course futuristically by any buyers should we decide to sell.. The rent if rented needs to be way below market value because of the view of the freeway and the noise. We are also within sight of the project offices for the Glenn Abernethy Bridge. We are requesting some relief from the freeway visual impacts and very loud noise impacts to our home in Gladstone as the view and noise is a prominent part of our current environment and more so as traffic increases. Please take a look at a soundwall which would help block some of the noise and hopefully all of the view from the freeway.

I have attached a photo to help illustrate the visual issue which has been changed because of the removal of 10's of thousands of CY of habitat and fill which leaves an open view and noise of/from freeway.

**Attachments :** View of I 205 from our house.jpg (2 mb)

**ODOT I-205 Toll EA - RECORD #1203 DETAIL****Submission Date :** 4/14/2023**First Name :** Tim**Last Name :** Gillette**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** The Oregon Department of Transportation's tolling plan for I-205 is a bad idea. It does not help Oregonians. It will add costs for everyday Oregonians that will be a challenge to bear in these inflationary times. It will not help with traffic congestion. It may make congestion worse as it will drive people to find alternate routes on surface streets to avoid the tolls. The tolling plan will cost jobs and wages will be lost. We will all become poorer as a result of this tolling plan.

**ODOT I-205 Toll EA - RECORD #1204 DETAIL**

**Submission Date :** 4/14/2023  
**First Name :** Ben  
**Last Name :** Klevit  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** I do not agree with the plan to implement freeway tolls in Oregon.

This will become a revenue stream ODOT will come to depend on and thus will be in its best interest to have more people driving, not less, and thus puts it at cross-purposes with its stated intention to reduce congestion.

My guess is that if anything congestion on side roads will get worse as those unwilling or unable to pay tolls will seek untolled byroads as alternative routes. Neighborhoods and other arteries will bear the brunt of rerouted traffic.

There needs to be surveyed evidence from I205 and I5 drivers that the stated objectives would actually be met through enacting tolls. Have scientific surveys of the freeway driving public been done to actually predict how driving habits would change and what these drivers think about the whole idea?

This program is just going to create more antagonism and resentment towards government agencies, especially if there is no transparency and accountability regarding exactly how the millions in revenue proposed to be and ultimately are being spent.

There's already too much waste as it is.

Please do not put another nail in the coffin of the Portland area's continued decline in its quality of life.

**ODOT I-205 Toll EA - RECORD #1205 DETAIL****Submission Date :** 4/14/2023**First Name :** Arvind**Last Name :** Garg**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** I am opposed to the tolling of any bridges in Oregon. It doesn't make sense and will hit those that work the hardest the most while giving free passes to those who don't contribute to society.**Attachments :** image001.jpg (2 kb)

**ODOT I-205 Toll EA - RECORD #1206 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** David

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** The idea of taxing people to drive on roads when so many can barely afford to have cars in the first place is Ludacris. Gas prices are about to skyrocket and this will make it even harder for Oregon residents to even get to work. Over \$15 to get from Vancouver to Wilsonville, there goes an hour of your pay. This is will kill the economy more than help it. It will also make traffic a nightmare in the city. Good luck trying to get anywhere.

**ODOT I-205 Toll EA - RECORD #1207 DETAIL**

**Submission Date :** 4/14/2023  
**First Name :** J.  
**Last Name :** Allen Green  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** As a sales rep for many years, I know how vital it is to get from point A to Point B, often many times in the same day. The prospect of paying \$2.20 each way every time a representative makes a follow-up visit to a prospective buyer makes me see red! It is hard enough just to pay for the fuel these days. How can you justify the added burden of tolls on hardworking people who are just trying to survive?

The charging of tolls to pay for a new bridge is another matter. I can see how that makes sense. Once the bridge is paid for, the tolls stop. But charging tolls on already existing roads and bridges is shortsided at best (you are giving people just another reason to flee the Portland Metro area) and outright mean at worst!

<b>ODOT I-205 Toll EA - RECORD #1208 DETAIL</b>
---

**Submission Date :** 4/14/2023  
**First Name :** Adam  
**Last Name :** Fiss  
**Affiliation :** Southwest Washington Regional Transportation Council (RTC)  
**Submission Method :** Letter  
**Q3. Comments :** Thank you for the opportunity to provide feedback on the I-205 Environmental Assessment. Overall, we are happy with the breadth of analysis that has been presented within this report. In addition to our comments submitted online, please accept the attached cover letter as further comment on this deliverable. We look forward to continuing to work together on this regional transportation project of bi-state importance.  
  
**Attachments :** image001.png (8 kb)  
RTC I205 EA Comments.pdf (178 kb)





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*

April 14, 2023

Mandy Putney  
Director of Strategic Initiatives  
Urban Mobility Office  
Oregon Department of Transportation  
Via Email: [Mandy.Putney@odot.oregon.gov](mailto:Mandy.Putney@odot.oregon.gov)

Mandy,

The Regional Transportation Council appreciates the continued partnership and consultation that our agency has received with respect to elements of the Oregon Tolling Project. We are submitting the following letter to supplement comments made on the NEPA Environmental Analysis for the I-205 Toll Project.

Located just 15 miles south of the state border, the I-205 Toll Project will influence and impact the traveling public and business based out of southwest Washington. Our comments, submitted online and included below, are structured around the June 13, 2018 Letter from RTC to Co-Chairs of the Portland Region Value Pricing Policy Advisory Committee and Chair of the Oregon Transportation Commission. This input holds true today and forms the framework through which we hope to continue exploring impacts and opportunities for SW Washington residents.

Overall, we are pleased with the breadth of analysis that has been presented within this report. With this EA as an example, we expect the same level of detail in the NEPA process for the Regional Mobility Pricing Project, which we believe will have substantial impacts on the traveling public and local economy of SW Washington.

We look forward to hearing from you and continuing to provide our insights and perspectives as we pursue regional transportation system improvements.

Sincerely,

Matt Ransom  
Executive Director

Attachments

cc: Comments on the I-205 Environmental Assessment

**Environmental Justice Technical Report:** The Area of Potential Impact (API) outlined in the Environmental Justice Technical Report, page 12, adopts the APIs of air quality and economic analysis, which are the EA's largest. The API includes census tracts in Multnomah, Clackamas, Washington, and Marion Counties. As acknowledged by the report, toll projects can have effects on users of the tolled facility that are not geographically constrained to the API. The cost of the toll – especially on low-income users – and the potential language or technology barriers to accessing the electronic toll payment system extends beyond these boundaries.

We believe the following items would further support the EA and the success of the program:

- ODOT/OTC policy and rules for Low Income Toll Program benefits/credits shall be accessible and available to all Washington state stakeholders, who are affected by the Toll Program costs. The Area of Potential Impacts (API) must include SW Washington, which historically and currently includes lower-income community members. The benefits that are derived from this program must flow across state lines.
- ODOT/OTC policy and programs for toll enforcement shall be equitably available/applied to SW Washington stakeholders.
- ODOT/OTC policy and programs shall be implemented in WA state, and/or partnerships be established with third party vendors, whereby Customer Service center(s) shall be located in WA state to provide for in-person cash services related to the OR Toll Program.

**Congestion Management:** An express goal of the program, as noted in each Appendix, is to use variable-rate tolls on I-205 to manage congestion. Regional corridor outcomes and performance metrics should be defined prior to beginning a value pricing pilot project. Through monitoring, propose corridor specific project mitigations and programs to ameliorate social/economic impacts created by a value pricing project. Corridor monitoring and mitigation towards the outcomes should be continuous for the duration of a pilot project.

Please consider the following question:

- What are the congestion performance targets associated with the I-205 Toll Project? How are metrics like speed, volume to capacity, emissions, hours of congestion, and VMT prioritized?
- How will these standards be set and will they periodically be reset or recalibrated? How will these targets be defined?
- What are the target traffic diversion metrics being used to measure success or failure?
- What is the target mode shift being used to measure success or failure?

**Miscellaneous:**

- ODOT should utilize general media outlets based in SW-WA communities; partnerships should be established with service providers and community groups and private businesses, and, distribution of materials in non-English languages shall be produced specific to SW-WA cohorts.
- How can toll revenues be spent in Washington State as part of a mitigation program? ODOT/OTC policy and programs shall identify the legislative steps to be taken to ensure equal opportunity to mitigation efforts that guarantee resources located in Washington.
- What are the direct and indirect impacts created by value pricing?

**ODOT I-205 Toll EA - RECORD #1209 DETAIL**

**Submission Date :** 4/14/2023  
**First Name :** Mark  
**Last Name :** Johnson  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Dear Oregon DOT:

As a frequent visitor to Oregon, I wish to enter my opposition to a plan to impose tolls for the use of the I-205 highway in Oregon and on all other interstate highways in Oregon in the future. As a non-resident, my use of the highway system in Oregon almost always includes a rental car. Typically these cars are not equipped with equipment that tolls the auto and user at a FAIR rate. Instead, significant fees are imposed. This circumstance creates an unreasonable burden on the out-of-state user and is probably a violation of the federal Constitution. There is a reason why Congress required states not to impose tolls on interstate highways. Oregon may need to raise money to support transportation needs but needs to find a way to do that without imposing unreasonable burdens on out-of-state residents and interstate commerce.

**ODOT I-205 Toll EA - RECORD #1210 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Donna

**Last Name :** Bleiler

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I disapprove of taking my constitutional right to free travel away. Tolling is a taxation that hits the poorest the hardest, and will increase prices on everything for everyone. It will hurt our economy more than help it. It is a socialistic lockdown.

life-long resident of Oregon

<b>ODOT I-205 Toll EA - RECORD #1211 DETAIL</b>
---

**Submission Date :** 4/14/2023

**First Name :** Jay

**Last Name :** Barber

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** No tolls! Tolls will create a revenue stream that will allow government agencies to find new ways to spend taxpayer dollars. If needs exist now, prioritize those needs and address them with existing revenues.

**ODOT I-205 Toll EA - RECORD #1212 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** shannan

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** If cars avoid the tolls, they will drive side roads this equals pollution. Traffic moves elsewhere? so now what? side road tolls? Where is the money going for the lottery I thought to help roads. I thought businesses pay road taxes, truckers ect. Isn't that enough money? Make a road tax people who make certain income would be better. How come the public didn't vote this in first? This gets voted in I doubt the public would accept this vote. The fees will b atrocious. Vote in a road tax for certain income brackets. Not A EYE IN THE SKY. POLLUTION, NO MATTER HOW YOU LOOK AT IT ITS EVERYwhere. Traffic happens it is what it is. I'm in traffic the government charges tolls I feel fair is fair I wanna charge a toll for waiting in traffic hehe

**ODOT I-205 Toll EA - RECORD #1213 DETAIL****Submission Date :** 4/15/2023**First Name :** Mark**Last Name :** La Bar**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** Absolutely no tolls on either 1-205 or 1-5 bridge crossings in either direction. It is time the US government pays the entire cost considering both Washingtonians and Oregonians pay more to federal government than we receive.

**ODOT I-205 Toll EA - RECORD #1214 DETAIL**

**Submission Date :** 4/15/2023  
**First Name :** Margo  
**Last Name :** Donelin  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** I am commenting on your proposed tolling system. I disagree with you and I just propose some questions to you. 1) What does the taxpayer get for this tax? Yes, it is a tax, because we already pay road taxes and now you're adding on this. You will drive out everyone from the State of Oregon except those people who can't afford to drive on your toll roads anyway. Your tax base will go down -- and who will you tax then. If the only folks left in Oregon are those who are on some sort of subsidy, the only thing you will gain is control over the people. And that seems to be the goal of this. Just be truthful. 2) Where are the road taxes going? Does this mean you will be reducing them because of the tolls? Or will you be increasing them to go along with the tolls? And will all this money be managed any better than how money is currently managed in this state? 3) Will our roads be any better since we will be paying all of this extra money? Probably not based on all of the road taxes we pay that were supposed to pay for upkeep of the roads. 4) Did anyone even consider what Cascade Policy Institute had to say about this or is it being "pushed thru" to get all this money (\$\$\$)? The answer is NOT just tax the people more -- that doesn't resolve anything. I think you folks are smarter than that but so are your constituents and taxpayers. Better decisions are ALWAYS made when you listen to counsel & input from those who will be affected BEFORE you make decisions. The question becomes "who do you work for?" If it's the taxpayers, then consider what they have to say BEFORE YOU MAKE THE DECISION. And Cascade Policy Institute represents the taxpayer. If it's not the taxpayers, how we treat others is how we will get treated in the future. We get treated like we treat others and it will come back to bite you. 5) Is the purpose of the tolls to fund the EA charging stations? If so, why do all the folks who have gasoline or diesel vehicles have to pay for the charging stations when the electric vehicles are out of the financial range for most of the population in the state. If folks can afford the electric cars, they should be able to collectively afford to build the charging stations without making those people who don't even own an electric car pay for someone else who does. Just be truthful.

Thank you for the opportunity to comment. I know you folks are capable of good decisions but this one gets a "C" in my book.



**ODOT I-205 Toll EA - RECORD #1215 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Scott

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** The toll location is all wrong. Its a tax on the residents of West linn, lake oswego and Oregon city. Many have no option but to use 205 and this is unfair. I live far from the toll area, but I would have no real choice but to pay twice a day to go to and from work. Tolls are a poor solution to a budget shortage.

**ODOT I-205 Toll EA - RECORD #1216 DETAIL**

**Submission Date :** 4/15/2023  
**First Name :** Laurie  
**Last Name :** Vandeberghe  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** I live on SS I can't afford to pay tolls. If this dumb idea is approved I'll be cut off from my doctor's and my family. This should go to the voters. They already upped the gas tax by 10 cents a gallon. Your not telling what the toll fees would be. I don't have public transportation out here. I'd have to drive 5 miles to apart and ride and take 3 buses to get to Dr appointments. That would take me 3 hrs one way and I'd have to go to downtown Pdx which scares me. This should be a mandatory vote from the people and not crammed down peoples throats. Don't steal from people. Learn to work within a budget. If you can't leave things alone. Find money somewhere else.

**ODOT I-205 Toll EA - RECORD #1217 DETAIL**

**Submission Date :** 4/15/2023  
**First Name :** STEVEN  
**Last Name :** ALDERETE  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** By the end of 2024, the Oregon Department of Transportation plans to toll both the Abernethy Bridge and the Tualatin River Bridges on I-205. Tolls could be as high as \$2.20 each way on each bridge, or \$8.80 round-trip across both bridges. That's just the first phase.

By the end of 2025, ODOT expects to impose tolls along the entire lengths of both I-5 and I-205 from Wilsonville to the Washington state border. After that, the Interstate Bridge Replacement Program plans to charge tolls to cross the Columbia River on both I-5 and I-205.

Cascade Policy Institute is sending out notices to comment on ODOT's tolling plans. Federal law allows anyone to comment on an Environmental Assessment. If the Federal Highway Administration (FHWA) receives sufficient comments that demonstrate the negative impacts of ODOT's tolling plan, then the agency may not approve the tolling plan.

Cascade writes: Under federal law, states must get permission from the Federal Highway Administration (FHWA) to charge tolls on Interstate highways. One of the steps is publishing an Environmental Assessment that details the potential environmental and economic impacts of a federally funded project. ODOT recently published its Environment Assessment of the Abernethy and Tualatin River bridge tolls.

ODOT estimates the average household will pay \$575 a year just for its first phase of tolls. That's \$575 that Oregonians won't be able to spend on other things, with restaurants and retail establishments the hardest hit. ODOT estimates that its tolls will cause more than 750 people to lose their jobs and reduce wages by about \$3 million a year.

The transportation department projects that it will collect \$132 million a year in tolls: \$93 million a year from households and \$39 million a year from freight carriers. At the same time, ODOT estimates that reduced traffic on I-205 will produce only \$105 million in economic benefits from reduced congestion, environmental improvements, and economic activity. That means Oregonians will be \$27 million worse off every year these tolls are collected.

This is not how congestion pricing is supposed to work. Done correctly, congestion pricing makes people better off because the value of the travel time saved is worth more than the tolls they pay. Somehow, ODOT got way off track and concocted a tolling scheme that charges outrageous tolls, doesn't generate sufficient time savings, impoverishes families, and drives out employers.

**ODOT I-205 Toll EA - RECORD #1218 DETAIL****Submission Date :** 4/15/2023**First Name :** Justin**Last Name :** Mills**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** No Interstate tolls for Gasoline and Diesel automobiles in Oregon

My proposal is to ONLY toll electric and hybrid vehicles and spare the gasoline and diesel vehicles. Gasoline and Diesel vehicles pay their tolls at the pump. The claims are that due to all the electric and hybrid vehicles not paying as much in fuel taxes, that there is no way to capture fuel mile taxes on those heavier, popular, and soon to be mandated vehicles. A Tesla Model S weighs 4740 lbs and a Mustang GT weighs 3750 lbs (and thus is wearing out our roadways at a higher ratio.) I know this proposal raises the ire of the current ruling elite, but it is a great way to have electric users pay their fair share.

I am against Portland Metro and eventually all of the State of Oregon tolling on Federal Highways that pass through Oregon. This is just another way Oregon is grabbing money from its citizens as well as people that pass through our beleaguered state.

I have heard on more than one occasion Government officials admitting that they WERE NOT going to use money generated to improve roads or relieve traffic. This is just another way that the State of Oregon is making residency more difficult.

**ODOT I-205 Toll EA - RECORD #1219 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Bonnie

**Last Name :** Saikkonen

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I strongly object to any plans to let tolls on our Oregon Bridges and Freeways. Our taxpayers are beating the burden for the poor decisions made by this state government administration.

Citizens are fleeing the state to escape the extreme misrepresentation of our needs and desires.

STOP!!!!

**ODOT I-205 Toll EA - RECORD #1220 DETAIL****Submission Date :** 4/15/2023**First Name :** Linda**Last Name :** Egbert**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** What the heck are you thinking? I travel to Portland maybe once a month if that the visit niece. I'll have to buy a toll ticket on I five and then one on 205. You realize, the traffic you are going to cause. If there's a fender bender on I five, you have bumper to bumper for miles. This is wrong. This is terribly terribly wrong. I vote no on this get your damn money some other way. Oh, why don't you be careful of our money. If there's a project you people spend so much useless money on that project, I know I've watched it. thank you very much I vote no no no on these tolls find some other way.

**ODOT I-205 Toll EA - RECORD #1221 DETAIL****Submission Date :** 4/15/2023**First Name :** Mary and Michael**Last Name :** Zeleny**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** I am hereby registering my extreme objection to the implementation of tolling on greater Portland freeways. I believe the results of this non-taxpayer approved plan will be a huge net negative for the people, especially Clackamas County. Please rescind this ill advised scheme before implementation. I'm afraid the unforeseen negative consequences will greatly outweigh any intended benefits.

**ODOT I-205 Toll EA - RECORD #1222 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Gary

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** This tolling idea is nothing more than to cover up ODOTs criminal level waste of tax payer dollars. We cant afford further fees, Democrats are bleeding Oregonians white already. Hold ODOT responsible for their waste of dollars instead of hitting us with more fees.



**ODOT I-205 Toll EA - RECORD #1223 DETAIL**

**Submission Date :** 4/15/2023  
**First Name :** CHRISTY  
**Last Name :** M  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** Everyone I speak to, especially, those that have to commute daily across Oregon bridges, CANNOT AFFORD COSTLY TOLL FEES, when most Oregonians are barely able to put food on their tables, pay for gas, water, heat, and housing/roof over their heads. Who is government to dictate this agenda, you work for the people, this Toll Fee for crossing bridges is to be up to the majority vote from Oregonians. In other words, put this toll fee funding on Oregon voter ballots (secure without voter fraud interferences) and you will find no Oregonian will vote for Toll Fees. Actually, if government officials stop spending our tax dollars on not life sustaining agendas, such as paying for abortions and miss-managed funds on contracts which costs the state 3 to 4 times more than it should, you would not be sucking Oregonian's dry of their hard earned dollars to make ends meet trying to pay for basic life sustainment, such as food, water, heat, and housing. You are real JERKS!

"Government has become our known enemy!"

A very concerned Oregonian and citizen for over 50 years.

**ODOT I-205 Toll EA - RECORD #1224 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Beth

**Last Name :** Smolens

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I have written before. In the beginning, during the "exploratory" phase. I cannot believe it has gotten this far.

Tolling the 205 corridor from Stafford through the Abernathy bridge is just such a monumentally bad idea, I just cannot believe it is still being talked about.

I am from Boston, I grew up with tolls. You want to toll roads to pay for improvements? Do it fairly. Do it smart. Put the tolls at the gateways and leave the suburban connections alone. Toll the gateway at I5 and 205 just North of Wilsonville...toll up at the Oregon border of the Columbia River Interstate Bridge. These access points to the Portland Metro area are going to toll the drivers that come through the area and use the roads and bridges the most. Don't encourage more people to take the Boreland/ Willamette Falls Drive access than we already have taking it. Don't gouge those that pay property taxes, pay for gas, shop local...and live.

West Linn Resident

**ODOT I-205 Toll EA - RECORD #1225 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Lynn

**Last Name :** Fish

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I am against road tolls. While I can afford to pay them, many Oregonians cannot. This will force drivers to find ways around tolls by driving on local streets, causing congestion and raising the risk of injury for pedestrians, bicyclists, and small children.

Please consider the ramifications and vote No. We already have too many pedestrian deaths due to drug-addicted people wandering across roads. Let's not increase fatalities by increasing traffic on secondary streets!!

(7 year member of the Citizen's Advisory Committee for the Banfield Light-rail Project.)

**ODOT I-205 Toll EA - RECORD #1226 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Agatha

**Last Name :** Chan

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :**

Dear Odot,

I am writing to express my strong objections to the proposed variable rate toll system on the I-205, with fees ranging from \$0.55 to a maximum of \$2.22 during peak hours. While I understand the rationale for this proposal - reducing traffic, preventing highway and bridge failures during earthquakes, and ensuring emergency vehicles aren't stuck in traffic - I must share my concerns as a resident of West Linn.

The I-205 is a crucial transportation route for those living in West Linn. Introducing tolls could result in a significant increase in drivers seeking alternative routes, such as Willamette Drive (#43), causing it to become overwhelmed with traffic. This shift may negatively impact our community's quality of life and create additional safety hazards.

Moreover, the existing funding for highways comes from gas taxes, making it unfair to impose additional toll charges on the public. Although the proposed electronic toll system aims to streamline the process through scanning or sensors, I believe it will still place a financial burden on many residents.

Additionally, the proposed toll system would charge \$0.55 even during off-peak hours, such as midnight, when traffic is minimal. This suggests that the primary objective of the toll system is revenue generation, rather than addressing pollution or traffic congestion.

Instead of imposing more fees on the public, I believe the government should concentrate on developing environmentally-friendly and sustainable solutions to tackle pollution and traffic problems. This could include promoting public transportation or investing in alternative transportation infrastructure, which would have a more significant and lasting effect on reducing pollution and traffic congestion. It is also disheartening that the government only sought our opinions after deciding on the toll, rather than allowing us to vote for or against the proposal.

As a Chinese resident of West Linn, I rely on the I-205 to shop for Chinese groceries. Implementing a toll system on this route feels discriminatory towards my specific needs. In light of these concerns, I strongly urge the government to reconsider the implementation of the variable rate toll system on the I-205 and explore alternative methods to address the issues at hand. Doing so would help protect the well-being of West Linn residents and strike a fair balance between the need for infrastructure improvements and the financial burden on the public.

**ODOT I-205 Toll EA - RECORD #1227 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** hing

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** There needs to reduce traffics, but does tolling works. even with tolling, when there's not enough traffic lane, there's no different.

**ODOT I-205 Toll EA - RECORD #1228 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Joey

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Like the others I don't love the idea of a toll, and I personally don't still don't understand how that is supposed to help with traffic and environmental impacts. "The people that has to work is going to work no matter what" so seem like this kinda sucks for them. And like them this project will definitely have an impact me, I have a part time job at Bridgeport, which I use i205 to get to. Sometime I only go into work like 2 to 3 hours to help. So when this goes into effect I'm going to have to make a decision of if I should keep this part time job, just pay the toll or take the longer route to avoid the toll.... Seems like I would be losing money and time for going to work.... And on top of that the added stress of another monthly bill for the online acct to keep track of...

**ODOT I-205 Toll EA - RECORD #1229 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** P

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I want to know the percentage of the collected toll will go to road improvements vs the percentage will go to admin cost. If the city do not sign off the right of way to the state for service roads. What is the backup plan?

**ODOT I-205 Toll EA - RECORD #1230 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Selina

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** i like to see different toll rate for annually, monthly and single use. different toll rate for different vehicle type (axle).



**ODOT I-205 Toll EA - RECORD #1231 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Peter

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** 1) The government has been continuously giving away money in the past two to three years, and even illegal immigrants have a share in collecting money. Why not put this money on highway maintenance instead of collect tolls? 2) If toll collection is necessary, different type of vehicles should pay more. 3) I hope there's not another toll on another stretch of the highway, if that happens, I hope you put tolls where the washington residents uses the most.

**ODOT I-205 Toll EA - RECORD #1232 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** MIN

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** too many washington residents are working and buying stuff in oregon causing more traffics, why don't we toll them?

**ODOT I-205 Toll EA - RECORD #1233 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** yan

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** it will cause some level of difficulty for people who use that stretch of highway in a regular basis. I don't think tolling is ideal. I feel like adding more driving lanes, that will help reduce traffic, less pollutions for the environment. maybe build more overpass.

**ODOT I-205 Toll EA - RECORD #1234 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** lisa

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** it's not easy for middle class financially. tolling will cause people to choose different routes, which cause problems for the locals.

**ODOT I-205 Toll EA - RECORD #1235 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** alice

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I'm oppose to this tolling system, tolling can't reduce traffic congestion. I think it helpful to add more traffic lanes. I think the tolling rate is unreasonable. I don't think the revenue from tolling can help oregon.

**ODOT I-205 Toll EA - RECORD #1236 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** sue

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I think tolling will cause local community stress because many will re-route due to tolling. it's not easy to minimize their effects. i agree to toll highway/bridge between oregon and washington.

**ODOT I-205 Toll EA - RECORD #1237 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Donald

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** This tolling proposal will hurt lower and better income Oregonians that have to commute because they can't afford to live in Portland close to their employment. If you want to toll a bridge then consider tolling the bridges spanning the Columbia River. Give struggling Oregonian residents a break!

<b>ODOT I-205 Toll EA - RECORD #1238 DETAIL</b>
---

<b>Submission Date :</b>	4/16/2023
<b>First Name :</b>	Patti
<b>Last Name :</b>	Allen
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email
<b>Q3. Comments :</b>	No to the toll.



**ODOT I-205 Toll EA - RECORD #1239 DETAIL****Submission Date :** 4/16/2023**First Name :** Mark**Last Name :** Brasch**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Please do not add tolling to any roads, highways, or bridges in Oregon. There are better ways to collect needed funds. What is the purpose of congestion tolling if not to punish mobility when people want to move? Mobility is a measure of prosperity as people get where they want to go and when. The rates I see proposed are too high. An added tax will never go away. Tolling will repel people from Oregon and the Portland area, hurt businesses, employees, and ordinary citizens all around, and the environment as people take longer, slower routes, putting more wear on their vehicles. The purpose of government should not be to harm its citizens, and this will harm. If you do force this upon us citizens, it should be equal, low, and either flat or proportional to vehicle weight. No exemptions, no special waivers.

Punishing drivers for picking a specific route, often the most efficient in time, miles, and fuel, will alter their behavior. A toll is a force, or coercion, and all such force by government will harm. Extra fuel burned. Extra time used. Wasted energy. Extra heat generated. More wear on vehicles. Time lost, resulting in lower income, less tax revenue, and higher costs of goods and services. Finally, lost sales by businesses not visited. Please do not punish prosperity.

Concerned citizen, Vancouver WA  
Frequent visitor and 44 year prior resident of Oregon

**ODOT I-205 Toll EA - RECORD #1240 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** Donna

**Last Name :** Yount

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** As a senior citizen, I'm very much against Oregon's plan to charge a toll; it's difficult enough as it is with rising prices of basic essentials and gasoline to make ends meet. I drive less than I used to but many of my friends live where I would need to pay tolls when I visit them. Please recalculate your math on the benefits of this plan!

<b>ODOT I-205 Toll EA - RECORD #1241 DETAIL</b>
---

<b>Submission Date :</b>	4/16/2023
<b>First Name :</b>	Tamara
<b>Last Name :</b>	
<b>Affiliation :</b>	
<b>Submission Method :</b>	Accessible form
<b>Q3. Comments :</b>	No tolls, no forcing people out of their cars

**ODOT I-205 Toll EA - RECORD #1242 DETAIL****Submission Date :** 4/16/2023**First Name :** Beth**Last Name :** DuPriest**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** I'm writing to say that I'm opposed to tolling on I-205. As a recent resident of West Linn, I can tell you that tolling on the Abernethy bridge - or really anywhere on I-205 - will be devastating to residents of that community. It is already difficult enough to navigate Hwy 43 and Willamette Drive during rush hour; adding tolling to the freeway will divert traffic to these local roads, making it nearly impossible for local residents to get home, and for emergency vehicles to get where they need to go at critical times. I moved to Vancouver, WA during the pandemic. A year later, I began a new job with a company headquartered in Eugene. I drive to Eugene twice a month (paying the State of Oregon income tax on the money I earn while I'm working in the state), almost always taking I-205. I-205 was built as a way to divert traffic from I-5. Adding tolling to I-205 will negate its original purpose. In addition to diverting some traffic to surface streets, it will divert other traffic to I-5 and make its congestion worse. The other possible diversions include country roads, where people will drive at speeds they are accustomed to reaching on the interstates in an attempt to keep total travel time the same as when they were on the interstate. That's a dangerous scenario - those country roads aren't meant for driving at 70+ mph, with people attempting to pass in unsafe places. You KNOW it will happen if tolling is introduced. People WILL crash, and people will die. You can't just assume that most people will drive safely. Of course most people will. But there are enough people who won't - and there's a huge overlap between that crowd and the ones who will do anything to avoid paying a toll - that the danger on two-lane highways and local roads will skyrocket. Of course, this is all in addition to concerns about tolling being a regressive tax. Enough said. The other thing tolling will do is to accelerate the already-impactful shift of jobs and residents to Clark County. In addition to losing out on tolling revenue, Oregon will also lose out on income tax. It seems like Oregon's leaders don't understand what drives human behavior. Adding tolls will NOT encourage people to use mass transit because our mass transit system is simply not good enough to meet people's needs - the added time to use transit vs. driving is prohibitive for most people. Adding tolls will NOT appreciably change people's driving habits because these habits are driven mostly by our work schedules, children's school schedules, and other events, which cannot be shifted at our whim. Tolling does not solve the problems it is being sold as intending to solve, and it creates MANY more new problems. Tolling is not the right solution to Oregon's problems. Want more income? Maybe end (or reduce) the income tax kicker, which is a policy that makes absolutely no sense. Born and raised in Oregon, and now living just across the river

**ODOT I-205 Toll EA - RECORD #1243 DETAIL****Submission Date :** 4/16/2023**First Name :** Matthew**Last Name :** Carlson**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** United States Transportation Department,  
Please do not approve Oregon's request to begin tolling residents for traveling on I205. The negative impacts are numerous and the positives do not outweigh them. Over 700 lost jobs, primarily among the most vulnerable in our area, and neighborhood traffic congestion, are just a couple of the negatives of this amazingly regressive collection scheme. This is not good for Oregon and should not be approved. Thank you

**ODOT I-205 Toll EA - RECORD #1244 DETAIL**

**Submission Date :** 4/16/2023  
**First Name :** Kevin  
**Last Name :** Janik  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Gentlemen,

Thank you for the chance to comment on tolls. Now please take a few minutes and think about the facts.

Your own Environmental Assessment of the potential environmental and economic impacts of the tolling project estimates the Abernethy and Tualatin River bridge tolls will cost the average household \$575 a year just for your first phase of tolls. That is \$575 that my family won't be able to spend on other things which reduces what Oregon businesses get from my family. It is not a dream I made up because ODOT estimates that its tolls will cause more than 750 people to lose their jobs and reduce wages by about \$3 million a year. On top of that the \$132 million a year in tolls they will produce only \$105 million in economic benefits from reduced congestion, environmental improvements, and economic activity. That means Oregonians will be \$27 million worse off every year of these tolls. That makes no sense stealing money from the people and then still have the state worse off just to create a whole new bureaucracy.

Reliably the government is out to lunch concocting a tolling scheme that charges outrageous tolls, doesn't generate sufficient time savings, impoverishes families, and drives out employers. Really smart if you want to hurt everyone and pay a bunch more government workers. This is not how congestion pricing should work. Congestion pricing should make us better off because the value of the time we save is worth more than the toll we pay.

Stop this lunacy before we must bail out another smart idea with more tax dollars and read your own studies to see it does not work. Also remember you really don't know much about business and how things work since your study proves it. Stop while we are all ahead and please let us use the roads we have already paid for without charging us again!

**ODOT I-205 Toll EA - RECORD #1245 DETAIL**

**Submission Date :** 4/16/2023  
**First Name :** Karen  
**Last Name :** Janik  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** To whom all who need to have some common sense,

Thank you for the chance to comment your toll plan. ODOT's plan to toll both the Abernethy Bridge and the Tualatin River Bridges on I-205 is just crazy. As normal the government is out to lunch concocting a tolling scheme that charges outrageous tolls, doesn't generate sufficient time savings, impoverishes families, and drives out employers. Really smart if you want to hurt everyone and pay a bunch more government workers. This is not how congestion pricing should work. Congestion pricing should make us better off because the value of the time we save is worth more than the toll we pay.

ODOT's own Environmental Assessment of the potential environmental and economic impacts of the tolling project estimates the Abernethy and Tualatin River bridge tolls will cost the average household \$575 a year just for your first phase of tolls. That is \$575 that our family won't be able to spend on other things and stimulate the economy. It is not something I made up because ODOT estimates that its tolls will cause more than 750 people to lose their jobs and reduce wages by about \$3 million a year. On top of that the \$132 million a year in tolls they will produce only \$105 million in economic benefits from reduced congestion, environmental improvements, and economic activity. That means Oregonians will be \$27 million worse off every year of these tolls. That makes no sense stealing money from the people and then still have the state worse off just to create a whole new bureaucracy.

Stop being so smart before we must bail out another smart idea with more tax dollars and read your own studies to see it does not work. Also remember you need to understand business and how things work since your study proves it. Stop while we are all ahead and please let us use the roads we have already paid for without charging us again!

**ODOT I-205 Toll EA - RECORD #1246 DETAIL****Submission Date :** 4/16/2023**First Name :** Molly**Last Name :****Affiliation :****Submission Method :** Accessible form

**Q3. Comments :** Tolling roads that have already been paid for by taxpayers should be up to a vote of the people. Oregon citizens are already struggling to pay for basic services and groceries and electricity and tolling our roads will be the straw that breaks the camels back for many people. Oregon voters should be given the information and given an opportunity to vote whether or not we want tolls. All projects should have costs associated configured ahead of time and the tolls should cease once the money has been raised for the project. We all know this will be never ending and DOT will keep finding reasons to toll us even when these projects are paid for. There is no accountability to make sure projects are finished on time and within budget and there needs to be. Oregon already has the second highest cost of living in the country and this will just make life harder for people trying to get to work and to make ends meet. I absolutely object to tolling these freeways.



**ODOT I-205 Toll EA - RECORD #1247 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** David

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** This is the single most stupid project that has ever been proposed in the State of Oregon. This will cause massive traffic jams due to rerouting/diversion, and descriminate against minimum wage workers. You should be ashamed.

**ODOT I-205 Toll EA - RECORD #1248 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** David

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** We strongly oppose any tolling in Oregon. Period. Too much burdening government control over the people especially for those who can least afford it. It is just another way the government is trying to squeeze every last dollar out of the taxpayers pocket instead of efficiently utilizing the gross amount of money they already get.

**ODOT I-205 Toll EA - RECORD #1249 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** sally

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** as a senior citizen on a fixed income, tolls on the bridge to take my husband to radiation treatments 5 days a week would be prohibited. Tolls Stop Health care.

**ODOT I-205 Toll EA - RECORD #1250 DETAIL**

**Submission Date :** 4/17/2023  
**First Name :** Ruppert  
**Last Name :** Reinstadler  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** I wanted to voice my opposition to the tolling program being proposed for Oregon's two bridges. It was originally suggested that the tolls would cut congestion on the highways at peak times. It appears now that it's more about raising money. Done correctly, congestion pricing makes people better off because the value of the travel time saved is worth more than the tolls they pay. Somehow, ODOT got way off track and concocted a tolling scheme that charges outrageous tolls, doesn't generate sufficient time savings, impoverishes families, and drives out employers. This is not a sustainable solution and I would hope that you would not support it. The last thing people need right now is to have more money taken out of their pockets just so they can commute to work. Let's come up with a better idea - like a 3rd bridge across the river. That will alleviate congestion.

All my best,

Tigard, Oregon resident

**ODOT I-205 Toll EA - RECORD #1251 DETAIL**

**Submission Date :** 4/17/2023  
**First Name :** John  
**Last Name :** Nemecek  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** NO!

**ODOT I-205 Toll EA - RECORD #1252 DETAIL**

**Submission Date :** 4/17/2023  
**First Name :** Rick  
**Last Name :** Mills  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** The proposed tolls for I-205 will have significant negative environmental effects. There is no plan to add additional lanes over the Columbia River a major bottleneck which clearly adds to the effects of motor vehicle emissions. If the toll money was used to reduce the bottlenecks on I-5 and I-205 over the Columbia River then maybe it would reduce motor vehicle pollution by reducing traffic jams.

Many people will attempt to avoid toll fees by going around the toll roads, which will create additional traffic jams in surrounding areas which will add to motor vehicle pollution.

Secretary Buttigieg has complained about "racist" roads, the proposed tolls will create an additional financial burden on people of color.

**ODOT I-205 Toll EA - RECORD #1253 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Jennifer

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** The transportation analysis needs to consider how cars using other roads to avoid tolls could slow traffic for all areas of West Linn. Having the gantry after Stafford Rd heading North on 205 allows cars to exit on Stafford to avoid paying the toll. This is a HUGE impact to one city (West Linn) and I don't see anything in your analysis that states how you are going to stop diversion. Do not start a toll that adversely impacts 1 town - West Linn.

**ODOT I-205 Toll EA - RECORD #1254 DETAIL****Submission Date :** 4/17/2023**First Name :** Suzie**Last Name :****Affiliation :****Submission Method :** Accessible form**Q3. Comments :** I would like to see an affordable option for people who work in Oregon and live in Vancouver. We already pay taxes in both states. I work for a non-profit and hold a 2nd job to make ends meet. If I have the additional burden of an expensive toll I will have to look for different employment.



**ODOT I-205 Toll EA - RECORD #1255 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Jill

**Last Name :** Foster

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Please DO NOT toll!!! I live in Durham, OR and am a caregiver for my 83 year old mother who lives in Gresham. This extra TAX will place a huge financial hardship on me and my family. Sure, I could travel i-84, however over the years the traffic on that highway has increased my travel time to nearly an hour, leaving me to use i-205.  
Let's just say what this toll is .... another TAX in a state that has incredibly high TAXES along with extremely high vehicle registrations fees (TAX). Quit TAXING us into poverty!!

<b>ODOT I-205 Toll EA - RECORD #1256 DETAIL</b>
---

**Submission Date :** 4/17/2023

**First Name :** Tom

**Last Name :** and Chris Irwin

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Asking Oregonians to pay a toll on highways that we are already paying taxes on for upkeep is so unfair. This toll will so affect residents that depend on these highways to get to their jobs. These tolls will take a big chunk out of their income that is needed to feed and care for their families. Please consider what you will be doing to harm so many of our vulnerable citizens. I urge you to not put another fee onto our communities.

**ODOT I-205 Toll EA - RECORD #1257 DETAIL**

**Submission Date :** 4/17/2023  
**First Name :** Tomike  
**Last Name :** Smyth  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** HELL NO! I-205 is paid for. Tolls are discriminatory and racist.

**ODOT I-205 Toll EA - RECORD #1258 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Chris

**Last Name :** Atkison

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** To my representative.  
Why toll West Linn and Oregon city residents for this.

Why have the politicians not put tolls on backed up Washington traffic on Oregon roads that are at a standstill every day on I205 and I5???

Please explain why the tolls pay for this when Oregon property taxes and lotto was supposed to pay for our roads.

**ODOT I-205 Toll EA - RECORD #1259 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** P

**Last Name :** Alexandria

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Have you ever listened to the Beatles song Taxman? It seems in Oregon they are taxing everything now including the air. I am against tolling we have a next enough taxes if you can't do anything with what you have now I will not approve more taxing Mr Taxman

**ODOT I-205 Toll EA - RECORD #1260 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Annamika

**Last Name :** Konkola

**Affiliation :** West Linn Youth Advisory Council

**Submission Method :** Letter

**Q3. Comments :** Dear Oregon Department of Transportation and the Federal Highway Administration,

Please find attached a letter from the City of West Linn's YAC responding to the recent Environmental Assessment, with a focus on its effects on youth and our local communities.

Thank you,  
West Linn Youth Advisory Council

**Attachments :** YAC letter to ODOT2.pdf (138 kb)



March 14, 2023

Dear Oregon Department of Transportation,

On behalf of the youth of West Linn, this letter expresses our concerns regarding the proposed plan to toll a limited stretch of Interstate 205 in our region. While we appreciate your outreach efforts on this matter, we believe that your proposed plan unfairly places a disproportionate burden on local residents for the essential and critical upgrades needed for the Abernethy Bridge and Interstate.

We are concerned that your proposed tolling plan will have a significant detrimental impact on our community, as many of us rely on these facilities on a daily basis. As youth living in this community, we rely heavily on I-205 to get to school, extracurricular activities, and part-time jobs. With the addition of planned lane closures and detours that will create additional traffic and congestion, the inconvenience caused for our community will dramatically impact our ability to be part of a larger community and be part of a larger region, as well as leading to delays and other missed opportunities. Additionally, changes in traffic patterns may make it more difficult for all community members, especially teen drivers, to react quickly and make safe decisions while behind the wheel.

Furthermore, this tolling project will disproportionately target local residents who must face the burden of funding these upgrades, especially considering the lack of sufficient transportation in our area. Among these local residents are high school students who may have to pay these tolls—at minimum—twice a day to get to and from school. We believe that the cost of major transportation projects should be allocated to all interstate users, as it has been done for decades.

In addition, we are concerned about increased diversion onto our local roads due to bottleneck congestion on I-205. Increased diversion to roads already accommodating diversion is likely to eliminate community support. We urge you to consider 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.

If tolling is necessary, we suggest that it only be implemented after a comprehensive, region-wide dialogue—complete with public buy-in—has been secured. Any tolling should not focus solely on the residents of West Linn, Oregon City, Milwaukie, and our neighboring communities. We urge you to consider a simultaneous and region-wide tolling approach on all major transportation highways, or at a minimum, the entirety of I-205 and I-5 through the Metro region. If a tolling plan for a limited confined reach is to move forward, such as Stafford Rd to Abernethy Bridge or Hwy 213, then all funds generated by that tolling must be spent within this area, and the tolling reach must be extended or expanded to different endpoints to minimize problems with diversion locally.

Thank you for your attention to this matter, and we hope that you will consider our concerns and suggestions as you move forward with this project.

Sincerely,  
West Linn Youth Advisory Council

**ODOT I-205 Toll EA - RECORD #1261 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Kendall

**Last Name :** Jobe

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** As far as tolls are concerned, there is no worse idea for Oregon.

Unfortunately, nobody expects the government to listen to the people's wishes on this matter. Tolling is just another unwanted scheme to be pushed down our throats.

If you want real input, put it to a vote and see how popular this bad idea really is.



<b>ODOT I-205 Toll EA - RECORD #1262 DETAIL</b>
---

**Submission Date :** 4/17/2023

**First Name :** Ken and Abby

**Last Name :** Crouch

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Please do NOT put tolls on Oregon roads. We are against this form of raising money - there has to be a more efficient method to get money. We have lived in Portland area for over 40 years but are considering moving out of Oregon. Don't give us another reason to relocate out of this state. Thanks for your consideration of our views.

**ODOT I-205 Toll EA - RECORD #1263 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** dottie

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** People that live in WA but work in OR already are taxed to the extreme!  
Adding a toll over a already paid for bridge puts an unfair financial burden on those that continue to work in Oregon but live in WA.

**ODOT I-205 Toll EA - RECORD #1264 DETAIL****Submission Date :** 4/17/2023**First Name :** Robert**Last Name :** Tappert**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** I am so against any tolls, vote no on tolling the citizens of Oregon! I am writing to say I and my wife are totally against tolling any of our highway, freeways, any road in Oregon. Once again the leadership of Oregon is bent on making it harder for working families and those on fixed incomes to live in this state. Leadership has foolishly used up the funds that have been collected for maintenance of our roads through the years on projects not related to road maintenance. Adding to the now push to go to all electric cars which means funding from gas tax used to maintain our roads will take another hit plus make it harder for families to live again. If one looked from the outside into the state running of our roads and bridges one would think that our leadership is bent on stopping all driving by citizens in the future and making us walk or bike to maintain or live our lives. I am so against any tolls, vote no on tolling the citizens of Oregon!

**ODOT I-205 Toll EA - RECORD #1266 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Bruce

**Last Name :** Olson

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Thoughts to consider:

1. Boone Bridge is a part of "Interstate Highway 5". Any work needed on the highway should be funded by federal funds.
2. Congestion on I-5 through Wilsonville could be mitigated by signage indicating "Through Traffic Left two Lanes". We've seen this approach successfully used on I-5 in California.
3. Wilsonville residents living on the South sides of the Willamette will be unfairly taxed. We not only will be charged to travel both direction to conduct business, but we will be charged by contractors, house keepers, or any other business entity who must cross the bridge to provide goods and services.
4. There is approximately 30 miles of open farm land along I-5 between Salem and the Boones Bridge. Placing a toll charge station 15 miles down I-5 should facilitate collection without overcharging a large number of existing housing and businesses.
5. Is it really appropriate to have two toll stations within 10 miles on Highway 205?

<b>ODOT I-205 Toll EA - RECORD #1267 DETAIL</b>
---

<b>Submission Date :</b>	4/17/2023
<b>First Name :</b>	Carole
<b>Last Name :</b>	Leofsky
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email
<b>Q3. Comments :</b>	No to toll roads.

**ODOT I-205 Toll EA - RECORD #1268 DETAIL****Submission Date :** 4/17/2023**First Name :** Karen**Last Name :****Affiliation :** Common Sense**Submission Method :** Accessible form**Q3. Comments :** We do not want tolls on I-205. We have no confidence that the money will be used to benefit us after what we have seen with the prior bridge commission spending. Traffic rerouting will result in bottlenecks for transit and emergency response, reducing the quality of living in most nearby areas.

<b>ODOT I-205 Toll EA - RECORD #1269 DETAIL</b>
---

**Submission Date :** 4/17/2023

**First Name :** Erik

**Last Name :** Dunkle

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** This is a terrible project, the Oregon taxpayers already have put money into these roads. I think this will cause more congestion and pollution. I am totally against this project and tolls.

**ODOT I-205 Toll EA - RECORD #1271 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Michael

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** If you are going to toll-even though I am opposed-to this. Toll ALL of 205 not just this project but equitable to everyone who drives the highway.



**ODOT I-205 Toll EA - RECORD #1272 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Jynx

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** TOLLS ARE A VERY POOR IDEA GIVEN THE OBVIOUS FACT THAT THEY'D IMPACT LOW-INCOME PEOPLE THE MOST, WHICH IS COMPLTELY UNJUST.

**ODOT I-205 Toll EA - RECORD #1273 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Connie

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I'd like to know what percentage of the funds collected will be allocated for administrative costs? I read the cited section of the Oregon Constitution but did not find it. When I was a public employee managing a grant funded project we were held strictly to no more than 10% of the funds could be used for administration. My experience working for 20 years at both Clackamas and Multnomah Counties, I found that many projects were markedly a bit heavy at the top with many administrative staff which didn't contribute to the overall success or quality of the actual project. Please provide a breakdown of staffing-to-administration expenditures. Thank you!

**ODOT I-205 Toll EA - RECORD #1274 DETAIL**

**Submission Date :** 4/17/2023

**First Name :**

**Last Name :** ktdomina

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Don't the Fuel Taxes we pay go towards highway maintenance and improvements? With the push towards EV's, Fuel Taxes will go down so it's safe to assume Tolls will go up.....it's never enough

**ODOT I-205 Toll EA - RECORD #1275 DETAIL****Submission Date :** 4/17/2023**First Name :** betsy**Last Name :****Affiliation :****Submission Method :** Accessible form

**Q3. Comments :** What I see daily, living a block east of Hwy 43, and 2 blocks north of the 205 bridge in West Linn, is very heavy traffic during morning and evening commutes. This traffic can back up 1/2 mile north on 43, and feeder streets coming into 43 are also clogged. This already includes cars avoiding 205 and choosing to use the 100 year old Oregon City/West Linn bridge which causes further backup and insane wait times, engines running all the while. My nightmare senario, the way you have the tolling set up, are cars exiting 205 before they hit the toll camera and using 43 north or heading over the little bridge into downtown Oregon City, causing even more congestion. I am all for seismic improvements to the bridge, but I don't agree with the way you want to fund this project. But if you must toll, pick a spot where cars aren't going to be tempted to avoid them and make a huge negative impact on local streets, as well as overburden the little bridge into Oregon City, which I might add is used extensively by walkers.

Living in the "shadow" of the bridge we have all been quite interested in the progress being made despite the noise. It's an amazing feat of engineering, but please consider the very real negative impact it can have on the West Linn Bolton neighborhood, the oldest neighborhood in West Linn, and the small Oregon City downtown area which we consider our "downtown" as well.

<b>ODOT I-205 Toll EA - RECORD #1276 DETAIL</b>	
---	--

**Submission Date :** 4/17/2023

**First Name :** Grant

**Last Name :** MacGillivray

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Adding more lanes to a freeway to alleviate traffic is a failed policy which has been demonstrably proven false hundreds of times all across the country. I know you planners know about "induced demand". It is, frankly, deeply embarrassing and shameful to seriously suggest a freeway expansion in 2023. We should be tearing them out and making our cities walkable and with robust public transit- you know, spaces designed for humans instead of cars. I am honestly furious at this proposal.

<b>ODOT I-205 Toll EA - RECORD #1277 DETAIL</b>
---

**Submission Date :** 4/17/2023

**First Name :** Wendy

**Last Name :** ferguson

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
It is critically important that ODOT follow through with an Environmental Impact Statement on the proposed I-205 freeway expansion. These decisions impact millions of people for many many decades, and any expansion proposal must be thoroughly vetted from ALL angles. It's not just about traffic.

**ODOT I-205 Toll EA - RECORD #1278 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Gregar

**Last Name :** Chapin

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Please do not move forward with this proposal without an Environmental Impact Assessment and additional opportunities for public comment and involvement in decision making and planning.

**ODOT I-205 Toll EA - RECORD #1279 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Linn

**Last Name :** Groves

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?: WE'RE KILLING OURSELVES ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ Please read The Sibling Society by Robert Bly ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐



**ODOT I-205 Toll EA - RECORD #1280 DETAIL****Submission Date :** 4/17/2023**First Name :** Travis**Last Name :** Close**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?: All freeway widening projects require full Environmental Impact Statement review due to the additional vehicle miles traveled (VMT) induced by the cars that will quickly clog up any added lanes, as proven by decades of research and countless examples around the world. In addition to the climate impacts, local residents near the freeway -- often people of low income -- will experience the negative effects of air pollution and develop chronic conditions such as asthma. Additionally, there are significant sound pollution concerns due to the noise that speeding cars impose on the surrounding environment. Finally, the additional cars induced by this project will result in more collisions, which will pose significant public health costs. All in all, this project will impose significant negative environmental effects on our community, which will require, at the minimum, a full EIS analysis.

**ODOT I-205 Toll EA - RECORD #1281 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Lincoln

**Last Name :** Hess

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

If we are to continue building roads at taxpayer expense, we deserve to know what the full implications will be from this construction on the community and environment.

**ODOT I-205 Toll EA - RECORD #1282 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Brandon

**Last Name :** Goff

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

ODOT needs to stop spending money adding more lanes to freeways and spend that money to make the assets they already own safer for those traveling on them. Stop pretending single occupancy vehicles are the only mode of transportation, it is not sustainable. Conduct an environmental impact statement so we can all see the additional carbon spewed into our atmosphere from this half billion dollar waste of money.

**ODOT I-205 Toll EA - RECORD #1283 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Amy

**Last Name :** Murray

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

I want to know exactly what harm the increased traffic will do to the environment and the people who live in the area. By not conducting an EIS it seems that ODOT knows the effects of an expansion are bad and they're trying to hide something.

**ODOT I-205 Toll EA - RECORD #1284 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** george

**Last Name :** feldman

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

We have WAY too many cars already using the freeways....expansion of lanes merely allows more cars. We need ALTERNATIVE transportation, buses with dedicated lanes, rail expansion, but NOT more concrete car lanes.

Thank you.

<b>ODOT I-205 Toll EA - RECORD #1285 DETAIL</b>
---

**Submission Date :** 4/17/2023

**First Name :** Piera

**Last Name :** Greathouse

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

An environmental impact statement must be conducted before we can responsibly move forward with an expansion of I-205. We need more information about whether this project is really in the best interest of our community and planet.

**ODOT I-205 Toll EA - RECORD #1286 DETAIL****Submission Date :** 4/17/2023**First Name :** Peter**Last Name :** Laciano**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

I am writing to demand that ODOT complete an Environmental Impact Statement for the 2nd-phase of the I-205 expansion in Clackamas County. Building additional lanes on 205 will not solve congestion but will substantially increase regional VMT, which directly contributes to the climate crisis and goes against our stated emissions reduction goals. Furthermore, given that this massively expensive project will require tolls for funding, ODOT must study the effect of those tolls on traffic. Projects across the country have demonstrated that tolls reduce congestion and render the additional lanes into a massive boondoggle to our public finances. Finally, spending our limited and precious public dollars on this project will prevent investment in other desperately needed infrastructure (hundreds of seismically vulnerable bridges, bike & ped infrastructure, and safety improvements) for decades. ODOT needs to study all of these major impacts via an Environmental Impact Statement.

**ODOT I-205 Toll EA - RECORD #1287 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Ben

**Last Name :** Foote

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

We need fewer roads, fewer cars and more action on climate change.



**ODOT I-205 Toll EA - RECORD #1288 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Rick

**Last Name :** Ray

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

Please conduct an Environmental Impact Statement that studies congestion pricing before freeway I-205 expansion.

As an east Multnomah County resident, I'm concerned with the total true cost of this project.

Thank you.

<b>ODOT I-205 Toll EA - RECORD #1289 DETAIL</b>
---

<b>Submission Date :</b>	4/17/2023
<b>First Name :</b>	CJ
<b>Last Name :</b>	Pinckard
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email

**Q3. Comments :**

Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

Oregon owes a lot of its strengths to rail infrastructure, much of which unfortunately no longer even exists. The further we move away from the logical layout provided by streetcar grids and electric commuter interurban railroads the uglier and less livable the city and its suburbs become. An intelligent coastal city would take advantage of this limited time of people crowding in to install city assets that will benefit us for generations such as a rail route beneath the Willamette meaning the Steel Bridge won't break the light rail circuit interrupting all MAX lines every time it lifts, and railway going between Vancouver and us. I-5 should be buried on the inner east side stretch to make the area tolerable and reclaim space for the Black community to rebuild their community they had stolen from them. The WES should expand to extend down to Salem reuniting the Portland metropolitan area with our capital. It makes perfect sense to build the full Southwest Corridor (Purple) Line with railway stations on Marquam Hill and at Portland Community College Sylvania Campus, for example, and zero sense not to.

Electric cars also destroy the environment through resource mining, manufacturing processes and ultimately going to the landfill in mass droves. The pollution they cause is simply unnecessary as is the amount of urban space squandered on parking and other paved over autocentric wastes. MORE VEHICLES ON THE ROAD MEANS MORE AVOIDABLE DEATHS WILL CONTINUE TO CONSTANTLY OCCUR! They also perpetuate redlining, urban sprawl, the food deserts that come from that invariably, along with cities that are not navigable as a pedestrian or bicyclist and are, in fact, inhospitable to humanity along with being lethally horrendous towards animals. They add to traffic congestion. Commodification of societal needs and normalization of trying to substitute rampant consumerism where we need standardized, regulated and uniform public utilities doesn't work.

Putting the financial burden of transportation inefficiently and directly on the individual citizen is simply not wise or fair and hasn't been the norm for even 80 years. We need to invest in commuter rail that's properly implemented as it typically is overseas. A commuter rail system is an engineering marvel while buses are just buses. The most reliable predictor of a neighborhood being impoverished is if it has no commuter rail connection. The American people are apathetic through decades of disenfranchisement and a lot of that marginalization (eg Robert Moses's racist urban renewal) is through divestment of public infrastructure, utilities and programs to help the American people. We can't undo the social inequities inflicted upon and retained by redlining until we transcend the highway robbery carcentric built habitat that physically structurally reinforces them. We're past the point of car dominated transportation being anything better than a tragic hindrance or an outright travesty. Public works materially improving life for the taxpaying citizenry will bolster civic pride.

Transcontinental High Speed Rail should integrate seamlessly with commuter rail networks so it can evenly function as one cohesive system and this will convert flyover country (CONUS flights should be virtually eliminated) back into a thriving heartland by functioning as an artery of commute and commerce which will reduce clustering on the coasts. Similarly, wholly integrated circuits of commuter rail blended with interurban routes, light rail lines, street car grids, subways, and even trolleys along with electric ferries functioning together as a comprehensive, coherent series of interwoven systems would prevent people from having to live on top of each other in city centers in order to have quick access to urban cores and downtown areas so this would stimulate our local economies and prevent gentrification from demolishing cherished heirlooms of our historicity, destroying our classic neighborhoods, shredding the fabric of our communities and toppling our civic landmarks and architectural heirlooms along with other social capital such as venerable culture generating venues.

Numerous studies show that built environments of homogenously bleak and bland duplitecture dreck that profiteering developers push on us for their

privatized gains to our public loss for the riches of themselves and corporate slumlords not only cause homelessness from being financially inaccessible to most Americans, but also cause depression from creating such a devastatingly sterile, cold, unloving urban habitat that's too congested and overcrowded to work properly as a correctly engineered built environment. Our roadways are overcrowded and no amount of widening them and adding lanes will do anything to help it because it just leads to induced demand that inevitably grinds to a halt at snags and bottlenecks down the road. Shouldn't American cities be thriving centers of culture and character rather than austere and chintzy morasses of mediocrity?

I believe that we can design the cities of our nation to reflect a future that embraces humanity and that we also must for America to have any sort of a bright future ahead of it. Right now we are mired in the destruction of our cities from the inward attacking neocolonial oppressors who weaponize their clout of wealth against the nation for their own off-shore un-American gains of privileged, parasitic, private profits. This greed fueled anti-social exploitation is present day feudalism driving us into another gilded age. Tons of new petrochemical building "luxury living" housing units remain empty serving only as financial assets in investment portfolios of hedge fund and permanent capital firm cretins sheltering dubiously acquired wealth instead of as direly needed shelter for humans. We deserve a landscape we can be proud of and country should come first before corporate looting and exploitation. Legacies are important and live on forever.

With space opened up in our cities we could rebuild beloved structures gone from economic and environmental disaster utilizing new technologies such as hempcrete and 3-D printing. We could create vertical agriculture, green pocket areas, etc. on spots currently now just serving as paved over squares and nothing more. We can extend democracy into offering the taxpayer residents democratic say in what their city consists of, how it looks and how it operates promoting civic engagement and participation.

**ODOT I-205 Toll EA - RECORD #1290 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Nina

**Last Name :** French

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

ENVIRONMENT, WILDLIFE AND PEOPLE ARE EXCEEDINGLY MORE IMPORTANT THAN HIGHWAYS. WOMEN ARE NOT INCUBATORS AND DESERVE BODY AUTONOMY. HUMAN OVERPOPULATION IS AS BAD AS THE CLIMATE CRISIS.

**ODOT I-205 Toll EA - RECORD #1291 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Allan

**Last Name :** Rudwick

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

stop expanding our roads. People are not asking for this. ODOT staff Job security does not require it.

These projects don't even improve traffic. For example my commute on US-26 got worse when it was expanded from 2->3 lanes.

Just stop.

<b>ODOT I-205 Toll EA - RECORD #1292 DETAIL</b>
---

**Submission Date :** 4/17/2023

**First Name :** Andrew

**Last Name :** Hull

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
This is a poor use of resources.  
It only encourages more driving. It will not reduce congestion.

**ODOT I-205 Toll EA - RECORD #1293 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** scott

**Last Name :** mahood

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
safety first!



**ODOT I-205 Toll EA - RECORD #1294 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Blake

**Last Name :** Goud

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
There are multiple ways to manage the transportation needs of people in our region, and it's a fallacy to keep thinking congestion can only be met by wider highways and more lanes of traffic. In fact, wider highways bring more cars, more pollution and more other negative impacts from the construction phase and once it is open. When we already see 40% of Oregon's GHG emissions coming from transportation, and our state is off-track of our climate goals, every big decision like this needs to be carefully vetted, and the appropriate way for that to happen is through an Environmental Impact Statement.

**ODOT I-205 Toll EA - RECORD #1295 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Tod

**Last Name :** Pitstick

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
It's simply an exercise in futility...

<b>ODOT I-205 Toll EA - RECORD #1296 DETAIL</b>
---

**Submission Date :** 4/17/2023

**First Name :** Troy

**Last Name :** Unverdruss

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

We should not be expanding any freeways without conducting a full EIS and also examining how tolling can impact demand on the existing infrastructure as tolling has been repeatedly shown to reduce demand. In contrast, increasing freeway lanes has repeatedly failed to reduce congestion in a meaningful way and instead results in more VMT at an increasingly high carbon impact over the years.

See this article about how a California 101 expansion was already inducing demand to the max basically as soon as it finished:

<https://sf.streetsblog.org/2023/04/12/not-a-surprise-101-freeway-widening-shows-negative-results/>

Let's start with cheaper and more sustainable options (EIS, tolling) before spending money on additional travel lanes which will only temporarily (if at all) reduce congestion.

**ODOT I-205 Toll EA - RECORD #1297 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Daniel

**Last Name :** Jaffee

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

I am writing in strong opposition to the I-205 expansion project, which would negatively increase greenhouse gas emissions, make it impossible for Oregon to meet its climate change commitments, and take desperately needed funds away from socially beneficial programs, including mass transit.

Worst of all, if tolling is fully implemented as proposed, traffic will be reduced and there will be no need for a freeway expansion in the first place.

I insist that ODOT conduct a full Environmental Impact Statement that studies congestion pricing before beginning any planning for the I-205 freeway expansion.

Thank you for your attention.

<b>ODOT I-205 Toll EA - RECORD #1298 DETAIL</b>
---

**Submission Date :** 4/17/2023

**First Name :** dell

**Last Name :** goldsmith

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
This project makes NO sense. We must reduce carbon pollution! We must stop spending billions of dollars on project after project that increases carbon pollution and fossil fuel burning. We cannot burn our way out of this perilous, dead end emergency. The only reason ODOT continues to operate this way is craven hunger for more money and blinding ignorance about what we are up against. Conduct the EIS and find out AGAIN!

**ODOT I-205 Toll EA - RECORD #1299 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** annie

**Last Name :** capestany

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

As a bike and bus rider I am horrified that ODOT is once again undermining state climate goals with a mega-car project. We need earthquake safe bridges, yes, AND we need an EIS for the massive I-205 freeway expansion in Clackamas county.

ODOT should NOT be spending huge amounts of money to increase carbon in our air (because we know, if you build it, the cars will come!) ODOT needs to study whether tolling will be enough to reduce traffic (and consequently carbon in the air.)

We need to spend our money wisely because we have hundreds of bridges that aren't seismically safe. Please don't let ODOT waste money on unnecessary and environmentally damaging projects. I believe that a properly done EIS will show that the Clackamas I-205 project is not necessary and not a good idea for Oregon. Give us an EIS!

**ODOT I-205 Toll EA - RECORD #1300 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** John

**Last Name :** Carr

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I travel this stretch of I-205 multiple times a month going between SE Portland and Corvallis. It's a beautiful area, still natural in many respects. In proposing to add lanes, ODOT ought to prepare a full Environmental Impact Statement. The wider highway would alter the landscape and most likely lead to induced demand and an increase in pollution and vehicle miles traveled. Only by doing a full EIS will the agency and the public understand the consequences of the project as well as possible alternatives to it.

**ODOT I-205 Toll EA - RECORD #1301 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Barbara

**Last Name :** Gicking

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
We need to see if tolling works. Adding another lane just invites congestion.  
Please do an EIS.



**ODOT I-205 Toll EA - RECORD #1302 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** David

**Last Name :** Levine

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Please conduct an EIS for the proposed I-205 expansion. Additional lanes are at best only a short-term fix for congestion and at worst increase single-occupancy vehicles and pollution, while diminishing quality of life for the community.

Thank you.

**ODOT I-205 Toll EA - RECORD #1303 DETAIL**

**Submission Date :** 4/17/2023  
**First Name :** Heidi  
**Last Name :** Geschwill  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** I oppose tolling on Interstates in Oregon. Oregon Department of Transportation did the math, and admits that there will not be a net monetary benefit to tolling. Oregonian's will lose household income to tolls, businesses that ship goods will be penalized (I own a nursery that trucks almost every day on I-5 and 205), and local businesses near toll roads will suffer from less visitation by customers who want to avoid tolls.

Nowhere do I see the grandiose benefits to the environment by tolling. Traffic will find alternate, inappropriate routes, there will still be congestion, and probably more traffic at a standstill—burning fuel and not going anywhere. What we need is more road capacity, not less! And not dumb tactics to force people to drive less. People want to live and prosper, not be injured into driving less. Society is going backwards at that point.

Today I learned that about 25% of the vehicles on the roads in Oregon have expired tags, and many have been expired for several years. Why is Oregon not collecting the proper DMV fees that should be helping to pay for better infrastructure? I also discovered that there is an approximate 20 year backlog on getting tickets to drivers who had parking violations, etc. Why is Oregon not collecting on motorist violations that should be helping to pay for more lanes on I-5?

I urge anyone to please reject the idea of tolling in Oregon. My stance is not political. It is merely that Oregon is creating more messes for itself every year. Adding the slap-in-the-face of tolling to Oregonian's will be another nail in the coffin to the Portland area. It will be a ripple effect, causing my Woodburn business to increase costs to my customers, and making me less competitive. It will cause out-of-state trucking to find alternate routes to avoid Portland, costing Portland hospitality. The list is long.

Sincerely,  
[]  
Woodburn, OR

**ODOT I-205 Toll EA - RECORD #1304 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Dean

**Last Name :** R. Sigler

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
It's been demonstrated that widening freeways only brings more congestion, traffic increasing to fill any number of new lanes.

<https://www.nytimes.com/2023/01/06/us/widen-highways-traffic.html>

We need to stop throwing money at "solutions" that only add to the problem.

**ODOT I-205 Toll EA - RECORD #1305 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Matt

**Last Name :** Meskill

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
It's the 21st century and you really want to expand a freeway? Let's invest in transit, OK? And just transit. And pedestrian infra. And bike infra. There's already enough out there for cars. No more.

**ODOT I-205 Toll EA - RECORD #1306 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Daniel

**Last Name :** Kapsch

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
It is hugely irresponsible to not conduct and EIA on any large scale project let alone a freeway expansion project. Please do your due diligence and conduct an EIA on any proposed freeway expansion project. The climate crisis is here and ODOT needs to be better about protecting our future.

**ODOT I-205 Toll EA - RECORD #1307 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Lucas

**Last Name :** Jans

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
ODOT operates as if it's mission is to make traffic flow faster. They need to consider other priorities. Given the trends in global warming and the ever growing municipal debts, we need to stop. Time for change.

**ODOT I-205 Toll EA - RECORD #1308 DETAIL****Submission Date :** 4/17/2023**First Name :** Aaron**Last Name :** Wolf**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
When we are unsure about the future impacts of a decision, we must first ask how costly and how easily reversible a decision is. Low-cost and easily reversible decisions are often worth trying. Highway expansion is the extreme opposite. Highway expansion is extremely expensive and nearly irreversible. So, for this decision, we must be certain it is in the public interest for the next several decades and beyond. Given the climate crisis and the need to shift away from car-oriented transportation, there is nowhere near enough evidence to conclude that expanding I-205 is in the public interest over a decades-long time frame. Other options including tolling, more transit support, carpooling incentives, and others are all less-costly and more reversible, so they should be tried first. While ODOT has done a huge amount of research into the I-205 expansion, it remains far from the appropriate level for such an expensive and irreversible decision. An Environmental Impact Statement is one of many steps in further preparations before going ahead. From my lay citizen perspective as someone relatively knowledgeable about transit and climate issues, I cannot see how this highway expansion could possibly be reviewed positively in hindsight by the world looking back from the year 2050 (which is really not long from now in terms of the life-span of highways).

**ODOT I-205 Toll EA - RECORD #1309 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** David

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** No tolls! Traffic will be diverted onto McLaughlin Blvd, through the Oregon city tunnel and on to Canby,/Aurora. Those local roads shouldn't bear the burden.

The freeways are already paid for and we already pay license fees and gas taxes. No more tolls, fees, taxes...no more money!



**ODOT I-205 Toll EA - RECORD #1310 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Audrey

**Last Name :** Pfahl

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** To Whom It May Concern:

As a resident of Oregon, I have an extreme objection to tolls on any road, highway, bridge, or other public transportation in Oregon.

Over thirty percent of my income already goes to taxes every year. A sizable portion of that is sent to the State of Oregon.

This is despite the fact that I do not make enough money to even rent an apartment. (And no, it's not because I'm spending my money on frivolities or only looking at fancier rentals. My budget is barebones.)

As one of the less-wealthy residents of Oregon, I can tell you that this toll will hurt those with lower income the most. Isn't the state supposed to help its poorer residents? Instead, they are trying to take even more away from those who can least afford it.

Implementing a program to lower tolls for those at or below 200 percent of the federal poverty level, as is currently being proposed, is also not an appropriate response to this objection.

Oregon has stolen enough money from me and everyone else who lives here that they should be able to afford the cost of a bridge or ODOT's other special projects WITHOUT tolls or other fees.

Each year, millions of state dollars go to financially propping up those capable of working who choose not to, social programs and education for illegal aliens who have no right to be here, parks and other infrastructure that we then cannot afford the upkeep of once they are built, attempts to ram train tracks and other infrastructure through in communities where it is neither wanted nor needed, and many other fiscally irresponsible projects and programs which only hurt the state and which should never have been approved.

If Oregon wants a new bridge, then the state needs to cut the fat from their budget instead of implementing yet another way to leech wealth away from the people they are supposed to serve. If they cannot do so, then Oregon will no longer be a steward of any portion of MY hard-earned paycheck.

Sincerely,

[ ]

(A.K.A., A tax-paying resident of Oregon who is seriously considering moving out of the state because of the government's financial irresponsibility.)

**ODOT I-205 Toll EA - RECORD #1311 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Nora

**Last Name :** Stern

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
We cannot afford to create more freeway lanes in the face of a global escalating climate crisis. That money should go to excellent mass transit.

**ODOT I-205 Toll EA - RECORD #1312 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Sarah

**Last Name :** Deumling

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I am for ANYTHING that will slow down or stop the expansion of our automobile centric transportation system. Climate change is the biggest threat to our collective future and reducing VMT is one of the most important ways we can hope to reduce GHG emissions. ODOT, it is time to join the 21st century and create a vision for a healthy, abundant future for Oregon. Start with a thorough EIS for this project.

**ODOT I-205 Toll EA - RECORD #1313 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Jules

**Last Name :** Boykoff

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Setting aside the clear and obvious fact that, in a time of whipsaw climate change, building fresh highways that encourage additional driving is a terrible idea, the fact that ODOT has not conducted an Environmental Impact Statement (instead, a mere Environmental Assessment), is outrageous. If you believe your mega-project is an important as you say it is, then an EIS should be pro forma.

Please slow down and think about both the big picture (climate change) and the quotidian rhythms of ethically conducting due diligence before plowing ahead with expensive projects, especially ones that harm the future of subsequent generations.

Thank you for your consideration,  
Jules Boykoff

**ODOT I-205 Toll EA - RECORD #1314 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Marne

**Last Name :** Duke

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Highway expansion is a waste of money.

**ODOT I-205 Toll EA - RECORD #1315 DETAIL****Submission Date :** 4/17/2023**First Name :** Chris**Last Name :** Sims**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I cannot support another freeway expansion when I continually see my tax dollars going toward climate arson, the rampant destruction of Indigenous heritage, and gambling on ecological disasters. I'm stunned that ODOT would (1) move forward with a freeway widening project at all; (2) do so without an EIS; and (3) not even consider viable alternatives to reduce congestion such as funding public transit partners, enforcing HOV lanes, or dedicating bus rapid transit lanes. It is disappointing to see other cities in the United States pursuing creative alternatives that are socially, environmentally, and economically responsible while ODOT repeatedly goes to the one tool they seem to know how to use - freeway expansion. This taxpayer expects better.

**ODOT I-205 Toll EA - RECORD #1316 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Jacob

**Last Name :** Gellman

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Hello,

My family are longtime residents of the Portland area and use the 205 all the time. We request that ODOT conduct an Environmental Impact Statement that studies congestion pricing before freeway expansion. Transportation is the United States' top source of carbon emissions, so we should do all we can to reduce driving. Adding freeway lanes does not reduce driving and it does not reduce congestion. ODOT has not acknowledged the well-documented phenomenon of induced demand -- adding more freeway lanes increases demand for driving and does not reduce congestion. The money spent on freeway widening would be better spent on transit, biking, and pedestrian infrastructure.

**ODOT I-205 Toll EA - RECORD #1317 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** jennifer

**Last Name :** frost

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I think repairing the infrastructure we have now is more important than expanding a road so more cars can sit on it. Fix the existing roads and bridges that have been neglected.



**ODOT I-205 Toll EA - RECORD #1318 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Judith

**Last Name :** Arcana

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Maybe you folks are not worried (like almost everybody else is) about our prior ways of being&doing. Maybe you don't think we are heading down the wrong road (a pun in this case). But most of the rest of us are looking for ways to use highways and cars less than - and certainly in different, healthier/safer ways than - we have been using them for nearly a century. Minimally, right now we need an impact statement, and maximally we need a totally diferent perspective.  
Knock off the I-205 Expansion!

**ODOT I-205 Toll EA - RECORD #1319 DETAIL**

**Submission Date :** 4/17/2023

**First Name :**

**Last Name :** Andrew

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I would like to know specifically how much new traffic the new lanes on I-205 are expected to attract, and how tolling on the Abernathy Bridge is expected to affect that.

**ODOT I-205 Toll EA - RECORD #1320 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** erin

**Last Name :** jeffrey

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Because I do know believe that freeway expansion is the BEST way to alleviate congestion on I 205. AND I do not trust ODOT to do it's due diligence on the environment...since the environment does NOT VOTE!!!

**ODOT I-205 Toll EA - RECORD #1321 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Jessi

**Last Name :** Presley-Grusin

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
It is critical to the health of our community that the environmental impact of expanding the I-205 be thoroughly researched before any such plan to do so is made. Additionally, we do not need more lanes on the I-205, we need more forms of accessible and equitable public transportation.

**ODOT I-205 Toll EA - RECORD #1322 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Beth

**Last Name :** Levin

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

If this proposal is completed, the Rocky Mountain Institute's calculator suggests this 205 expansion will add between 72 and 109 million vehicle miles traveled (VMT) a year. Under today's conditions, the annual emissions from this are the same as ~9,800 passenger cars and light trucks or ~5 million gallons of gas, and represents by 2050 as much as 1.2 million metric tons of carbon.

Obviously, this is directly in conflict with Oregon's aggressive targets for reducing carbon emissions, prioritizing investments in safer streets, or ensuring ODOT has the resources to invest in basic seismic retrofits for the 700 bridges across the state that need repair.

**ODOT I-205 Toll EA - RECORD #1323 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Tim

**Last Name :** McCoy

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I do not support the tolling plan. It's simply unfair. The plan has the added problem of overloading side streets from locals wanting to avoid the tolls. It's a lose lose proposition.

The plan unfairly targets one freeway with two booths just a few miles apart. If you need revenue, seek it from a broader base, like the gas tax. If you are seeking to address traffic congestion and patterns, build more roads.

Thank you.

[ ]

**ODOT I-205 Toll EA - RECORD #1324 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Joachim

**Last Name :** schalk

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
The planet is on fire. We must do more

**ODOT I-205 Toll EA - RECORD #1325 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** jennifer

**Last Name :** frost

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Why are we not building PUBLIC TRANSIT instead of more fucking freeway lanes?! Why?!?! We already already know the solution for traffic, build fucking trains.



**ODOT I-205 Toll EA - RECORD #1326 DETAIL****Submission Date :** 4/17/2023**First Name :** josh**Last Name :** berger**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Any freeway expansion must have an environmental impact statement. It's as if ODOT thinks there is no environmental impact to widening our freeways. I was recently visiting some family in southern California and it boggled my mind how many lanes of freeways there were. Don't turn Oregon into California. I get congestion is an issue, but we need to do better. And the first step in doing better is to do an Environmental Impact Statement. Beyond this, I believe the Oregon state legislature approved some very specific climate targets. This freeway expansion is directly in conflict with Oregon's aggressive targets for reducing carbon emissions.

**ODOT I-205 Toll EA - RECORD #1327 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Joseph

**Last Name :** Herbert

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
CONDUCT AN EIS.  
INVEST IN SUSTAINABLE LOCAL ECONOMIES & HOUSING.  
INVEST IN LOCAL TRANSIT ALTERNATIVES.  
INVEST IN WALKABLE NEIGHBORHOODS.  
INVEST IN LOCAL PRODUCE AND LOCAL FARMS where I can buy non-GMO vegetables, versus junk.  
Because I'm 37 years of age and this Billion dollar proposal is FAR BETTER SPENT ELSEWHERE. and want a sustainable, steady-state future -- not this expansion.

**ODOT I-205 Toll EA - RECORD #1328 DETAIL**

**Submission Date :** 4/17/2023  
**First Name :** Jonathan  
**Last Name :** Greenwood  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Hello, I believe that ODOT should conduct an Environmental Impact Statement that studies congestion pricing before freeway expansion. Firstly, any congestion tolling ODOT implements should be progressive. Low-income earners shouldn't have to pay, and as income increases for higher-earners they should pay more in toll money. That money should then be used on public transit and bike/walk infrastructure, not to widen our freeways anymore anywhere. I can't believe I have to say this to a state transportation agency in 2023, but induced demand is a thing. If you widen the freeway, you will end up with just as bad or worse congestion than before. Widening the freeway provides no benefits to our community, and it only serves to keep bloated highway budgets flowing. Please move toward a model that only maintains freeways and vastly expands public transit and bike infrastructure. Further, I access I-205 fairly regularly and see the gouge it has made in our city fabric. The fact that city freeways still exist today because we don't have proper transit oriented development and expansion of transit is a travesty. We need to move forward to a green, low-car future.

**ODOT I-205 Toll EA - RECORD #1329 DETAIL****Submission Date :** 4/17/2023**First Name :** Alastair**Last Name :** Roxburgh**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
There is no place in today's world for DOTs to ram through dated designs for I-5 that arguably amount to a freeway expansion in search of a far too expensive bridge that they admit will not significantly cut travel times. Moreover, even though the present bridge has been deemed (by qualified DOT engineers) to have another thirty years of life, the IBRP, in their typical fashion of using outdated, decade-old traffic estimates, wants to build a costly and over-sized boondoggle of a bridge which is supposed to provide the impossible confluence of road, light rail, pedestrian and bicycle traffic, while violates the U.S. Coast Guards requirement of 178 feet of vertical nautical clearance, which is the minimum CG requirement to protect river commerce, and emergency services to the PDX ditch zone for the next century. The IBRP could make many of the safety problems and the cost burden of a high bridge go away if they opt for a much lower bridge with a bascule span or an immersed tunnel. For these reasons, and many more which there is no space to go into here, ODOT (and IBRP) must restart the design process after conducting a genuinely transparent and honest public debate of the pros and cons of the various possible design approaches discussion, including a full ODOT Environmental Impact Statement of all factors. There is no room in this discussion for egos and preconceptions. Only this way will the people of Oregon and Washington get the best value for their hard-earned dollars.

**ODOT I-205 Toll EA - RECORD #1330 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Sandy

**Last Name :** Polishuk

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
The environment needs to be primary in our decision making. Do more highways create more traffic, more miles driven, more carbon pollution or less congestion? The Rocky Mountain Institute's calculator suggests this 205 expansion will add between 72 and 109 million vehicle miles traveled a year. Under today's conditions, the annual emissions from this are the same as ~9,800 passenger cars and light trucks or ~5 million gallons of gas, and represents by 2050 as much as 1.2 million metric tons of carbon. This is unacceptable and incompatible with our carbon targets.  
An EIS could help clear up if this is the case. Please do and EIS for this project now.

**ODOT I-205 Toll EA - RECORD #1331 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Michael

**Last Name :** Ryan

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
To consider alternatives that are not pushed by money and power

**ODOT I-205 Toll EA - RECORD #1332 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Steve

**Last Name :** Piercy

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
An Environmental Impact Statement is required due to the massive expansion of vehicle miles traveled and increased greenhouse gas emissions and other toxic pollutants that will be spewed into the air. Additionally the microplastics from tires and other detritus that drivers shed from their vehicles poisons the waterways.

**ODOT I-205 Toll EA - RECORD #1333 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Jan

**Last Name :** Wulling

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Name:  
Jan Wulling

Email:  
homeharmonynow@yahoo.com

---

Time: April 17, 2023 at 8:30 pm

IP Address: 76.115.177.24

Contact Form URL: <https://nomorefreewayspx.com/i205expansion/>

Sent by an unverified visitor to your site.



**ODOT I-205 Toll EA - RECORD #1334 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Diane

**Last Name :** Jones

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Please have ODOT conduct an Environmental Impact Statement on the proposed I-205 Freeway Expansion, an Environmental Assessment is not sufficient. This area of I-205 sits near Clackamas and Willamette Rivers where anglers and locals fish and boat and swim and enjoy the natural environment near the Historic Oregon City and site seeing. The expense of the project coupled with the plan for tolling directly impacts people who live in this area while there are no basic improvements to walking in the neighborhood vicinity, no sidewalks, curbs and gutters, nor really any bicycle path infrastructure in most of the area near this proposed project. Yet, this area is also extremely dangerous to pedestrians who have limited crossing lights in much of the areas near this project. More cars and no pedestrian safety improvements will only bring more cars and danger. Quality of life and tourism to Oregon City which has many exciting developments, will not be the cute Main Street and historic tourist destination that it could be. Huge interstate bridges and traffic which already cut through Oregon City will further make it less desirable as a tourist destination, even with the restoration of Willamette Falls and developments in the river area.

**ODOT I-205 Toll EA - RECORD #1335 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Francisco

**Last Name :** Gadea

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Given the magnitude of this project I feel that an Environmental Impact Statement has to be conducted. The cost is too high and the consequences too dire if we get it wrong. Thank you.

<b>ODOT I-205 Toll EA - RECORD #1336 DETAIL</b>	
---	--

**Submission Date :** 4/18/2023

**First Name :** Duncan

**Last Name :** Baruch

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Global heating is with us an getting worse.  
Droughts, floods, extreme weather, all contributing to cost of living and much more: hunger and famine, chaos, a bleak future -- vastly more so if we continue using fossil fuels. Business as usual with internal combustion engines, let alone expanding their use is pure folly. We are so very close to the point of no return from a tolerable future. Freeway expansion is out of the question.

<b>ODOT I-205 Toll EA - RECORD #1337 DETAIL</b>
---

**Submission Date :** 4/18/2023

**First Name :** Yehudah

**Last Name :** Alan Winter

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Our focus needs to move away from autos and fossil fuels if our children and grandchildren are going to have a place on earth in their future.

**ODOT I-205 Toll EA - RECORD #1338 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Jacob

**Last Name :** Apenes

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Hello,

For a freeway of this magnitude, an Environmental Impact Statement for the proposed I-205 Freeway Expansion is necessary. My future is at stake with potentially millions of metric tons of carbon being put into the atmosphere with this project. Please save our planet by conducting an EIS.

Thank you.

**ODOT I-205 Toll EA - RECORD #1339 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** David

**Last Name :** Regan

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Why wasn't an Environmental Impact Statement done for the I-205 Freeway Expansion?

Why are we building more lanes when we have to reduce pollution? What is the effect of tolling on the amount of traffic expected? Maybe we should tolling to reduce traffic, not building more lanes.

**ODOT I-205 Toll EA - RECORD #1340 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** mel

**Last Name :** scott

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I demand that ODOT conduct an Environmental Impact statement for the proposed I-205 freeway expansion because we are in a climate change emergency right now not in the future. More black tar and less green and trees means we get hotter. It's also become very dangerous for myself and others because there isn't better infrastructure in place for pedestrians and bicyclists. We need more protection as reports will show that pedestrian and bicyclist injuries and deaths have risen and that is not in line with with vision zero. Reports show quality of life goes up with bicycling and walking included as part of a getting to work routine. Inflation has made these things necessary as well. But again, with climate change happening right now it would be a waste of money to expand and then have to undo the damage as we realize the mistake of not doing our best to preserve the soil and air. So what I'm stressing is that this expansion probably would be reversed as our climate change problems worsened. There's many existing roads that could be fixed for cars while this detriment to our fight on climate change and our quality of life goes down without the ability to easily walk and/ or take a bike. So as a tax payer and resident of Oregon, I demand less worry when I walk and in the air I breathe.

**ODOT I-205 Toll EA - RECORD #1341 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Nick

**Last Name :** Mediati

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
We know that highway expansion just leads to more cars on the road and that more cars on the road leads to more carbon emissions. We also know that auto emissions and other particulates stirred up by road traffic leads to myriad health issues for nearby residents. For these reasons, ODOT needs to conduct a full EIS for this I-205 expansion proposal.



**ODOT I-205 Toll EA - RECORD #1342 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Erika

**Last Name :** von Kampen

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
ODOT must prove whether highway expansion is compatible with our 2040 emissions targets.

**ODOT I-205 Toll EA - RECORD #1343 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Gerson

**Last Name :** Robboy

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I request an environmental impact statement on the widening of I-205. What effect would it have on CO2 emissions and on air pollution in general? While traffic deaths are spiraling upward and we have hundreds of bridges that need seismic upgrades, ODOT wants to widen a freeway and encourage more traffic on it? What about doing something about safety on all the non-freeways?

**ODOT I-205 Toll EA - RECORD #1344 DETAIL**

**Submission Date :** 4/18/2023

**First Name :**

**Last Name :** Marj

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Time to rethink our transportation system towards sustainable, public, less car-centric.

**ODOT I-205 Toll EA - RECORD #1345 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** James

**Last Name :** Zurcher

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I would like to know what the expected impact is going to be on the communities that will see increased traffic on local roads and sideroads to avoid the tolls. With the multitude of driving apps out there, I would imagine a large percentage of users would simply to click the "avoid tolls route" option when asking for directions. Both defeated the purpose of the tolls and putting communities at risk more traffic accidents on local streets. Will there be an increased police present on local roads to help drivers obey the speed limit? I would assume that a route with no tolls would take longer to get to destination, increasingly the likelihood of drivers speeding. In addition to the increased danger to local communities, these "non toll routes" would also be keeping drivers on the road longer to get to the same destination. This has a twofold increase in the amount of greenhouse gasses emitted. Not only will drivers be spending more time on the roads, but that time they spend driving will be done at speeds that are much less efficient. Constant stopping and accelerating through local communities and neighborhoods uses far more gasoline to drive the same distance, than traveling at a speed of 50mph or greater.

I look forward to reading your response.

Thank you.

**Attachments :** image001.jpg (17 kb)  
image002.png (21 kb)

**ODOT I-205 Toll EA - RECORD #1346 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Bobbee

**Last Name :** Murr

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
A major project like this requires an EIS, especially now that the State of Oregon has a GG emissions reduction timeline. Calculate: increased acoustic pollution; greenhouse gas emissions; emissions of other toxics; soil and water conditions, including erosion and runoff, due to increased pavement; highway structural integrity during an earthquake; affect on nearby neighborhoods; how the projected vehicular traffic increase will affect metro area residents' health outcomes, and more.

**ODOT I-205 Toll EA - RECORD #1347 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Desiree

**Last Name :** Tullos

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Expanding highways has repeatedly been demonstrated in the scientific literature to increase demand. ODOT should consider alternatives to the expansion of I-205 that reduce demand on the interstate and reduce environmental impact.

**ODOT I-205 Toll EA - RECORD #1348 DETAIL****Submission Date :** 4/18/2023**First Name :** Karen**Last Name :** Ashikeh**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Fix the bridge but adding car lanes only worsens traffic congestion and use of private vehicles. That money could be spent to expand electric buses between cities for commuters, repairing more deteriorating bridges and supporting in-town clean transportation options like bike routes and walking paths from homes to transport hubs where people can connect within their city and catch longer-route transport to systems statewide and between states. Make car travel the last choice within and without cities to spur local development or shopping and industry, jobs and recreation.

**ODOT I-205 Toll EA - RECORD #1349 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** DC

**Last Name :** Donohue

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Portland! Stop it with the freeways!!! And if you MUST plan them, please assess honestly the impact on the environment, which includes the humans affected by the project!  
Thank you, Portland.



**ODOT I-205 Toll EA - RECORD #1350 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Janet

**Last Name :** Weil

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
EIS.  
It's the right thing.  
It's needed for a huge project like this one.  
Do the damn thing. Conduct an EIS.  
And don't expand the I-205.  
Climate change, traffic congestion, GHG emissions, are bad enough already.  
Don't make things worse, with our tax dollars.

**ODOT I-205 Toll EA - RECORD #1351 DETAIL**

**Submission Date :** 4/18/2023

**First Name :**

**Last Name :** Ethan

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
The outdated, dirty, and deadly automobile system must be replaced with public transportation, high-speed rail, and walkable cities. ODOT must stop bowing to the automobile industry that robs, poisons, and kills Oregonians.

**ODOT I-205 Toll EA - RECORD #1352 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** James

**Last Name :** Cavin

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
We need an EIS to show that additional lanes will not make it harder to meet Oregon's climate goals. We also need to see if the tolling that will fund this project would reduce traffic sufficiently to eliminate the need for additional lanes.

**ODOT I-205 Toll EA - RECORD #1353 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Nancy

**Last Name :** Reed

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** This idea is outrageous. The state receives plenty of money for roads. Ours is one of the highest taxed for roads. You have gone too far. NO to toll roads!

**ODOT I-205 Toll EA - RECORD #1354 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Margaret

**Last Name :** E. Ruby

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Hello, I am writing to you in dismay upon learning ODOT is attempting to "Greenlight" yet another highway expansion, the proposed I-205 Expansion. ODOT hopes to skip the rigor of the EIS, and instead slip by with the much less rigorous EA, and, in so doing, ODOT is attempting to obscure the facts: Expanding freeways actually generates more demand, inducing more cars on the road, and more congestion. By building more highways, instead of reducing congestion, it will beget more! Expand = Induced Demand + Increased Congestion = Justification for more roads. By definition, this is crazy!  
The extra driving alone on this freeway would create as much as 1.2 million metric tons of carbon by 2050.  
Pursuing freeway expansion is in direct conflict with Oregon's aggressive targets for reducing carbon emissions, prioritizing investments in safer streets, or ensuring ODOT has the resources to invest in basic seismic retrofits for the 700 bridges across the state that need repair.  
As our elected representatives, please require ODOT to conduct a full Environmental Impact Statement for the proposed I-205 Freeway Expansion. Oregonians deserve to know the truth: that the proposed I-205 Expansion is a Trojan Horse which will not decrease but rather will increase congestion, and throw vastly more pollution in the air. Obviously, this is directly in conflict with Oregon's aggressive targets for reducing carbon emissions, prioritizing investments in safer streets, or ensuring ODOT has the resources to invest in basic seismic retrofits for the 700 bridges across the state that need repair. Please require ODOT to conduct an EIS for this proposed boondoggle. Thank you.

**ODOT I-205 Toll EA - RECORD #1355 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Janice

**Last Name :** Rose

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
It is a PROVEN fact that more and wider freeways just cause MORE traffic. Haven't any of you taken a sociology class? Please STOP this continuing expansion of our freeway system. It will NOT help the traffic, the environment, the allure of the Pacific NW.

**ODOT I-205 Toll EA - RECORD #1356 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Veronica

**Last Name :** Ripley

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
The 205 is already encroaching on numerous wildlife habitats and important flora - the idea that it could be expanded and even greater amounts of emissions could be introduced to that environment could potentially hurt not just Portland but our future generations as well. Please conduct a comprehensive environmental impact study.

**ODOT I-205 Toll EA - RECORD #1357 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** David

**Last Name :** Pedersen

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
(disclaimer: I have been blocked by the Oregon Department of Transportation [ODOT] on Facebook for reasons which are unbeknownst to me)

As a concerned Canadian, I respectfully request that ODOT conduct a thorough science-based environmental impact statement for their proposed expansion of I-205. Embarking on a freeway-expansion project carries numerous side effects which cannot possibly be understood from a mere "skim-over" approach. The route through which I-205 currently travels is already plagued by air pollution, road and tire dust, and many other issues that would be worsened were I-205 to be expanded.

Air pollution was classified in 2013 as a known (Group I) carcinogen by the International Agency for Research on Cancer. Additionally, the atmospheric concentration of carbon dioxide was approximately 280 parts per million (ppm) before the Industrial Revolution; it is now over 420 ppm. And if THAT'S not enough, we are also on track to lose over one million species due to primarily-anthropogenic extinction.

Additionally, expanding a road does NOT resolve congestion; it only kicks it down the road (no pun intended). In fact, according to Jevons' Paradox, expanding a road actually WORSENS congestion by making it "easier" to use and thus more attractive (in the short term anyway). Expanding I-205 would also sacrifice valuable wildlife habitat, riparian areas, and so on - many of which act as natural buffers against flooding, something that will become increasingly important as extreme-precipitation events become more common due (ironically) to climate change.

Road transportation is inherently inefficient in terms of people and goods moved per vehicle, and expanding roads will not solve this problem.

In light of all of the above and more, I respectfully ask that ODOT prepare a full, transparent, and science-based environmental impact statement before embarking on this project - or, better yet, simply shelve this project entirely and use the funds to expand walking, cycling, and [electric] public-transit infrastructure instead.



**ODOT I-205 Toll EA - RECORD #1358 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Jordan

**Last Name :** Lewis

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Every dollar spent on freeway expansions contradicts any climate, environmental justice, or vision zero goals set by our state. 100 years ago we had access to safe, clean, electrified rail transit between most cities in Oregon. Now we have almost nothing, and it was stolen from us by organizations like ODOT who refuse to question the orthodoxy of "one more lane".

Idling cars do not cause emissions; driving does. Electric vehicles do not "solve" the environmental impacts of road infrastructure, tire and brake particulates, or the gross inefficiency of every 1.2 people getting a 4-ton, air conditioned metal box to themselves. Building another freeway is climate arson, and the people DEMAND a stop to these wasteful, harmful fossil fuel projects. Every freeway is an oil pipeline.

DO NOT hold another "user comment" meeting to which you invite only truckers & contractors with a horse in the race (I was there thursday). The people of Oregon--your constituents, my friends and family--DEMAND that you hold an Environmental Impact Statement on the effects of another God forsaken road project.

**ODOT I-205 Toll EA - RECORD #1359 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Aubrey

**Last Name :** Pullman

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Widening roads creates demand for driving. Driving that causes climate breakdown, severe weather and destruction of the ecosystems we rely on for survival.

I've been living in or visiting the Columbia River Gorge for my whole life. Every road expansion has brought more cars driving faster. We simply cannot afford the climate cost, let alone the financial cost for such projects.

**ODOT I-205 Toll EA - RECORD #1360 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** William

**Last Name :** Coker

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
We need to stop induced demand and take care of our environment.

<b>ODOT I-205 Toll EA - RECORD #1361 DETAIL</b>
---

**Submission Date :** 4/18/2023

**First Name :** Joseph

**Last Name :** Stenger

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Every big project needs to be examined for its climate impact. No time to skip that step!

**ODOT I-205 Toll EA - RECORD #1362 DETAIL****Submission Date :** 4/18/2023**First Name :** Dawn**Last Name :****Affiliation :****Submission Method :** Accessible form**Q3. Comments :**

I have been a volunteer with Trauma Intervention Program ( TIP)for 5 years. If you've never heard of us, consider yourself lucky. Ask any first responder in Mult or Clack county what they think of TIP and you will instantly see that our free service is invaluable to them. We are highly trained volunteer citizens that help fellow citizens in traumatic events (homicide, hit and run, traffic deaths, suicide, natural death, drowning, overdoses, etc): our calls come from first responders in Multnomah and Washington counties. We are 24/7, 365 days a year and typically respond within the first 20 minutes of the 911 call. We have a high turnover of volunteers and there are over 250 of us in Mult/Clack/Hood River counties. Many volunteers are retired and on fixed incomes. We drive our own cars and pay for own gas and are required to put in three 12-hour shifts a month. Because of this toll, and FUTURE tolls ( we are in Clark County Washington too)we will lose many volunteers. Why are you burdening Oregonians with a tax that pays for something our taxes have already paid for?

The transportation department projects that it will collect \$132 million a year in tolls: \$93 million a year from households and \$39 million a year from freight carriers. At the same time, ODOT estimates that reduced traffic on I-205 will produce only \$105 million in economic benefits from reduced congestion, environmental improvements, and economic activity. That means Oregonians will be \$27 million worse off every year these tolls are collected.

This is not how congestion pricing is supposed to work. Done correctly, congestion pricing makes people better off because the value of the travel time saved is worth more than the tolls they pay. Somehow, ODOT got way off track and concocted a tolling scheme that charges outrageous tolls, doesn't generate sufficient time savings, impoverishes families, and drives out employers.

The City of Portland began to back away from enforcing minor traffic violations- expired tags. Also, Senate Bill 1510, helped to erect barriers to police enforcing minor violations. While Oregon is not enforcing expired tags, it means that state is losing money. Is this why ODOT said they need to erect tolling to help fill in a \$500 million hole in their budget? Oregon has a top 10 national high gas tax and a top 10 most expensive auto fee compared to other states. How can ODOT ask for more money if the State doesn't even bother to collect the funds it is owed?

These taxes/tolls will drive away tourists, business (many are already shuttering Walmart, Nike, REI too many to name) and people are moving from this state for the first time ever because of high taxes, record crime, out of control homelessness, and now you want to add tolling?

Please stop this idea and give Oregonians a break for once.

**ODOT I-205 Toll EA - RECORD #1363 DETAIL**

**Submission Date :** 4/18/2023  
**First Name :** Mark  
**Last Name :** Russell  
**Affiliation :** Technology Development Network, LLC  
**Submission Method :** I-205 EA email

**Q3. Comments :** I am totally opposed to the proposed tolls on I 205. As a local Clackamas county resident for 25+ years and already paying some of the highest state and local taxes in the US, additional fees for living here and conducting daily business and personal travel on I 205 is too much. Suggest all Clackamas residents receive a lifetime waiver for the tolls.

Regards,

Technology Development Network, LLC

[ ]

**ODOT I-205 Toll EA - RECORD #1364 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Mark

**Last Name :** Harris

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?: Please get your heads out of the sand and realize that climate change is real! You need to complete an EIS and try tolling before anything else! I'm sure you have heard of induce demand? Maybe check to see what has been happening in San Francisco? Our children's lives depend on it. Thank you

**ODOT I-205 Toll EA - RECORD #1365 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Charlotte

**Last Name :** VanCleve

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
We must start taking thoughtful action against climate change. It's time we examine our society's gut response to expand freeways and continue building cities around cars. There are other ways to improve traffic (and people's lives). Please indict an environmental impact statement for the proposed i-205 freeway expansion. Our future depends on it.



<b>ODOT I-205 Toll EA - RECORD #1366 DETAIL</b>
---

**Submission Date :** 4/18/2023

**First Name :** Steve

**Last Name :** Morris

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Please be honest with your employers, the taxpayers, when you report survey results, including NOs.

**ODOT I-205 Toll EA - RECORD #1367 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Stephen

**Last Name :** Bachhuber

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
The environmental impact of an I-205 expansion would be enormous. It goes beyond making bridges survive earthquakes to resetting the entire transportation network throughout The Portland metropolitan area. It would suck money needed for climate friendly alternatives into more lanes, induced congestion, cost overruns, and climate disaster. This is the definition of insanity, 205 reached capacity decades early. Congestion priced tolling is a low priced, effective alternative. Bikeways can eliminate a significant amount of congestion. There are climate friendly alternatives. We need an EIS.

**ODOT I-205 Toll EA - RECORD #1368 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Wendy

**Last Name :** Horvat

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Please focus on improving transportation options for non- motorized transport methods!

**ODOT I-205 Toll EA - RECORD #1369 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Trish

**Last Name :** Claffey

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Please, no more Freeways!  
This highway expansion project is directly in conflict with Oregon's aggressive targets for reducing carbon emissions, prioritizing investments in safer streets, or ensuring ODOT has the resources to invest in basic seismic retrofits for the 700 bridges across the state that need repair.  
At the least, an environmental impact statement by ODOT should be required.

**ODOT I-205 Toll EA - RECORD #1370 DETAIL****Submission Date :** 4/18/2023**First Name :** Phillip**Last Name :** Ross**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

Dear Members of the Oregon Department of Transportation,  
I am writing to express my opposition to the I-205 expansion project, which includes the construction of the Abernethy Bridge and the expansion of multiple freeway lanes on I-205. As a concerned citizen of Oregon, I find this project to be in direct conflict with our state's aggressive targets for reducing carbon emissions, prioritizing safer streets, and allocating resources to the necessary repair of over 700 seismically vulnerable bridges.

The total cost for this 14-mile freeway expansion project, consisting of a seven-mile new lane expansion in each direction, is estimated to be \$515 million. This amount, when added to the \$544 million price tag for the Abernethy Bridge, amounts to a substantial expenditure for a project that is not only harmful to the environment but also fails to address the urgent transportation issues our state faces.

The Rocky Mountain Institute's calculator predicts that this I-205 expansion will generate between 72 and 109 million additional vehicle miles traveled (VMT) per year. Under the current conditions, this increase in VMT will produce annual emissions equivalent to 9,800 passenger cars and light trucks, or approximately 5 million gallons of gas. By 2050, the project is expected to contribute as much as 1.2 million metric tons of carbon.

It is alarming that ODOT did not conduct a comprehensive Environmental Impact Statement for a project of this magnitude, opting instead for a mere Environmental Assessment. Furthermore, the lack of research into the potential effectiveness of tolling to reduce traffic is disconcerting. It is unclear whether the additional lanes will be necessary if tolling reduces traffic to a sufficient degree. Lastly, the dubious cost-benefit analysis and traffic projections that have been used to justify this project are misleading and potentially harmful in the long run.

Considering the pressing transportation issues our state is currently facing – the escalation of traffic fatalities, the presence of over 700 seismically vulnerable bridges, and ODOT's history of massive cost overruns – it is essential that we prioritize our resources and efforts more effectively. Instead of investing in environmentally harmful and expensive projects like the I-205 expansion, we should allocate resources towards addressing safety concerns, maintaining existing infrastructure, and promoting sustainable transportation alternatives.

I urge the Oregon Department of Transportation to halt the I-205 expansion project and reconsider its priorities. By doing so, we can work towards a safer, more sustainable, and fiscally responsible transportation system for the benefit of all Oregonians.

**ODOT I-205 Toll EA - RECORD #1371 DETAIL**

**Submission Date :** 4/18/2023  
**First Name :** Jeffry  
**Last Name :**  
**Affiliation :**  
**Submission Method :** Accessible form  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #1372 DETAIL****Submission Date :** 4/18/2023**First Name :** Richard**Last Name :** Weinhold**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
A project this big, with huge building costs and resulting in significant passenger and freight miles has huge repercussions for the communities it traverses and of little direct benefit to them and certain degradation of air quality. Rethink this project needs to start with conducting a thorough environmental impact statement.

**ODOT I-205 Toll EA - RECORD #1373 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Lucy

**Last Name :** Corbett

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
ODOT,  
Please reconsider the expansion of I-205 Freeway. This project is directly in conflict with Oregon's aggressive targets for reducing carbon emissions, prioritizing investments in safer streets, and lessens funds to ensure ODOT has the resources to invest in basic seismic retrofits for the 700 bridges across the state that need repair.



**ODOT I-205 Toll EA - RECORD #1374 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Kristin

**Last Name :** Miller

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Don't waste money on projects that increase emissions. Make public transit free and expand zero carbon options.

**ODOT I-205 Toll EA - RECORD #1375 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Veronica

**Last Name :** Poklemba

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
The I-205 expansion in Clackamas Co. should have an EIS completed. Our old pattern of haphazardly expanding freeways without thorough review needs to stop. The costs tend to be astronomical and interfere with the availability of funds for other projects that are very necessary. We also need to move away from continuing to encourage more driving, which automatically results when freeways are expanded.

**ODOT I-205 Toll EA - RECORD #1376 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Dave

**Last Name :** Durocher

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I attended the RTAC meeting via Zoom on 02/27/23.

I have downloaded and reviewed the ODOT Environmental Assessment. The EA offers an insufficient analysis regarding the issue of diversion. I live in the Hidden Springs neighborhood near Salamo and Rosemont Road. Post toll implementation I am very confident that I would never pay the toll to travel the 7-mile toll corridor. I could drive to the on-ramp and enter I205 South at Stafford Road and enter I205 North at CR43. The problem is every other driver on I205 would also divert to Stafford, Rosemont, then down Sunset to CR43. If this plan was implemented, it would be impossible to exit or enter my neighborhood during any hour day or night. Three schools on this minor detour and many local neighborhoods, so our local children and residents would also be at risk.

This issue needs to come before a vote of the people. The first ever new toll road in the country where there is no new road with no public vote is clearly government overreach.

**ODOT I-205 Toll EA - RECORD #1377 DETAIL****Submission Date :** 4/18/2023**First Name :** Patrick**Last Name :** Halley**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
In a progressive state like Oregon, I am struggling to understand why citizens need to write and appeal for the DOT to conduct Environmental Impact Statements. Are you hoping nobody notices, or do you already know it will be a project killer? Can you remember how we figured out several decades ago that expanding freeways only temporarily reduces congestion, and quickly induces more demand. It seems critical to me that we study whether tolling could reduce traffic to the point that the additional lanes aren't needed (then we can spend the \$500-1B on projects that will help save peoples lives and not incentivize more driving).

Here's what I have read that makes me concerned about the project:  
This 14 mile freeway expansion (a seven-mile expansion of a new lane in each direction) has a price tag of \$515 million, in addition to the \$544 million price tag for the Abernethy Bridge. If this proposal is completed, the Rocky Mountain Institute's calculator suggests this 205 expansion will add between 72 and 109 million vehicle miles traveled (VMT) a year. Under today's conditions, the annual emissions from this are the same as ~9,800 passenger cars and light trucks or ~5 million gallons of gas, and represents by 2050 as much as 1.2 million metric tons of carbon.

The state has many other pressing needs for investment in our transportation system – traffic fatalities are skyrocketing, the state has over 700 seismically vulnerable bridges. FURTHERMORE, this project would be directly in conflict with Oregon's aggressive targets for reducing carbon emissions, prioritizing investments in safer streets, or ensuring ODOT has the resources to invest in basic seismic retrofits for the 700 bridges across the state that need repair.

**ODOT I-205 Toll EA - RECORD #1378 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Elyssa

**Last Name :** Kiva

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
In a climate crisis the last thing we need is more freeways, especially without researching the impacts and alternatives. ODOT must conduct an Environmental Impact Statement.

**ODOT I-205 Toll EA - RECORD #1379 DETAIL****Submission Date :** 4/18/2023**First Name :** Thomas**Last Name :** Remley**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** This has to be the most ridiculous proposal I've seen in a long time. To think this is favorable to Oregonians is absurd, even when ODOT says it will cost the average Oregonian \$575 per year. Wake up and get rid of this proposal before it does permanent damage to our state and its citizens.

**ODOT I-205 Toll EA - RECORD #1380 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Steve

**Last Name :** Cheseborough

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
The planet is deep in an environmental crisis that is getting worse. A responsible transportation agency should be discouraging driving, not promoting it. Stop the freeway expansion or at least do a full Environmental Impact Study before even considering it. Thank you.

**ODOT I-205 Toll EA - RECORD #1381 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Lily

**Last Name :** Burnett

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
ODOT must conduct an environmental impact statement for the proposed I-205 freeway expansion because our future depends on reducing greenhouse gas emissions and reducing vehicle miles traveled. Expanding freeways is a proven way to do just the opposite and we cannot let that happen. Please study congestion pricing if you are concerned about reducing traffic, but do not expand freeways - it doesn't work!

As a new mother of a beautiful baby girl who I plan to raise here, I am deeply concerned that ODOT continues to look for ways to put more cars on the road and destroy our chances of mitigating climate impacts. Please, for the future of our children, do not expand freeways!



**ODOT I-205 Toll EA - RECORD #1382 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Daniel

**Last Name :** Sloan

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
ODOT must conduct an environmental impact statement for projects of such magnitude. Doing otherwise is in direct conflict with Oregon's goals to aggressively reduce carbon emissions, as it has been shown time and time again that widening freeways only induces demand.

**ODOT I-205 Toll EA - RECORD #1383 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Diane

**Last Name :** Meisenhelter

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
It is absolutely insane when we are facing critical climate related tipping points that could affect the lives of millions of humans and other species to even be considering a freeway expansion that will add 14 miles of traffic lanes and an estimated 1.2 million metric tons of carbon by 2050. The costs both financially and environmentally are outrageous and the money would be much better spent on helping public transit go fareless (when Trimet is increasing fares) to get more people out of their cars, reduce congestion, pollution, and emissions. There are cheaper ways to do the seismic upgrade to the bridge and even add rapid transit trains without long terms commitments to increasing emissions and induced demand. We need an Environmental Impact Study!

**ODOT I-205 Toll EA - RECORD #1384 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Alice

**Last Name :** West

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Our planet and communities are in a climate crisis. Additional pollution will impact the health of people living near the 205 and increase emissions in a time when we need to be investing in cleaner ways of moving people.

**ODOT I-205 Toll EA - RECORD #1385 DETAIL**

**Submission Date :** 4/18/2023

**First Name :**

**Last Name :** Eli

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
We are dealing with the outcomes of choices made by planners and politicians of decades past in ever-expanding and encroaching fire seasons, record heat waves and their associated deaths, and multiple record breaking storms every winter. The planning choices we make with roads have consequences and to say we don't need to pay attention to them is to repeat those mistakes and sentence future generations to shorter, more difficult lives.

**ODOT I-205 Toll EA - RECORD #1386 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Paul

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I oppose all tolls.period. This is an economic hardship on hard working blue collar middle class families and individuals. The economic engine that pulls the financial load for all American iis the middle class worker. This toll is just a disguised form of additional taxation, that is crushing middle class families and individuals trying to keep their head above water. Cut the foolish wasting of our tax dollars and redirect the money to our infrastructure fuels economic growth. Homeless people have more right and privileges than middle and lower middle class home owners who have spent their whole lives working and playing by the rules.

**ODOT I-205 Toll EA - RECORD #1387 DETAIL**

**Submission Date :** 4/18/2023

**First Name :**

**Last Name :** Mulysa

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

The environmental impact of the proposed free way expansion is likely to have significant environmental impact and that needs to be assessed before considering going forward with this project. From the impact of the construction to the increase in carbon emissions from increased traffic, we need a clearer picture and clear intentions for how funds are used.

As a Clackamas County tax payer, I don't want to see our funds being used for freeway expansion – these projects ADD to vehicle miles traveled. I'd like to see funds used for reducing carbon emissions, public transit and projects that benefit the community and ecosystem.

**ODOT I-205 Toll EA - RECORD #1388 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Scott

**Last Name :** Clyburn

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
No more freeway expansions! Enough is enough!!

**ODOT I-205 Toll EA - RECORD #1389 DETAIL****Submission Date :** 4/18/2023**First Name :** Michael**Last Name :** Boyles**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
The science is clear and principle is simple: greenhouse gas emissions are warming the planet and causing ecological and economic destruction, and we must at the barest minimum make sure that we don't do anything to actively make it worse. Emissions from the transportation sector are the largest contributor to climate change in the US, and building infrastructure that encourages yet more personal driving only serves to increase those emissions. Any highway expansion warrants extremely close scrutiny to ensure that the totality of the project mitigates climate change. No new lanes without an EIS!



**ODOT I-205 Toll EA - RECORD #1390 DETAIL**

**Submission Date :** 4/18/2023

**First Name :**

**Last Name :** E

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
ODOT needs to conduct a full environmental impact statement for the proposed I-205 Freeway Expansion. This tool is designed to help us make good long term decisions. Use it!

**ODOT I-205 Toll EA - RECORD #1391 DETAIL****Submission Date :** 4/18/2023**First Name :** Cassie**Last Name :** Wilson**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?: I'm a resident of Clackamas County and frequently travel through the I-205 corridor. I'm also a young person who is terrified about the impacts of climate change. In Clackamas County, we've seen our community devastated by wildfires, heatwaves, and ice storms. As a disabled person, I'm terrified of joining the statistics of people left behind in climate disasters. Freeway expansions don't solve congestion, but they do contribute to climate chaos. Adding another lane to I-205 will make it easier to drive, encouraging more people to do so and increasing emissions as a result. Whenever I drive the two lane stretch of I-205, people are constantly passing me for doing the speed limit. The current 45mph construction zone stretch of I-205 has people doing 75+ through it still. Personally, I just anticipate and plan for the congestion in this area and have never been seriously delayed by it. Additionally, ODOT's own presentations have said that tolling will reduce congestion, so why would we need more lanes? We need to study the impacts of tolling without expansion. No freeway expansion has ever solved congestion, so spending millions of dollars on this one will be a waste of money that could be better spent on fixing our deadly, crumbling state highways or investing in public and active transportation options. I've seen absolutely no commitment to fund regional transit service through this area. You can have a bus on shoulder option, but it's meaningless if you don't run any buses or invest in a feasible public transportation system in Clackamas County. 1 in 3 Oregonians can't or don't drive which includes many disabled people, young people, older people, and those who can't afford the high costs of owning a vehicle. 7 miles of freeway expansion will not solve congestion and will be a colossal waste of money that aids in lighting my generation's future on fire while expecting us to pay for it. As a community development student, I've learned in my classes that it's the standard to conduct a full environmental impact statement on mega projects such as this one, so why is that not what's happening here? Conduct a full environmental impact statement on the I-205 freeway expansion.

**ODOT I-205 Toll EA - RECORD #1395 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Janna

**Last Name :** Tessman

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
It is fiscally irresponsible to buy additional lanes that might not even be needed given the planned tolling. Especially with my tax dollars. Hundreds of millions of dollars could surely pay for expanded max service, long bike and walkways, and freeway caps, to improve local air quality, reduce the intensity of the next killer heat waves, and so that people who can't drive are still able to travel to work and to see their families. The people of Clackamas county deserve transportation options. Why are we relying on old dirty technology in this third decade of the 21st century. Where is the American innovation? I would like to recreate outside of the metro area without contributing to the degradation of those natural areas by traveling to them using energy costly means of transport.

**ODOT I-205 Toll EA - RECORD #1396 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Eric

**Last Name :** Casteleijn

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Climate change is killing our planet. We need to invest in affordable public transit and get people out of cars, not enable more traffic.

**ODOT I-205 Toll EA - RECORD #1397 DETAIL****Submission Date :** 4/18/2023**First Name :** Denise**Last Name :****Affiliation :****Submission Method :** Accessible form

**Q3. Comments :** For 24 years, I traveled to work from Oregon City to Wilsonville via Willamette Falls Drive and the Arch bridge. Whenever there was a backup on I205, there was a huge backup from Stafford Road to Oregon City. A toll at the Abernathy bridge will, without ANY doubt, cause the same problem. This will totally negate the plan to decrease air pollution from stalled cars on I205 because they will be stalled on Willamette Falls Drive, the Arch Bridge, and Main Street. This is a certainty, not a possibility. A toll in this area is a horrible idea.

**ODOT I-205 Toll EA - RECORD #1398 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Lloyd

**Last Name :** Vivola

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

As someone who lives near I-205 and spends much time - socially and as a consumer - in the SE Portland I-205 corridor, I insist that ODOT conduct an Environmental Impact Statement before approving 14-miles of new I-205 lanes in Clackamas County. The \$500 million dollar price tag for road expansion seems nothing less than an egregious denial of known facts and unforeseen consequences as we face the challenges of climate disorder that will impact the lives and lifestyles of younger citizens and future generations. In a time of shift on multiple fronts - like traffic tolling, the still-uncertain accessibility and viability of electric vehicle transition, or the need to preserve green spaces and pollution buffers for local communities - this plan demands deeper analysis to discern whether it is the right plan for these times or any time in the near future. To my mind, the proposed monies would be much better spent on enhancing public transportation options and upgrading our state's ageing roadway system in an environmentally friendly manner. As for life in the SE I-205 corridor today, I will leave you with a scientific analysis by PSU professor Vivek Shandas as reported in the Willamette Week cover story, July 14, 2021. Link below.

<https://www.wweek.com/news/city/2021/07/14/this-is-the-hottest-place-in-portland/>

Thank you for taking comments.

**ODOT I-205 Toll EA - RECORD #1399 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Sam

**Last Name :** Stuckey

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Before spending public money, it's imperative that we understand and have a full accounting of the environmental and public health impacts that I-205 Freeway Expansion will have in our community.

**ODOT I-205 Toll EA - RECORD #1400 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Zachary

**Last Name :** Leshner

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I demand that ODOT conduct an Environmental Impact Statement that studies the potential impacts of congestion pricing on traffic. I feel strongly about this as someone who primarily moves about the region on a bicycle or on foot. My safety is regularly jeopardized by the massive volume of vehicles dumped into my area by the freeway system, who terrorize me and my neighbors by speeding, running red lights, and behaving aggressively in the public right of way. Any plan that makes it easier to drive than to use any other form of transportation will exacerbate this issue. The solution should be a combination of congestion pricing and a scaling down of our expensive, dangerous, polluting car-centric infrastructure with a concomitant increase in funding for public transportation, cycling, and walking.



**ODOT I-205 Toll EA - RECORD #1401 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Dan

**Last Name :** Ryan

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Planning a freeway expansion without a EIS is climate arson and fiscally irresponsible. You can't expand freeway's when you can't even take care of the roads that you already have. Why are all of the urban arterioles in terrible shape, and the most deadly roads in the Portland area.

We need to be looking at transportation alternatives, not continuing to throw money at things that do not improve traffic or congestion.

**ODOT I-205 Toll EA - RECORD #1402 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Richard

**Last Name :** Bayer

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Our tri-county area suffers from air pollution, which contributes to asthma and lung cancer. The freeway expansion seems to help people pass through Portland rather than help those who live in the Portland metroplex and tri-country area. Please do an Environmental Impact Statement to determine the pollution and toll on the health of the community. An alternative avenue to spend ODOT money is to fix bridges to make them earthquake safe or better yet to purchase electric buses for urban areas suffering from air pollution. Please recall the significant worsening of our air in recent years from wildfires. Together with more traffic, this makes it difficult to breathe for part of the year. We need to stop expanding freeways. Thank you for your concern.

**ODOT I-205 Toll EA - RECORD #1403 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Evan

**Last Name :** Ward

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
If this expansion didn't significantly increase the number of cars on the road, it wouldn't be worth doing! If this project will be a valuable piece of transportation infrastructure, it will be full of vehicles, even moreso than at present. This significant increase in the number of vehicles on the road means there should be a real environmental analysis. If this project is worth doing, it requires an environmental impact statement.

**ODOT I-205 Toll EA - RECORD #1404 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Daniel

**Last Name :** Wilson

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Cars and car culture are killing humans and the planet. Stop expanding freeways and dismantle them, instead.

**ODOT I-205 Toll EA - RECORD #1405 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Walt

**Last Name :** Mintkeski

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
ODOT must conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion which will add seven miles of a new lane in each direction.

Considering the size and estimated \$515 million cost of this project, an Environmental Assessment is totally inadequate. ODOT must, as a minimum, study whether the tolling that it is proposing to use to fund this project will reduce traffic to the point that the additional lanes are not needed.

**ODOT I-205 Toll EA - RECORD #1406 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** David

**Last Name :** Medford

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
For a project of this scope and funds spent , an Environmental "Summary" is woefully inadequate . ODOT must complete a full Environmental Impact Statement to truly understand all the consequences . The EIS should include a serious study of congestion pricing before the massive cost of freeway expansion .

**ODOT I-205 Toll EA - RECORD #1407 DETAIL****Submission Date :** 4/18/2023**First Name :** Nancy**Last Name :** Crumpacker**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
ODOT must conduct an Environmental Impact Statement for the I-205 freeway expansion proposal. This expansion will create more carbon emissions as more cars use the added lanes. I am strongly opposed. Thank you for your attention.

**ODOT I-205 Toll EA - RECORD #1408 DETAIL**

**Submission Date :** 4/18/2023

**First Name :**

**Last Name :** Lincoln

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
It seems that we need a clearer way to determine when an EIS is required for government projects. I'd think that the scale of increased carbon emissions and urban sprawl associated with this project would certainly have "cumulatively significant climate impacts", which compromise the state's emissions goals. But apparently this definition isn't clear enough.

Why not study congestion pricing in a more controlled setting before adding the variable of additional lanes?

Why not first study the effect of adding some overdue transit alternatives along this section of freeway?

Thank you for your consideration and your efforts to become a department of increasingly SUSTAINABLE and EQUITABLE transportation.



**ODOT I-205 Toll EA - RECORD #1409 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Tyler

**Last Name :** Norbury

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

The area west of Oregon City which I-205 travels along is beautiful, from the views of the Willamette River, to the trees that overlook you as you drive by.

As such I believe that it is of upmost importance that you do the following:

1. Conduct research and provide an Environmental Impact Statement, to ensure that expanding I-205 won't harm more of our state's natural beauty.
2. Explore congestion pricing as an alternative to expansion. Freeways are a convenience, not a right, so people should have to pay (a reasonable amount) to use them during traditionally high traffic times.
3. The money raised from the congestion pricing could help to not only provide maintenance to 205. But also be reinvested back into the region that surrounds it by:
  - a. Taking care of the natural beauty through land maintenance, and building parks.
  - b. Develop other (mass) systems for travel along the 205 corridor, partnering with TriMet to provide bus, and maybe even rail lines to give people the freedom to choose how they want to travel through the region. Construction infrastructure to allow for safe bike travel along that stretch of I-205, similar to the existing I-205 bike path further north.

I love this region of the state and metro, and don't want to see it pockmarked by more and more car lanes when there already exist quality alternatives.

Thank you,  
Oregon Resident

**ODOT I-205 Toll EA - RECORD #1410 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Robert

**Last Name :** Galanakis

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
We should not be taking on any projects that will add VMT. Our children- both mine and yours- will have to live with the consequences of these decisions, both in terms of increased carbon emissions, and crumbling necessary infrastructure we are not maintaining so that we continue to expand freeways. These expansions make us poorer and sicker as a society. On top of that, they have been proven not to work to reduce congestion. At what point do we stop doing a thing we know both doesn't achieve stated goals, and also has negative side effects (carbon, land use, pollution, cost). There's no better time to stop freeway expansion than right now. ODOT must conduct an EIS to demonstrate the effects of this expansion.

**ODOT I-205 Toll EA - RECORD #1411 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Sarah

**Last Name :** Smith

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Climate change is happening rapidly and vehicle emissions are a huge part of this. We also know that marginalized people experience more poor outcomes from increased air pollution. These reasons are why we need an EIS before expanding any freeway in Oregon.

**ODOT I-205 Toll EA - RECORD #1412 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** gabrielle

**Last Name :** roth

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
We've known since 1962 (Anthony Downs) that adding more lanes does nothing to improve traffic conditions, and expanding any of our freeways will prevent us (Oregon) from meeting our carbon emissions reduction targets.  
We can't keep doing this!

Please conduct an EIS - one that includes congestion pricing, so we have a more realistic picture of the impact.

**ODOT I-205 Toll EA - RECORD #1413 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Maria

**Last Name :** Schur

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Why should we have to demand environmental impact statements and studies for freeway expansions?!? First, stop expanding freeways, it only entices people to drive more. Second, wake up and smell the pollution - we need to stop hurting our ecosystem immediately. The very least ODOT can do is to conduct an EIS for their huge pollution-encouraging projects. Come on.

**ODOT I-205 Toll EA - RECORD #1414 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Linore

**Last Name :** Blackstone

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

ODOT, what is your ethic: target management as evidence of the ignorance of consequences for the environment, the lands, people, waters. There are always consequences but humans continue to use up, take over, invade.

Act with some integrity and find out what the consequences will be with a environmental impact study. Humanity can no longer believe that there is no harm from our actions.

**ODOT I-205 Toll EA - RECORD #1415 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Bjorn

**Last Name :** Warloe

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
These freeway expansions are bad for portland, dumping pollution into our city while increasing VMT and putting us all at greater risk of injury or death due to car based collisions. At the bare minimum this project requires an Environmental Impact Statement and decongestion pricing should be evaluated to see if a variable toll could reduce the demand for this type of road to the point that the existing infrastructure is more than adequate. When I think of how much better we could make our city with a billion dollars to invest the last thing I think of is widening an urban freeway. I also live near the project area and am concerned about the increased congestion and danger that will be caused by all the additional cars the widened freeway will bring into our neighborhoods.

**ODOT I-205 Toll EA - RECORD #1416 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Charles

**Last Name :** Townsend

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

It is a must that ODOT conduct an Environmental Impact Statement that studies congestion pricing before freeway expansion. It makes no sense to expand the freeway without knowing what congestion pricing will do the traffic volume.

The rules of induced demand show that freeway expansions do not help congestion in any way. The money for a useless freeway expansion could be used somewhere else to actually affect congestion and help battle climate change.



**ODOT I-205 Toll EA - RECORD #1417 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Chris

**Last Name :** Shaffer

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
ODOT should conduct an Environmental Impact Statement that studies congestion pricing before freeway expansion. We need to stop building more freeways and inducing more demand. Everyone needs healthy air and a cooler planet!

**ODOT I-205 Toll EA - RECORD #1418 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Greg

**Last Name :** Petras

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
ODOT must do an environmental impact of the proposed expansion project.  
What are the impacts of the proposed expansion? The public deserves to know why this project is needed and what it's impacts are before endorsing it

**ODOT I-205 Toll EA - RECORD #1419 DETAIL**

**Submission Date :** 4/18/2023

**First Name :**

**Last Name :** Kyle

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Hi there,

I would really like an environmental impact statement to be conducted, particularly one that takes the likely impact of tolls on traffic into account so that we can minimize the amount of money that we are spending on freeway expansion and make sure that our infrastructure is actually appropriately sized relative to likely demand.

**ODOT I-205 Toll EA - RECORD #1420 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Jeremiah

**Last Name :** Casteel

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
The expansion of the highway and interstate system comes at great environmental and economic cost and is not the best use of the taxpayers money when it comes to long term effective transportation.

**ODOT I-205 Toll EA - RECORD #1421 DETAIL****Submission Date :** 4/18/2023**First Name :** Brad**Last Name :** Baker**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
The time has long past for expanding freeways. We know that adding lanes will increase total vehicle miles traveled and increase emissions, which goes directly against our state and ODOT's goals. Please conduct and Environmental Impact Statement for the proposed I-205 second phase.

**ODOT I-205 Toll EA - RECORD #1422 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Daniel

**Last Name :** Pepper

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

To whom it should concern,

When you are chosen for positions you hold, we expect you to do your jobs correctly. We expect you to advocate for all people affected by your decision making. We expect you to save your constituents money where it's not necessary to be spent. We expect you to look at the failures of other cities and not repeat their mistakes.

One of thousands of very concerned citizens,  
Dan

<b>ODOT I-205 Toll EA - RECORD #1423 DETAIL</b>	
---	--

**Submission Date :** 4/18/2023

**First Name :** Peter

**Last Name :** Kokopeli

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I am writing in opposition to the expansion of I205. At a minimum ODOT must conduct a complete Environmental Impact Statement for the project so that taxpayers can understand the entire cost of the project including climate and human health.

**ODOT I-205 Toll EA - RECORD #1424 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Lauren

**Last Name :** Kelly

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

Many studies have shown that adding lanes leads to more traffic congestion in the long term, so this will at minimum be a massive waste of money, time, and resources. ODOT should be investing in public transit, biking, and walking infrastructure that will benefit the whole region and are aimed at reducing carbon emissions. Furthermore, it would take up valuable land space that could be used for housing (to address the current homeless and housing affordability crisis) or as green space to benefit the wildlife and ecology. Adding lanes is the laziest "solution" ODOT could propose, did you even consider other options?

Please conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion. But also feel free to do your job (serving the community) by proposing approaches that will make the region accessible AND improve quality of life for those living near the highway. Living near a highway has long term negative health impacts and those who live in that area tend to be working class or below the poverty line. Serve them and not big money that wants to throw more asphalt on the land.



**ODOT I-205 Toll EA - RECORD #1425 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Garlynn

**Last Name :** Woodsong

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
This is climate arson. The age of expanding freeways needs to be over, at least until we have complete, connected transit, bike, and pedestrian networks.

**ODOT I-205 Toll EA - RECORD #1426 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Martha

**Last Name :** S Van Dyke

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
More freeway does not help. It only brings more traffic. And so much money. With that money you could provide lots of free public transportation for everyone. Plus, large amounts of housing for the poor and homeless.

no more freeways

**ODOT I-205 Toll EA - RECORD #1427 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Brody

**Last Name :** Sargent

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
As a resident of Vancouver who frequently travels to Portland I am more interested in how train, max lines and other alternatives to automobiles can be built between the cities than doubling down on freeways.

**ODOT I-205 Toll EA - RECORD #1428 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Sandra

**Last Name :** Brown

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
As a tax paying, concerned about climate Portlander/Oregonian, I demand that ODOT conduct a full Environmental Impact Statement that objectively studies congestion pricing before further freeway expansion. It is extremely frustrating that ODOT somehow manages to be 'above the rules/process' by not doing a full, transparent EIS. ODOT continues to ignore that freeway expansion doesn't actually address congestion, and is not acknowledging the reality of the impact of induced demand. The time is NOW to reverse the tide on carbon/emissions and to prioritize our budget for the many pressing transportation needs and climate friendly transit instead of widening freeways.

**ODOT I-205 Toll EA - RECORD #1429 DETAIL****Submission Date :** 4/18/2023**First Name :** Allister**Last Name :** Brister-Smith**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
We need to stop building more freeways. They are expensive, damaging, and ODOT is well aware of induced demand. More lanes will NOT SOLVE TRAFFIC PROBLEMS. Build people centric transportation infrastructure, not cars.

**ODOT I-205 Toll EA - RECORD #1430 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Michael

**Last Name :** Ladewig

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Expanding I-205 is a MISTAKE that will be a huge waste of time and effort! I demand an environmental impact statement that studies a congestion pricing option!

**ODOT I-205 Toll EA - RECORD #1431 DETAIL****Submission Date :** 4/18/2023**First Name :** Charlie**Last Name :****Affiliation :****Submission Method :** Accessible form

**Q3. Comments :** I live in the Marylhurst area off HW 43 and it terrifies me to imagine the congestion that will be thrust upon HW 43, my primary road for travel to and from my home. There will be a flood of people attempting to avoid the tolling across the Abernathy bridge. It will bring traffic to a standstill on an already overloaded HW 43. I am also most concerned about the onerous expense burden tolling will place on my entire family. We've already paid our taxes once to construct HW 205 and now you want to force us to pay a new exorbitant amount of money again & forever more. Your actions continue to drive people to pull up their roots and leave the area to avoid this heavy handed assault on our way of life. Please put a stop to this wrong thinking Tolling Plan!

**ODOT I-205 Toll EA - RECORD #1432 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Mia

**Last Name :** Nolting

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
More cars equals more pollution, obviously. Fossil fuels, plastics from tires and construction, other toxic construction materials, CO2 CO2 CO2.



**ODOT I-205 Toll EA - RECORD #1433 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Timothy

**Last Name :** Fryer

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Don't waste over a billion dollars of our money, fund expansions to public transit and walking/cycling infrastructure instead!

**ODOT I-205 Toll EA - RECORD #1434 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Brandon

**Last Name :** Barnhart

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Please reconsider making room for more cars and more emissions. We can't keep doing the same things we've been doing, we need to support other means of transportation. The time to act is now.

**ODOT I-205 Toll EA - RECORD #1435 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Steven

**Last Name :** Brown

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
ODOT

As an Oregonian taxpayer and citizen of the world I demand that a full Environmental Impact Statement be conducted and specifically include an analysis of the effect of congestion pricing on the reduction of carbon emissions. I am extremely concerned that as the I-205 expansion as currently planned by ODOT will result in an increase of carbon emissions which is in direct conflict with Oregon's stated climate goals. Expansion of the I-205 freeway will result increased carbon emissions and negatively contribute to global warming. Conduct the full Environmental Impact Statement so that the public and governmental approval agencies can see the true negative environmental impact on highway expansion which will enable them to make sound environmental decisions. The continued release of carbon emission from vehicular traffic is an existential threat to life on earth. Conduct an Environmental Impact Statement prior to project approval.

**ODOT I-205 Toll EA - RECORD #1436 DETAIL****Submission Date :** 4/18/2023**First Name :** Nell**Last Name :** K Westerlund**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Oregon, please stop expanding freeways. This type of development has proven how destructive it is over and over again over the last 50-100 years. Look at any progressive country in the developed world, they are not expanding freeways. They are expanding train service and investing in the livability of urban centers. At the very least, an Environmental Impact Statement must be conducted.

**ODOT I-205 Toll EA - RECORD #1437 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Adam

**Last Name :** P

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?: Adding expansion to any freeway system comes with a mass amount of environmental and social degradation of the surrounding area. The increased traffic, idling vehicles and emissions directly relate to increased cancer rates and asthma cases surrounding. Unfortunately this also inadequately affects disenfranchised communities more than others due to lack of resources, capital to invest in lawsuits against polluting companies, and a reduction in mobility. This is a huge mistake and it's been proven time and again that expanding freeways does nothing to improve traffic. This similar investment into communities, public transit would be far more beneficial.

**ODOT I-205 Toll EA - RECORD #1438 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Levin

**Last Name :** Nock

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
This project is diametrically opposed to the decarbonization that is desperately needed for a livable future.

Use the pavement that's already there to deploy a rush-hour bus/HOV lane on the shoulder (as popular around WA DC). Run express buses in rush hour, so commuters can make the trip in 30 minutes by bus, or in an hour sitting in gridlock in a single occupancy vehicle (SOV). If you don't want to use the shoulders, then just take one of the 2 lanes during rush hour as a bus/HOV lane, and let the SOV folks figure out that next time, they need to hop on one of the many buses and carpools whizzing by.

If you absolutely must spend more money in this area, then connect the Milwaukie and Clackamas MAX stations with a new express bus on dedicated bus lanes; and wait for ridership to increase before building an express MAX line.

**ODOT I-205 Toll EA - RECORD #1439 DETAIL**

**Submission Date :** 4/18/2023  
**First Name :** Kristen  
**Last Name :** Sartor  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Hello,

I'm really concerned about ODOT consistently disregarding the climate catastrophe and jeopardizing the health, safety and access to a livable future for my generation as well as future generations.

ODOT should not have to be told by the public to complete a full environmental impact statement for the proposed freeway expansion. This should be happening automatically. We can't pretend anymore that expanding freeways is not going to impact our air and our future. Congestion pricing must be studied before jumping to the false solution of expanding freeways.

**ODOT I-205 Toll EA - RECORD #1440 DETAIL****Submission Date :** 4/18/2023**First Name :****Last Name :** Audrey**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** Yet again they are trying to build more lanes when it's been proven time and time again that more lanes doesn't reduce congestion. They also haven't taken into account tolling or congestion pricing into this expansion.



**ODOT I-205 Toll EA - RECORD #1441 DETAIL****Submission Date :** 4/18/2023**First Name :** Gabriele**Last Name :** Hayden**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** Because freeways are destroying our planet. We need trains, mass transit, and congestion pricing which would mean no need to expand lanes. We don't need new lanes, and doing anything else will have a terrible environmental impact.

**ODOT I-205 Toll EA - RECORD #1442 DETAIL****Submission Date :** 4/18/2023**First Name :** Howard**Last Name :** Shapiro**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** Having lived in southern California for 60 years and observing their freeway expansion projects to mostly, unsuccessful attempts to alleviate traffic, I conclude that we should not invest in freeway expansion. A better solution would be electrified mass transit to specified hubs and electric shuttles to business locations. Adding freeway lanes seems to open already congested areas to further development and traffic which leads to air pollution and more congestion.

**ODOT I-205 Toll EA - RECORD #1444 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Diane

**Last Name :** Dulken

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Sprawl is a self fulfilling prophecy, and just means more congestion, more expensive infrastructure and reduced quality of life. Not to mention exacerbating our climate crisis. Widening I 205 actually should be a nonstarter. As long as communities along the corridor are built in ways that make destinations car dependent and further apart, we are doing the wrong thing. Let's do the right thing - reinvest in existing communities, turn large paved areas back into open space, create neighborhoods and districts with high Walkscores - which evidently people want otherwise it wouldn't be a sales point - that would be a good use of our dollars and investments.

**ODOT I-205 Toll EA - RECORD #1445 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Joan

**Last Name :** Petit

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Sheesh, how many freeway miles are you all trying to expand? What happens if you catch up with the times and the climate catastrophe and use those smart engineer brains to figure out ways to move Oregonians around without adding freeway miles? We need you all to do better and be better. You all know we want you to do an EIS (Environmental Impact Statement), and we know you don't want to because this contributes even more to our climate catastrophe. So, here's my demand, adding to the pile, for an EIS. Stop this nonsense of trying to build more freeway miles. We have to find better and different ways.

**ODOT I-205 Toll EA - RECORD #1446 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Nick

**Last Name :** Sauvie

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** ODOT must produce an environmental impact statement for the proposed I-205 freeway expansion in Clackamas County. My organization, ROSE Community Development, is a nonprofit organization working to revitalize outer southeast Portland neighborhoods. The construction of I-205 in the 1960s and 70s cut our neighborhoods in half and destroyed thousands of homes.

Today, our neighborhoods have many transportation needs, including pedestrian safety, traffic calming, and improved mass transit. I-205 pollution is harming many neighborhood residents and worsening urban heat island effects. It is unacceptable that ODOT is expanding freeways, without an environmental impact statement. ODOT should be investing in transportation solutions that will not make climate change worse.

**ODOT I-205 Toll EA - RECORD #1447 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Robert

**Last Name :** Parker

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** An Environmental Impact Assessment is needed for the proposed I205 Freeway Expansion because the increase emissions will deeply impact Oregon's carbon emission goals, decrease air quality, and negatively impact the health of the community.

Other options must be considered such as congestion pricing and mass transit to move people efficiently in our community.

**ODOT I-205 Toll EA - RECORD #1448 DETAIL**

**Submission Date :** 4/18/2023  
**First Name :** Shannen  
**Last Name :** Knight  
**Affiliation :** A Sight for Sport Eyes; STRAC member  
**Submission Method :** I-205 EA email

### Q3. Comments :

I am a resident and business owner in West Linn, and have focused my comments to this area as this is where tolling will most impact my business. I have questions as well that if they could be answered, that would be greatly appreciated.

\* Section 1.4.2 talks about I-205 Northbound having the lowest operating speeds in the region. Question: Is this at the stretch of freeway being considered for tolling? Or does generally mean the whole stretch of freeway? In my real life experience, I-205 northbound at the Washington border is much slower than it is in the area being tolled. If this comment is directed at this stretch of freeway, it should be clearer that this is the stretch of freeway being referred to with this comment. I-205 Northbound is 30+ miles yet only a 7 mile stretch is being tolled.

\* Section 1.4.2 should also notate that the reason for the slowdown is the bottleneck of going from 3 lanes to 2 lanes. Without the bottleneck, the congestion would not be as poor as it is. Which is why adding the third lane is most important, but also the reason only the new lanes should be tolled. However, there is no guarantee in this EA that shows that 3rd lane will be built. Without the 3rd lane, the bottleneck will continue to exist, even with tolling.

\* Section 1.5 Goals to limit traffic diversion. There is no explanation in this report on how ODOT is going to limit traffic diversion. It has mitigation measures designed to improve traffic flow or make certain intersections safer. But I did not see anything in this report that tells me how ODOT is going to prevent diversion into neighborhoods, especially in overnight hours since 24 hour tolling is being proposed. There is no "value of time" improvement by staying on the freeway during off peak hours. Question: How does ODOT propose to prevent diversion during non-peak hours? If there is a charge, many people will divert into quiet, dark, rural and residential areas to avoid a toll.

\* Section 1.5 Goals to support safe multimodal travel options. I don't see any mention in this report on how this will be accomplished. There are no proposed mitigations to increase transit options or build bike lanes. Some crosswalks will be built but if this is a goal, there should be more efforts to improve multi-modal options proposed in this report.

\* Section 1.5 Goals to collaborate with transit providers. Again, there are no proposed transit options provided in this EA report. Question: How is ODOT going to accomplish this goal?

\* Section 2.4 (page 2-5). Off peak toll rates are assumed to be lowest overnight. Question: If this is "congestion pricing" why is there tolling overnight if there is no congestion in overnight hours? \$0.55 is enough that most people will get off the freeway and divert into local neighborhoods. As mentioned before, there is nothing in this report that tells me how ODOT is going to prevent diversion into local neighborhoods during off-peak hours.

\* Section 3.1 (page 3-3) Average weekday travel times were 8 minutes in AM and 18 minutes in PM peak period in Jun 2019. Question: What was the travel time on the local route of Willamette Falls Dr. which is the main alternative route? I don't see much reference to travel times on the local diversion routes for comparison.

\* Section 3 (page 3-5). Question: Why was the intersection at Ostman and Willamette Falls Dr. not analyzed? Considering that this street runs parallel to I-205 in the toll zone, and this is the first controlled intersection after diverting off the freeway at the exit before the toll gantry, why was this not analyzed? (this is where the freeway also goes from 3 lanes to 2 lanes and thus the biggest bottleneck issue we have now). There is also a junior high school being built now right before that Ostman intersection. The modeling from 2019, there was no school being built. With a school there by the time tolling goes in, more mitigation is needed at this intersection where there will be increased pedestrian traffic. There is a school on one side and a park that is used for baseball leagues. There is a lot of children crossing this stretch of road, and it is the road, per your report that could increase up to 100% with diversion. Yet, no safety measures were taken at this intersection, nor was this intersection even considered in the report.

\* Section 3 (page 3-6), the EA states that the Willamette Falls Dr transit has a LOS of F as only one bus runs on this stretch. Question: Why is there not more mitigation for transit due to a LOS F bus line? Again, if the goal is to



increase multi-modal transit, and to improve the environment, why not mitigate issues with the transit system?

\* Section 3 (page 3-6), under Active Transportation, the EA states that there is limited pedestrian and bicycle connectivity between cities. Question: Why is there no mitigation required for this? For the same reasons as mentioned above, if it is a goal, then mitigation should be offered to improve pedestrian and bicycle connectivity.

\* Section 3 (page 3-7). Question: If safety is one of the biggest concerns, why are there not sidewalks and bike lanes being considered when there are a large number of crashes involving pedestrians and cyclists on Hwy 99 and Hwy 43? These would be the major commuter bicycle routes. Again, when this is a goal, having bike lanes that go to Portland (where most people would commute to work) would make the most sense for infrastructure to promote other modes of transportation.

\* Section 3 (page 3-12). It states that traffic on SW Borland and Willamette Falls Dr. (since they run parallel to the freeway) would experience 30% to 100% traffic increases compared to the no build alternative. Yet there is not a single mitigation project on this stretch of road. Question: How can you say that a minor arterial will increase traffic 100% but at the same time state that there is nothing that needs to be done to mitigate traffic on this road? It is a minor arterial, not a major arterial. Yet traffic is expected to increase 100%. It is a safe assumption, regardless of modelling that there will be negative impacts to this road. The only mitigation is on a local street, not the minor arterial. A blinking crosswalk for the school is the only mitigation proposed (again, not on the minor arterial either, only on the local street a block from the diversion route). Also, this modeling did not again take into account the new junior high school being currently built on this stretch of road. PM peaks start at 3pm and school gets out at 3:30. The new middle school has only one exit point for cars. That is Willamette Falls Dr. All drop off and pick up traffic will flow into this intersection, yet this intersection was again not assessed in this report. The school is set to open this year, before tolls go into affect. The EA must take this intersection into account for the safety of children.

\* Section 3 (page 3-25). The table does not show any intersections getting better in the build scenario. All intersections get worse. The Build scenario only considers the impact of the freeway and does not take into intersections that are already failing due to diversion. Mitigation strategies do not address all intersections (as mentioned previously, the intersection at Willamette Falls Dr. and Ostman was not considered at all, is near a school being built, and already is a LOS F intersection due to diversion)

\* Section 3 (page 3-26). Again, transit gets worse with the Build scenario, but no mitigation was considered to increase transit or multi-modal transit options.

\* Section 3 (page 3-28). The Build Scenario will create 3 more crashes at 10th street ramps, but no mitigation is offered to this intersection. There will be 7 more crashes on Willamette Falls Dr. yet again, there is no mitigation proposed for this intersection. Question: Why, if there is going to be more predictive crashes is there no mitigation options offered?

\* Section 3 (page 3-31) Pedestrian LTS at 12th and Willamette Falls Dr. was considered because there is a school here. Again, why was the intersection at Ostman and Willamette Falls Dr. not considered when the school being built is twice the size of the one analyzed?

\* Section 3 (page 3-48). Higher VMT in rural and suburban areas. The biggest stretch of toll avoidance would occur in rural and suburban areas. Question: Why does the air quality on local streets not matter for this assessment? It seems like air quality only matters on the freeway itself. But the air quality on local streets, especially the rural ones with livestock outdoors, should be considered and mitigation measures offered to reduce diversion on to rural roads. With slower speeds on neighborhood roads, stop signs, traffic, that is more cars (again up to 100% per your other reports) on to Willamette Falls Dr. A proper assessment would take into consideration the air quality on the local streets which stands to get worse with more idling cars on local roads, and slower speeds increase gasoline usage. Which is also why my earlier question on what the average speed is on Willamette Falls Dr with current diversion is important so the environmental impacts can be properly assessed on the local roads.

\* Section 3 (page 3-53). The no build scenario seems overall better for the

environment. The only benefit to the build scenario is more reliable transit times. Is it worth sacrificing the environment so we can get to work, home, or other appointments faster? Yes more reliable for truck industry costs money too but what are the costs to the environment for "conveniences"

\* Section 3 (page 3-57) The economic analysis is weak. The "destination oriented" positive does not apply to Willamette Falls Dr. where we don't have any convenience stores, fast food restaurants or auto dealerships as mentioned in the report. We have the diversion now that brings all those cars into our business district. Very little of that increased traffic translates into dollars for our local businesses. In fact, quite the opposite happens. Customers avoid the area during peak hours because they don't want to deal with the traffic. We need to see more positive impacts to the business community and as a business owner. I see only negatives associated economically for my business (see other comments below)

\* Section 3 (page 3-60) The EA did not consider the offset of the loss of business for regular customers who no longer want to come to the area because they either have to pay a toll to patronize that business, or the traffic has gotten so bad that it is not worth the hassle. The EA only tries to skew for the positive affects without looking at any of the actual negatives. If I have a choice to go to a salon, for instance, where I have to pay a toll, or a salon where I don't have to pay a toll, why would I choose to patronize the salon that I have to pay a toll for? Without tolls on any other freeways in the metro area, tolling is going to negatively impact businesses directly on the toll route.

\* Section 3 (page 3-63). States household impacts to tolls. Question: How was this calculated when the toll rate has yet to be set? Is this for an average person who lives near the toll road or an average of someone who lives outside the toll zone and just occasionally comes to the area? I need to understand how this was calculated. If I have to drive to Portland to work everyday, it costs me \$3-4 each way, that is \$6-8 a day, and \$30-40 a week, which equates to \$1500 to \$2000 a year. That is a conservative number considering ODOT has thrown around tolls costing as much as \$12 during peak hours. So how was this average calculated?

\* Section 3 (page 3-66). Question: Was noise considered at all hours of the day? Considering that tolling will take place 24 hours a day, was noise to rural and residential roads considered in the middle of the night where it is completely silent at night? 6dBA increase is substantial when the base noise is 0. This is why tolling 24 hours a day should not be considered as quiet neighborhoods (and animals at the rural farm areas) will be disturbed by even 3dBA of noise increase in the middle of the night.

\* Section 3 (page 3-77) Many of the local small businesses are restaurants who already have trouble keeping low wage employees. Question: Does the environmental justice report take into consideration the low wage employees that have to now pay a toll to go to work? These employees typically cannot afford to live where they work. Thus, restaurants will be at an unfair disadvantage of being able to retain employees when low wage earners have to pay to go to work, or if those employees can't afford to change jobs, will have to give part of their already minimum wage away to tolling just to get to work. Again, real world example. If you were an employee and had to pay a toll to go to work would you continue to pay the toll? Or would you look for work where you didn't have to pay a toll? Until the whole metro area is tolled, again, this toll is creating an unfair disadvantage to businesses bordering the toll road.

\* Section 3 (page 3-101). Question: Why does the API not include Fields' Bridge Park on Willamette Falls Dr. and the Willamette Historic District on Willamette Falls Dr?

\* Section 3 (page 3-103) The EA does not reference at all that there is a water line that supplies all of the water for West Linn on the bridge. That water line has 20 years left but the pipeline must be replaced for this project. The cost of this pipeline falls solely on the residents of West Linn to pay. Thus, this project is burdening the taxpayers of West Linn with the \$10M cost to replace the waterline, along with the burden of having tolling in only their neighborhood. This should be addressed in the EA as a land use issue.

\* Section 3 (page 3-125). Question: Why were the primary and secondary objectives listed not considered to be part of the mitigation to be done? If the projects listed here were in the mitigation for sure to be done, the EA would be more digestible as these are the primary projects that the community

would like to see done. This would also meet the goal of alternative modes of transportation and overall environmentally positive projects (Willamette Falls Dr. Multimodal improvements). There was a big failure to include local decision makers in the mitigation decisions. These are the roads that need to be mitigated, not most of the ones listed in this report. We live this. Why no involve those that live with the traffic every day?

\* Section 4.1. Question: Why is tolling all lanes the only option? The most equitable option would be to leave one lane not tolled so those of any income level have the option to stay on the freeway and not pay a toll. Many people don't like to get off the freeway into unknown roads, especially at night. It is a safety issue. As a female driving alone at night, I want to stay on the freeway. I could stop at a stop sign and get carjacked or raped. I grew up in LA and I never wanted to get off the freeway at night for this reason. When talking about equity and justice, staying on the safer freeway should always be an option. I don't see information on the studies that were done on tolling all lanes and why that decision was made. This report should reference why the decision to toll all lanes was made, especially in regards to equity and marginalized communities. I believe the math didn't work with one lane, but tolling 2 lanes was not looked at by ODOT. Leaving one lane a non tolled lane gives all marginalized people the option to stay on the freeway first so they don't have to try to find a new job just to avoid a toll.

\* Section 4.1. Equity. There is poor transit for the proposed toll area. The assessment does not take into account the lack of transit, nor does it address any mitigation for this issue. Tolling assumes there will be a change in behavior, but people still have to get to work at a certain time. From an equity perspective, those that make the least amount of money have the least flexibility on their work schedule. They can't just go at a different time. They are often hourly employees and required to be at work at a specific time that they do not get to pick to use the freeway at a "cheaper" time. The EA does not consider lower income residents and the lack of public transportation assessable to them.

Other notes not specific to any section but things I think were missed in the EA report.

\* There is no lighting whatsoever on much of the roads that traffic will divert on at night. No mitigation is proposed for lighting and the increased dangers of dark roads was looked at when implementing 24 hour tolling. Many parts of the diverted roads are also more rural with wildlife being a danger at night. Hitting deer or coyotes, for instance, increases when more cars are on these roads that don't usually see traffic 24 hours a day. Car lights can affect the sleep patterns of farm animals in the overnight hours. The EA should have considered lighting both from a safety standpoint of dark roads, and from increased ambient light by car traffic on farm animals in rural areas.

\* Currently the gas tax has a percentage that is broken out to go to each city and county. There is nothing in this EA that shows how the money will go to the cities or counties to pay for roads that will need to be repaired more often with an increase of traffic. The major diversion routes are not ODOT owned for the most part, leaving the burden on the cities to maintain these roads. As mentioned, Willamette Falls Dr. may see increases of up to 100% more traffic, but with no promised support from ODOT to help maintain these roads.

\* I don't believe any actual research was done to see how this would affect business owners. Did ODOT contact any of us and asked us if business is better on days when there are more cars on the road? Or did you just assume this? I believe the EA should have polled business owners in the affected districts on how they thought tolling would impact their businesses.

\* As a business owner my customers are not local. They come from all over the area including as far away as Australia (yes I had a customer coming to the US and did a layover in Portland just to visit my store). Where they didn't have to pay a toll to visit my store in the past, they will now have to pay a toll to come visit my business. This is competitive disadvantage for my business. Tolling should not start until all the metro area has tolling. Otherwise, it is an unfair advantage for my business versus another business where a customer doesn't have to pay a toll to get to their business. As mentioned earlier, patrons for services or dining will go to a business where they won't have to pay a toll over a business they have to pay a toll. This is

just common sense. Tolling only one section of road is unfair, especially to businesses. A more equitable solution would be to toll only when tolls in the entire metro area are in effect at the same time.

\* The proposed mitigation to West Linn makes no sense. Our city lies entirely within the toll zone, yet all we get is pedestrian improvements on one block of a side street (not the main diversion road), assumingly because it is by a school. How pedestrian only improvements mitigates traffic diversion is not explained. The diversion traffic already backs up the Willamette Falls Dr/Hwy 43 intersection. This is going to be the biggest bottleneck when diversion happens. Why not mitigate with a roundabout here? It is already designed by ODOT/West Linn. ODOT has the opportunity to give West Linn a "win" by building this roundabout there as that is by far the biggest pain point for diversion and per ODOT's documents, can stand to get up to 100% worse with tolling. Mitigation should be fixing the biggest pain point, not just trying to look for the cheapest option which because it is by a school looks good on paper. While traffic may increase on this road from diversion through Pete's Mountain, it does very little to "mitigate" any of the diversion issues. While I understand your EA only had to take into consideration "new" traffic issues caused from tolling, if you know that people already divert in order to avoid the traffic on the freeway, and that diversion causes issues now, the best fix for the community would be to deal with the issues that we already know are a problem. ODOT doesn't have to only consider the future issues with their mitigation plan. If they want the community to accept tolling, then propose options that will make traffic in neighborhoods, not just the freeway, better than it is now before it gets worse.

\* I also don't see any reference in the EA as to when the proposed mitigation will be built, nor how it will be funded. 2027 impacted mitigation recommendations should be done prior to 2027, for instance, but this is not stated in the EA. There is no commitment to fund the mitigations. They are "proposed" so without funding and promises, there is concern that the mitigation efforts will never actually be done and just be empty promises.

\* If the point is to encourage other modes of transportation, and to consider the environment, then mitigation should include building multi-modal bike lanes and sidewalks to encourage other forms of transportation instead. For instance, if your mitigation extended bike lanes the entire stretch of Willamette Falls Dr./Borland (main diversion lane) from Stafford to Hwy 43, this would in my opinion then meet the federal guidelines for mitigation and the environment. It would then allow people to ride a bike safely if they live in Stafford and work in Oregon City, for instance. That would be many vehicles off the road which would then be beneficial to the environment.

\* The bus runs every 30 minutes and is not reliable, often not making that schedule. As mentioned, my customer from Australia gave herself a 3 hour layover to come to my store. Her visit at my store took 15 minutes. She then had to wait 45 minutes for the next bus, that was late, and she missed her connecting flight. Thus, transit is not a viable option for the stretch of freeway being tolled. Alternative forms of transit was not addressed in the EA and should have been. Alternative forms of transportation should have been required as a form of mitigation.

\* I-205 project is in a bubble. It doesn't assess how tolling will be done in other areas (if and when) and puts the burden only on a select group of residents. This is not fair to these residents to be the "guinea pigs" for tolling. Tolling for local residents and employees (within certain zip codes) should be no charge until the rest of the freeways also have tolls.

I'm not against tolling. I have lived where it has worked. But this ODOT has not considered residents, cities and counties in working toward meaningful solutions before implementing tolling. The EA does not properly reflect the issues we are currently experiencing and how they will only get worse as more cars divert to our local roads, especially during hours that normally the quiet residential roads don't see any diversion traffic now. They only address future impacts to roads that are not affected by diversion now. There are no alternative modes of transportation being offered, no bike lanes being built as alternative routes. If it is a goal to prevent diversion, there needs to be something in this plan that does this. Nothing in this plan does this. Overall, this EA misses the mark and local municipalities will be bearing the brunt of the burden. Things get better on the freeway itself, but there is no solution to

prevent diversion. Leaving one lane open to no tolls which is the only solution that would prevent diversion. Economic factors for businesses were not properly assessed, and tolling only in one region is not fair to those business owners whose patrons and employees will seek competing businesses to avoid tolls.

Tolling can be done right, but more consideration needs to go to the residents and businesses in the affected area first. I urge ODOT and FHWA to do more research on impacts to businesses, and come up with better mitigation solutions that actually address current problems, as well as solutions that increase multi-modal transit before moving forward on tolling.

I appreciate the opportunity to give testimony.

<b>ODOT I-205 Toll EA - RECORD #1451 DETAIL</b>
---

**Submission Date :** 4/18/2023

**First Name :** Karalie

**Last Name :** G Adams

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** WE need intensive investigation ( mentioned above) to build more freeways. WE as a Culture are going over the cliff! Many of my neighbors only drive. They have no sense of walking or using public transport. You need to set the example.

**ODOT I-205 Toll EA - RECORD #1452 DETAIL****Submission Date :** 4/18/2023**First Name :** Joy**Last Name :** Lee**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :**

I live close to the Abernathy bridge and Tualatin river bridge on I 205. We do not have access to public transportation. We are elderly and our daughter is disabled as well. We frequently have medical and dental appointments which we can get to only by crossing the Abernathy bridge. The only alternative route would be the Oregon City bridge through Oregon City and Hwy 99. If the tolls happen, I can only imagine the gridlock that will occur on those roads. Traffic is already horrible . We are trapped and I'm afraid our lives will be hugely disrupted by this. We are retired. Our taxes just went up considerably because of Metro which we never had to pay before. Our income is down because we depend on retirement and social security. Adding a toll on a route that we basically HAVE TO use is unfair. We don't have any reasonable alternative.

I really afraid of the impact this will have on my family not only financially but also in much time spent in traffic. It's just not right for people in my neighborhood or any of the south West Linn residents and Oregon City residents who don't have alternatives.

Maybe it's not a big deal for people in Portland, Gladstone, Clackamas, etc. but it is to us!

**ODOT I-205 Toll EA - RECORD #1453 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Will

**Last Name :** Fruhwirth

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** It is irresponsible for the state to embark on a mega project like this without conducting an EIS.



**ODOT I-205 Toll EA - RECORD #1454 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Michael

**Last Name :** Swyter

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** This is a disastrous plan for Oregon and the environment.

Please don't approve this plan.

**ODOT I-205 Toll EA - RECORD #1455 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Bradley

**Last Name :** Bondy

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** This widening is a subsidization of further suburban sprawl in the Portland region. Every new home built on the suburban fringe rather than as infill closer to urban centers will translate into more more GHG emissions from increased VMT, as well as the destruction of yet more farm and forest land.

ODOT needs to conduct an EIS.

**ODOT I-205 Toll EA - RECORD #1456 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Robert

**Last Name :** Mizia

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :**

To Whom it May Concern:

I'm strongly OPPOSED to this plan to additionally burden Oregonians with additional fees to "pay" tolling for roads our own tax dollars have already & continuously provided for over many years!!!

Additionally, as a Lake Oswego resident for 27 years, I and many other residents have noted the chronic traffic congestion already plaguing Highway 43 through Lake Oswego & West Linn! To avoid paying a greedy toll grab by ODOT, this highway & other connecting roads will simply become full-time "parking lots" for an inordinate number of vehicles, and thus adding to pollution from idling vehicles, not to mention potential "road rage!"

Please spare us this nightmare! I and many of my friends are already considering a "migration" to other states as is now happening in Oregon, especially residents "skid marking" out of Multnomah & Washington Counties! Clackamas County is not far behind, especially residents along the 205 corridor!!!

Finally, this an appeal for common sense & prudence to prevail over an additional money grab from already burdened & struggling Oregonians!!! Thank you for your serious attention to this matter!

**ODOT I-205 Toll EA - RECORD #1457 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Jeffrey

**Last Name :** Kaufman

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I thought it was the LAW that an EIS HAD to be done before any construction of ANY KIND could start. My goodness, you're asking to disrupt a metaphysical system that will be made significantly more congested, with little promise of positive return or relief from any the accompanying crowding which will result. This needs a much more exhaustive study, review and CONTEMPLATION of the balance achievable.

<b>ODOT I-205 Toll EA - RECORD #1458 DETAIL</b>
---

<b>Submission Date :</b>	4/18/2023
<b>First Name :</b>	Lenny
<b>Last Name :</b>	Dee
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email
<b>Q3. Comments :</b>	We need to decrease carbon not increase it.

**ODOT I-205 Toll EA - RECORD #1459 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Ken

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** NO TOLLS on I205, voters should have the final say!  
Unfairly targeting West Linn residents, pushing traffic into our local residential neighborhoods as 205 commuters try to avoid tolls. Creates financial burden on local families that have access services outside of West Linn.  
NO TOLLS!

<b>ODOT I-205 Toll EA - RECORD #1460 DETAIL</b>
---

**Submission Date :** 4/18/2023  
**First Name :** Jeff  
**Last Name :** Jones  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :**

<b>ODOT I-205 Toll EA - RECORD #1461 DETAIL</b>
---

<b>Submission Date :</b>	4/18/2023
<b>First Name :</b>	Rick
<b>Last Name :</b>	Cook
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email



**Q3. Comments :**

To: ODOT and the Federal Highway Administration  
From: The Stafford Hamlet Board of Directors and Residents

We would like to place in the public record the following comments and recommendations concerning the I-205 Project.

1. Local residents and members of the Clackamas County staff, Advisory Boards and neighboring cities are struggling to get through this huge document. We request the comment period for citizen, county and city input be extended another 30 days. Now, the Public Comment Period is to end on April 21st. It's not feasible for the general public to examine this extensive document in that amount of time.
2. An Environmental Impact Statement (EIS) is needed. The Environmental Assessment (EA) does not provide the evidence that this project's benefits outweigh the negative impacts. For example, regarding environmental impacts there is no data, analysis or mitigation for the top five greenhouse emitters around this area—Lake Oswego, Oregon City, West Linn, Tualatin and Wilsonville. The traffic diversion of I-205 through local streets, neighborhoods and communities has not been fully addressed. ODOT has offered little to no support for mitigation.
3. The safety of residents on local, city and county roadways has not been adequately studied. Mitigation proposals for crosswalks, bike pathways and striping are not sustainable solutions to diverted traffic. Quoting from the Concept Evaluation and Recommendations Technical Memorandum: "The rerouting of traffic away from I-205 would bring a percentage of traffic through commercial districts along alternative routes." Why were Lake Oswego and West Linn not projected to experience increases in traffic volumes? Why were those cities not studied? What impacts on the Stafford Hamlet area will diversion traffic have on air quality and climate? An EIS would insure a broader evaluation of potential impacts both positive and negative.
4. Tolling before mitigation solutions are in place will have lasting impacts on the livability and character of local and regional communities. Negative impacts outweigh benefits by far. "Build it then fix it" creates more problems than it solves. Again, we request an EIS.
5. An in-depth study of actual business impacts needs to be conducted and solutions analyzed before this program is approved. Diversion and financial impacts need to be further analyzed.
6. An EIS would address the total impacts of ODOT's Tolling and Regional Mobility Pricing Project. The total regional impact needs to be considered. "An analysis would determine whether the effect of combining multiple Round 2 concepts would be positive or negative". (From the Concept Evaluation and Recommendations Technical Memorandum.) If tolling of I-5 and I-205 does in fact happen, the impacts need to be analyzed together. An EIS is appropriate to address both tolling projects, not an EA.
7. There is no approved "long range" funding plan for future mitigation of traffic issues. Transit in the area is "limited" at best. There is no funding plan projected to adequately address this.
8. The actions of ODOT will set the precedent for tolling not just I-205, but throughout the entire state of Oregon. It is imperative that this is done right. Therefore, we again request that an EIS be completed before approval or denial of tolling I-205 and Regional Mobility Pricing Project. This project currently has very little support in the region and possibly even statewide.

The Stafford Hamlet with more than 2,000 residents requests that an in-depth EIS be required for this project that will have everlasting consequences on the region. It deserves a fully vetted document that has community backing with approval for the outcomes.

Sincerely,  
Stafford Hamlet Board of Directors

Bill Markt – Chair / Rich Fiala Vice- Chair  
pdf sh odot.pdf (203 kb)

**Attachments :**



April 21, 2023

To: ODOT and the Federal Highway Administration

From: The Stafford Hamlet Board of Directors and Residents

We would like to place in the public record the following comments and recommendations concerning the I-205 Project.

1. Local residents and members of the Clackamas County staff, Advisory Boards and neighboring cities are struggling to get through this huge document. We request the comment period for citizen, county and city input be extended another 30 days. Now, the Public Comment Period is to end on April 21st. It's not feasible for the general public to examine this extensive document in that amount of time.

2. An Environmental Impact Statement (EIS) is needed. The Environmental Assessment (EA) does not provide the evidence that this project's benefits outweigh the negative impacts. For example, regarding environmental impacts there is no data, analysis or mitigation for the top five greenhouse emitters around this area—Lake Oswego, Oregon City, West Linn, Tualatin and Wilsonville. The traffic diversion of I-205 through local streets, neighborhoods and communities has not been fully addressed. ODOT has offered little to no support for mitigation.

3. The safety of residents on local, city and county roadways has not been adequately studied. Mitigation proposals for crosswalks, bike pathways and striping are not sustainable solutions to diverted traffic. Quoting from the Concept Evaluation and Recommendations Technical Memorandum: "The rerouting of traffic away from I-205 would bring a percentage of traffic through commercial districts along alternative routes." Why were Lake Oswego and West Linn not projected to experience increases in traffic volumes? Why were those cities not studied? What impacts on the Stafford Hamlet area will diversion traffic have on air quality and climate? An EIS would insure a broader evaluation of potential impacts both positive and negative.



4. Tolling before mitigation solutions are in place will have lasting impacts on the livability and character of local and regional communities. Negative impacts outweigh benefits by far. “Build it then fix it” creates more problems than it solves. Again, we request an EIS.

5. An in-depth study of actual business impacts needs to be conducted and solutions analyzed before this program is approved. Diversion and financial impacts need to be further analyzed.

6. An EIS would address the total impacts of ODOT’s Tolling and Regional Mobility Pricing Project. The total regional impact needs to be considered. “An analysis would determine whether the effect of combining multiple Round 2 concepts would be positive or negative”. (From the Concept Evaluation and Recommendations Technical Memorandum.) If tolling of I-5 and I-205 does in fact happen, the impacts need to be analyzed together. An EIS is appropriate to address both tolling projects, not an EA.

7. There is no approved “long range” funding plan for future mitigation of traffic issues. Transit in the area is “limited” at best. There is no funding plan projected to adequately address this.

8. The actions of ODOT will set the precedent for tolling not just I-205, but throughout the entire state of Oregon. It is imperative that this is done right. Therefore, we again request that an EIS be completed before approval or denial of tolling I-205 and Regional Mobility Pricing Project. This project currently has very little support in the region and possibly even statewide.

The Stafford Hamlet with more than 2,000 residents requests that an in-depth EIS be required for this project that will have everlasting consequences on the region. It deserves a fully vetted document that has community backing with approval for the outcomes.

Sincerely,

*Stafford Hamlet Board of Directors*

Stafford Hamlet Board of Directors

Bill Markt – Chair / Rich Fiala Vice- Chair



**ODOT I-205 Toll EA - RECORD #1462 DETAIL**

**Submission Date :** 4/18/2023  
**First Name :** Josh  
**Last Name :** Hetrick  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** ODOT must conduct an Environmental Impact Statement that studies congestion pricing, including scenarios where only pricing is introduced without adding lanes or expanding road capacity. Spending hundreds of millions of dollars to expand freeways, which ODOT itself has repeatedly admitted won't solve congestion, would be irresponsible and dangerous for our climate and air quality. Those funds (and those from potential congestion pricing) would be much better off spent on transit and active transportation, which improve rather than degrade the region's resilience, public health, and finances. I lived in Oregon City for a time and it was a big challenge to get around without a car. We need better transit, biking, and walking/rolling options, not more miles of incredibly expensive and gridlocked asphalt.

**ODOT I-205 Toll EA - RECORD #1463 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Most Rev. John

**Last Name :** Vlazny

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Another way to make life more complicated for workers who need to travel to and fro daily. You can do better. It's like raising taxes without any assurances that the funds will be spent for the purpose of improving travel. Back to the books, please. Thank you.

<b>ODOT I-205 Toll EA - RECORD #1464 DETAIL</b>
---

**Submission Date :** 4/18/2023

**First Name :** Rudy

**Last Name :** Jeffery

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Because the answer is always "one more lane" and that isn't a long term solution. We can't even maintain the current infrastructure and they want more because it's easier then finding alternative solutions.



**ODOT I-205 Toll EA - RECORD #1465 DETAIL**

**Submission Date :** 4/18/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** El Freeway del 205 necesita mas de un carril del I-5 hasta el Puente del rio Columbia.  
Hay suficiente espacio de cada lado para la expansion.

Absolutamente no debe tener toll o si va a tener, solo un carril expreso a mano izquierda con un costo minimo de .50 centavos a un dolar maximo.

El Segundo carril clasificado para camiones grandes de carga no toll, el tercer carril a la derecha no toll.

Todo el freeway solo el carril expreso con un toll asi los viajeros no dejarian de usar el freeway y usar calles locales para evitar toll.  
Esto es igual para el freeway I-5 del Marcom Bridge hasta el Interstate Bridge  
Agregar un tercer carril donde no tiene, carril izquierdo como expreso con toll de .50 centavos a no mas de \$1 dolar.

Segundo carril para camiones grandes,

Tercer carril a la derecha para vehiculos lentos y para salida y entrada de los freeways

[Translated by Google]

The 205 Freeway needs more than one lane from I-5 to the Columbia River Bridge.

There is enough space on each side for expansion. It should absolutely not have a toll or if it will have, only an express lane on the left with a minimum cost of .50 cents to a maximum dollar. The second lane classified for large cargo trucks no toll, the third lane to the right no toll. The entire freeway only the express lane with a toll so commuters would not stop using the freeway and use local streets to avoid the toll. This is the same for the I-5 freeway from the Marcom Bridge to the Interstate Bridge. Add a third lane where it does not have a left lane as an express lane with a toll of .50 cents to no more than \$1 dollar. Second lane for large trucks, Third lane to the right for slow vehicles and for exiting and entering the freeways

**ODOT I-205 Toll EA - RECORD #1466 DETAIL**

**Submission Date :** 4/18/2023  
**First Name :** Redland  
**Last Name :** CPO  
**Affiliation :** Redland-Viola-Fischers Mill CPO  
**Submission Method :** Letter  
**Q3. Comments :** Attached is Redland-Viola-Fischers Mill CPO's Response and Objection to tolling and related Environmental Assessment.  
  
Thank you.  
  
Redland-Viola-Fischers Mill CPO  
**Attachments :** final comment letter from Redland CPO.pdf (734 kb)

April 18, 2023

To: Oregon Department of Transportation  
[I205TollEA@odot.oregon.gov](mailto:I205TollEA@odot.oregon.gov)  
[OregonTolling@odot.oregon.gov](mailto:OregonTolling@odot.oregon.gov)

From: The Redland-Viola-Fischers Mill CPO

### Response and Objection to Environmental Assessment

Redland-Viola-Fischers Mill CPO (CPO) is an unfunded, non-expert, volunteer run community planning organization organized under the laws of the State of Oregon and Clackamas County. The CPO represents citizens and businesses within its jurisdictional boundaries west of the Clackamas River and extending south and east. An excerpt of the County's CPO map is included for reference. The CPO is entirely rural, and its residents for the most part use I 205 when travelling towards the Metro areas and as such will be directly impacted by tolling.

In two years of presentations at CPO board meetings, opposition to tolling has been consistently and emphatically voiced by the CPO residents, with no one speaking in its favor. The CPO's constituency is therefore uniformly against tolling of any nature.

The CPO files this response and opposition pursuant to motion passed by the CPO board after notice and extensive discussion.

#### **1. The CPO joins in other responses and objections.**

The CPO joins with Clackamas County, and the responding Clackamas County cities, in their objections to the Environmental Assessment (EA), for the reasons stated. Those entire responses, and any amendments to their responses, are incorporated into this objection by reference.

#### **2. The CPO's objection to tolling and the EA.**

The CPO objects to the EA, and ODOT's tolling proposals, as follows:

a. Tolling is regressive and inherently unfair. Alternate funding sources should be used whenever possible.

b. Vote before Tolling. ODOT should not implement tolling until the scope of improvements covered, and the duration that tolls would be imposed, are approved by popular vote.

c. ODOT cannot implement tolling for costs beyond the strict repayment of current widening and bridge construction. The EA does not establish sufficient grounds for the federal Department of Transportation's approval, as the EA fails to demonstrate sufficient grounds to allow for permanent tolling under Section 1216(a) of TEA-21 continued as part of SAFETEA-LU the Value Pricing Pilot Program (VPPP) (Congestion Pricing).

d. Missing vehicles. ODOT states without proving both that congestion will decrease, and air quality will increase. ODOT does not explain where the current traffic, and anticipated increases in traffic over the next 20 years, will go in lieu of I 205. Major portions of Clackamas County roads and highways have been constructed by the County and ODOT itself, to utilize I 205, and alternatives to I 205 do not exist in most all situations.

For example, State Road 213, a major north south arterial from the southern portions of the County and areas below, simply terminates to the north at I 205. Current traffic on 213 during rush hours can line up for as much as a mile prior to I 205, and there is no other place for that traffic to go except onto I 205. This is also true for State roads 99E and 43. These situations, created and maintained by ODOT, will exist well into the future without sufficient mitigation.

e. Local traffic must be part of the mitigation of diversion analysis. ODOT has not been clear in its presentations, certainly from a layperson's review of the EA, whether it includes in its traffic estimates local traffic and local commutes. Prior communications have indicated they do not consider local traffic to be part of the diversion analysis. This is wrong.

Many local commuters have no alternative to I 205. Much, even most, of the local traffic uses I 205 because ODOT designed the State roads within Clackamas County to use I 205 for local purposes. Equity should estop ODOT from ignoring a situation it helped create.

Geographic limitations furthermore prevent any realistic non-tolled alternatives to I 205. The best example of this is how I 205 threads the geographic obstacles of the Clackamas River and the West Linn foothills. The river itself, along with the Tualatin River, present barriers, with only the two-lane Oregon City bridge as a non-tolled alternative for traffic over the river.

There is no reason local commutes should not be counted as part of ODOT's Congestion Pricing analysis, especially in determining whether traffic congestion will lessen, and air quality improve due to tolling.

f. Tolling must be fair and equitable to economically challenged persons. Rule and statutory language used to describe the nature of tolling and the obligations it creates must be clear that the claim against users is a non-priority, unsecured claim and not as a penalty or fine. Statutory language characterizing it as anything other than a non-priority unsecured claim will, among other things, cause tolling claims to have priority in reorganization efforts of debtors under Title 11 of the US Code, and therefore in direct competition with debtor's cost of living and daily expenses.

g. Tolling must only be initiated on a region, or State-wide basis. Funding new transportation projects through tolling is a new concept for ODOT and Oregon. It is inherently unfair to Clackamas County citizens for ODOT to first implement its new tolling program solely in Clackamas County. Doing so will mean Clackamas County citizens will pay, and will always

have paid, more into ODOT's tolling program than any other group of Oregon citizens. This, for the cost adding seismic reinforcements, and replacing an "interstate" bridge that is integral to the region's transportation system.

While it is true that Clackamas County citizens will benefit from these improvements, the greater benefit will be to the region and State.

There is irony here: as stated above, ODOT's proposes to not even count local commutes in its plans to mitigate diversion due to tolling. We therefore apparently count for tolling, but not for mitigation.

No explanation is given for this anomaly, no legitimate reason would seem to exist.

### **3. Amendments to this Response and Objection, and others.**

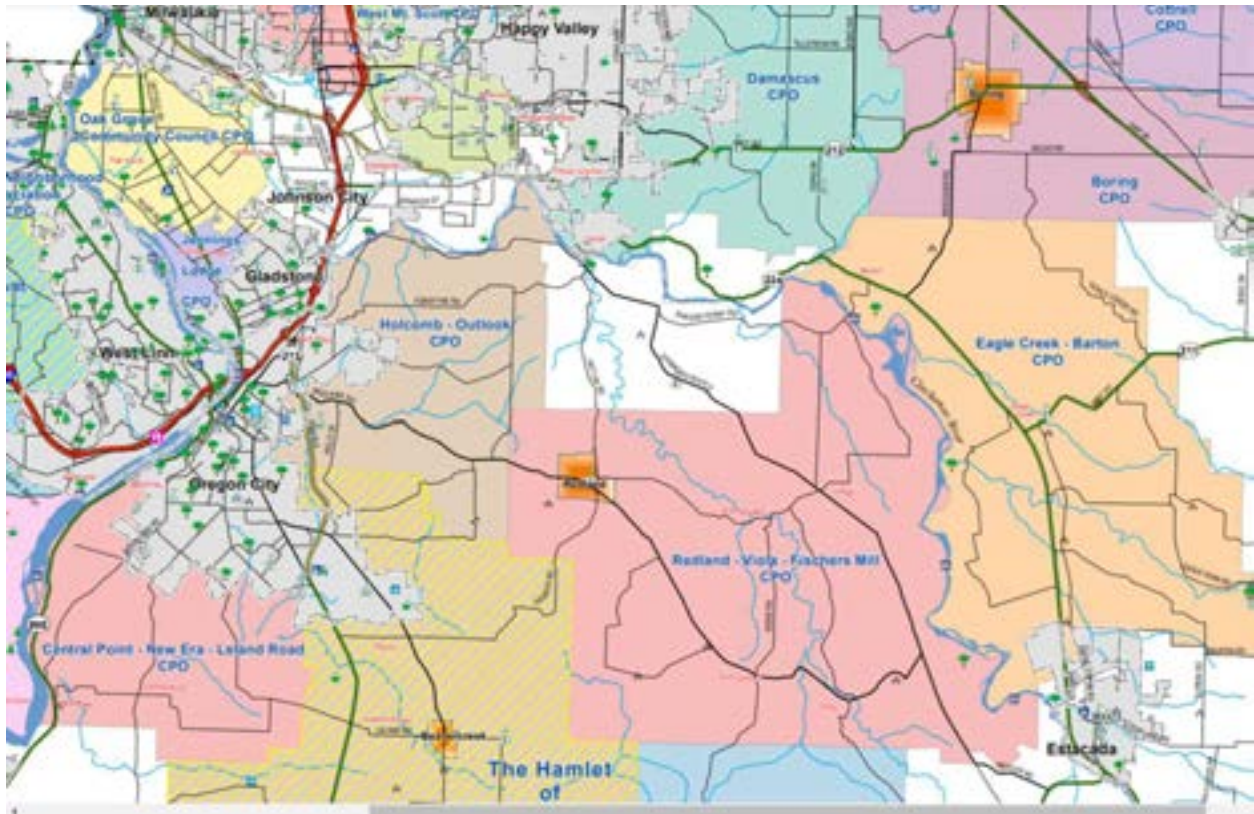
ODOT's must consider all amendments to this Response and Objections, and those amendments filed by others.

The EA is dense, and technically complex, and therefore well beyond the ability of lay persons to understand it and cogently respond. The CPO, being made up of non-expert volunteers, lacks resources and therefore the ability to hire rebuttal experts of its own, and must therefore rely on the experts hired by other impacted jurisdictions.

The deadlines for responding to the EA allow for insufficient time for those other impacted jurisdictions to hire experts and for those experts to read, digest and analyze the EA before the several deadlines to respond that ODOT has established for comments. Nonetheless, the CPO understands other Clackamas County jurisdictions are or will be hiring experts to help with their responses to the EA.

As a matter of equity, fairness, full disclosure and analysis of Clackamas County's current and future transportation needs, and the dire impact tolling will have on them, ODOT must allow and consider those experts' responses and objections, even after passage of the deadlines it has arbitrarily set, including for this CPO to amend this Response and Objection as needed.

Thank you for this opportunity to respond and object.



C:

- [Rep.GregSmith@oregonlegislature.gov](mailto:Rep.GregSmith@oregonlegislature.gov)
- [Rep.JanelleBynum@oregonlegislature.gov](mailto:Rep.JanelleBynum@oregonlegislature.gov)
- [Rep.JanelleBynum@oregonlegislature.gov](mailto:Rep.JanelleBynum@oregonlegislature.gov)
- [Rep.RickLewis@oregonlegislature.gov](mailto:Rep.RickLewis@oregonlegislature.gov)
- [Rep.AnnessaHartman@oregonlegislature.gov](mailto:Rep.AnnessaHartman@oregonlegislature.gov)
- [Rep.CourtneyNeron@oregonlegislature.gov](mailto:Rep.CourtneyNeron@oregonlegislature.gov)
- [Rep.MarkGamba@oregonlegislature.gov](mailto:Rep.MarkGamba@oregonlegislature.gov)
- [Rep.JulesWalter@oregonlegislature.gov](mailto:Rep.JulesWalter@oregonlegislature.gov)
- [Rep.HoaNguyen@oregonlegislature.gov](mailto:Rep.HoaNguyen@oregonlegislature.gov)
- [Rep.DanielNguyen@oregonlegislature.gov](mailto:Rep.DanielNguyen@oregonlegislature.gov)
- [Rep.JeffHelfrich@oregonlegislature.gov](mailto:Rep.JeffHelfrich@oregonlegislature.gov)
- [Sen.BillHansell@oregonlegislature.gov](mailto:Sen.BillHansell@oregonlegislature.gov)
- [Sen.FredGirod@oregonlegislature.gov](mailto:Sen.FredGirod@oregonlegislature.gov)
- [SenKayseJama@oregonlegislature.gov](mailto:SenKayseJama@oregonlegislature.gov)

Clackamas County  
Commissioner Paul Savas  
Mayor Brian Hodson  
Clackamas County Coordinating Committee  
CPO Summit, CPOs

**ODOT I-205 Toll EA - RECORD #1467 DETAIL**

**Submission Date :** 4/18/2023

**First Name :**

**Last Name :** Charlie

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Freeway expansion has failed to resolve traffic issues time and time again across many of this country's cities. Public transit that offers citizens an alternative way to get around the greater Portland area can REDUCE the amount of cars on the road, instead of increase it. The negative social, health, and environmental impacts of so many cars on the road should be considered a serious threat to ODOT. This is a crucial time for our environment as it can no longer buttress against our unsustainable use of fossil fuels, and so many vehicles that rely on them. Brake dust, emissions, and chemicals leech from cars to poison our water and air more each day. 63 people were killed in car accidents last year, as in 2021. Records for the Portland area. Not all members of our community are able to operate cars, leaving them stranded as public funds are squandered on roads that don't serve them. Inflation and thus the cost of living continues to creep ever higher in our economy putting car ownership out of reach for many as well. Our governing bodies should work for all people, not just car owners. Please invest in safer, cleaner, and more inclusive alternatives to highway expansion for the sake of our generations and those that come after.

**ODOT I-205 Toll EA - RECORD #1468 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Phyllis

**Last Name :** Webber

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** To whom it may concern,

I would like to send my objections and concerns regarding the tolling planned for the I-205 corridor. Our home is directly in the middle of the 2 tolling areas planned for 2024. That means we are virtually stuck with having to pay round trip tolls for every excursion outside of our small area. My husband and I both assist with the care of our family members who do not drive, but both require frequent medical appointments, assistance with groceries, assistance with medical equipment, assistance with household duties, assistance with any outing including family gatherings. We would be paying double tolls for every trip to help our family members.

In our area we have 3 grocery stores and a few restaurants, most all other things such as Home Depot, Fred Meyer, Costco, etc. will require travel through a toll area regardless which direction we travel. Family gatherings = tolls, going to the movies = tolls, out to dinner = tolls, dr appt. = tolls.

With inflation, the rising cost of EVERYTHING, the shortages caused by a broken supply chain (which has also raised prices) leave people to have to search for necessary items outside of their home area. I am not sure how our state government can add this extra burden at this time along with everything else we have to deal with & pay for.

The Oregon State government is over bloated with divisions that are not necessary. They need to start tightening the belt like every other business has had to do and stop taking more & more of the publics money. Things are just too expensive and it is time to cut back.

Please do not approve the I-205 tolls.

Regards,



**ODOT I-205 Toll EA - RECORD #1469 DETAIL****Submission Date :** 4/18/2023**First Name :** Stewart**Last Name :** Buettner**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** When will ODOT stop its expensive expansions of Interstate highways? Wider highways mean more cars. More cars mean more pollution. More solution and more greenhouse gasses mean a warming planet. By the time most Oregonians buy and drive EVs, it may well be too late. It's time to save the planet, not save drivers a precious two or three minutes in traffic.  
It's Time To Wake Up, ODOT!

**ODOT I-205 Toll EA - RECORD #1470 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Aaron

**Last Name :** Choate

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I oppose freeway expansion in favor of effective climate mitigation action. I am in favor of tolling as way to reduce demand and improve transportation and road management services without adding additional lanes.

**ODOT I-205 Toll EA - RECORD #1471 DETAIL**

**Submission Date :** 4/18/2023  
**First Name :** Lukas  
**Last Name :** Bauer  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** This project will absolutely cause more pollution for the Portland metro by inducing more traffic, which ODOT continues to willfully ignore, and because of this ODOT must be required to conduct an EIS. ODOT should not waste our tax money on pointless freeway expansions that will not mitigate traffic, create more pollution, and will undoubtedly incur more fees for maintenance. Instead of wasting money on redundant and ineffective transportation strategies that are guaranteed to go over budget, this taxpayer would prefer to not see Portland turn into Texas and instead spend on more on improving effective transit like rail. A much more competent idea is to finally extend the Max to Tigard. Better alternatives to driving will get cars off the roads, and this taxpayer is tired of needing to drive everywhere when well built cities have choices for transit. Start actually using your engineering degrees.

**ODOT I-205 Toll EA - RECORD #1472 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Desiree

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Before you start taking more money from the tax payers to start another project maybe you better take a look at what you are wasting all our tax money on and fix our roads before somebody gets hurt and damage on our cars... it is a mess out there. Quit having donuts coffee and lunches on the tax payer while you spend our money foolishly. What a bunch of pathetic people you are

**ODOT I-205 Toll EA - RECORD #1473 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Rose

**Last Name :** Redwood

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** We have people living in this corridor and also rivers and streams. Adding more lanes doesn't make that big of a difference. We need to make accessible and appealing alternative transportation. Add some charging stations for electric vehicles in Clackamas County to help encourage less carbon admissions

**ODOT I-205 Toll EA - RECORD #1474 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Ashley

**Last Name :** Haight

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** My family and I live very close to I-205 and the noise and pollution are already very aggravating to our quality of life. Many people and animals will be affected if you expand I-205 at a time when we should be focusing on reducing, not expanding, our vehicular travel due to the climate crisis. I strongly urge you to conduct an Environmental Impact Statement on this huge proposed project. We have a right to know how much environmental degradation this could cause. I'm worried about my 6-year-old breathing even more polluted air from the freeway. I'm concerned about the time running out to reduce our impact on the climate enough to prevent the worst possible outcomes—and this project makes those worst case scenarios even more likely. Invest in making our neighborhood more walkable! We don't even have sidewalks! Invest in more bike lanes and pedestrian-friendly streets to lower the death toll of our roads. Make sure our bridges are seismically retrofitted to withstand a huge earthquake. Do the right thing. This project won't even lessen congestion because it doesn't work that way. More lanes = more cars = more pollution and warming of the planet. Thank you for your time.

**ODOT I-205 Toll EA - RECORD #1475 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Matt

**Last Name :** Zajack

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Any way you slice it, we should have sound science in at least the form of an Environmental Impact to understand the need and impact.

**ODOT I-205 Toll EA - RECORD #1476 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Linn

**Last Name :** Groves

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** STOP KILLING US AND YOURSELVES [] [] [] [] [] [] [] [] [] [] READ The Sibling Society by Robert Bly and the current book NOT TOO LATE and GET A CLUE [] [] [] [] [] [] [] [] [] []



**ODOT I-205 Toll EA - RECORD #1477 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Paul

**Last Name :** Sheprow

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** This project needs an EIS. As a Clackamas County resident I'm concerned that this project will not be given the due diligence it requires to evaluate it.

**ODOT I-205 Toll EA - RECORD #1478 DETAIL****Submission Date :** 4/18/2023**First Name :** Freddy**Last Name :** Finney-Jordet**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** I'm demanding that ODOT conduct an environmental impact statement because if billions of dollars of government money are going to be spent on regressive infrastructure changes that perpetuate a climate-exacerbating car-centric system, we the People deserve to know just how bad it will be.

**ODOT I-205 Toll EA - RECORD #1479 DETAIL**

**Submission Date :** 4/18/2023  
**First Name :** Mike  
**Last Name :** Farell  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** How can ODOT think that expanding freeways and building more roads can be done without conducting and Environmental Impact Statement. Without a full Environmental Impact Statement how can we know if this freeway expansion will fit into Oregon's aggressive carbon emission targets. We have no way of knowing how much damage and how much it will hurt our carbon emissions as a state if this study is not done.

In today's world where climate change is evident everywhere and in our weather it is simply neglect to not perform a full environmental study before a project of this size. A project this big, should be fully vetted before it is started. If we are not going to study the environmental impact then it is not vetted.

Do the study.

**ODOT I-205 Toll EA - RECORD #1480 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Shawne

**Last Name :** Martinez

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** We must conduct an Environmental Impact Statement before expanding I-205. Congestion pricing should be implemented before adding more lanes. Expand public transit now! (Have you ever tried to take public transit from Tigard to Clackamas Town Center?) Build safe separated bicycle infrastructure now! We need more East-West routes for micromobility. We must reduce VMT, why would we add car lanes? Prioritize people over cars!

---

Time: April 18, 2023 at 8:21 pm

IP Address: 24.21.172.68

Contact Form URL: <https://nomorefreewayspx.com/i205expansion/>

Sent by an unverified visitor to your site.

**ODOT I-205 Toll EA - RECORD #1481 DETAIL****Submission Date :** 4/19/2023**First Name :** Lorreina**Last Name :** Guyett**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** I'm speaking in opposition to the i-205 freeway expansion. Additional freeway expansion is not what our money should be. Our tax dollars should be spent on. We are in a climate crisis and need to be prioritizing public transportation, not adding more car lanes to the freeway. Please stop prioritizing cars in order to spend money we don't have. We need ODOT to conduct an Environmental Impact Statement before they start planning for freeway expansions.

<b>ODOT I-205 Toll EA - RECORD #1482 DETAIL</b>
---

**Submission Date :** 4/19/2023

**First Name :** Brittany

**Last Name :** Bogue

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I implore ODOT to conduct a thorough Environmental impact statement for the I-205 freeway expansion. Expanding freeways flies in the face of climate goals and is a massive expenditure for something that catastrophically misses the mark.

<b>ODOT I-205 Toll EA - RECORD #1483 DETAIL</b>
---

**Submission Date :** 4/19/2023  
**First Name :** Jason  
**Last Name :** Nolin  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #1484 DETAIL****Submission Date :** 4/19/2023**First Name :** Paul**Last Name :** Billing-Ross**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** You are destroying our world. Stop expanding freeways.



**ODOT I-205 Toll EA - RECORD #1485 DETAIL**

**Submission Date :** 4/19/2023  
**First Name :** Carver  
**Last Name :** Akiteru Oblander  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** I have grave concerns about ODOT rushing ahead to double down on the mistakes of the past by widening yet another highway. Continuing to enable our longtime addiction to adding more lanes, cars, and traffic to our highways will only worsen our carbon emissions at a time when it is imperative that we cut those back (which the state has committed to do), not to mention harming the livability of the region.

At the very least, ODOT must conduct an Environment Impact Statement for this proposed expansion that will study congestion pricing before barreling ahead with freeway expansion. I fear that without proper foresight, not only will this expansion fail to solve traffic forever, but in another 10 or 20 years, we'll find ourselves once again trying to widen our way out of the problem with "just one more lane".

**ODOT I-205 Toll EA - RECORD #1486 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Cheryl

**Last Name :** Jones

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** No tolls in Oregon! Again, this toll is a "tax" dumped on the backs of the working folks, while the companies, corporations and their stock-holders who benefit and make the most money transporting goods on these roads and these companies need to pay their fair share! They use the public roads and transportation to make billions\$\$\$  
no tolls in Oregon.  
Thank you.

<b>ODOT I-205 Toll EA - RECORD #1487 DETAIL</b>
---

**Submission Date :** 4/19/2023

**First Name :**

**Last Name :** Ray

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Ive used this stretch of I5 plenty of times. I used to live in East Portland and now live in SE. I was born in portland and have lived here my whole life. I have been to many other cities but this is the one I keep coming back to. Its a special city and I hope it stays one. Please consider alternatives to freeway expansion.

**ODOT I-205 Toll EA - RECORD #1488 DETAIL**

**Submission Date :** 4/19/2023

**First Name :**

**Last Name :** Ryan

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I've seen multiple unpopular freeway expansion proposals pop up during the past few years. It's a little bizarre. The claim is always that they will reduce traffic... But did you all know you can spend less money on a lot of small projects that actually remove cars from the road, without even adding highway lanes? The other option which you keep choosing, is spending a lot of money on two to three huge highway projects that are known by science to create traffic, so it's a little confusing.

If your priorities are to create additional traffic, just say it-- we'll appreciate the honesty. Anyway, do an EIS!

Thanks.

---

Time: April 18, 2023 at 11:20 pm

IP Address: 97.115.2.199

Contact Form URL: <https://nomorefreewayspx.com/i205expansion/>

Sent by a verified WordPress.com user.

**ODOT I-205 Toll EA - RECORD #1489 DETAIL****Submission Date :** 4/19/2023**First Name :** Jonathan**Last Name :** Moore**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** I am requesting that ODOT conduct an environmental impact statement for the proposed I-205 freeway expansion. I believe it is essential to thoroughly evaluate the potential environmental impacts of such a project.

Expanding the freeway could have significant consequences for the surrounding ecosystem, including the disruption of habitats for wildlife and the degradation of air and water quality. These effects could have long-lasting implications for the health and well-being of local residents and the environment as a whole.

An environmental impact statement will provide a comprehensive analysis of the proposed expansion, including a thorough assessment of the environmental impacts and potential mitigation measures that could be implemented to reduce any negative effects.

Therefore, I urge ODOT to prioritize the protection of the environment and the health of the community by conducting an environmental impact statement before moving forward with any expansion plans.

Thank you for considering my request.

---

Time: April 19, 2023 at 2:15 am

IP Address: 97.115.73.67

Contact Form URL: <https://nomorefreewayspx.com/i205expansion/>

Sent by an unverified visitor to your site.

**ODOT I-205 Toll EA - RECORD #1490 DETAIL****Submission Date :** 4/19/2023**First Name :** Jakob**Last Name :** Slemc**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** It's been proven that more lanes on freeways do not fix traffic congestion due to induced demand. Similarly, it's been proven that more driving is only making out climate crisis even worse! Expanding a freeway instead of adding better bike lanes or transit is an idiotic move that is not backed up by science at all. I demand an environmental impact study be done before this is even considered an option. It will show that this is directly going against the goals of Oregon to decarbonize, and quit wasting half millions of taxpayers money on things that don't help them.

---

Time: April 19, 2023 at 6:36 am

IP Address: 97.120.191.32

Contact Form URL: <https://nomorefreewayspx.com/i205expansion/>

Sent by an unverified visitor to your site.

**ODOT I-205 Toll EA - RECORD #1491 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Mark

**Last Name :** Colman

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** No new freeway expansion. Too costly in human lives lost, too costly financially.  
Facts are that the resulting pollution would shorten many of our lives. We have to stop living like the earth is our garbage dump.  
We have to care more about people than ever-expanding profits. Adamantly opposed.  
Stop killing the tax payers!

**ODOT I-205 Toll EA - RECORD #1492 DETAIL****Submission Date :** 4/19/2023**First Name :** Eva**Last Name :** Weyers**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** This runs right alongside the Willamette river. I think it's important a complete Enviromental Impact Statement is completed so we can ensure that there are no serious impacts to the river during construction, and no long term consequences to increased traffic emissions from an expanded highway.



**ODOT I-205 Toll EA - RECORD #1493 DETAIL**

**Submission Date :** 4/19/2023  
**First Name :** Mitch  
**Last Name :**  
**Affiliation :**  
**Submission Method :** Accessible form  
**Q3. Comments :** Please No Tolling Thank You

**ODOT I-205 Toll EA - RECORD #1494 DETAIL****Submission Date :** 4/19/2023**First Name :** Jennifer**Last Name :** Johnson**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** ODOT needs to conduct an Environmental Impact Statement for the I-205 expansion in Clackamas county. As someone who lives near the area of the expansion, I have seen and experienced the congestion that occurs here, however there is no evidence that expanding freeways reduces traffic (to the contrary: it worsens it). ODOT ought to assess how much this anticipated increase in vehicle traffic will contribute to air pollution, and whether other methods could be used to reduce congestion (like tolling and expansion of alternative transportation options). I'm hopeful ODOT will reconsider this expensive project in favor of fixing up existing streets and building more infrastructure for alternative transportation options in the area.

<b>ODOT I-205 Toll EA - RECORD #1495 DETAIL</b>
---

<b>Submission Date :</b>	4/19/2023
<b>First Name :</b>	Lexey
<b>Last Name :</b>	Purcell
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email
<b>Q3. Comments :</b>	What is the best time to meet

**ODOT I-205 Toll EA - RECORD #1496 DETAIL**

**Submission Date :** 4/19/2023  
**First Name :** Eddie  
**Last Name :** Barnhart  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** The science is clear- more freeways don't help congestion and contribute to greenhouse emissions. The The Intergovernmental Panel on Climate Change has called climate change a red alert for humanity. It's time to act like we're on red alert. That means an Environmental Impact Statement at a minimum. Better yet, invest the millions into freeway alternatives. I say this as a lifelong Portlander who drives on I-205 regularly. I don't like traffic but more freeways will just make things worse.

---

Time: April 19, 2023 at 8:54 am

IP Address: 75.164.137.65

Contact Form URL: <https://nomorefreewayspx.com/i205expansion/>

Sent by an unverified visitor to your site.

**ODOT I-205 Toll EA - RECORD #1497 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Ryan

**Last Name :** Swofford

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** The idea that you are plunging half a billion dollars into a freeway expansion without addressing the rise in pedestrian fatalities, transit safety and reliability, or replacing aging and seismically vulnerable infrastructure is absolutely asinine. You are not a highway expansion department, you are a transportation department and it is irresponsible and dangerous to be committing your entire budget towards three climate killing freeway expansions, none of them being any more justifiable than the last. Build safe streets, expand bike infrastructure, invest in transit, foster walkable communities and transit oriented development, invest more in Amtrak Cascades, WES, and other intercity train trips, fix your tolling to be actual congestion pricing rather than predatory tolling at all hours. To repeat, you are a TRANSPORTATION agency, not a highway agency, ditch the Texas strategy and have some responsibility for our future.

**ODOT I-205 Toll EA - RECORD #1498 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Laura

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** The effect of traffic is going to be terrible. Why is just this area being used. You never have cared about it before now you want us to pay for your bad planning. We are a town that has to use 205 to get places because we don't have enough resources here now we have to pay to go anywhere. Not fare at all.

**ODOT I-205 Toll EA - RECORD #1499 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Nick

**Last Name :** Egan

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Traffic around Oregon City is getting worse, but freeway expansion is not the solution to it. I ask that ODOT please conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansions.

**ODOT I-205 Toll EA - RECORD #1500 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Cory

**Last Name :** Pinckard

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
The automotive city is a failure that kills people. Why would we want to continue down that path? We need to de-clutter our city and heal the scars of racism the major thoroughfares cruelly maintain.  
EVs also needlessly destroy the environment through resource mining, manufacturing processes & going to landfill in mass droves. So much urban space is squandered on parking & other paved over auto-centric wastes. They perpetuate urban sprawl & cities that aren't navigable as a pedestrian or bicyclist & are inhospitable to humanity. EVs add to traffic congestion. Putting the financial burden of transportation inefficiently on the back of the individual is regressive & hasn't been the norm for even 80 years. We need to invest in rail that's properly implemented as it is overseas. We're suffering from decades of trickle down economic austerity disenfranchisement & a lot of marginalization (eg Robert Moses's racist redlining urban renewal) is through divestment of public works/infrastructure, utilities & programs to help the American people. Commodification of societal needs & normalization of rampant consumerism for privatized profits is what put us in this mess. National Transcontinental High Speed Rail should integrate seamlessly w/commuter rail networks so it can function as one cohesive system & this will convert flyover country back into a thriving heartland which will reduce clustering on the coasts. Similarly, wholly integrated circuits of interurban commuter rail routes blended with light rail lines, streetcar grids & trolleys prevent people from having to live on top of each other in city centers in order to have quick access to work & local economies downtown. Our roadways are overcrowded & no amount of adding lanes helps since it causes induced demand that inevitably grinds traffic to a halt at snags & bottlenecks down the road. We can rebuild cherished structural heirlooms of civic pride destroyed by financial & environmental disaster on space reclaimed from cars to serve social capital & green initiatives. We can resurrect lost local landmarks with green technologies such as hempcrete.



**ODOT I-205 Toll EA - RECORD #1501 DETAIL****Submission Date :** 4/19/2023**First Name :** Sarah**Last Name :** Risser**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I'm a new Oregon resident and I care deeply about the environment, the climate, and road safety. Expanding I-205 by adding more lanes takes us in the wrong direction on all three of my valid concerns. As I'm sure ODOT understands, more lanes will induce more vehicular traffic. More vehicular traffic will exacerbate our already-dire dual climate and road safety crisis. For the health and wellbeing of Oregonians, their exceptional natural environment, and the climate we all depend on to survive, it is imperative that ODOT do the bare minimum: conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion. Freeway expansions exacerbate problems. What Oregon needs at this time is aggressive investment in active and public transit systems.

**ODOT I-205 Toll EA - RECORD #1502 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Joel

**Last Name :** Statz

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I'm opposed to any and all freeway expansions. At the very least, ODOT needs to conduct an EIS for this proposed expansion.

**ODOT I-205 Toll EA - RECORD #1503 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** William

**Last Name :** Nurse

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

Why wouldn't you? This is a no brainer. You are proposing doing work on the environment. Do an environmental impact statement for all to see.

7 generations ... Google it. See what ya learn. Maybe it will impact people's thoughts more.

<b>ODOT I-205 Toll EA - RECORD #1504 DETAIL</b>
---

**Submission Date :** 4/19/2023

**First Name :** B.

**Last Name :** Greene

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Adding 14 miles of lanes to I-205 would add 1.2 million metric tons of carbon emissions by 2050 - which goes against Oregon's carbon reduction goals.  
Cost: \$515 million or maybe more; road projects are (in)famous for cost overruns. These funds could be used for public transit and the 700+ bridges needing seismic upgrade in Oregon. Freeway expansion is the last thing we need - we're in a climate crisis. Let's act like it!

**ODOT I-205 Toll EA - RECORD #1506 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** James

**Last Name :** Schiffer

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
This is the year 2023. We have evidence that freeway expansions like this do nothing to solve congestion, hurt alternative transit mode share, and promote more car dependent sprawl. We have more than enough automobile capacity in the region, and what we need desperately more of are viable alternatives. Do not expand 205, toll it, and then use the toll funds to build alternative train/bus infrastructure in this region.

<b>ODOT I-205 Toll EA - RECORD #1508 DETAIL</b>
---

<b>Submission Date :</b>	4/19/2023
<b>First Name :</b>	Richard
<b>Last Name :</b>	Larson
<b>Affiliation :</b>	
<b>Submission Method :</b>	Letter

**Q3. Comments :**

Dear Ms. Putney

Herewith are my comments submitted on the I-205 Toll Project (Project) draft Environmental Assessment dated February 2023 (draft EA) authored by the Federal Highway Administration (FHWA) and Oregon Department of Transportation (ODOT) under the National Environmental Policy Act .Furthermore, I am registering my dissatisfaction with the timeline provided by the Agencies to adequately review, evaluate and comment on the draft EA. There are so many shortfalls in the draft EA as well as the process for the exposure draft and limited public involvement and outreach effort that there cannot be a Finding of No Significant Impacts (FONSI). Hence, the project should go through a full Environmental Impact Statement (EIS)analysis. My comments on the draft EA fall under four general themes:

1. Environmental Assessment is inadequate and fails to support FONSI;
2. Poor public involvement and outreach effort;
3. Complexity of the project area and nearby areas;
4. Fairness.

Environmental Assessment is inadequate and fails to support FONSI

The draft EA is inadequate and fails on its face because it does not correctly identify and commit to solutions to diversion of traffic from the project to local roads and streets. Significant analysis is being done by Clackamas County consultants and local cities consultants which will show that some intersections within the project were not addressed and some intersections which were addressed had incorrect modeling which understated the results of diversion. There are also important stretches of road way such as Willamette Drive in West Linn where the draft EA acknowledges there will be a 100% increase in traffic volume, where the roadway already fails to meet standards during the afternoon rush hour and which the draft EA proposed no mitigation whatsoever. This is an ongoing theme of the draft EA, finding no or little impact and failing to provide mitigation. Additionally, where mitigation is mentioned, there is no commitment of funding to pay for same and there is no timeline provided by which mitigation will take place. Due to the very short timeline, full analysis by consultants engaged by the City of West Linn have not been able to publicly provide specific numbers on these failures at the time I am writing these comments. Apparently the City of West Linn requested ODOT to provide modeling data, which would be used to evaluate the draft EA diversion estimates, on March 14, 2023. ODOT misdirected the City's consultant to request the data from Metro. When that request was made to Metro they redirected the consultant to ODOT because they did not have that data. Whether this runaround by ODOT was an intentional delay to inhibit complete analysis or whether it was simply another instance of ODOT not knowing what they are doing is anyone's guess. Regardless, the delay in the ability of complete analysis of ODOT data requires that there be no FONSI and a full Environmental Impact Statement analysis be conducted. Poor public involvement and outreach effort ODOT, or their public relations consultants, in publicly distributed information (Urban Mobility Strategy 8 page document dated Feb. 2023) makes a claim that public input from "Communities, Stakeholders & Travelers" began in early 2020. However, the draft EA is dated February 14, 2023. This comment period is scheduled for end on April 21, 2023. During this very short 68 day comment period there have been three significant snowfall events, delays or mis-directions for data by ODOT and elections of public officials resulting in changing decision makers in local government. Outreach meetings have been typically scheduled by ODOT, or their public relations consultants, in the middle of the day when many citizens are at work. Sometimes these meetings were scheduled on very short notice. For example, the meeting at the West Linn Senior Center was scheduled with little advance notice and I was unable to change previously made plans to attend. It is unknown if ODOT intentionally schedules meeting with short notice to limit attendance and at times that make it hard for public input but the result is that a significant sector of our citizens have not had ample opportunity to receive information and provide input.

I have attended a number of the information sessions that were held prior to the release of the draft EA. My experience at those sessions was decidedly less than satisfying. I will recite several examples to illustrate why; ODOT repeatedly claims that the Project is of regional significance, however with this project, in a historical change of course for ODOT, they now claim

funding must from the project itself to pay for it. Additionally, they present overall project budgets which show funding contributions from tolling. At the same time, when they were asked, repeatedly in every meeting, how much the tolls would cost they refused to answer. As a CPA who worked on governmental budgets for over 35 years I ask how did they develop revenue budget assumptions about the financial contribution of tolls without some assumption of the cost of the toll?

At one meeting there were genuinely nice, polite consultants there to take comments and respond to comments. When I tried to discuss a specific intersection with Willamette Falls Drive and Highway 43, the consultant replied he didn't know "because he just flew in from Texas" earlier that day. He did know he "crossed a green bridge" on their way to the meeting. What kind of help is that to public trying to become informed about ODOT plans? At every public meeting I've attended, people have asked about the possibility of having some lanes tolled and some lanes not tolled. The idea being that if tolled lanes will be faster then people will happily pay for that and those who want to avoid tolls can stay in the slower lane. At every meeting ODOT just goes silent when this topic is broached. Having ODOT simply close their eyes and ears to public input is emblematic of a long tradition in ODOT operations. The history of Oregon highways administered by ODOT is replete with examples of this behavior, basically doing what they want, the public be damned. Again, I want to reiterate, these examples are from meetings held prior to February 14, 2023 when the draft EA was dated. I cite these as evidence why the time prior to February 2023 should not be counted as public input when considering a FONSI. Complexity of the project area and nearby areas The draft EA focuses on some specifics and misses other specifics, but I think the most glaring void in the draft EA is recognition and discussion of the complexity of this locality. It is truly a case of missing the forest for the trees. Astonishingly, on page 1-1 of the draft EA there is one short paragraph of 44 words describing the project area generally as being located miles south of Portland and the cities and county and some of the ODOT owned highways. Beyond that, the draft EA completely misses the context in which this project will take place. There is no acknowledgement of the three significant rivers in the project area, all of which are environmentally sensitive. There is no mention of the numerous streams and creeks that are significant parts of the stormwater management system and maintenance of water quality. There is no consideration given to the geography of this area, typified by steep hills. There is no discussion of the geology of the area which requires dynamite blasting to carve in roadways. The complexity of the existing transportation network, the lack of connectivity of significant vehicular roadways and pedestrian/bicycle byways is ignored. In addition to the physical characteristics of the project region, the historical significance of this area is also ignored. The history of the area to indigenous native Americans, the history of the early white Christian settlers, the history of the original I-205 construction and how that bifurcated the City of West Linn deserve at least some acknowledgement and discussion.

ODOT plans work on 8 bridges in the Project area but I count at least three more bridges if t expand the horizon by approximately a half-mile. These issues should be documented, discussed and considered before a FONSI determination is made. This complex area simply cries out for a full Environmental Impact Statement analysis. Fairness Imposing tolls on every vehicle crossing the Abernathy Bridge and passing through the project area for each trip is unfair to the local residents. The draft EA does not acknowledge that the Abernathy Bridge, in particular, functions more like a local collector for those of us who live here. We must cross the Willamette River for so many basic functions of our daily lives. Shopping for food, clothing, household goods and pharmaceuticals is more diverse and options are more plentiful on the east side of the river. The nearest DMV office, DEQ facility, Oregon Human Resources office and County offices are ail located on the east side of the river. Restaurants, entertainment, recreation and even river access itself is more plentiful on the east side of the river. Imposing a toll for each trip across the Abernathy Bridge for residents living in the project area is unfair. Local residents will further be impacted by the vendors who provide services in our area because they will surely add the cost of the toll to the cost of their services. Business in our area will be negatively impacted by tolling in the Project area. For example, if a person living in Tualatin or



Wilsonville wants to go to a shopping mall and has a choice of Clackamas Town Center or Washington Square, the imposition of tolls amounting to \$8 to \$10 will influence their decision. Business who receives deliveries or who make deliveries will be impacted by the cost of tolls which will change the competitive balance of prices. It is actually laughable that the ODOT claims that traffic will be so congested in downtown Oregon City that people will just stop and have a drink to wait until the gridlock subsides and ODOT claims this as a benefit to business. The local cities of West Linn, Oregon City, Gladstone, Lake Oswego, Canby, Clackamas, Wilsonville, Happy Valley and Tualatin as well as Clackamas County will be impacted unfairly due to the failure of the draft EA to adequately address diversion of traffic onto local roads and streets. These localities will get pressure from their patrons to address traffic jams and this will come at the expense of the localities themselves. The draft EA is deficient in addressing adequate mitigation, funding for mitigation and timelines for completing mitigation. The schedule to begin tolling, if implemented, is unfair when considered along with proposed tolling of I-5. The draft EA proposes tolling of the Project would begin in December 2024. ODOT proposes tolling to begin on various sections of I-5 at a much later date. The travelling behaviors of motorists from this implementation timeline is unfair to the project locality. In the paragraphs above discussing the unfairness to business and residents, the impacts are magnified due to this timeline. For this reason, the draft EA does not meet FONSI and a full Environmental Impact Statement analysis must be undertaken. Since I-205 was opened 50 years ago, the highway in the project area has received scant upgrades or improvements and even only the most basic maintenance necessary to keep the roadway from literally falling apart. On the other hand, Oregon 217 Beaverton — Tigard Highway has received continuous improvement and first class maintenance. Even as I write these comments, Highway 217 is undergoing major upgrades budgeted at \$158 million. Again, this current upgrade is in addition to all the previous upgrades. During this time the I-205 Project area has barely received required maintenance. And, it does not go unnoticed by those of us who live in this Project area that no tolls are planned or even discussed for Oregon 217. How this discrepancy exists is never explained despite ODOT or their public relations consultants being asked. We are also aware that Oregon is receiving hundreds of millions of dollars from the Federal Inflation Reduction Act, yet not one cent has been allocated to this shovel ready project. This is patently unfair. There can be no FONSI where this unfairness exists. The City of West Linn is being disproportionately impacted by the Abernathy Bridge construction due to the requirement to replace the city waterline attached under the bridge. This waterline is only about halfway through its useful life. Initial cost estimates, apparently provided to the City by ODOT, were for around \$6 million. Since those initial estimates, the cost has ballooned to nearly \$14 million. Construction cost inflation alone cannot be attributed to this cost increase. This is one more example of how ODOT has failed to be a reliable partner in working with the City. Frankly, I think trust has been lost and ODOT has little to no credibility with us. To bring my comments to a conclusion, I think it would do everyone a service to take a deep breath and stand back for a moment and reflect on the Urban Mobility Strategy process as a whole. It is clear that local residents oppose the plans as currently proposed; There has been insufficient discussion with Oregon citizens about how they want highway maintenance and upgrades to be funded while fuel tax revenue is declining; ODOT and their public relations consultants have failed in conducting public outreach because they are trying to rush through the process without hearing or seeing the people affected; The draft is incomplete because it has missed a number of specific impacts on sections of roadway and intersections and has underestimated those impacts in other areas; The draft is incomplete because it has not learned, discussed and evaluated the impact of the complexity of the larger area, its social history and its specific history with I-205 itself. I look forward to hearing more from ODOT about how we can work as a community to address the funding for this much needed Project and make sure that all of the impacts of the Project are addressed as part of the overall Project cost in a timeline consistent with the Project completion. Thank you for consideration of these issues.

**Attachments :**

Toll Comments - Richard Larson .pdf (219 kb)

Richard Larson  
5955 Skyline Dr.  
West Linn, OR 97068

April 15, 2023

Mandy Putney  
ODOT Urban Mobility Office  
182 / 7 SW Bounes Ferry Road  
Tualatin, OR 97224

Dear Ms. Putney

Herewith are my comments submitted on the I-205 Toll Project (Project) draft Environmental Assessment dated February 2023 (draft EA) authored by the Federal Highway Administration (FHWA) and Oregon Department of Transportation (ODOT) under the National Environmental Policy Act.

Furthermore, I am registering my dissatisfaction with the timeline provided by the Agencies to adequately review, evaluate and comment on the draft EA. There are so many shortfalls in the draft EA as well as the process for the exposure draft and limited public involvement and outreach effort that there cannot be a Finding of No Significant Impacts (FONSI). Hence, the project should go through a full Environmental Impact Statement (EIS) analysis.

My comments on the draft EA fall under four general themes:

1. Environmental Assessment is inadequate and fails to support FONSI;
2. Poor public involvement and outreach effort;
3. Complexity of the project area and nearby areas;
4. Fairness

**Environmental Assessment is inadequate and fails to support FONSI**

The draft EA is inadequate and fails on its face because it does not correctly identify and commit to solutions to diversion of traffic from the project to local roads and streets. Significant analysis is being done by Clackamas County consultants and local cities consultants which will show that some intersections within the project were not addressed and some intersections which were addressed had incorrect modeling which understated the results of diversion. There are also important stretches of roadway such as Willamette Drive in West Linn where the draft EA acknowledges there will be a 100% increase in traffic volume, where the roadway already fails to meet standards during the afternoon rush hour and which the draft EA proposed no mitigation whatsoever. This is an ongoing theme of the draft EA, finding no or little impact and failing to provide mitigation.

Additionally, where mitigation is mentioned, there is no commitment of funding to pay for same and there is no timeline provided by which mitigation will take place.

Due to the very short timeline, full analysis by consultants engaged by the City of West Linn have not been able to publicly provide specific numbers on these failures at the time I am writing these comments. Apparently the City of West Linn requested ODOT to provide modeling data, which would be used to evaluate the draft EA diversion estimates, on March 14, 2023. ODOT misdirected the City's consultant to request the data from Metro. When that request was made to Metro they redirected the consultant to ODOT because they did not have that data. Whether this runaround by ODOT was an intentional delay to inhibit complete analysis or whether it was simply another instance of ODOT not knowing what they are doing is anyone's guess. Regardless, the delay in the ability of complete analysis of ODOT data requires that there be no FONSI and a full Environmental Impact Statement analysis be conducted.

#### **Poor public involvement and outreach effort**

ODOT, or their public relations consultants, in publicly distributed information (*Urban Mobility Strategy 8 page document dated Feb. 2023*) makes a claim that public input from "Communities, Stakeholders & Travelers" began in early 2020. However, the draft EA is dated February 14, 2023. This comment period is scheduled for end on April 21, 2023. During this very short 68 day comment period there have been three significant snowfall events, delays or mis-directions for data by ODOT and elections of public officials resulting in changing decision makers in local government. Outreach meetings have been typically scheduled by ODOT, or their public relations consultants, in the middle of the day when many citizens are at work. Sometimes these meetings were scheduled on very short notice. For example, the meeting at the West Linn Senior Center was scheduled with little advance notice and I was unable to change previously made plans to attend. It is unknown if ODOT intentionally schedules meeting with short notice to limit attendance and at times that make it hard for public input but the result is that a significant sector of our citizens have not had ample opportunity to receive information and provide input.

I have attended a number of the information sessions that were held prior to the release of the draft EA. My experience at those sessions was decidedly less than satisfying. I will recite several examples to illustrate why:

ODOT repeatedly claims that the Project is of regional significance, however with this project, in a historical change of course for ODOT, they now claim funding must from the project itself to pay for it. Additionally, they present overall project budgets which show funding contributions from tolling. At the same time, when they were asked, repeatedly in every meeting, how much the tolls would cost they refused to answer. As a CPA who worked on governmental budgets for over 35 years I ask how did they develop revenue budget assumptions about the financial contribution of tolls without some assumption of the cost of the toll?

At one meeting there were genuinely nice, polite consultants there to take comments and respond to comments. When I tried to discuss a specific intersection with Willamette Falls Drive and Highway 43, the consultant replied he didn't know "because he just flew in from Texas" earlier that day. He did know he "crossed a green bridge" on their way to the meeting. What kind of help is that to public trying to become informed about ODOT plans?

At every public meeting I've attended, people have asked about the possibility of having some lanes tolled and some lanes not tolled. The idea being that if tolled lanes will be faster then people will

happily pay for that and those who want to avoid tolls can stay in the slower lane. At every meeting ODOT just goes silent when this topic is broached. Having ODOT simply close their eyes and ears to public input is emblematic of a long tradition in ODOT operations. The history of Oregon highways administered by ODOT is replete with examples of this behavior, basically doing what they want, the public be damned.

Again, I want to reiterate, these examples are from meetings held prior to February 14, 2023 when the draft EA was dated. I cite these as evidence why the time prior to February 2023 should not be counted as public input when considering a FONSI.

#### **Complexity of the project area and nearby areas**

The draft EA focuses on some specifics and misses other specifics, but I think the most glaring void in the draft EA is recognition and discussion of the complexity of this locality. It is truly a case of missing the forest for the trees.

Astonishingly, on page 1-1 of the draft EA there is one short paragraph of 44 words describing the project area generally as being located miles south of Portland and the cities and county and some of the ODOT owned highways. Beyond that, the draft EA completely misses the context in which this project will take place. There is no acknowledgement of the three significant rivers in the project area, all of which are environmentally sensitive. There is no mention of the numerous streams and creeks that are significant parts of the stormwater management system and maintenance of water quality. There is no consideration given to the geography of this area, typified by steep hills. There is no discussion of the geology of the area which requires dynamite blasting to carve in roadways. The complexity of the existing transportation network, the lack of connectivity of significant vehicular roadways and pedestrian/bicycle byways is ignored.

In addition to the physical characteristics of the project region, the historical significance of this area is also ignored. The history of the area to indigenous native Americans, the history of the early white Christian settlers, the history of the original I-205 construction and how that bifurcated the City of West Linn deserve at least some acknowledgement and discussion.

ODOT plans work on 8 bridges in the Project area but I count at least three more bridges if I expand the horizon by approximately a half-mile.

These issues should be documented, discussed and considered before a FONSI determination is made. This complex area simply cries out for a full Environmental Impact Statement analysis.

#### **Fairness**

Imposing tolls on every vehicle crossing the Abernathy Bridge and passing through the project area for each trip is unfair to the local residents. The draft EA does not acknowledge that the Abernathy Bridge, in particular, functions more like a local collector for those of us who live here. We must cross the Willamette River for so many basic functions of our daily lives. Shopping for food, clothing, household goods and pharmaceuticals is more diverse and options are more plentiful on the east side of the river. The nearest DMV office, DEQ facility, Oregon Human Resources office and County offices are all located on the east side of the river. Restaurants, entertainment, recreation and even river access itself is more plentiful on the east side of the river. Imposing a toll for each trip across the Abernathy

Bridge for residents living in the project area is unfair. Local residents will further be impacted by the vendors who provide services in our area because they will surely add the cost of the toll to the cost of their services.

Business in our area will be negatively impacted by tolling in the Project area. For example, if a person living in Tualatin or Wilsonville wants to go to a shopping mall and has a choice of Clackamas Town Center or Washington Square, the imposition of tolls amounting to \$8 to \$10 will influence their decision. Business who receives deliveries or who make deliveries will be impacted by the cost of tolls which will change the competitive balance of prices. It is actually laughable that the ODOT claims that traffic will be so congested in downtown Oregon City that people will just stop and have a drink to wait until the gridlock subsides and ODOT claims this as a benefit to business.

The local cities of West Linn, Oregon City, Gladstone, Lake Oswego, Canby, Clackamas, Wilsonville, Happy Valley and Tualatin as well as Clackamas County will be impacted unfairly due to the failure of the draft EA to adequately address diversion of traffic onto local roads and streets. These localities will get pressure from their patrons to address traffic jams and this will come at the expense of the localities themselves. The draft EA is deficient in addressing adequate mitigation, funding for mitigation and timelines for completing mitigation.

The schedule to begin tolling, if implemented, is unfair when considered along with proposed tolling of I-5. The draft EA proposes tolling of the Project would begin in December 2024. ODOT proposes tolling to begin on various sections of I-5 at a much later date. The travelling behaviors of motorists from this implementation timeline is unfair to the project locality. In the paragraphs above discussing the unfairness to business and residents, the impacts are magnified due to this timeline. For this reason, the draft EA does not meet FONSI and a full Environmental Impact Statement analysis must be undertaken.

Since I-205 was opened 50 years ago, the highway in the project area has received scant upgrades or improvements and even only the most basic maintenance necessary to keep the roadway from literally falling apart. On the other hand, Oregon 217 Beaverton – Tigard Highway has received continuous improvement and first class maintenance. Even as I write these comments, Highway 217 is undergoing major upgrades budgeted at \$158 million. Again, this current upgrade is in addition to all the previous upgrades. During this time the I-205 Project area has barely received required maintenance. And, it does not go unnoticed by those of us who live in this Project area that no tolls are planned or even discussed for Oregon 217. How this discrepancy exists is never explained despite ODOT or their public relations consultants being asked. We are also aware that Oregon is receiving hundreds of millions of dollars from the Federal Inflation Reduction Act, yet not one cent has been allocated to this shovel ready project. This is patently unfair. There can be no FONSI where this unfairness exists.

The City of West Linn is being disproportionately impacted by the Abernathy Bridge construction due to the requirement to replace the city waterline attached under the bridge. This waterline is only about halfway through its useful life. Initial cost estimates, apparently provided to the City by ODOT, were for around \$6 million. Since those initial estimates, the cost has ballooned to nearly \$14 million. Construction cost inflation alone cannot be attributed to this cost increase. This is one more example of how ODOT has failed to be a reliable partner in working with the City. Frankly, I think trust has been lost and ODOT has little to no credibility with us.

To bring my comments to a conclusion, I think it would do everyone a service to take a deep breath and stand back for a moment and reflect on the Urban Mobility Strategy process as a whole.

- It is clear that local residents oppose the plans as currently proposed;
- There has been insufficient discussion with Oregon citizens about how they want highway maintenance and upgrades to be funded while fuel tax revenue is declining;
- ODD and their public relations consultants have failed in conducting public outreach because they are trying to rush through the process without hearing or seeing the people affected;
- The draft is incomplete because it has missed a number of specific impacts on sections of roadway and intersections and has underestimated those impacts in other areas;
- The draft is incomplete because it has not learned, discussed and evaluated the impact of the complexity of the larger area, its social history and its specific history with I-205 itself.

I look forward to hearing more from ODOT about how we can work as a community to address the funding for this much needed Project and make sure that all of the impacts of the Project are addressed as part of the overall Project cost in a timeline consistent with the Project completion.

Thank you for consideration of these issues.

Sincerely,



Richard Larson  
503-522-1287

**ODOT I-205 Toll EA - RECORD #1509 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Scott

**Last Name :** Hillson

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Any Freeway expansion in Oregon should require a mandatory EIS. At a minimum.

**ODOT I-205 Toll EA - RECORD #1510 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Douglas

**Last Name :** Kelso

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

It is essential that ODOT conduct a full Environmental Impact Statement on the proposed I-205 freeway expansion that includes complete and detailed evaluation of the effects of congestion pricing at various levels.

If congestion pricing is effective, it can eliminate any perceived need to expand the freeway. Instead of spending hundreds of millions of dollars, ODOT can simply get a source of revenue for permanent freeway maintenance. Keep our freeways in good shape instead of expanding them, while managing congestion.

Do a detailed, HONEST study of alternatives before committing to an expensive and probably-unnecessary expansion project.



**ODOT I-205 Toll EA - RECORD #1511 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Doug

**Last Name :** Keeler

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Dear Oregon Department of Transportation,

Do not begin collecting tolls for the use of roads the citizens of Oregon have already paid for.

Oregon has many funding mechanisms already in place to collect needed resources to meet the transportation needs of its citizens. Any additional taxing approaches bring inefficiencies and will unnecessarily burden the people of Oregon.

Additionally, ODOT can reduce its funding needs by constructing a replacement Interstate 5 bridge that is similar to the Glen Jackson Memorial Bridge which carries Interstate 205 traffic between Oregon and Washington over the Columbia River. This bridge was opened in 1982 and constructed for a cost of \$169.6 million. The U.S. Bureau of Labor of Statistics CPI calculator tells me that is equivalent to about \$524.5 million in today's dollars. We do not need to take \$5, \$6, or \$7 billion dollars from Oregon and Washington citizens to replace a simple bridge.

Respectfully,

**ODOT I-205 Toll EA - RECORD #1512 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Phil

**Last Name :** Moll

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
An EIS is important in general and for this project.

**ODOT I-205 Toll EA - RECORD #1513 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Andre

**Last Name :**

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Expanding freeways will have extremely detrimental effects to our local communities as well as the environment as a whole. There needs to be better initiatives proposed for more efficient city transportation so that highways can be left as is. Highway expansion will also displace communities who are otherwise minding their own business.

**ODOT I-205 Toll EA - RECORD #1514 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Caleb

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I would like to see the toll proposal stopped. This toll project is not good for any citizen. The local communities will see increased traffic on the smaller old Oregon city bridge in Oregon city. No community member wants to pay a toll. This project was never voted on its just being implemented which is not fair to citizens of this state who do not want it. I am a local business owner who drives 205 frequently. I have customers all over Oregon and Washington on both sides of the political isle. None of them have voiced support for the tolling of I205. This is bad for Oregonians. Please take my request seriously and stop tolling on I205.

**ODOT I-205 Toll EA - RECORD #1515 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** rickey

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** As a realtor for over 40 years, a small business owner, a commuter, VP of a national company doing site analyze and selection for retail use, local resident of West Linn for 20 years, and a resident and business owner in other areas of the country that has tolling, I strongly oppose tolling as it negatively effects the quality of life and is unfair way of raising funds. No tolling in Oregon please.

**ODOT I-205 Toll EA - RECORD #1516 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Vivian

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I am a 45 year resident of Oregon City. Traffic on McLoughlin; Willamette Falls Drive and Highway 43 are already nightmares in morning and afternoon work hours. If this toll goes into affect, we won't b3 able to use these roads at all during commute times! More People will not use the freeway if it costs them money. I already spend 30 to 40 minutes to do a 10 minute non-commute drive because people divert off freeway. It will be impossible to move if you put this toll in place. You're justifying the toll is not honest as it will only divert congestion to residential streets. Please drop this insane toll.

**ODOT I-205 Toll EA - RECORD #1517 DETAIL**

**Submission Date :** 4/19/2023  
**First Name :** Edward  
**Last Name :** Gronke  
**Affiliation :** Chair, Jennings Lodge CPO  
**Submission Method :** Accessible form

**Q3. Comments :** The Jennings Lodge CPO's jurisdictional area includes River Road from Roethe south to the Clackamas River and McLoughlin Blvd encompassing roughly the same area to the East. Both streets bisect our community and heavy traffic can present a real problem to community coherence. The beginning of work on the Abernethy Bridge has already resulted in dramatic traffic increases on both streets, especially where they meet at the corner of Arlington and McLoughlin in Gladstone. We realize that this will only get worse. We have no public transit to replace automobiles in crossing the Willamette River, and many of our members use the bridge daily to access child care and other services which cannot be rescheduled. We have had ODOT presentations at our meetings and we have openly voiced our opposition to the tolling project and lack of realistic mitigation strategies. None of this has changed other than the sense of hopelessness and frustration has grown ever stronger. On behalf of the Jennings Lodge Community Planning Organization, I want to register our community voices as strongly opposed to your proposal.

**ODOT I-205 Toll EA - RECORD #1518 DETAIL**

**Submission Date :** 4/19/2023  
**First Name :** Shane  
**Last Name :**  
**Affiliation :**  
**Submission Method :** Accessible form  
**Q3. Comments :** No tolls period fools



**ODOT I-205 Toll EA - RECORD #1519 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Gary

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** We are taxed enough to make road improvements. Get whatever changes you need to make done and forget about a toll!

**ODOT I-205 Toll EA - RECORD #1520 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Naomi

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Adding tolls will divert vehicles into other neighborhoods causing major problems. The tolls will create strain for commuters. More money is not always the answer to problems

**ODOT I-205 Toll EA - RECORD #1521 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Carri

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I have concerns about the financial impact this will have on already suffering financially on people in the communities and surrounding communities who drive 205. We are already paying higher food prices, gas prices along with gas taxes that are suppose to be going to our roads to be fixed, why not use this money? What about the property taxes, higher energy costs, water sources and the impacts our pollution problems are impacting our communities. Putting tolls on our road ways is not the solution, you are making us pay such high costs we cannot afford to live. We do not support this and do not want to pay tolls to drive on the roadways. Please stop making the people suffer more with paying out more costs. Where is all the money we currently pay to help roadways going?

**ODOT I-205 Toll EA - RECORD #1522 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Charissa

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Washington residents already pay over \$300 million in Oregon income tax. I have seen estimates of \$30 per day round trip and that is \$600 month. We can't afford to pay that. My husband works in Tualatin. Second I am concerned about the traffic diversion and congestion this will cause on back streets. ODOT estimates 130,000 vehicle diversions. And lastly the cost of collection makes this inefficient. Costs can run from 30-60% I am against tolls period.

**ODOT I-205 Toll EA - RECORD #1523 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Teresa

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** These tolls with be too expensive for me to keep my job in Oregon. It's really a tax on Oregon businesses because they will loose employees.

**ODOT I-205 Toll EA - RECORD #1524 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Christian

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I am concerned that the tolls will increase congestion non highway roads due to people attempting to avoid paying tolls. This will not only be dangerous but will impact local communities. Also the tolls will disproportionately affect minorities and low income households. With the high cost of gas and inflation at historic highs I feel this is badly timed and flat out wrong to add another tax to working families who have already paid for the roads thru their taxes

**ODOT I-205 Toll EA - RECORD #1525 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Jeff

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Tolling sets a precedent and will do more harm than good to the transportation infrastructure. Instead ODOT should focus on improving the free flow of private vehicles NOT mass transit. It is not good for Oregon to social engineer their transportation system. I drive into Oregon almost every day.

**ODOT I-205 Toll EA - RECORD #1526 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Rene'

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Tolls are another name for more misappropriated monies for government squandering. ODOT already receives plenty of money to do the work that needs done (believe me, I can relay plenty of squandered money actions). NO TOLLS they will not help anything, unless you count it toward the many ways government throws your money away. We are taxed enough, in fact on the top ten list. People bypassing tolls will make the roads even more congested.



**ODOT I-205 Toll EA - RECORD #1527 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Scott

**Last Name :**

**Affiliation :** Oregon Resident and Voter

**Submission Method :** Accessible form

**Q3. Comments :** I see no need for any tolls being collected until there is a complete accounting for how our fuel tax dollars and other transportation-related taxes are spent. Moreover, that being said, there should never be an imposed tax, as tolls are, that go either to the General Fund of the State of Oregon, or any other such slush fund used for whatever a politician feels a need to spend our money on without a public vote on efficacy of the proposed expenditure and why it needs to be spent!

Furthermore, I feel a serious consideration needs to happen before proceeding any further regarding the financial and practical impact such a proposed action inflicts on the people it affects and the traffic patterns and alternative routing plans that will need to be made available and the resulting impacts on surrounding neighborhoods and livelihoods of the people in the affected areas if this proposal comes to fruition! I would have to choose another route of travel or detour around the toll booths in order to avoid paying the tolls as I have a very low income and, being disbled, this would cause much undue hardship for me, my family, and others like us, by causing increased delay getting to our respective destinations! It would cause an increased exposure to auto accidents, confusion determining the best route to take around the tollbooths, frustration in V determining how much extra time to allow for getting to or respective destinations, etc.

Turning freeways into tollroads has never er had positive results where implemented by cities I moved from, like the Chicago area, due to the high cost of living, tolls,the increased crime rate, etc., which always seems to accompany proposed projects of this nature from my personal experience!

**ODOT I-205 Toll EA - RECORD #1528 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Sharon

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** The congestion problems will not be solved by replacing the existing bridge.  
A third bridge is needed. I am opposed to tolling on any bridge.

**ODOT I-205 Toll EA - RECORD #1529 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Jo Ellen

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** It doesn't appear anything has been done to eliminate vehicles from the roadways which should not be on the road. Uninsured vehicles, postal mail haulers and delivery of underpriced junk mail, empty/near empty trimet buses etc. Oregonians bear the burden of pollution, congestion, road damage etc and should not be charged for this. How many more homeless people will happen because of this?

**ODOT I-205 Toll EA - RECORD #1530 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Ronald

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** The I205 bridge is already complete and paid for. It should not be tolled. Also, tolling is very inefficient, costing more than it brings in so I oppose tolling of any type. Oregon will lose many casual Washington visitors as a result.

**ODOT I-205 Toll EA - RECORD #1531 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** mark

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Due to \$1.8 Billion going to subsidize homelessness... Oregon is broke. so no toll roads at it would not be PC for old people who can't fund it all and remain housed.

**ODOT I-205 Toll EA - RECORD #1532 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Bill

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Tolling for I205 is inequitable in that it will affect local communities more than the rest of the state even though the improvements will benefit the rest of the state., because cost of collection will be consume 30-40% of the revenue it is a very poor business decision when other methods of funding (gas tax, registration, etc) are already in place and would make more sense. Tolls on 205 would decimate local businesses, and most of the people using at the maximum cost hours are people going to work, school and simply do not have a choice. Have you done anything to reduce congestion like encouraging work from home or staggered work hours as was done in the 70's. There is no sunset clause and would create a source of funding without limit or oversight. Overwhelming opinion is that tolls are not good for Oregon.

**ODOT I-205 Toll EA - RECORD #1533 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Teresa

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** The annual fee for households living in API is estimated to be \$600.(pg3.61), which for my household of 2 retired people seems accurate. But for workers commuting is total underestimating. A workers cost commuting the length of the I205 tolling zone would be \$8.80 per day ;\$2,200 per year. This an extraordinary expense when considered that workers are only spending an extra 3 to 18 minutes a day from the section of I-5 tosE 82nd st ( pg 3.3 Traffic operations.) An area that needs further assessment is the financial impact for businesses just outside of the API in Tualatin, Wilsonville and Tigard such as decrease in customers not willing to shop because of fees,increase in costs to contractors etc having to pat tolls to reach customers, difficulties in recruiting and retaining employees, discretion to medical facilities on both sides of the tolling zone. I support not implementing any tolls until Regional Mobility Pricing is completed and the publicis allowed to comment.

**ODOT I-205 Toll EA - RECORD #1534 DETAIL**

**Submission Date :** 4/14/2023  
**First Name :** don  
**Last Name :** young  
**Affiliation :**  
**Submission Method :** Toll program email  
**Q3. Comments :** Horrible idea It doesn't solve any problem. Just makes it worse



**ODOT I-205 Toll EA - RECORD #1535 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Mary

**Last Name :** Aberg

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Please reconsider the decision to toll the entire length of I 205. When I lived in CA where there were occasional tolls, they were usually in effect during rush hours and typically only one lane of the freeway was the tolled lane (where there were fewer cars). IF you build an additional lane in both directions, and toll just that one, you may find there are fewer objections. Please consider this as an alternative. Respectfully submitted,

**ODOT I-205 Toll EA - RECORD #1536 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Randall

**Last Name :** Addington

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** In voicing my opinion on tolling in Clackamas County FREEways. This is not a well thought out plan and will only flood off ramps and cities with congestion from those that wish to avoid tolling. It will further reduce the amount of traffic on the Freeway's for which they were designed for. A vote on infrastructure and ODOT spending the taxpayers money without consent doesn't seem right, where was the vote?

**ODOT I-205 Toll EA - RECORD #1537 DETAIL**

**Submission Date :** 2/21/2023  
**First Name :** Sandra  
**Last Name :** Akerill  
**Affiliation :**  
**Submission Method :** Web comment form  
**Q3. Comments :** NO TOLLING!!!!!!!!!!

**ODOT I-205 Toll EA - RECORD #1538 DETAIL****Submission Date :** 4/14/2023**First Name :** P**Last Name :** Alexandria**Affiliation :****Submission Method :** Toll program email**Q3. Comments :** Hello I wanted to talk to you about your idea about tolling. So you think it's a real good idea when people are leaving Oregon in groves. The whole entire West Coast is becoming so expensive with income taxes property taxes and the high cost of housing.

How in the world do you think it's a good idea to toll our roads. Only someone who's on the government Dole and who knows they have a lifelong pension no matter what they do would think of something that stupid. Think again most people do not have the money for this especially in Oregon. No tolls

**ODOT I-205 Toll EA - RECORD #1539 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Julia

**Last Name :** Anderson

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** The tolling of the freeways will add vast amounts of traffic to neighborhood streets. My grandmother lived in Orlando where they toll the roads. Traffic on her neighborhood street was tremendous. Please do not toll the roads. People will do everything they can to avoid paying the toll.

<b>ODOT I-205 Toll EA - RECORD #1541 DETAIL</b>
---

<b>Submission Date :</b>	4/5/2023
<b>First Name :</b>	Paul
<b>Last Name :</b>	Androniychuk
<b>Affiliation :</b>	
<b>Submission Method :</b>	Toll program email
<b>Q3. Comments :</b>	Please please please please do NOT implement tolls on i205!!!

**ODOT I-205 Toll EA - RECORD #1542 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Amorita

**Last Name :** Anstett

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** As a resident of Clackamas County, I am very concerned about the impact of the proposed project on county residents and businesses.  
As a resident I am particularly concerned about: the safety on county and city roadways, the environmental impacts, inadequate plans to reduce negative impacts of the project (known as mitigation measures), and the lack of planning to begin tolling before mitigation measures are in place.  
I am requesting for ODOT to: Conduct an Environmental Impact Statement (EIS) for the tolling project, which would require additional analysis and more public outreach and community involvement; and Extend the public comment period for an additional 30 days (for a total of 90 days) and conduct another public hearing during non-working hours so people who work a standard work schedule are able to participate. As well as a Cost Benefit Analysis on how much the toll will be per resident, what are the other solutions to this project and how will the funding of this project actually be measured and audited on a quarterly basis.  
Thank you for your time and consideration  
Concerned resident

**ODOT I-205 Toll EA - RECORD #1543 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Michelle

**Last Name :** Armstrong

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Dear Whomever is in charge,  
Just stop! We are not buying what you are selling. We voted no! We mean no! Do not try to twist the end game. Tell Your bosses we don't agree with this and we will continue to fight this!!!  
Truly,  
A concerned citizen



**ODOT I-205 Toll EA - RECORD #1544 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Roger

**Last Name :** Arnell

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** This is just one more way of getting more tax money. We pay a high state gasoline tax and that is supposed to pay for roads in Oregon. I oppose ANY toll charge... just one more tax. I am a retired Oregonian and use I-205 several times a week. All I need to have my retirement stretched thin is to have to pay for use of a road.

**ODOT I-205 Toll EA - RECORD #1545 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** James

**Last Name :** Arnold

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I want to comment on the toll proposal. I am totally against it, we have already paid for the roads for years. No new roads or lanes have been added in over 25 years. Where does all the money that has been collected in taxes and gas taxes go? It will only create hardship for the people and business in the OC area. I vote no on any tolling.

**ODOT I-205 Toll EA - RECORD #1546 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Scott

**Last Name :** Averette

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** As most things go the voice of the people doesn't matter. Why don't you put this on the ballot for the people of Oregon to vote on? Why? Because you know it would fail. Again the voice of the people doesn't matter. This just another tax mechanism and the citizens of East County get to burden the cost. I drive this route to work everyday. Why should I have to pay extra just to go to work when my coworkers don't. This could have huge impacts on family's budgets. Have you thought of what this could cost a family when the only option is to cross through these tolls 2X per day. That's 4 tolls 20x a month. That's a huge cost for most families. Everything I read is these tolls are expected to reduce traffic? How? I and everyone else still need to get to work. Yes maybe reduce traffic on the highway but it's only going to be diverted to the side roads. You aren't reducing traffic!!! I'm not going to have a choice but to try and get around these tolls. That means instead of sitting in traffic on the highway I'll be sitting in traffic on the side roads. That's not reducing traffic. What are you going to do about that start tolling the side roads? Where does the money grab stop? I feel sorry for the people who live in these communities. It's going to be a mess for them. Do I really have to tell you your studied are wrong. Don't be stupid! Again why don't you let the citizens of Oregon have a say. I know why because you know you stupid toll idea would be stopping dead in it's tracks. PUT IT TO VOTE!!!!!!!!!!

**ODOT I-205 Toll EA - RECORD #1547 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Brian

**Last Name :** B

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Oregon has one of the highest tax burdens in the entire country. Tolling is another tax. One that selectively impacts people disproportionately based on where they live vs where they work. I oppose all tolling in oregon.

**ODOT I-205 Toll EA - RECORD #1548 DETAIL**

**Submission Date :** 4/4/2023  
**First Name :** Nicole  
**Last Name :** Babnick  
**Affiliation :**  
**Submission Method :** Toll program email

**Q3. Comments :** Hello,  
I do not have the privilege of working a remote job and public transportation doesn't run during the hours I need to be at work. I work in a manufacturing environment and help keep products made in America. This requires me to work in Oregon and Washington. Adding a toll to the bridge will cost me more to get to work and is inequitable. It will hit some of our lower paid employees even harder as they struggle with inflation. There is no way to avoid the bridge or take public transport to get to work on time. This toll will harm me and my coworkers who are just trying to go to work during a time when so many people don't appear interested in working despite lots of job openings. I'd encourage more equitable solutions other than tolling such as statewide transit taxes, use of gas tax dollars, or some other method. In sum, tolling hurts those who have to go to and from work. I'm opposed. Oregon resident who works in OR and WA

**ODOT I-205 Toll EA - RECORD #1549 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Mojdeh

**Last Name :** Bahar

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolling should be for the bridges coming into Oregon.  
I live in Tigard and work on Beavercreek road. I cross that bridge twice a day.  
Tolling I205 is going to congest the side streets and neighborhoods.  
There is no public transportation to take in order to avoid I205 tolling area. Do  
Not Create a Toll for I-205 within Oregon

**ODOT I-205 Toll EA - RECORD #1550 DETAIL**

**Submission Date :** 3/27/2023

**First Name :** Betty

**Last Name :** Banks

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** I'm calling about the public toll that you want to put on all Oregon roads. This is for the toll committee. I am opposed to all toll roads in Oregon, these roads have already been paid for. We have a \$3.9 million dollars surplus in the state of Oregon. You can take the money out of that instead of trying to gouge the public for these old falling apart roads. Fix the roads first. Stop trying to gouge the public. My name is \_\_, and I'm opposed to this, I've been at Oregon Resident for 69 years, and I've had enough of this garbage in the state of Oregon. You can take the toll and send it someplace else because I'm a posted this, and so as my husband. Thank you.

**ODOT I-205 Toll EA - RECORD #1551 DETAIL**

**Submission Date :** 3/7/2023  
**First Name :** Bill  
**Last Name :** Barnett  
**Affiliation :**  
**Submission Method :** Web comment form  
**Q3. Comments :** NO TOLLS!!!!!!



**ODOT I-205 Toll EA - RECORD #1552 DETAIL****Submission Date :** 3/24/2023**First Name :** Gary**Last Name :** Barrett**Affiliation :** Self-employed bookkeeper**Submission Method :** Web comment form**Q3. Comments :** I live in the tolling area of I5 and 205 around Canby and Oregon City. I am over 70 years old but still work in this tolling area as a self-employed bookkeeper. Not only is my auto registration higher, but my gas taxes are higher, and property taxes have gone up. I am NOT in favor of taxing business commerce in our section of the state through highway tolls. We are already taxed too much.

<b>ODOT I-205 Toll EA - RECORD #1553 DETAIL</b>
---

**Submission Date :** 3/25/2023

**First Name :** Michael

**Last Name :** Bartell

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Please do not toll our roads as we pay enough in taxes to pay for the new bridge. The state lost 300 million last time trying to design the new interstate bridge. Let the State of Washington pay for the new design.

**ODOT I-205 Toll EA - RECORD #1554 DETAIL****Submission Date :** 4/11/2023**First Name :** Kim**Last Name :** Bass**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I am expressing my concern over the tolls that will be placed on I205. Our family has two kids that attend West Linn highschool. We would have to pay a toll for each of their vehicles to go back and forth each day for school. Our kids are involved in sports and extracurricular activities that involve them going back-and-forth from school in the evenings which again we would be charge for the tolls each time. Our kids have jobs and competitive sports programs they attend in Tualatin year-round, which we will again be paying for tolls each time they need to go back-and-forth. There are three adults in this household who go back-and-forth for work purposes. We will severely be impacted financially on a daily basis with these tolls. There is an additional time burden placed on all members of this family because it will take us longer to get around everywhere based on the traffic backed up on side streets due to people avoiding the tolls. This is a heavy financial burden you are putting on the residence of Clackamas County. The tolls are a deterrent for us to do business nearby including local restaurants and shopping. We will not be going to these locations or these tolls are placed. It's unbelievable what is happening. The other concern is the likely case that are home values will decrease because others will not want to move into the area where their families will be impacted by the tolls on a daily basis. Stop building the tolls!

**ODOT I-205 Toll EA - RECORD #1555 DETAIL**

**Submission Date :** 4/7/2023  
**First Name :** Kim  
**Last Name :** Bass  
**Affiliation :**  
**Submission Method :** Toll program email

**Q3. Comments :** I am writing to express my concern over the tolls that will be placed on 205. Our family are current residents of Oregon city. We have two high school kids that attend West Linn high school. We would have to pay a toll for each of their vehicles to get to school back-and-forth every day. Our kids are involved in sports and extracurricular activities that involve them going back-and-forth from the school in the evenings which we will be charged for the tolls each time. Our kids have jobs and competitive sports programs they attend in Tualatin year round, which we will be paying for the tolls each time they need to go back and fourth. The impact is also with three other adults in this household , who need to use 205 for work purposes, and will severely impact our family financially as well. There is also going to be a time burden placed on all members of this family because it's going to take us longer to get around everywhere based on the traffic backed up on side streets, by people trying to avoid the tolls. This is a heavy financial burden that you are putting on the residents of Clackamas county. This is a deterrent for us to do business nearby, including local restaurants and shopping. We will not be going to these places when these tolls are up and going. It's unbelievable what is happening. This also could likely Decrease the value of our homes, because people will not want to move into the area where their families will be impacted by the tolls on a daily basis. Stop building the tolls!

**ODOT I-205 Toll EA - RECORD #1556 DETAIL****Submission Date :** 4/4/2023**First Name :** Rachel**Last Name :** Bays**Affiliation :****Submission Method :** Web comment form**Q3. Comments :**

I am a mother of a young child in Oregon City. We enjoy walking through the sleepy downtown Oregon City and old West Linn. We have concerns that this tolling project will push not only weekday commuters onto our local side streets but also congest these areas during the weekend. I worry that this increase in traffic will also put a strain onto our aging streets and storm systems that are in these areas. More traffic can mean more debris, oil and other hazards that can possibly clog up our drains and have an even greater impact on the environment around there as well. Not to point fingers, but I believe that ODOT is being selfish about the implementation of this tolling project first in the Oregon City/West Linn area without properly providing support for the surrounding areas. If there is money to put forward in pushing the tolling project, then there should be money to partner with the surrounding municipalities in preparing their infrastructure for the inevitable influx of traffic. Furthermore, many Oregon City residents that I know do not work in the city limits and must travel along I-205 for work. I know that my employer is not going to pay for my tolls to come to and from their place of business. I fear that while Oregon City is currently improving their property values, that this tolling project will make it a less desirable place to live and have a place of business. I implore you to continue your assessments into the impact of not only the surrounding communities of this project but the environmental impacts that it may have as well.

<b>ODOT I-205 Toll EA - RECORD #1557 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Lorena

**Last Name :** Bedsole

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** No. I don't agree with a toll, especially a variable toll. People should not be penalized for the time of day they are required to travel, be it for work or family. We have already paid for the 205 corridor. Any new assessment needs to be voted on at an election.

**ODOT I-205 Toll EA - RECORD #1558 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Chris

**Last Name :** Beko

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** No Tolls!! I pay Taxes in Gladstone my parents live in West Linn who also pay there Taxes. I go there house a lot to help them. Current Residents who live in Clackamas county pay there taxes shouldn't pay for tolls its wrong

**ODOT I-205 Toll EA - RECORD #1559 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Albert

**Last Name :** Belais

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I am supportive of tolling as the best and most fair way to fund needed highway improvements. Those that benefit from the improvements will pay the costs.



**ODOT I-205 Toll EA - RECORD #1560 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Cameron

**Last Name :** Bennett

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolls are the only effective way to manage congestion. Increased highway capacity just results in induced demand over time. Please introduce aggressive tolling measures and scrap megaprojects in order to keep our state out of debt, protect our environment, and move us away from auto dependency.

<b>ODOT I-205 Toll EA - RECORD #1561 DETAIL</b>
---

**Submission Date :** 4/14/2023

**First Name :** Catherine

**Last Name :** Bennett

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I have sent four emails. If you have not read one of them, here is the gist: The Stafford-Willamette area is unsuitable for tolling because of the lack of reasonable alternative routes. There is no national or state highway in the area, only country roads. Toll the fast route only when there are alternative routes. I mentioned how this worked in France. There is no autoroute avec peagé, without alternative highways. When 205 was built it departed from the old route 99E. The two roads begin and end in different places. You could divert traffic on 205 to both 122 and 82nd, parallel roads with highway delineation.

<b>ODOT I-205 Toll EA - RECORD #1563 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Alan

**Last Name :** Benoit

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Yes, tolls are needed in these areas on 205 and I 5. We also need Max to travel from the metro area to Salem. More people need to get out of their private transportation and onto public transportation and more money needs to be spent on the infrastructure. We have homes in the Willamette valley and we bike, drive or take Amtrak between the areas is getting too busy for the traffic.. Thank you,

**ODOT I-205 Toll EA - RECORD #1564 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Shannon

**Last Name :** Berlant

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** No road tolls. Stop wasting our transportation dollars on trains, bicycle lanes and buses. Fix and expand our roadways. You have plenty of tax dollars already.

**ODOT I-205 Toll EA - RECORD #1565 DETAIL****Submission Date :** 3/28/2023**First Name :** Nick**Last Name :** Betsacon**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** Not a question. Just a comment on ODOT's tolling plan because your tolling information pages don't seem to provide for online comment. Not in favor of your tolling plan. It will reduce travel on the affected roadways by creating more driver inconvenience and cost. Trickle-down adverse effects from reduced road traffic such as adverse impact on businesses that rely on citizen freedom of movement at lowest possible travel cost. Gas tax revenue dips, overall revenue generated by depressed economy dips. A chaotic nightmare for no good reason other than ODOT mismanagement of funds and miscalculations over the years. So long as this department and State government as a whole marches lockstep with overdramatized and inaccurate "climate change" messaging, and embraces an alternative green energy future that sits on a house of cards with no viable transition plan from fossil fuels that will guarantee citizens the same or better level of affordable mobility, and unsustainable alternative energy sources (forcing us into more reliance on hostile nations for sourcing), the citizens will just continue to be ill-served by the government that is supposed to serve us as we pursue life, liberty and happiness. Common sense dictates the folly of ODOT's tolling plan. Apparently, the agency has more dollars than sense (pun intended).

**ODOT I-205 Toll EA - RECORD #1567 DETAIL****Submission Date :** 4/4/2023**First Name :** Roger**Last Name :** Bingham**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I am totally against the tolls on I-205. Will ODOT listen to the polling?  
Doubtful.

**ODOT I-205 Toll EA - RECORD #1568 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Pamela

**Last Name :** Blake

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolling will only make the prices of goods and services rise. Traffic will divert into neighborhoods, many in underserved, underrepresented communities. Air quality will suffer, as well as livability. I disagree this is the course to take.

<b>ODOT I-205 Toll EA - RECORD #1569 DETAIL</b>
---

**Submission Date :** 3/7/2023

**First Name :** Dixie

**Last Name :** Bland

**Affiliation :** Retored

**Submission Method :** Web comment form

**Q3. Comments :** I feel if you toll on I-205 that it will move more traffic onto I-5 which is why 205 & 405 were built to begin with. If tolling is going to happen it must be on all freeways as to not shift traffic from one freeway to the next.



<b>ODOT I-205 Toll EA - RECORD #1570 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Cathy

**Last Name :** Blank

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I will be taking an alternate route as I can not afford tolls. You are taxing the low income area however not Stafford/Lake Oswego area. You ask for input from taxpayers in this area, however, ignore their concerns. You received tax dollars from the government and should use this, not tax people who already pay high taxes and are in the low income areas.

**ODOT I-205 Toll EA - RECORD #1571 DETAIL****Submission Date :** 4/4/2023**First Name :** Ben**Last Name :** Blau**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** As a native Oregonian who has spent most of my life in Clackamas County I can't imagine having tolls here. I've traveled to other areas that have tolls and the negative affects they have on our most vulnerable population isn't ok. For my work I drive all around the metro area and my employees do the same. The nightmare this will cause for businesses isn't ok when I watch so many people looking for an excuse to leave here. So please work to find a better solution to pay for this work instead of tolls.

**ODOT I-205 Toll EA - RECORD #1572 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Bruce

**Last Name :** Bohman

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolling as you plan is unfair and just another tax to burden us with. Tolls have always been used to add new lanes or bridges to enhance traffic flow. The current plan is a tax ripoff. What's in it for commuters, people with real jobs, trying to support families. Put up to a vote of the people would get demolished.

**ODOT I-205 Toll EA - RECORD #1573 DETAIL****Submission Date :** 4/4/2023**First Name :** Jeri**Last Name :** Boley**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** I am greatly opposed to tolling. I think you are penalizing people who live in Clackamas County. I do not know why you are taxing people who can least afford it. There are limited ways to get around the tolls, and you are trying to make money on one group of people. With inflation the way it is, people can hardly afford to buy gas and food. Basic utilities have doubled. Rent has gone up by hundreds of dollars, and now you are adding additional costs. You will end up forcing people to quit their jobs because they can't pay tolls. You are being greedy by charging dollars per trip. You truly should be ashamed of yourselves.

**ODOT I-205 Toll EA - RECORD #1574 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** AJ

**Last Name :** Bormann

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** How long will toll be in place? Interesting no hard number is available. Think this is such a great idea, why not put it to the voters? How many people total came up with this idea?FYI. Oregon does not have traffic problems. Don't believe it, go to LA , Las Vegas, the Bay Area.We pay enough taxes in this state. This toll will never end.So sure it is a great idea, put to Oregon Voters.

**ODOT I-205 Toll EA - RECORD #1575 DETAIL****Submission Date :** 3/24/2023**First Name :** Robert**Last Name :** Borschowa**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I've never been a supporter of toll roads in Oregon. If tolling occurs in the areas that have been discussed, it will have little impact on me. It still doesn't get my support even when it impacts others far more than it impacts me. Find a better answer than tolls on an interstate highway.

**ODOT I-205 Toll EA - RECORD #1576 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Stephanie

**Last Name :** Boyce

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** My name is [] Canby, Oregon calling in regards to the urban mobility I-205 toll project. Mine is, I don't want it. Thank you.

<b>ODOT I-205 Toll EA - RECORD #1577 DETAIL</b>
---

**Submission Date :** 4/3/2023

**First Name :** Ryan

**Last Name :** Brady

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I am amazed that you are still moving forward with a plan to add tolling on I205 and have not taken the concerns of the soon-to-be affected neighborhoods. The expensive tolling will force traffic onto small neighborhood streets that are already full at peak hours of the day. Perhaps members of ODOT should vote for a freeway in their own backyard so that they can understand what they are doing to the families in West Linn and Oregon City.



<b>ODOT I-205 Toll EA - RECORD #1578 DETAIL</b>
---

**Submission Date :** 4/4/2023

**First Name :** Paul

**Last Name :** Brady

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Please come up with an alternative means of financing repairs, etc. We do not need, nor can we afford "toll roads"....Do not do this!

**ODOT I-205 Toll EA - RECORD #1579 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Elly

**Last Name :** Branch

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Please reconsider your decision to charge a toll on I-205. Knowing that most people and companies will endeavor to avoid paying money to drive the freeway, have you thought about how many more cars and trucks will speed, clog, and ruin the asphalt on nearby surface streets? Go ahead and raise gas taxes and EV charges if you need more money. Please resist the temptation to make our local streets more dangerous by increasing traffic on them. We are not the East Coast. Keep tolling and salt (when it snows) out of Oregon!! Thank you.

**ODOT I-205 Toll EA - RECORD #1580 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Suzy

**Last Name :** Brander

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Oregon - One of the worst ideas I have heard of. Badly impacts people who can not afford, disincentive to travel here, drives traffic off highway and on to city streets. Its a money grab - pure and simple - nothing else. I see no good in the plan and I don't even drive the highways - so I won't be paying.

**ODOT I-205 Toll EA - RECORD #1581 DETAIL**

**Submission Date :** 3/12/2023

**First Name :** Emily

**Last Name :** Brault

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Living in Oregon City, I'm quite annoyed by the added expense to my commute anywhere I want to go. Work, to see friends, to go shopping in Portland, so many things. I would be more amenable to the idea if the tolls would cease once the specific projects were paid for. Oregonians already pay the 4th highest tax rates in the country, where is all that money going? I lived in Chicago area before I moved here and the toll roads there are just as crowded as they've always been. I am extremely skeptical of the whole "reducing congestion" component of your pitch. Very disheartening and disappointing. I guess we will see. And when it doesn't work, then what?

<b>ODOT I-205 Toll EA - RECORD #1582 DETAIL</b>
---

**Submission Date :** 4/11/2023

**First Name :** Alan

**Last Name :** Brawner

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** The people of Clackamas County and Oregon have said "NO" to any type of tolls on 205. For once listen to the people.  
If this is such a good thing then have the citizens vote on it!

<b>ODOT I-205 Toll EA - RECORD #1583 DETAIL</b>
---

**Submission Date :** 4/4/2023

**First Name :** William

**Last Name :** Bray

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I am against any tolling on 1-205 or the 1-5 Boone Bridge in Wilsonville until the public is allowed to respond and vote on specific plans with clearly defined uses of the revenue. The lack of transparency from ODOT is concerning and seems to be moving forward with no interest on the impact on the citizens adjacent to the highways who due to location near the tolling areas will inordinately be impacted. We are ODOTs constituents and should have a say in what they do.

**ODOT I-205 Toll EA - RECORD #1584 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Robert

**Last Name :** Brinker

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I am opposed to tolling on I-205. I cannot get to work using public transit and the tolls will hit me four times per day. ODOT should find the funds elsewhere: I.e. Biden's infrastructure money.

**ODOT I-205 Toll EA - RECORD #1585 DETAIL****Submission Date :** 4/4/2023**First Name :** Joan**Last Name :** Briscoe**Affiliation :** Springcrest Townhouses**Submission Method :** Web comment form

**Q3. Comments :** There are 20 senior citizens living here at Springcrest. Over the years it is becoming so much more difficult to enter HYW 43 from Pimlico Road as well as entering Pimlico Road from Pimlico Terrace, where we live. We have asked for a stoplight on 43 and Pimlico Road but that has been denied. One of our sons has already been killed on that corner. The noise from traffic just keeps increasing. Tolls on 205 will bring even more traffic than we already have. This is one of the reasons that we are against tolling, not to mention the cost to go over the bridge to get our prescriptions from Riteaide and Walgreens.



**ODOT I-205 Toll EA - RECORD #1586 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Philip

**Last Name :** Brock

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I do not want tolling added to I205. My taxes paid for the construction of the road in the first place. Why should I be taxed again to use the road?

<b>ODOT I-205 Toll EA - RECORD #1587 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Angela

**Last Name :** Brouillette

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** This toll is unfair for the people who live in Oregon City and West Linn. Any time we go anywhere we will have to pay a toll. We already pay an exorbitant amount of fuel taxes as it is. We will not even be able to attend church service without having to pay a toll.

<b>ODOT I-205 Toll EA - RECORD #1588 DETAIL</b>
---

<b>Submission Date :</b>	2/21/2023
<b>First Name :</b>	Robert
<b>Last Name :</b>	Brown
<b>Affiliation :</b>	personal
<b>Submission Method :</b>	Web comment form
<b>Q3. Comments :</b>	i am adamantly against any type of toll anywhere on Oregon highways or side roads.

**ODOT I-205 Toll EA - RECORD #1589 DETAIL**

**Submission Date :** 2/26/2023

**First Name :** Christopher

**Last Name :** Browne

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I do not think that tolling is a good idea. It will tax the people that can least afford it the most. I know that there will be ways for poorer people that cannot afford as much not to pay but not everyone will be able to sign up for it.

**ODOT I-205 Toll EA - RECORD #1590 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** David

**Last Name :** Brownlow

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I live on a fixed income and this is going to be painful and very unfair. I use 205 every day and have been paying taxes for our roads all my adult life and now I will be charged again for the same service. This is not very neighborly, please reconsider

<b>ODOT I-205 Toll EA - RECORD #1592 DETAIL</b>
---

<b>Submission Date :</b>	3/9/2023
<b>First Name :</b>	Ron
<b>Last Name :</b>	Buck
<b>Affiliation :</b>	Transportation Maintenance Division
<b>Submission Method :</b>	Web comment form
<b>Q3. Comments :</b>	No Tolls!

**ODOT I-205 Toll EA - RECORD #1593 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** Sean

**Last Name :** Buckman

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I live in Washington and commute to Oregon, these tolls will cause undue burden on the people of Washington state. As someone who already pays Oregon state taxes for all kinds of thing I don't get to use or enjoy including; education, health and human services, forestry etc, I think your tolls amount to theft from Washington residents. Little of my tax money goes to the only thing that matters to me, your roads. In fact, driving around Portland, you will see just how crappy your roads are because you have failed time and time again to correctly budget. I shouldn't have to pay for your failures, I do not live in Oregon. Your plan to reduce road congestion by tolling will do nothing more than push people onto surface roads. Those same roads that you fail to maintain and are also restricting through traffic on. You all must be nuts to think your tolling plan will work and I for one will not pay a single dime more so you can fail to maintain your roads. The same roads that I don't drive on, considering I won't enter Portland unless it is to drive through as quickly as possible. But here, now I have to pay for the stuff that I don't use and don't want to and that you don't and won't maintain. Go fuck yourselves.

**ODOT I-205 Toll EA - RECORD #1594 DETAIL****Submission Date :** 4/2/2023**First Name :** Kim**Last Name :** Buckmaster**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I am a senior living on a fixed income. With the rise of gas, food, and heating my home the added money for tolls are unacceptable. We all pay the highest taxes in the entire 50 states and it is poor management of those funds that has got us here. My children live in areas that would require me to pay a toll just to go see them. Our government officials need to stop the mismanagement of our tax dollars. You waisted millions of dollars on trying to get a new bridge over the Columbia river and got nothing accomplished. Now you are going to force a bridge with light rail that nobody wants. And now the added tolls. The citizens have the right to vote on all of this just not have it implemented.



**ODOT I-205 Toll EA - RECORD #1595 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Karen

**Last Name :** Burmester

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Unfair. Limited to two projects, hitting only a small segment of users. Expensive to set up and implement going forward. No environmental impact study done to assess results for residential areas, businesses, low income workers, and above all the natural areas affected.

**ODOT I-205 Toll EA - RECORD #1596 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Michael

**Last Name :** Burmester

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I feel that tolling will have negative economic impacts on both individuals and metropolitan businesses. Also, vehicles avoiding tolls will create negative environmental and infrastructure impacts.

**ODOT I-205 Toll EA - RECORD #1597 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Alexis

**Last Name :** Burnell

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** Hi. This is {}, I have a comment for the I-205 project. I am a female business owner in the Willamette area. And I, as well as many of my employees are adamantly against the tolling on I 205. We experience detrimental traffic in front of our business most of the year, and especially during the summer. And that is from people who cut around the freeways to go through our community. And we struggle with it every year and pretty consistently throughout the year and are very, very against the tolling on the freeway. Thank you.

**ODOT I-205 Toll EA - RECORD #1598 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Denne

**Last Name :** Burns

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I am extremely concerned about the proposed tolling of I205. I believe that it will greatly increase traffic on hwy43 causing congestion and an increase in accidents in the area.  
Plus the cost of taking a short trip to Oregon City or Clackamas will really add up in a short period of time.  
The proposed tolling will put increased costs on all of West Linn and Oregon City as we are caught right in the midst of the tolling locations.  
Please reconsider tolling as an option for our roads!

**ODOT I-205 Toll EA - RECORD #1599 DETAIL****Submission Date :** 2/24/2023**First Name :** William**Last Name :** Burt**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** It should be obvious by now to any thinking person that Oregonians DO NOT WANT freeway tolls! After all, ODOT has calculated that Oregon households (families) will pay \$575 on average annually in road tolls. The impact on Oregon's economy will be devastating. The timing of this proposal could not be worse. We're in the midst of a serious recession, and yet ODOT has the temerity to spend more of the taxpayer's hard-earned money to create and operate this draconian tolling system in order to suck more of our money from our pocketbooks. The request for comments is a mere formality, of course. ODOT will proceed with this boondoggle whether Oregonians like it or not. Tolling = economic destruction. If people are concerned about the environment, plant a tree. I have planted many. This proposal is an absolute outrage. When will the taxation end????

**ODOT I-205 Toll EA - RECORD #1600 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Cheree

**Last Name :** Burton

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I think the burden of tolls will unfairly fall onto families within these Oregon City & West Linn communities. Your average 3 kid family will have a parent making multiple trips to/from after school activities or daily errands costing them more by unfairly charging them throughout the day rather than a nominal fee for all to improve our roadways.

<b>ODOT I-205 Toll EA - RECORD #1601 DETAIL</b>
---

<b>Submission Date :</b>	4/5/2023
<b>First Name :</b>	David
<b>Last Name :</b>	Butts
<b>Affiliation :</b>	
<b>Submission Method :</b>	Toll program email

**Q3. Comments :**

I am writing to express concerns in several areas regarding the impact of I-205 tolling as currently envisioned. Include points that could easily lead to lawsuits. I live just off of HWY 43 near Abernathy bridge.

1. Impact on surrounding roads. This has not been adequately considered. There are no real plans to account for this impact because the impact has not been properly assessed and there is no planned adequate funding source identified. Many residents will avoid the expensive tolls by looking for alternative routes. There will be great impact to roads unequipped to handle the burden. I do not see any provisions to mitigate this impact. Tolling = Shifting traffic from I-205 moving the traffic problem to neighborhood roads.

\* Hwy 43 already is in great disrepair and need of upgrades.

\* Pete's mtn roadways are designed for low volume local traffic. Same for Stafford and West Linn area roadways. These roads will fail costing a great deal of money to repair and maintain. I estimate it will cost more to maintain the local roads than the tolling brings in. It is unfair for the citizen's of West Linn, Oregon City and surrounding areas to bear the burden and costs to keep these roads functioning due to the state's I-205 tolling impact.

2. Climate and health impact will be enormous.

\* The additional traffic on area roads will cause great slow downs and jams. This will waste everyone's time.

\* While wasting everyone's time and raising driver anxiety on the roadways, countless cubic meters of excess exhaust will fill the air. This is not only bad for the climate but especially impactful on the local residents who now will have dirtier, unhealthy air to breath. Sensitive citizen's would have a case to bring a lawsuit.

\* Safety - additional traffic on roadways not designed for the volume will undoubtedly result in higher risks leading to more traffic accidents. Again, a potential lawsuit in waiting.

3. Tolling on Abernathy and Tualatin river crossing is extremely unfair to the local residents who are frequent users of I-205 areas. Why should the local residents foot most of the bill for ODOT's tolling revenue. There should be an exemption from tolls for local residents.

\* I, as well as many neighbors, cross from 43 to 99 hardly using any of the total length of 205, only on the road for less than a minute. Yet, I will have to pay a toll 4 times a day.

\* Tolling will negatively impact the value of real estate and home prices in the neighboring communities. Some will be forced to vacate their homes due to added cost of tolling plus the diminished value of their homes.

4. Local residents and businesses will become isolated from necessary services to keep their homes and buildings in good working order and safe to live in. Residents will be forced to pay additional tolls. Businesses will lose customers. The tolling plan is NOT Equitable.

\* Contractors who have to pay the tolls to reach local residents will either not service the area or will pass on the tolls to the local residents. This amounts to a "tax" penalty to the local residents, paying additional tolls for services to reach their homes. Local business will similarly have to pay additional tolls. They will then pass these expenses on to the customers making them uncompetitive with businesses outside the tolling area. These are unfair consequence of the I-205 tolling plan.

5. Funding for road improvements comes from the taxes we already pay. Proper management of these funds will preclude the need to have tolling. The EVs not paying gas tax as a reason to toll is ridiculous. EV's can simply pay a EV registration fee each year they must register the vehicles.

I hope you take my points and the valid concerned inputs from many others to reconsider the tolling concept and improve highways without the need for tolling.



**ODOT I-205 Toll EA - RECORD #1602 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Katie

**Last Name :** Buxton

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Whom it concerns,  
I am writing this email to ask that this toll not be implemented on i205. This proposal is not going to help our already taxed road system. You are correct in that it will alleviate i205 but only because it will force drivers to use other roads to get around. Therefore the traffic will only be redirected and clog up other smaller and already congested roads. The reason why is because people are already taxed to their limit. Oregonians may not have the extra money to purchase crossing over of i205. We as a nation, as a state, and a county are causing hard working families and individuals to make hard decisions about their financials due to higher prices and taxes. If ODOT decides to implement this toll then that is what they will cause individuals and families to do. To choose between paying a toll and feeding their families. This is not what families should have to choose between.  
Thank you

**ODOT I-205 Toll EA - RECORD #1604 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Bruce

**Last Name :** C

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :**

You ask for our view now after the project has already began. I will make this VERY short and sweet.

We already pay road taxes, Use them. I will absolutely avoid using 205 at all cost. If I do use it it will be an imperative situation where finding another route is impossible.

205 and other freeways were originally put in place to alleviate traffic congestion and make more direct access to destinations of public travel. This project will reverse that progress and push that congestion back onto the side streets that won't be able to handle the traffic. It will with me.

**ODOT I-205 Toll EA - RECORD #1605 DETAIL**

**Submission Date :** 3/8/2023

**First Name :** Betty

**Last Name :** Cabine

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** In regards to tolling; my husband and myself are in our 70's and reside in the proposed tolling area. We rely on 205 Abernathy Bridge as well as the proposed Tualatin site of tolling. In our everyday living, we are constantly back and forth these two areas. We rely on these routes for commuting to Dr.'s Dentist, and shopping. There is no bus service, and we certainly cannot ride bikes. There is no bike access even for able bodied individuals. The toll would cause a hardship on us as well as many other residents here in West Linn. We oppose the toll

**ODOT I-205 Toll EA - RECORD #1606 DETAIL****Submission Date :** 4/7/2023**First Name :** Patty**Last Name :** Caldwell**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I understand that we need to address the need for improvement to reduce congestion and safety on 205. I believe that stopping all traffic to pay toll would make a huge slow down that would make safety and congestion worse let alone putting the financial burden and the average working person. Oregon is one of the highest property tax states in America. Why is the money for improvement put on us citizens who are carryig the loads while big corporations are not paying their share if anything! Also, the Federal government under Biden just allocated big money to all states for improved infrastructure! Where is our share going and why can't it be used for this project? Lets pass laws to tax the corporations and business making over a million dollars. We know it failed before because of out of state forces contributing big money on a " propaganda campaign " whick worked. Let's try again! I am totally against the toll on 205.

**ODOT I-205 Toll EA - RECORD #1607 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Ogaenia

**Last Name :** Calkins

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :**

1) Why weren't citizens allowed to vote on this solution

2) ODOT needs to conduct an environmental impact study for the tolling project that will review the impact on the arterial roads that will be flooded by those bypassing the tolled roadways.

3) There is so much controversy surrounding this project it would seem to be in the best interest of all citizens to have an longer review with more citizen input. This was thrust down the citizens throats with no due process of voting.

**ODOT I-205 Toll EA - RECORD #1608 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Donna

**Last Name :** Cancio

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Concerned that it will force traffic into neighborhoods to avoid toll roads, causing increased safety risks for local residents, especially children. Additionally, it has the potential to hurt businesses as it will cost more to simply to go out locally. Those on fixed incomes and/or those already struggling financially may not be able to do what they need to because the cost of getting on 205 will be prohibitive.

<b>ODOT I-205 Toll EA - RECORD #1609 DETAIL</b>
---

**Submission Date :** 4/4/2023

**First Name :** Stacey

**Last Name :** Carlisle

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** What are people who take this route to work supposed to do with tolls they can't afford. Must look for alternative funding source.

<b>ODOT I-205 Toll EA - RECORD #1610 DETAIL</b>
---

**Submission Date :** 4/4/2023

**First Name :** Raegan

**Last Name :** Carpenter

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Dear ODOT, I will keep it simple no tolling if you need more revenue please just raise the gas tax, once again no tolling I am against this.



**ODOT I-205 Toll EA - RECORD #1611 DETAIL****Submission Date :** 4/7/2023**First Name :** Alice**Last Name :** Cascorbi**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** Just a note to say that, as a Clackamas County resident who has lived in several other major cities, tolling is the logical step to mitigate problems on I-205. Without a sales tax, Oregon seems always strapped for cash for local projects. And, as electric vehicles become more popular, gasoline-tax revenue won't be the sure thing it once was. Having people pay as they drive seems a very reasonable thing--and I am a driver. I just don't think tolls are a big deal, especially with the modern technology (EZ Pass and the like).  
Yours cordially,  
Science Writer & Editor

<b>ODOT I-205 Toll EA - RECORD #1612 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Nancy

**Last Name :** Castille

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Please do not install tolls. I vote against the idea.

**ODOT I-205 Toll EA - RECORD #1613 DETAIL****Submission Date :** 4/4/2023**First Name :** Rebecca**Last Name :** Castro**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** Please do not start tolls. Find another way. This will be a burden on the a person's finances and our neighborhoods. It will also increase pedestrian and bicycle injuries and deaths. The communities in which the tolls are implemented first will be greatly impacted. People will choose not to spend their leisure dollars beyond the tolls. Tolls will greatly diminish our quality of life.

**ODOT I-205 Toll EA - RECORD #1614 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Cheri

**Last Name :** Ceridwen

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** The solutions offered in this plan emphasize auto transportation, instead of public transportation options. Building more infrastructure for cars, encourages and prioritizes their use, and the resulting damage to the environment.

**ODOT I-205 Toll EA - RECORD #1616 DETAIL**

**Submission Date :** 4/4/2023  
**First Name :** Jackson  
**Last Name :** Chandler  
**Affiliation :**  
**Submission Method :** Toll program email

**Q3. Comments :** Dear ODOT,  
Are reviewing the environmental assessment of the proposed I-205 tolling project, I believe the findings of that study do not indicate that proposed project will provide a net benefit to the taxpayers of Oregon. I believe further research must be done prior to making a final decision on whether the project moved forward or not. This research should include: 1. Conduct an environmental impact study for the tolling project, which would require additional analysis and more public outreach. 2. Extend the public comment period for an additional 30 days and conduct another public hearing during non-working hours so people who work a standard schedule can participate. Thank you for your understanding. I'm certain you can find other ways to raise funds for the department. Perhaps an efficiency audit of the department could also find places where you could save money internally and use those funds for widening the freeways.

<b>ODOT I-205 Toll EA - RECORD #1617 DETAIL</b>
---

<b>Submission Date :</b>	3/16/2023
<b>First Name :</b>	Gloria
<b>Last Name :</b>	Chang
<b>Affiliation :</b>	
<b>Submission Method :</b>	Toll program email
<b>Q3. Comments :</b>	I adamantly oppose tolling I-205.

**ODOT I-205 Toll EA - RECORD #1618 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Parris

**Last Name :** Chargois

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Gadzooks, this can't be happening! Tolling and slowing down our traffic in the process, not to mention air quality impacts. Don't our planners and leaders realize that these additional fees will create a maze of traffic in our neighborhoods to avoid these unfair tolls. The cost for commuters could be over \$200 per month in additional costs to commute to jobs. That income is taxed also. This crazy idea is counterproductive. Seems a gas tax put the user fee squarely and evenly distributed for actual use and not just on the freeways. Please don't make people hate the oppressive state government by adding another tax that will slow people down, pollute the environment, and levy an unfair tax for commuters, plus hassle residents as they try to squeeze errands into their day. Thanks for reviewing this horrible idea and put the tax where it belongs, at the gas pump. Once people realize gas is too expensive perhaps we will begin investing in less polluting cars like hybrids and electric cars. ODOT should be working on areas at our rest stops that include high speed charging stations. People wouldn't mind paying a user fee for that convenience. Let's be innovators not punishers. Let's help people love their state government. I hope Tina gets a better Web Planner/Director that actually helps citizens who want to use the site, pay fees, submit and receive data. Gosh, what an archaic system with a rare encounter with a human to straighten out easy to solve issues. Thanks for listening

**ODOT I-205 Toll EA - RECORD #1619 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Alecia

**Last Name :** Chew

**Affiliation :** Kaiser Permanente

**Submission Method :** Web comment form

**Q3. Comments :** Tolling 205 is going to cause worse traffice in a already tight spot causing every to get off the freeway and cut side roads that are already full. Do we not pay enough Property tax and Income tax to fix our roads. We have the highest state and property taxes, Fourth in our country, how can you ask us to pay more!!!! I would rather pay a tax on goods. You will make us pay this TOLL and still never fix the roads. We have some of the worst traffic in the US and the toll will only make it worse. NO TO TOLL!!!!!!



**ODOT I-205 Toll EA - RECORD #1620 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Carolyn

**Last Name :** Christoferson

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I am against this toll. I am concerned about the impact this has on Clackamas County Residents, especially those who cannot afford one more tax, the impact the toll will have on businesses and the safety in neighborhoods. This toll will negatively affect those low wage earners trying to get to their jobs. They cannot afford to pay it. In addition, it will negatively affect small businesses and it seems that there is no plan in place to help businesses or residents with the impact that the toll will have.

**ODOT I-205 Toll EA - RECORD #1621 DETAIL****Submission Date :** 4/13/2023**First Name :** Jaslyn**Last Name :** Cincotta**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** The cost for our roads should be paid for by the government and the businesses that benefit from them; not paid by the lowest paid members of society. Tolls pass the cost disproportionately onto our essential workers and working families, instead of evenly distributing them amongst the entire society that benefits from this change.

**ODOT I-205 Toll EA - RECORD #1622 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Lawrence

**Last Name :** Cirotski

**Affiliation :** Legacy Health

**Submission Method :** Web comment form

**Q3. Comments :** I oppose tolling on any existing roadway. I think it is an unfair, inefficient, and unneeded tax increase in an era when Oregon has overcollected 4 billion in taxes. Tax electric cars directly to increase revenue—triple the registration on electric cars, and delete solar and electric car subsidies and rebates.

**ODOT I-205 Toll EA - RECORD #1623 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Lyneil

**Last Name :** Vandermolen

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :**

To Whom it May Concern:

The proposed tolling for bridges that have already supposed to have been paid off indicates that Democrats are fiscally incompetent and expect the public to keep paying unlimited government costs. Stafford road is already a freeway from 5:30 am to 7:00 pm., and we can expect it to be worse when thousands more per day use side roads instead of paying the toll.

The social justice, sliding scale aspect of your rates is also absurd. I have a better idea. Stop wasting money on stupid government programs, such as the DEI office, the Women's Commission, and scores of others. You waste more than you bring in and it's your fault. Don't make it mine. Expecting better government

**ODOT I-205 Toll EA - RECORD #1624 DETAIL****Submission Date :** 3/7/2023**First Name :** Crystal**Last Name :** Clearwater**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** West Linn, Stafford and Oregon City residents should get a pass just like people who live in 2 hr parking zones in Portland get a pass. Or we should be able to buy an inexpensive yearly flat fee pass. Because I will not be able to drive over to Exit 10 or 9 without paying the toll, so I will just stop shopping over there very often. Sometimes I just pop over there. But that kind of driving will stop because of the toll, and that will hurt those businesses.

**ODOT I-205 Toll EA - RECORD #1625 DETAIL**

**Submission Date :** 3/14/2023

**First Name :** Dan

**Last Name :** Cleary

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** i do not want tolling on any roads in Oregon. It is not necessary given all the other resources available at the federal , state , and local level. Thank you

**ODOT I-205 Toll EA - RECORD #1626 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Dan

**Last Name :** Cleary

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I do not want a toll on 205 for any reason. you can use money from the one percent business tax , the war chest there is huge or some other unused tax accumulation. No more taxes for the ordinary worker, they have been over taxed for too long!!

**ODOT I-205 Toll EA - RECORD #1627 DETAIL****Submission Date :** 4/19/2023**First Name :** Kathleen**Last Name :** Cleary**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I don't believe there should be any tolling on I-205 or anywhere else in the State of Oregon. There should be plenty of State resources to complete the project without charge tolls on drivers who use that stretch of I-205. Please reconsider this tolling option,



**ODOT I-205 Toll EA - RECORD #1628 DETAIL****Submission Date :** 4/4/2023**First Name :** Nicholas**Last Name :** Compton**Affiliation :****Submission Method :** Web comment form**Q3. Comments :**

Washingtonians cause congestion on Oregon highways to avoid paying taxes while not being charged to drive on our highways.

The toll bridge being erected on 205 is primarily a money-machine for ODOT, a disguised tax by the government to target Oregonians, rather than Washingtonians, who work in Oregon to avoid taxes and undoubtedly other reasons. The consequences of this are detrimental to not only commuters, but those who live in West Linn, Gladstone and Clackamas. The traffic created by this will be devastating, slow entry onto highways, blocking those who need to drive on 205 to commute to work. The biggest concern is the effect this will have on the environment, increasing carbon emissions due to idling cars.

Gladstone is the closest DMV to West Linn, which many rely on for transportation needs, especially obtaining a drivers license, a required form of identification. Blocking this means forcing people to drive to a further, alternative location. This also affects the DEQ, where drivers get tags for their vehicles, signaling that their registration is up-to-date. Another concern is the traffic through residential zones and possible increase in accidents due to how bad Oregonians and Washingtonians already are at driving, including blocking intersections, texting and driving, speeding and road rage. I find it contradictory that, rather than making highways and roads safer and less anxiety inducing to drive on (especially in portland), ODOT focuses on ways to make more money, especially to "reduce congestion," once again, caused by Washingtonian drivers. Other alternatives to fund construction on 205 are to put toll booths near Washington, forcing those who cause congestion on our highways to pay for improvements, or not placing toll booths on highways, an incredibly dangerous, inconvenient space.

Though I know you will disregard this and will avoid what almost everybody who lives in clackamas county has to say, I urge you to take into account the concerns and suggestions when listening to what others have to say.  
Sincerely,

**ODOT I-205 Toll EA - RECORD #1629 DETAIL****Submission Date :** 2/22/2023**First Name :** Ray**Last Name :** Conklin**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** Please...NO tolling. I could list all the general reasons for it being a bad idea, but they are all well known. The personal reasons for myself and others living in the immediate area to the tolling are obvious. We have to viit medical facilities on the other side of the river fairly often. There are other ways to pay for the cost involved for road/bridge improvement. Please use them.

**ODOT I-205 Toll EA - RECORD #1630 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Ross

**Last Name :** Connor

**Affiliation :** Resident

**Submission Method :** Web comment form

**Q3. Comments :** Tolling 205 is a burden to the people who live in Clackamas and East Portland and use 205 as the thoroughfare to do their local business. In your effort to create some kind of ambiguous utopia you guys are screwing over the people who have no other choice in the matter. Terrible idea. Scrap it.

**ODOT I-205 Toll EA - RECORD #1631 DETAIL**

**Submission Date :** 3/6/2023

**First Name :** Athena

**Last Name :** Contreras

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Adding toll roads between access to basic services on existing roads without other pathways is not about making incidental extra income...it's flat out wrong! You're adding a tax without adding a service. That makes zero sense and impacts families heavily.

**ODOT I-205 Toll EA - RECORD #1632 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Laura

**Last Name :** Cook

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** We should not be tolling the roads as it is an unfair practice as not everyone can afford to pay to go to work, home, school, doctors appointments etc. Also this is going to dump freeway traffic onto local streets which were not meant to handle high volumes of traffic. That is what the freeways are for. Had Oregon and ODOT had the foresight in the 80's to build freeways to accommodate future traffic and make them 4-5 lanes in each direction that would have been better. Taking alternate transportation like a bike to work is not practical, nor safe. Not everyone is for public transportation, and they will not use it. It's not convenient, it's not practical, and with the current state of the greater Portland metro area it is not safe. As far as funding for this project goes, why doesn't ODOT make their books transparent and let the public determine where the money should come from within ODOT's budget. DONT TOLL THE ROADS!!!

**ODOT I-205 Toll EA - RECORD #1633 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Heith

**Last Name :** Cook

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** To whom it concerns,  
I would like to say that I am 100% against tolling our highways as it is a disproportional tax against the poor and will only move traffic to surface streets and increase transportation anger due to heavy traffic and inefficient traffic flows. The Portland metro area has already shown it complete disgust for any vehicles other then bicycles and has created more traffic as their solution which only creates frustration on ALL sides. The messaging is simply wrong and does not achieve any positive outcomes. Taxing our highways is no different and puts a heavy burden those who have the least in our communities. It is not possible for everyone to live in walking, bus or mass transit distance from their work, health care and shopping needs which means they will need to use our highways just to survive and even if it was only a \$1.00 per trip that is HUGE when you have to take that away from putting food on the table or clothing for your kids. Everyone needs to pay for the road regardless of their use to spread out the cost and have every citizen support the state and cities that they live in. ODOT needs to find a more balanced approach that does not HARM the poor and spreads the cost evenly between all citizens to make the burden smaller per citizen.  
Thanks,

**ODOT I-205 Toll EA - RECORD #1634 DETAIL****Submission Date :** 4/4/2023**First Name :** Jennifer**Last Name :** Cook-Buman**Affiliation :** Portland Senior Housing**Submission Method :** Web comment form**Q3. Comments :** the location of the toll points on I-205 seem to be targeting a specific community; West Linn, and Oregon City. If the point is to raise funds, and to pay for upgrade for the purpose of commerce, this misses a lot of trucking traffic that will divert to I-5 and -84 to avoid the tolls, and in turn the side streets will be overloaded with regular traffic avoiding the tolls. It would seem to make better sense to capture the majority of the traffic if the tolling points were moved a bit further apart. perhaps on the I-5/I-205 intersection

**ODOT I-205 Toll EA - RECORD #1635 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** James

**Last Name :** Cooper

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :**

There are 2 lanes going north and 2 lanes going south.  
How is a toll (TAX) going to relieve traffic congestion on a 4 lane freeway??  
This is another money grab by the state for more taxes!  
The citizens of Clackamas county are already getting gouged with \$60.00  
tacked onto our vehicle registration!  
There is no reason for this!  
Oregon State Government needs to examine the poor management of the  
states already existing highway and fuel tax funds!



**ODOT I-205 Toll EA - RECORD #1636 DETAIL****Submission Date :** 2/21/2023**First Name :** Thomas**Last Name :** Copeland**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I regularly use the I-205 bridge to drive from Washington into Portland, or on the way to Bend. I am opposed to tolling on public roads. Around Seattle, we have tolling on the WA-520 bridge and part of I-405 through Bellevue. It would be a mistake to follow this pattern and require user fees on public infrastructure. Find another way to pay for roads.

**ODOT I-205 Toll EA - RECORD #1637 DETAIL**

**Submission Date :** 3/3/2023

**First Name :** Lynn

**Last Name :** Courtney

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I believe voters should make the decision on tolling in Oregon. Also there is no public transportation between Tualatin and Oregon City in order to avoid the tolls. Finally this is a tax that will mainly affect those in the south metro area and will cause side roads to get crowded. It will also force travel to Portland on I-5 to clog up to avoid the tolls. This is a bad idea. Just increase gas tax to evenly spread cost out

**ODOT I-205 Toll EA - RECORD #1638 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Dick & Shirley

**Last Name :** Bailey

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** The citizens of West Linn don't want tolling. The citizens of Clackamas County DON'T want tolling. We will do what ever it takes to bring it to a vote! Find another way to fund the project.

<b>ODOT I-205 Toll EA - RECORD #1639 DETAIL</b>
---

**Submission Date :** 3/17/2023

**First Name :** Kathleen

**Last Name :** Dalton

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I VOTE NO on tolling any Oregon highways except for the Columbia River Crossing between Oregon and Washington and other bridges crossing the Columbia. Oregon residents should be free to travel all Oregon roads within the State at no charge.

**ODOT I-205 Toll EA - RECORD #1640 DETAIL****Submission Date :** 4/4/2023**First Name :** Patricia**Last Name :** Danilson**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** The toll on I205 will be a hardship for many who have to use it for their transportation needs. It will send traffic onto side roads making cities unbelievably congested and 2 lane roads will turn into highways. There has to be a better way. Mass transit is not an option when you want to go from Tualatin to Oregon City. You must rethink this idea to be inclusive of those who live in the area and not just ramming this idea down the throats of those who will be most affected.

**ODOT I-205 Toll EA - RECORD #1641 DETAIL**

**Submission Date :** 4/3/2023

**First Name :** Paula

**Last Name :** D'Annibale

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Approximately 90% of respondents to the Oregon Journal's poll on tolling Do NOT want tolls on our roads. If ODOT is not willing to do the business of Oregon's citizens, the employees therein need to move on. There are so many reasons to prohibit tolling, not the least of which is the cost to lower income workers, who are already stretched to the limit. Make the wealthy pay. Make large industry pay. Do not strap on the backs of already nicke-and-dimed-to-death Oregonians. We've lived in our home for 40 years. We are not of the gentrification movement that has raised our property taxes to an unsustainable rate. We are working class people with deep roots in our community. Please listen to the majority of Oregon's citizenry and drop the move toward tolling taxation. Thank you

**ODOT I-205 Toll EA - RECORD #1642 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Marilyn

**Last Name :** Darrell

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** No toll on 205. This would cause an extreme undue hardship on too many people and would also lead to traffic nightmares on alternative streets due to folks trying to avoid the toll. No toll.

<b>ODOT I-205 Toll EA - RECORD #1643 DETAIL</b>
---

<b>Submission Date :</b>	2/21/2023
<b>First Name :</b>	Randy
<b>Last Name :</b>	Davis
<b>Affiliation :</b>	Davis
<b>Submission Method :</b>	Web comment form
<b>Q3. Comments :</b>	No Tolls!



<b>ODOT I-205 Toll EA - RECORD #1644 DETAIL</b>
---

**Submission Date :** 4/4/2023

**First Name :** Randy

**Last Name :** Davis

**Affiliation :** Davis

**Submission Method :** Web comment form

**Q3. Comments :** I think the toll bridge idea is anti-Oregon idea and I will be forced to use other routes in order not to pay even more taxes. It is an absurd way of raising funds because of poor planning.

**ODOT I-205 Toll EA - RECORD #1645 DETAIL**

**Submission Date :** 4/4/2023  
**First Name :** Gary  
**Last Name :** Davis  
**Affiliation :**  
**Submission Method :** Web comment form  
**Q3. Comments :** don't be like the east coast, you stupids.

**ODOT I-205 Toll EA - RECORD #1646 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Deborah

**Last Name :** Spellecy

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I'm a West Linn resident and your Tolling is shameful!!!  
Everyone should be allowed to VOTE on this....  
NOT just cram it down our throats!!  
STOP RIGHT NOW!!!!  
If it passes fine; if it doesn't.... That's your answer.

**ODOT I-205 Toll EA - RECORD #1647 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Michelle

**Last Name :** Decker

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I am writing in to say I am completely opposed to the Toll on I205 or any where in Oregon.  
It would cause hardship on those that have to use it every day to get back and forth to work, school or day care multiple times a day.  
People are struggling with the cost of living going up so fast since covid it seems crazy to add yet another fee.  
Resident of Clackamas County

**ODOT I-205 Toll EA - RECORD #1648 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Aaron

**Last Name :** Dennis

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** The section you intend to toll is just two blocks from my house. This will create a traffic nightmare where commuters who do not live in West Linn will be using our narrow side streets as well as Borland Road and Willamette Falls Drive to bypass the freeway tolls. In addition this unfairly penalizes local residents who have no other option other than using this section of I205 to get to work, schools, groceries, and other daily activities. At the very least residents who live within the area being tolled should be given passes so that we are not unfairly penalized based solely on where we live.

<b>ODOT I-205 Toll EA - RECORD #1649 DETAIL</b>
---

**Submission Date :** 4/7/2023

**First Name :** Don

**Last Name :** DePamphilis

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolls are regressive, impacting the poor primarily. They will also contribute to congestion on surface streets as people try to avoid the toll roads. Tolls add to commuting costs and make working in Portland less attractive. Public transportation does not run frequently enough to make it a good alternative in many areas. I also wonder what is being done with the money we currently pay in state and local taxes.

**ODOT I-205 Toll EA - RECORD #1650 DETAIL**

**Submission Date :** 4/11/2023

**First Name :** Carol

**Last Name :** Detweiler

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** We are against tolls from West Linn to Oregon City. It will mean many more will be using the small bridge to pass over to Oregon City instead of the highway. It will put more traffic on route 43 through West Linn. Why should this area be charged when others are not? Oregon should be progressive, not burdening our local people with highways tolls!

West Linn resident

**ODOT I-205 Toll EA - RECORD #1651 DETAIL****Submission Date :** 2/24/2023**First Name :** Cindi**Last Name :** Devich**Affiliation :****Submission Method :** Toll program email**Q3. Comments :** As a life-long Oregonian and retiree I demand this tolling project be stopped due to undo financial hardships on Oregonians. It is unconscionable that regulators could even think to implement tolling as people struggle to make ends meet, put food on the table and provide affordable housing for their families. Tolling will only add one more financial hardship that Oregonians can't afford!! Wake up ODOT!!! Do the right thing and stop this project!!!



**ODOT I-205 Toll EA - RECORD #1652 DETAIL**

**Submission Date :** 3/27/2023

**First Name :** Cindi

**Last Name :** Devich

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** As a retired, life-long Oregonian I am vehemently OPPOSED to tolls!! Please hear my voice!!! Do not implement tolls in Oregon as they will NEGATIVELY affect Oregonian families and businesses. Government needs to step back and stop this insane tolling project! Oregonians can't afford tolling, nor can the government!!

**ODOT I-205 Toll EA - RECORD #1653 DETAIL**

**Submission Date :** 3/9/2023

**First Name :** Yvonne

**Last Name :** Dollard

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I believe the current tolling plan will place an increased financial burden on Oregonians - especially since inflation has increased our financial outgo significantly, not to mention the fact that there is very little public transportation available to counter the tolling plan in Clackamas County.

**ODOT I-205 Toll EA - RECORD #1654 DETAIL****Submission Date :** 2/22/2023**First Name :** Robert**Last Name :** Donnan**Affiliation :** Pacificorp**Submission Method :** Web comment form

**Q3. Comments :** I don't think the cost of building the infrastructure to collect tolls will be worth the low results. I feel by actually improving highway flow by completing the Interstate bridge, adding more electronic real time alert signage, and improving flow through Rose Quarter, as well as finding more incentives for interstate freight to travel off peak will have a much more significant affect. I have lived in a state with tolls previously, and instituting them in Oregon will cause more residents and businesses to leave. It is just someone's pipe dream with false hopes. Just fix the bottleneck areas. All these stupid ideas are just turning Oregon into another California. We don't want tolls.

**ODOT I-205 Toll EA - RECORD #1655 DETAIL**

**Submission Date :** 2/22/2023  
**First Name :** Robert  
**Last Name :** Donnan  
**Affiliation :** Pacificorp  
**Submission Method :** Web comment form

**Q3. Comments :** If you are going to ruin Oregon by installing tolls, you should add in a net zero value component. Where drivers who choose non-peak hours, should get a credit. Trucking companies especially. If someone is required to work 9-5 and must commute, they should not pay a toll. But someone who drives during peak hours just to go shopping at Janzen Beach mall, should pay a high toll. These are the incentives and disincentives not being captured by adding tolls. The regular commuters should not be penalized, nor should freight. Unless you are going to add the right incentives for the right reasons, it is not worth building the infrastructure for tolls. Why not just stop cars on the on ramp, and ask them where they are going and prevent them from getting on the highways. Plus we want to incentivize highway travel for cars so that there are less of them in the city streets.

**ODOT I-205 Toll EA - RECORD #1656 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Wendy

**Last Name :** Doran

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** ODOT is proposing a disproportionate number of tolling locations around Clackamas county which adversely impact those who live and work in the area and don't have alternatives or flexibility in their work schedule. People who are working are doing so out of obligation so as not to be a drain in society, and most do not have the flexibility to just come and go to work as they please, so adding toles and having the adasity to suggest they will improve the horrendous traffic on our local freeways is a complete farse as you are aware and nothing short of false propoganda. The impact on the economy who already pay taxes ODOT receives and should be making better use of will be profound. Traffic will not change, you'll only have more people who cannot afford to drive to work on top of skyrocketing gas prices. The fact that you make these decisions without voter decisions, is just unconscionable.

**ODOT I-205 Toll EA - RECORD #1657 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Ryan

**Last Name :** Doss

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** This isn't a good idea. It'll just cause avoidance of use and cause other areas to be congested even more. There needs to be arterial flow throughout the state without penalty. There's more people that use these roads than just who live nearby and it really penalizes a whole community. Please do not add to one more thing to drive people away from the area. The way to solve this problem is to add certain areas where large flows of traffic can exist to bring down the traffic of the whole. The solution has been to just DE-incentivize driving; not taking into account the vast majority of people that have to travel long distances daily. Due to the fact that it's increasingly too expensive to live near the cities, where much of the business still occurs. All this toll will do would add to the frustration, move the problem elsewhere and not really achieve anything other than another tax and revenue scheme.

<b>ODOT I-205 Toll EA - RECORD #1658 DETAIL</b>
---

**Submission Date :** 4/9/2023

**First Name :** Kress

**Last Name :** Drew

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** My name is [] and I am writing to ask you NOT to toll public roads in Oregon in general and specifically NOT to toll the proposed portions of I-205. A toll would cause a huge financial impact for families who travel the roads. It would cause large amounts of congestion on alternative routes of people trying to dodge the toll sections of our public roads. These roads are not designed for large amounts of traffic and will have significant impact on those who live in these areas as well as those who would now frequent these roads. Also, these tolls will harm local businesses and commerce and hurt our local economy. I ask you to please NOT toll our public roads in Oregon and to specifically to NOT toll the proposed portions that are being considered in this plan. Thank you. Please feel free to contact me with any questions you may have. Sincerely,

**ODOT I-205 Toll EA - RECORD #1659 DETAIL**

**Submission Date :** 2/23/2023

**First Name :** G

**Last Name :** DuBois

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I can't understand how this will alleviate congestion. Not everyone can pick their work hours. And people certainly aren't going to stop driving. Where will all this traffic go?  
I know I'll take 99E if I have to go south for any reason. What will tolling accomplish?  
Fund the proposed improvements? Really?  
Highways are necessary for our existence. Why not just raise the gas tax, statewide, to pay for road improvements? Instead of targeting the users of a few bridges, when having these modern roads benefits us all?



**ODOT I-205 Toll EA - RECORD #1660 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Stephen

**Last Name :** Dudley

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :**

1. I can't imagine that tolling will induce people to drive less -- inadequate transportation alternatives do not come close to matching "when and where" people need to go somewhere.

2. I am very concerned that local roads will suddenly go into grid-lock as people seek to avoid a toll. In Lake Oswego, streets like McVey as well as Hwy 43 could see a huge influx....and they are busy streets now. People will suddenly be taking the Milwaukie Expressway and then the Sellwood Bridge to get into south Portland.

3. I am sympathetic to the argument advanced by some that "we've already paid for these roads.....and you want to start charging me again?"

4. Whatever your plans, don't just force them on the residents - put it to a vote and see if your plans are acceptable by a majority....instead of taking the position that "ODOT knows best...and we're just going to do it".

Sincerely,

**ODOT I-205 Toll EA - RECORD #1661 DETAIL****Submission Date :** 3/1/2023**First Name :** Jeremy**Last Name :** Dueck**Affiliation :** NA**Submission Method :** Web comment form

**Q3. Comments :** Hello ODOT, I have lived in Oregon now for 40 years and have traveled the world mostly with the military and under my own volition. I have watched this state change over the years and love what it offers in general. What I've started seeing more recently is a growing disappointment in the direction of the state, a high comparable tax burden on its citizens (compared to the nation) and a decreasing population even with being a highly moved-to location. This is a serious problem. Now add that to the reality that half of Oregon would like to combine with Idaho!! If that doesn't tell you how unhappy people are. If you think that adding tolls to the roads is going to improve things, I fear it will compound issues. I personally drive 205 and I5 for work (not on my commute) and tolls will increase costs for businesses (subsequently consumers like us) along with costs for drivers. It will also divert traffic to side roads. What we need is better use of funds... like gas taxes and already high state taxes. We need to capture taxes from the thousands of WA State residents that don't pay Oregon taxes but consistently drive Oregon rds and work in Oregon and shop in Oregon (with no sales tax). No tolls!

**ODOT I-205 Toll EA - RECORD #1662 DETAIL****Submission Date :** 3/7/2023**First Name :** Brian**Last Name :** Duke**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I commute from Portland to Clackamas County (ConMet on 212). I don't mind tolling if it can help create more ways for me to get to work with a bike. I can ride, but there are gaps in the trails, and they are often dangerous. Have other coworkers to take transit, but it's so infrequent. Would be great for shuttles or vanpools to take folks to the transit stations for Max.

**ODOT I-205 Toll EA - RECORD #1663 DETAIL****Submission Date :** 4/4/2023**First Name :** Donna**Last Name :** Dula**Affiliation :****Submission Method :** Voicemail

**Q3. Comments :** Hi! My name is [] This message is regarding the I-205 toll. I'm a resident of Oregon City. I've lived here for 23 years, home owner, and I'm really upset about this toll. I mean, what does that mean for the people of our town? Do we get a variance so that we're not paying the toll. To get from point A to point B you need to get on 205. And further, what's going to happen for all the people that don't want to pay the toll that skirt around? You know, Oregon City, Gladstone, Clackamas. Because that's what's going to happen, and what kind of impact on our roads on our town is that going to make? It just doesn't seem right, it doesn't seem fair, that this is the area that's targeted. Why aren't you going for I-5 bridge or 205 bridge to Vancouver? I mean, this just doesn't make sense. And I am definitely against it, and I know the majority of my neighbors feel the same way. OK, I hope our voices are actually heard. I really do. Thank you.

**ODOT I-205 Toll EA - RECORD #1664 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Kristine

**Last Name :** Duncan

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** The proposed I-205 tolling of the Abernathy Bridge will have a very negative impact on older, fixed-income widows like myself who rely on delivered goods and who need to cross the river frequently for medical care. I-205 is a FEDERAL interstate highway and as such should be improved with FEDERAL interstate highway dollars. THINK of us before you burden us any further.

**ODOT I-205 Toll EA - RECORD #1665 DETAIL****Submission Date :** 3/7/2023**First Name :** Chris**Last Name :** Durkee**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I'm against the proposed tolling. While I'm in favor of all drivers paying for road maintenance (and tolling would add EV's into the "payer" group), tolling would also adversely impact low and middle income drivers who can't afford EV's and already pay gas taxes. If the object is to spread the maintenance burden to all drivers - why not tax EV's through registration fees so they pay their "fair share".

<b>ODOT I-205 Toll EA - RECORD #1666 DETAIL</b>
---

<b>Submission Date :</b>	4/3/2023
<b>First Name :</b>	Anne
<b>Last Name :</b>	Duston
<b>Affiliation :</b>	
<b>Submission Method :</b>	Toll program email
<b>Q3. Comments :</b>	NO TOLLS! NONE! STOP IT!

**ODOT I-205 Toll EA - RECORD #1667 DETAIL****Submission Date :** 2/22/2023**First Name :** Chris**Last Name :** Dye**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** Tolling this road will cause costs that many people will have a very difficult time paying for. It is rumored that the OC arch bridge will be closed to vehicles as well. This seems more like a way to force people to pay a toll and create even more travel across a toll bridge. I do not support any of this!!!



**ODOT I-205 Toll EA - RECORD #1668 DETAIL**

**Submission Date :** 3/17/2023  
**First Name :** Kimberly  
**Last Name :** Eaton  
**Affiliation :**  
**Submission Method :** Toll program email

**Q3. Comments :**  
Dear ODOT,  
I am a resident of Clackamas county who will be severely impacted by the tolling on I-205. I strongly oppose these tolls.  
ODOT estimates the average resident will pay \$575 per year for these tolls. Because I use these roads up to 8 times per day, my personal cost could exceed \$4000 per year. This is an outrageous sum. Why are my roads being taxes when other roads in Oregon are maintained with my tax dollars?!?  
Further, my home backs to one of the detours that will be used by commuters wishing to dodge these tolls. How will traffic on my road be mitigated? How will increased air pollution be mitigated?  
Finally, the depressive effect these tolls will have on our local economy is punitive.  
This project addresses none of its stated objectives. Equity is adversely impacted. My local community transit times will increase. There is no local transit option to avoid driving. The cost is prohibitive and punitive.  
Please stop these tolls now.

**ODOT I-205 Toll EA - RECORD #1669 DETAIL****Submission Date :** 4/14/2023**First Name :** Sara**Last Name :** Ecker**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** I am a West Linn resident and live very close to where your proposed toll will be located. I feel a toll road in this area would have a tremendous detrimental impact to our small community. To me, a toll road in this area is, in essence, equivalent to robbing Peter to pay Paul; and by Peter, I mean West Linn and the surrounding communities, and by Paul, I mean paying for updates to Oregon's bridges and roads. A toll road would cause undue hardship upon a very small, select community of people. In addition, a toll road will impact not only its citizens, but businesses as well. No one will want to go drive down I-205, if they have to pay to drive there. I greatly fear that Downtown Oregon City businesses, which have done so much to become a welcoming tourist destination, will suddenly experience a great loss of revenue due to the tolls. For a small business, it will be extremely difficult to recover, if they can recover at all. Furthermore, Rosemont and the auxiliary streets will likely be congested and have more wear and tear than they were meant to have. As a native Oregonian and a current resident of West Linn, I am greatly against this toll road. If the committee insists that 205 must be a toll road, then I propose that West Linn, Oregon City, Gladstone and the other impacted residents be able to buy special passes that limit the economic impact of driving within our own community. We live here and won't have a choice to use the toll roads. Forcing working families to add additional fees when economic growth is so slow will be detrimental. The hardest hit will be the poor, as they often have to commute longer distances and have very little wiggle room in their budgets. I greatly recommend a Free or Exempt Toll Pass for citizens who make less than \$70,000. In addition, I recommend citizens of West Linn, Oregon City, Gladstone and the other communities who will be impacted most by a toll road but make over \$70,000, be given a greatly reduced \$52 (\$1 dollar per week) Yearly Toll Pass that will allow them to do their daily business without having to pay exorbitant fees every time they run an errand away across the street. They could buy this with proof of address on their drivers license. I sincerely hope you reconsider building the Toll Road. Thank you for reading my opinion and recommendations as a citizen who will be impacted by this Toll Road.

**ODOT I-205 Toll EA - RECORD #1670 DETAIL****Submission Date :** 3/9/2023**First Name :** Paul**Last Name :** Edgar**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** Let me introduce myself, I am Paul Edgar a retired business owner, consultant, and business automation analyst and 30 years ago I was commuting from my home in Hazel Dell - Salmon Creek Washington to my office in Northwest Portland and I got a first hand view of what congestion looked like and it causes. We had in those days a two lanes bottleneck at Delta Park (I served on the ODOT Committee that eliminated it), and drivers trying to figure out what they could do to navigate through what we saw everyday. Jansen Beach was thriving retail and entertainment location and the middle and right hand lanes crawled with drivers trying to think through all of thee people slowing down, to do something and those who just wanted to get through congestion that existed. I lived this, and saw first hand the I-5 Corridor between Vancouver and Portland with my analyst hat on. So when some Washington State Legislators, SW Washington State Senator and State Representative of whom I knew asked me to become involved in what was at that time called, the I-5 Trade and Transportation Partnership Study of the I-5 and I-205 Corridors between Portland and Vancouver and I jumped in, and that started 30 years study and learning on transportation. A former Head of your Portland FHWA Office, David Cox and I became friends along with Matt Garrett, who was then ODOT Region One Director, and Cam Gilmour who was Director of Transportation for Clackamas County become part of my teachers, as I attempted to learn the craft of Transportation Planning, and if I could move and direct data, i thought I could figure out what needed to be done. In those early periods, I took upper division classes at PSU in transportation and planning. I was invited inside TriMet Planning and Operations. I served on the ODOT Committee that developed what become the Delta Park Widening Project that eliminated the two lane bottleneck that existed and tracked through to the CRC, thou not on that exact committee, thank God as I had a business to run. I retired and moved to Oregon City, shutdown my office and became landlord. However, I got invited to join the Clackamas County Transportation Committee that created the current TSP for Clackamas County. Well publicized, Cam Gilmour wrote on the I-205 Toll Project, that this proposed Tolling of the I-205 Corridor and I-205 Abernethy Bridge was at the wrong place and at the wrong time and it should not happen. The mayor of Oregon City Denyse McGriff, wrote about how her city would be sacrificed on the alter, and just questioned how anyone would allow it. What I hope is that all of you in FHWA will understand is that the only way you can be assured of having the facts correct, is turning back this Environmental Assessment and requiring full Environment Impact Statement, thus gaining full disclosure of the foreseeable diversion impacts and re-routing and what that means, in System Wide implications. Nothing short of that is adequate. The well being of a much larger community than most realize is at stake, businesses, people, local governments, property values, and the economy, please understand.

Thank you in advance,

**ODOT I-205 Toll EA - RECORD #1671 DETAIL****Submission Date :** 4/5/2023**First Name :** Jonathan**Last Name :** Edwards**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I lived in the Puget Sound area when they implemented tolling on I-405 to decrease congestion and provide funding for growth. Zero change in congestion occurred, and no meaningful infrastructure growth has occurred to alleviate the volume. At worst, this will push more traffic to surface streets, creating more pollution from more vehicles idling or through increasing stop-n-go in the populated areas. Even if the infrastructure for mass transit was present to meet most needs, you have an inherent safety issue with the MAX with unfettered/unmonitored access. To even propose mass transit as the best alternative, you need to show that you care about safety and take active steps to provide secure/safe transit. Take a lesson from Japan Rail to see a model of effective safe mass transit.

**ODOT I-205 Toll EA - RECORD #1672 DETAIL**

**Submission Date :** 4/3/2023  
**First Name :** Mark  
**Last Name :** Elliott  
**Affiliation :** Oak Grove Community Council  
**Submission Method :** Web comment form

**Q3. Comments :** I am vice-chair of the Oak Grove Community Council and speaking for myself I am in favor of tolling for the local freeways as a way to pay for needed transportation infrastructure and as a disincentive to drive. With the advent of more fuel-efficient cars and all electric vehicles revenue from gas taxes will continue to decline. Whereas these taxes have been sustainable in the past they will not sustain the needed funds to keep our infrastructure current. Tolling allows those who use the roads the most to pay the most just as they do now with gas taxes. I see that as an equitable way to fund roads. And I support ways to help low-income people to use the roads at a lower cost to them. Even though these potential incentives don't exist for gas taxes, it could be helpful to those who travel alot on the freeways to get to work. It would be best to start tolling all at one time rather than starting with I205 but the pain will be the same either way to those who oppose it.

**ODOT I-205 Toll EA - RECORD #1673 DETAIL****Submission Date :** 4/5/2023**First Name :** Matt**Last Name :** Ellis**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I would like to see the toll idea dropped. We already pay property taxes and income taxes that should more than cover any road projects. DMV and DEQ charges significant fees on all private and company vehicles, of which those fees have increased significantly the last 5 years. Commercial trucks are already charged DOT fees for road use. This is just another way for the government to tax us which is becoming more and more burdensome.

**ODOT I-205 Toll EA - RECORD #1674 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Mitzi

**Last Name :** Elrod

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Letter RE: Toll Fees

Good Afternoon,

So many people are severely suffering financially because of Biden's "get used to it" slogan, increase in cost of food and gas, etc., and now you want to put an additional burden on people who are already struggling by slapping them with your toll fees? I have a 27 year old son living at home with us because he can't afford to live out on his own, it's not because he wouldn't like to. He went to college, is making just above minimum wage, and he drives from our home on Bull Mountain to Aurora (where he works) and back, every day of the week. That sure isn't going to help him become independent. Think about all the young parents trying to feed their children, supply them with all their needs, just hoping they have enough gas to get them to a job that didn't change in wages just because the whole world is falling apart. Or how about the elderly on fixed income that have no control over their circumstances? Is it worth it? If you think it is, it's most likely because YOU are not suffering any of the consequences of your decision to enable this, and during, of all things, such unimaginably difficult times for so many people. If you're middle aged like me, think back to when you first got married and had kids and how you tried to make ends meet. Times that by 100% today. Please reconsider and at LEAST postpone this until our economy stabilizes again. Thank you for listening

**ODOT I-205 Toll EA - RECORD #1675 DETAIL**

**Submission Date :** 3/11/2023  
**First Name :** Tracy  
**Last Name :** Emmerson  
**Affiliation :** N/A  
**Submission Method :** Web comment form

**Q3. Comments :** Addressed to the committee, I don't envy the positions you are facing with trying to come up with a solution to solve the problem of needing to raise funds. However the proposed toll on I-205 for this small section of Highway through West Linn is totally unfair. It's wrong to punish this small, sleepy pocked community with the burden of this toll. Our side streets paralleling the freeway are already backed up from 3PM - 6PM, because commuters are trying to cut the back up on the Highway. Now, if you add to toll to drive that stretchy, there is No Doubt that it will compound the overflow on our streets. Willamette Falls Drive, that is used for this Highway bypass is a street that I and many others live off of. It is our neighborhood street that we take walks on, walk our dogs on, walk with our children down to Fields Bridge park, to play or learn to ride bikes. Further east on Willamette Falls Drive and now you're in the Historic Willamette Main Street Area and it is Bumper-to-Bumper. So much traffic that it is unsafe for kids and adults to walk our part of town. The commuters driving through at that time of day have nothing vested in our community, it's just a shortcut for them to skip the traffic on the Highway and with you imposing a toll it will only make it worse. Like I said in the beginning, I don't envy your position to come up with a solution. But Wrong is Wrong and this is totally unfair to our small city to have to carry this load for everyone else.  
Thank you for listening,



**ODOT I-205 Toll EA - RECORD #1676 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Christa

**Last Name :** Engle

**Affiliation :** LO Resident

**Submission Method :** Web comment form

**Q3. Comments :** Doesn't seem like the controlling agency has provided the public with enough proof that the tolling project will provide a public benefit, versus a money grab that will last forever and always go up in cost to the user.

**ODOT I-205 Toll EA - RECORD #1677 DETAIL**

**Submission Date :** 3/3/2023

**First Name :** Barbara

**Last Name :** Erlich

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** We pay high gas taxes and should be allowed the freedom to drive our own freeways and roads.  
Why would you toll inside Oregon when you need to put the tolls on the bridges between Oregon and Washington?  
The drivers who drive between the two states are adding to the bottlenecks in traffic.  
Washington drivers come to Oregon to work and shop. In Oregon they escape paying tax on purchases and what benefit is that to Oregon? The money they save by shopping in Oregon could be subsidized by charging them tolls.  
Don't force neighborhoods to deal with the people who wish to avoid tolls. It is only going to cause more damage to neighborhood streets, back up traffic and create areas which are no longer safe for residents.  
The tolls could help pay for the expansion of light rail between the two states.  
Think ahead.  
Thank you

**ODOT I-205 Toll EA - RECORD #1678 DETAIL****Submission Date :** 3/9/2023**First Name :** Thomas**Last Name :** Eskridge**Affiliation :** self**Submission Method :** Web comment form**Q3. Comments :** Tolls are traditionally to pay for projects such as roads and bridges. The roads you are wanting to toll have been paid for. This seems like just another scheme to strip money from the public!

**ODOT I-205 Toll EA - RECORD #1679 DETAIL****Submission Date :** 4/14/2023**First Name :** Heather**Last Name :** Evans**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** I am writing as a 40yr plus resident of West Linn who is both saddened and angry about the effects of tolling on Oregon citizens and the City of West Linn in particular. Tolling is an imperfect solution to ODOT's search for revenue. Trust me...in these days...we are all searching for ADDITIONAL REVENUE. It is not well thought out and puts the burden on people that are already facing crowded and unsafe roads. I travel along Stafford Road and Rosemont Road in West Linn and I already feel that I am in danger. Additional traffic will make these roads a burial ground for many. Your arrogance and lack of published ways of lessening the effect in this area is AMAZING. Do you have plans of mitigating the problems...where are they? I read the cockeyed report that we could use mass transit, change job schedules etc. which you have since deleted. Did you do any research, what do you know about this area???? Who wrote this??? I think it would be far more fair to get income from an annual tax on all Oregonians rather than tolling. Taxes would be based on income. This would be way more equitable. Tolling is NOT THE answer. You are hurting commerce, working people, and of course the residents of these areas. Looking ahead...with the decrease of gasoline taxes, the failure of public transport (which has become rife with crime and citizen mistrust)...you will need to come up with ideas in the future that are fair. This is NOT ...it is a knee jerk response. Also, you need to change the ODOT spokesman that we see in the media. Your spokesman is like a barker at a fair who also dabbled a bit in the theater. Overly dramatic, excitable, and short on the true facts. Wake up ODOT. This state is getting a NOT SO NICE place to live and we need better from our officials.

**ODOT I-205 Toll EA - RECORD #1680 DETAIL****Submission Date :** 3/9/2023**First Name :** Jennifer**Last Name :** Feerer**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I am very saddened by this, its going to put more financial stress on families who are already struggling. Its unfortunate because that is the only way for most people to get to work and most of us have to work out of our home area. I am sure at least one of my family members would have to quite her job because she already makes so little and will not be able to pay the toll to get to work 4 days a week. :(

**ODOT I-205 Toll EA - RECORD #1681 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Aaron

**Last Name :** Fellis

**Affiliation :** Resident

**Submission Method :** Web comment form

**Q3. Comments :** Seems a very biased plan that impacts residents that are more dependent on 205 than those that can easily alternate commutes on 5/84 vs 205. Also may push some highway traffic into local residents insanely increasing surface street traffic. Concerned that method of rolling could be cumbersome, expensive and further cause traffic delays and back up. No clear "exit strategy" based on milestones or of cost of targeted projects go beyond initial estimates.

**ODOT I-205 Toll EA - RECORD #1682 DETAIL****Submission Date :** 4/10/2023**First Name :** Toni**Last Name :** Fields**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I don't see how this is going to make the traffic less congested. I drive this highway to and from work every day. Even if I take the side roads home they are also packed and congested. All you are doing is making the side roads more congested and more wrecks on them. The only thing is I have to still go over the bridge at Wilsonville to get home. The problem I see is that the only way you are going to get rid of the traffic is to add more mass transit down I-5 to Salem and to widen the road to a 5 lane like in Seattle. I really think you are make a much more mess with a toll road. I used to live in a city with a toll road and it did no good to keep the traffic moving on the toll and on the side streets. Both were still a mess. I moved back to Oregon to get away from the toll road mess.

**ODOT I-205 Toll EA - RECORD #1683 DETAIL**

**Submission Date :** 4/11/2023

**First Name :** Linda

**Last Name :** Fields

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Toll bridges put an unfair burden on commuters. The revenue for road maintenance and repairs MUST be the responsibility of ALL Oregonians.....how about Oregon FINALLY establishes a small sales tax!?? WAY OVERDUE!!!!



<b>ODOT I-205 Toll EA - RECORD #1685 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Scott

**Last Name :** Fitzpatrick

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I believe the idea to toll I-205 will be the end to Portland as we know it. I will submit my comments in the appropriate manner through the public comment process.

**ODOT I-205 Toll EA - RECORD #1686 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Corrine

**Last Name :** Flint

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Read your environmental study. The tolls on I205 do NOT benefit Oregonians! DO NOT toll OR roads!!!

**ODOT I-205 Toll EA - RECORD #1687 DETAIL****Submission Date :** 4/5/2023**First Name :** Bob**Last Name :** Forrest**Affiliation :****Submission Method :** Toll program email**Q3. Comments :** To Whom it may concern, I have been a resident of Clackamas County for 32 years and have two children with 4 grandchildren who also reside in CC. We cross the bridge to put our boats in at West Linn, we cross to dine out and go to work. As we pay property taxes, income taxes, federal taxes and some local taxes already. We do not need more incidental fees such as bridge or highway fees. Please don't drive me and my families out.

<b>ODOT I-205 Toll EA - RECORD #1688 DETAIL</b>
---

**Submission Date :** 2/22/2023

**First Name :** Greg

**Last Name :** Forrester

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** If tolls are implemented, could you please use EZ-Pass as the transponder so I don't have to get a separate transponder to visit Oregon. Most states east of the Mississippi River use EZ-Pass to collect tolls and it needs to be nationwide.

**ODOT I-205 Toll EA - RECORD #1689 DETAIL****Submission Date :** 3/7/2023**First Name :** Trey**Last Name :** Forsman**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** Tolls only tax the poor. I have no problem with adding a toll lane for an express way. a pay for a faster lane kind of thing. Great idea but to toll to pay for the toll booth and maintenance is a horrible idea. I thought the government was there to serve the people not for us to serve the government. ODOT use to be source of pride for OR. Quick to solve an issue for its residences but not anymore. Construction on tolls has been disruptive and no thought has been given about how this infringes on public. ODOT just pushing an agenda.

**ODOT I-205 Toll EA - RECORD #1690 DETAIL****Submission Date :** 4/6/2023**First Name :** Marty**Last Name :** Fouch**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** Please don't make Oregon a toll road state. All governments ever want is more and more money. Live within the massive amount of money we already give to you.

**ODOT I-205 Toll EA - RECORD #1691 DETAIL**

**Submission Date :** 3/24/2023

**First Name :** Dave

**Last Name :** Freeman

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** im against tolling and so r all my neighbor's. lets see u want less traffic. if u make it high enough may be but lets say it doesnt work. All roads r paid for. they want to so many more houses then what? up the toll right. this sounds more like greed

**ODOT I-205 Toll EA - RECORD #1692 DETAIL**

**Submission Date :** 4/12/2023  
**First Name :** Rosemarie  
**Last Name :** French  
**Affiliation :**  
**Submission Method :** Toll program email

**Q3. Comments :** To: Toll Road committee, I am concerned about the direction the State of Oregon has taken in the past few years in making Oregon new laws regarding decisions which will ultimately affect each resident in Oregon financially.  
The new toll roads I do understand are needed to assist financially in the cost of constructing the 2 bridges in need of replacement: I-5 & West Linn bridges. Can you begin with tolls on these 2 bridges for now and perhaps add the roadway tolls a few years later? This is a HUGH adjustment for drivers to budget into their weekly income.  
I highly support several emails, news reports aiding to educate the general public on how the toll fees may be collected.  
To come out with offering public comments, after all the toll road plans are in place is frustrating, futilely, discouraging and disappointing. My comments have no effect on this project, and you know this.  
Sincerely,



**ODOT I-205 Toll EA - RECORD #1693 DETAIL****Submission Date :** 4/4/2023**First Name :** sam**Last Name :** Freshner**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** Being from new england I have a long exposure to the traffic issues and items that toll bridges cause to the area. Cities/states believe it will generate revenue but the roadways do not see vast improvement from those funds. The tolls also cause traffic to move to surface streets to avoid the tolls. There is more congestion on the side roads and an increase in accidents and the additional costs that will be associated with them. I live in Multnomah county but work in Clackamas County and right now traffic is already a nightmare on 205. There is not a day that goes by there isn't an issue on the Oregon City Bridge or 205 anywhere from West Linn to Division St. tolls on folks that have already been taxed enough is not a responsible solution to your goals.

**ODOT I-205 Toll EA - RECORD #1694 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Andrew

**Last Name :** Frisby

**Affiliation :** Tolling 205

**Submission Method :** Web comment form

**Q3. Comments :** Tolling 205 will highly effect low income familie. Who are trying to survive pay check to paycheck. Shame on you for doing this mony grubby liberals.

**ODOT I-205 Toll EA - RECORD #1695 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Keith

**Last Name :** Galitz

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I am very cicerone's about the pressure rolling will put on H99 E as. a result of tolling. I believe the State is under estimating the impact on 99 E and communities along the highway!

**ODOT I-205 Toll EA - RECORD #1696 DETAIL****Submission Date :** 4/4/2023**First Name :** Chris**Last Name :** Garibay**Affiliation :****Submission Method :** Web comment form**Q3. Comments :**

I don't like the tolling of any Oregon roads. I don't think it will help traffic congestion, the last pricing I heard of for the toll is concerning. I feel only people making 6 figures will be able to afford driving daily. Not everyone will want to take public transit like last I heard you guys were suggesting. I think it will also cause extreme congestion on side roads, damaging there and cause more possible crashes. My last concern is how the funds will be used. Lately it seems higher ups have been misappropriating funds on big projects and I'd want the public to have full transparency if this project goes forward.

**ODOT I-205 Toll EA - RECORD #1697 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Katherine

**Last Name :** Garoutte-Smith

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** If this were a vote, I would be voting AGAINST. NO TOLLS on interstate freeways. Period.

**ODOT I-205 Toll EA - RECORD #1698 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Charlie

**Last Name :** Gasbarra

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** "Reinvested in Clackamas County" is way to vague and fishy. Exactly were is it going. This is like a blank check for some silly program a board member might "like". Always wanting more money without accountability.

**ODOT I-205 Toll EA - RECORD #1699 DETAIL****Submission Date :** 3/31/2023**First Name :** W.**Last Name :** Gayle**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** This is so very unfair to average citizens of the region. There is no way to reach the opposite side of Portland, or even access Portland without using these routes. Everyone will be forced into congested neighborhoods trying to bypass these tolls. People who work, people with hospital needs, people who run businesses, will all be penalized just trying to live. Another penalty tax on the working poor. I personally will already do almost anything to not travel these roads. However there often is No Choice. Thanks for finding a new way for ruining the Willamette Valley. Unbelievably greedy.

<b>ODOT I-205 Toll EA - RECORD #1700 DETAIL</b>
---

<b>Submission Date :</b>	4/14/2023
<b>First Name :</b>	Jim
<b>Last Name :</b>	Gibbons
<b>Affiliation :</b>	
<b>Submission Method :</b>	Toll program email



### Q3. Comments :

Hello all,

After spending a considerable amount of time looking into the Tolling proposal that has been an emotional topic, I want to make a suggestion based upon a number of hopefully rational thoughts garnered from the hundreds of pages of budget information on the ODOT website. First those thoughts.

The ODOT budget information on the state website shows the ODOT budget in 2019-2019 was just over \$4,000,000,000. The current budget is set for \$6,760,000,000, a 38% increase. That makes it very hard to provide the desired funds without finding additional income sources. The four evident source of income and the amount they provide for the 2 year budget are the vehicle registration (\$450,000,000), the weight per mile (\$850,000,000), the fuels tax (\$1,500,000,000) and the Federal Funds (1,850,000,000). And yes, there are other sources, but these are the big four. It is no surprise that ODOT wants additional ways to get revenue.

My suggestion is to use the programs currently in place with some reasonable adjustments to provide at least an additional \$640,000,000 every two years. By discarding the Tolling Plan and raising the vehicle registration fee for all passenger vehicles by \$200 every two years, that amount would be easy to obtain and would remove the strong opposition to tolling. Other adjustments to the funding areas above could also be made. Of course these numbers can be adjusted to reach the goals of the Department. With 3,200,000 passenger vehicles (a constantly growing number) that renew registration every two years, a simple \$100 per year increase per vehicle would be easily tolerable.

Currently the renewal for a gasoline car plus the county fee adds up to close to \$200 for two years. An all electric vehicle is \$316 and maybe a \$60 county fee. Each really is a bargain. Just \$100 per year for a gas vehicle is a ridiculously low amount. Raising that amount by \$100 per year for the benefits of good transportation would have far less opposition than a tolling fee and be extremely simple to implement, and likely well received.

The reasoning behind this idea saves the expense of constructing tolling gantries or booths and operating a new system which could easily amount to \$100,000,000 in new costs for the areas being considered. Also in the 35 or so states that I have travelled to over my 55 years of driving, all the tolling I have noted had these features:

- 1) None were in an actual metro or populated highway area. That avoided more congestion.
- 2) The Toll road was the actual bypass to take congestion away from the highways and around a city to reduce congestion.
- 3) None put a burden on drivers to seek out local alternate routes to avoid traffic.

The ODOT proposal violates these three principles.

Congestion will not be reduced by variable rate tolling because people need to go to work, get kids to school, go to doctor appointments or attend meetings at definite times. People already travel at less busy highway times for grocery shopping, entertainment, dining, visiting friends and other activities. Many of the areas being looked at for tolling sites offer no alternative routes period. The Boone Bridge in Wilsonville is the only way for traffic to go north or south to Portland or Salem. The other suggested tolling sites are similarly limited for options.

In thinking about others in my position in Clackamas county, I drive only 11,000 miles per year. A toll to get to my important activities now entail about 320 trips per year. That would be 640 tolls at an average of \$2.50 or \$3150 per year. Such amounts would affect businesses that rely upon customers traveling. A business would also have the cost of \$3,000 or more per year per worker just for them to get to work. 10 workers would cause a \$30,000 loss for that business to retain its workers. Pity the larger businesses. Many businesses will fail under this scenario.

Is the legislature bound by actions taken a few years ago to develop a tolling plan, or can that be rescinded, amended or withdrawn? Can the legislature look at the Fuels tax which is going to 40 cents per gallon soon, and make that 1 or 2 cents higher? Then by adjusting the weight per mile amount as well as raising the vehicle registration fee, enough money could easily come in to fund necessary roadway improvements and manage congestion without the very unpopular implementation of tolling stations.

I do hope my comments bring about some critical thinking to solve the unpopular tolling proposal in a common sense, budget conscious way.

**ODOT I-205 Toll EA - RECORD #1701 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Monica

**Last Name :** Gilman

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I think the public would not be so opposed to tolling if it wasn't soooo expensive. I realize the need for change, but the figured the DOT is putting out there is extreme.

**ODOT I-205 Toll EA - RECORD #1702 DETAIL**

**Submission Date :** 4/4/2023  
**First Name :** Mark  
**Last Name :** Goodale  
**Affiliation :** Engineered Products a Pape Company  
**Submission Method :** Toll program email

**Q3. Comments :** OK we pay more than enough taxes in the tri county metro area. We can't afford another tax is what tolling amounts too. I am a single home owner and routinely travel on 205 but will find alternate routes to travel to avoid paying any tolls. These tolls which will expand are not wanted or needed if our government would spend out tax money wisely which they don't. I have worked hard my whole life from a 12 year old kid with a paper route to paying my own way through college with no help at all to owning my own house. I do not make very much money and scrimp and save where I can. With the inflation of everything it very hard to make ends meet. I sure would like to retire soon but can't afford it due to taxes and inflation. NO TOLLS! Use that \$200,000 for the freeways instead of the homeless. My parents taught me you make your bed you sleep in it no matter what. Well I have always done that through thick and thin. The homeless choose to do drugs and alcohol and I am paying for that it's a joke. NO TOLLS.

**ODOT I-205 Toll EA - RECORD #1703 DETAIL****Submission Date :** 3/7/2023**First Name :** Linda**Last Name :** Goodman**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I have reviewed the EA and I found it very disappointing. First, to not even have an alternative that looks at tolling one lane as an option, makes no sense to me. That would generate funds, it would let people choose whether they wanted to spend the extra money to move through traffic faster, you should have at least analyzed it. Also, to say traffic on the side road, especially one that affects me personally will not increase is crazy. People will want to avoid tolls even if going on the freeway is faster so there will be an increase on Highway 43. Your analysis indicated for most of highway 43, there wouldn't be an increase. Not sure how you came up with that, but I don't believe it. The towns of west Linn and Oregon City will be unfairly impacted. If you are going to toll, start with the I-5 bridge or toll the whole interstate so the increased cost hits everyone not so disproportionately as it will be now. I understand the need for more money for road improvements but this approach is not fair. I am opposed to having this short stretch of freeway tolled.

**ODOT I-205 Toll EA - RECORD #1704 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Linda

**Last Name :** Goodman

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** We must protest to the many assumptions made in the tolling Environmental Assessment. We believe there should be an EIS where there would be more in-depth analysis. It was shocking to see there wasn't an alternative that looked at tolling a third lane so people could choose whether they wanted to pay a toll or stay in the non-toll lanes. We also believe the impact on the communities of Lake Oswego, West Linn, and Oregon City has not been thoroughly analyzed. Highway 43 cannot handle anymore traffic and there will be more people using highway 43 to avoid the tolls. We are strongly against the approach ODOT is using including starting tolls before the mitigation has been completed. I hope the least that should be done at this point is moving to an EIS. Thank you,

**ODOT I-205 Toll EA - RECORD #1705 DETAIL**

**Submission Date :** 3/31/2023

**First Name :** Corina

**Last Name :** Goodrich

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** This tolling project seems criminal! Imposing a 4 cent gas tax that everyone pays is a much more equitable solution then penalizing a few to foot the bill on this entire project (although what is being done with the gas tax collected? Shouldn't a portion be used to fund projects like this in the first place?). ODOT shouldn't be allowed to impose tolling without, at least, a vote by the population. Many are going to be greatly affected personally by this as our neighborhoods will become overwhelmingly congested with middle income, fixed income and low income people attempting to avoid these tolls. This will cause more neighborhood accidents and put our citizens, particularly our children, at even a greater risk. This plan does not solve the traffic problem. It won't go away. It just redirects it and will create a financial hardship to many. Has this actually been thought thru carefully? AND this doesn't even begin to speak to the effect tolling will have on contract drivers, ubers/lifts, businesses who deliver services, etc. and the effect it will have on our economy as a whole. Outrageous!

**ODOT I-205 Toll EA - RECORD #1706 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Jennifer

**Last Name :** Gorski

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I am against tolling on I-205 and I-5. I understand the need for another funding source because the gas tax is not supplying necessary funds for road maintenance and improvement. However, I'm against tolling because it will increase traffic on side streets as people will then avoid freeways. I am in favor of adequate research on whether tolling will really decrease congestion on freeways. I have read viewpoints that indicate the models you are using to predict that congestion will be decreased on freeways are flawed. I do not want tolls forced upon us when the majority of citizens are against it. It should be put to a vote. If forced upon us, tolls will just increase and increase over time. It should be part of the money taken in thru taxes from Oregonians. I do think there should be a non-food sales tax and a revamping of property taxes and personal income taxes so OR is a more favorable place to retire. DOT should receive a cut of what is taken in thru collective taxes.



**ODOT I-205 Toll EA - RECORD #1707 DETAIL**

**Submission Date :** 3/14/2023

**First Name :** Michael

**Last Name :** Gowen

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** You need to find more responsible ways of using current funding instead of continuing to take more and more money from the citizens of Oregon. We have had enough of the constant increases in taxes and fees and whatever else you want to call the never ending money grab. No to tolling!

**ODOT I-205 Toll EA - RECORD #1708 DETAIL****Submission Date :** 4/1/2023**First Name :** Melissa**Last Name :** Grace**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I see the tolling begins at Stafford but there is no public transportation to these places. There will be more cyclists on the roads as they seek alternative routes to avoid tolls. This tolling idea needs to END now. This is a safety issue for pedestrians and cyclists.

**ODOT I-205 Toll EA - RECORD #1709 DETAIL**

**Submission Date :** 4/5/2023  
**First Name :** Kathy  
**Last Name :** Grady  
**Affiliation :**  
**Submission Method :** Toll program email

**Q3. Comments :** Dear ODOT,  
As a resident and business owner in downtown Oregon City, we frequently utilize I-205, exits 8, 9 and 10 as well as many of the surrounding feeder roads and streets, for both personal and business reasons. We are extremely concerned about the environmental and financial impact that I-205 tolling will have. Therefore we request that you:

1. Conduct an Environmental Impact Statement (EIS) for the tolling project, which would require additional analysis and more public outreach and community involvement; and
2. Extend the public comment period for an additional 30 days (for a total of 90 days) and conduct another public hearing during non-working hours so people who work a standard work schedule are able to participate.

Thank you for your consideration.

**ODOT I-205 Toll EA - RECORD #1710 DETAIL****Submission Date :** 3/26/2023**First Name :** Hilary**Last Name :** Graff**Affiliation :** 4Petsake Mobile Wellness clinic**Submission Method :** Web comment form**Q3. Comments :**

Hi, I am a low cost mobile vet clinic that serves Oregonians in rural areas as well as the metro area. We go to peoples houses to take care of their pets. We travel up and down i205 daily. If tolls are required we will most likely go out of business or be forced to take surface roads causing more congestion. We can not pass on the cost to our customers since most are also on a limited budget. I am asking to NOT toll the hwys. Thank you.

**ODOT I-205 Toll EA - RECORD #1711 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Julie

**Last Name :** Grantz

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** As a resident of Multnomah County and an employee in Clackamas County, I have looked at the impact this toll would have on me for daily trips to work...With the economy already making it difficult to afford housing, gas, groceries, there isn't room in an already tight budget to afford this too. Also, to think this will increase the usage of public transit instead of driving that too is unrealistic. To take public transit (Bus/Max/Bus) from my house to work it takes approximately 2.25 hours, and to add that to both side of my day of work (10 hours) I am now also losing almost 5 hours of time with my family..this is not sustainable. As for work closer to where you live...that doesn't work for someone who has worked somewhere for 15 plus years, and can't get a new job and make the same amount of money/benefits.The idea of a toll is not going to improve anything other than take money out of hard working residents pockets and put it into the government that already doesn't manage the roads, crime, or other community concerns well.

**ODOT I-205 Toll EA - RECORD #1712 DETAIL****Submission Date :** 4/5/2023**First Name :****Last Name :** Grasshopper**Affiliation :****Submission Method :** Voicemail

**Q3. Comments :** Yes, this message is for the, regarding the I-205 toll project, to the attention of Mandy Putney. And I wanted to provide my comments that I am absolutely against the toll. I actually live in Multnomah County but I travel to church in Clackamas County. And I do not want to have to pay a toll to go to church. And I also don't think it's right that people who have to work and have to pass through that corridor, that they should have to pay a toll every day. Toll is not the answer. You may want to consider something like, developing a lane that is just strictly for carpooling or something like that, two people only and charge them the toll, so they can get to where they want to go faster. But everyone else, we shouldn't have to pay a toll. I hope it doesn't happen. Thank you.

**ODOT I-205 Toll EA - RECORD #1713 DETAIL****Submission Date :** 4/5/2023**First Name :****Last Name :** Grasshopper**Affiliation :****Submission Method :** Voicemail**Q3. Comments :** I'm from Salem, Oregon and this is a bunch of bull. You're gonna make it so we're never going to be able to go to Portland, or Washington or anywhere. And we can't afford to go there any way, or only go there for medical appointments. You're going to make it so we can't go anywhere in our own country, in our own state. This is just a bunch of bull.

**ODOT I-205 Toll EA - RECORD #1714 DETAIL**

**Submission Date :** 4/7/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** Hi this is [], I'm a resident of West Linn. I'm calling for a comment on the I-205 tolling project. I'm sure by now you've already deleted the message. I'm just concerned there's not a lot of input being received on this. You guys are just ignoring the local West Linn residents. We're really concerned about this, it's really gonna impact our lives as we deal with the toll evaders flooding our streets, especially right near the interstate here, as they redirect to the old Arch Bridge. I have to drive across that twice a day minimum for work. And once again twice a week to get my kids down to Oregon City for lessons, for a tutor. I just think it really disproportionately affects those of us who that live right there, who just need to use that one bridge for a moment. We're not using that entire run of I-205. By the time there's upgrades to justify that tolling, I came here from New York, I live back east, I've been on many toll roads that offer multiple lanes, little to no traffic, expedited ways to get around things, and that's not what this does. This barely improves our condition, with one extra lane for less than half a mile and charges a lot of money for it with no other options. I doubt you'll do anything about this, you guys have already decided. It's really disappointing and depressing and it really feels like nobody really cares to listen to people in Oregon anymore, and this is where we're at. So anyways, have a good day. If you want to call me back, my number is [].



**ODOT I-205 Toll EA - RECORD #1715 DETAIL**

**Submission Date :** 4/14/2023

**First Name :**

**Last Name :** Grasshopper

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** I'm calling about the toll road possibility, and I think before it is even implemented it should be put to a vote. And if I was voting without a good explanation why from you all, I would vote no! Let's vote on it.

**ODOT I-205 Toll EA - RECORD #1716 DETAIL****Submission Date :** 4/14/2023**First Name :****Last Name :** Grasshopper**Affiliation :****Submission Method :** Voicemail

**Q3. Comments :** I live in Skyline Ridge in West Linn, and I cannot believe that you guys are trying to push this through without considering what all the extra traffic is gonna be on our streets. My hill is pretty steep and it only has two really good ways to get down, and most involve using 43. And unfortunately right now, since I've moved here in 2018, I have seen it get worse and worse and worse. Now it takes roughly more than half hour to get from Arbor Dr, headed towards 205, and then to get to the Market of Choice, and that's ridiculous. There aren't enough lights, and if you're trying to make a left turn, forget it. I'm not anti-toll per se. However, I have lived in California and New York and other areas where they have tolls, and the thing that they have that Oregon does not is, number one, good train transportation like California has the VAT and BART. I used to take the BART from Sunnyvale to San Francisco every day for work when I lived there, and it was perfect. And the other thing that they have is alternative freeways and ways to get from where you are living to where you're going or to where you work. Oregon has neither of those things. And I think that you people need to work on that problem first before you start trying to toll and get extra money just to try to discourage people from going to work or shopping, because without that extra services and without that good train and options, it's never gonna work.

<b>ODOT I-205 Toll EA - RECORD #1717 DETAIL</b>
---

**Submission Date :** 4/8/2023

**First Name :** John

**Last Name :** Green

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** road is already paid for. don't charge us again. this will not add any more access.

**ODOT I-205 Toll EA - RECORD #1718 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Brian

**Last Name :** Greenwood

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I am 100% against TOLLING 205 or any other highway to raise revenue. If you must raise revenue, additional gas tax would be more equitable and spread cost more evenly.  
Thank you,

**ODOT I-205 Toll EA - RECORD #1719 DETAIL****Submission Date :** 4/4/2023**First Name :** Rachael**Last Name :** Grey**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** We just moved from Oregon City back to Portland. This is a great idea. The tolls will help with congestion and generate revenue for transportation. Plenty of back road options for folks who don't want to do the freeway.

**ODOT I-205 Toll EA - RECORD #1720 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** GR

**Last Name :** Gries

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** No tolls. Bridges are paid for. Spend existing funds wisely.

**ODOT I-205 Toll EA - RECORD #1721 DETAIL**

**Submission Date :** 4/4/2023  
**First Name :** LEO  
**Last Name :** GRONER  
**Affiliation :** West Linn City Council  
**Submission Method :** Web comment form

**Q3. Comments :** Apparently the city of West Linn has been chosen to become a guinea pig for tolling to support Highway improvements. the first stage of tolling begins and ends in West Linn. I have read your Environmental impact statement and I find that it underestimates obvious impacts and dismisses findings as irrelevant. Treating a hundred % traffic increases not needing substantial mitigation is unconscionable. One pedestrian crosswalk as the totality of mitigation is pathetic. Although the financial impact on residents is estimated as 1% of income this is can be only an average that does not address the variability of income and the variability of the use of tolled facilities. Drivers, challenged financially, might well choose to avoid the tolls by diverting to use of the Arch Street Bridge and Willamette Falls Drive. These are routes that are already highly congested. I understand that you are considering time of day adjustments and low income adjustments. I would also propose that you consider frequent toller adjustments that would prevent people who must cross the Willamette at the Abernathy Bridge from paying more than they would for just one Crossing.

**ODOT I-205 Toll EA - RECORD #1722 DETAIL****Submission Date :** 4/4/2023**First Name :** Rhonda**Last Name :** Gropp**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** To those who think they have our best interest in mind. Please first research where ALL tax dollars and Federal funding for HWY maintenance for the last let's say 25 years has vanished too. To start! You feel our best avenue for transportation and the environment was to have electric cars, clean energy you say. Except for the fact to produce that energy you energy, you polite our lands oceans and streams. And don't forget your creating power monopoly. You are creating a triment government. Should not be! Citizens did not vote to give them that power they hold!!! We are TAXED to death in Oregon. Along time ago.. Oregon's motto used to be lovely to visit, but don't stay! For me, I will use side streets and back roads. I will take the long way around. Yep, it will congest other areas such as 99E. Which every year has pot holes the size that will swallow a tire deep enough to bust it or the rim. Why because you get what you pay for. Maybe the companies providing the work should guarantee the work. I ask for funds looked into for the same reason taxpayers and the feds era marked funds to update the Oregon Unemployment systems. I never heard what became of it. 15 and 205 should be 4 to 5 lanes in all Clackamas, Multnomah, Washington and Marion, at least one should be for HOV only all the way and actually managed. Those that carpool should not be punished. I live in Clackamas county and have to work in Downtown . Have you noticed how much gravel laid down during snow storms has not been picked up, All that goes in the sewer system and clogging it, creating yet again more wasteful spending. People fear public transportation still. Some cannot ride due to risk to health. But here you are taking another chunk of my pie. Another piece of my pursuit of happiness. Which quite frankly does not involve living anywhere near public transportation. No one wants to get robbed at knife point, even the bus drivers, OR spit on or cussed at. Why because Oregon is taxed to death!! California has moved up here in Drovers and driven our economy further in the sand With their million dollar equity homes. . How many Native Oregonians have stayed this is not their Oregon anymore. Heck you even have a California based company running Sunrise water in Clackamas county and for the first time ever I won't drink Oregon tap water it's disgusting!! Keep selling out Oregonians. Look at Southern and Eastern Oregonians! That should be your first clue. Id take Idaho and Im not in Eastern Oregon. Even though Roads are your main source of infrastructure to work. Tourism is also hurting. You should add it to plate or tags, and actually use what is already in place. I see people with tags 3- 5 years old. It's a crime. Oh that's right, it's a crime to pull someone over, but not paying taxes you garnish wages. Tags it's low crime. And we don't want to offend anyone. Give me a break!



**ODOT I-205 Toll EA - RECORD #1723 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Jeff

**Last Name :** Grub

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I often go over the 205 bridges from highway 43 to get to Oregon City from Lake Oswego. If you decide to toll them, I will probably just drive through Oregon City, which uses more gas and adds to the traffic in downtown Oregon City. I suggest you do not add tolls to 205.

**ODOT I-205 Toll EA - RECORD #1724 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Zeke

**Last Name :** Guenther

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** As Oregonians, we already pay enough in taxes to fund roads, schools, and public safety - if the money was spent wisely. Tax the Vancouver immigration over the Columbia river. Yes they pay Oregon employment tax, but no property taxes that benefit Oregon's infrastructure (which they gladly use), and they just come over here to buy goods without paying sales tax.

**ODOT I-205 Toll EA - RECORD #1725 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Walt

**Last Name :** Guenther

**Affiliation :** Oak Lodge Library

**Submission Method :** Toll program email

**Q3. Comments :** If major improvements were going to be made to I-205, I would still be against putting up tolls. A third lane is not enough. I will be sure to avoid the tolls any way I can and look forward to slowing everyone else's progress as I zig zag my way through lovely Lake Oswego. Tolls never go away and like taxes always increase.

**ODOT I-205 Toll EA - RECORD #1726 DETAIL****Submission Date :** 3/13/2023**First Name :** Grant**Last Name :** H**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I've lived in Clackamas County for over ten years. A toll will make things significantly harder for people who live here. It will make the neighborhoods more dangerous with more drivers trying to avoid the toll routes. Safety is a big concern of mine, if the toll happens. It will change my driving habits and make it more difficult and much more expensive for me to do my job, which involves a significant amount of driving. It is a slippery slope...start charging tolls will lead to other tolls and increased tolls. Find the money elsewhere, perhaps through taxes, that will be shared by all, and not just target drivers. A toll would be a significantly negative part of living in this area. And once it happens, there's no turning back. It's a terrible idea that will negatively impact a big part of the residents and travelers in this area.

**ODOT I-205 Toll EA - RECORD #1727 DETAIL**

**Submission Date :** 4/3/2023

**First Name :** Pati

**Last Name :** Hall

**Affiliation :** NA

**Submission Method :** Web comment form

**Q3. Comments :** I vote a resounding NO on the tolls. This should be to a vote of the public, not shoved down our throats!! We have a lot of fixed income people that can't afford a toll. This will force drivers who have to use a road to head south, to go in alternate roads to avoid tolls, which means the side streets will be jammed with cars. It's not going to reduce traffic but create a nightmare on side streets. Knowing this state, the costs are already enormous and out of control. None of the dots will be honest with us and it will turn into a pork barrel spending spree. We demand to be able to vote on this!!! We've got unused bike paths and 26 billion in pension debt. NO on tolling! NO!!!

**ODOT I-205 Toll EA - RECORD #1728 DETAIL**

**Submission Date :** 4/18/2023  
**First Name :** Lori  
**Last Name :** Hall  
**Affiliation :** Clackamas Community College  
**Submission Method :** Letter  
**Q3. Comments :** Sent on behalf of President Tim Cook.  
**Attachments :** 20230417\_Letter\_to\_ODOT\_Re.\_Tolling\_on\_I5.pdf (238 kb)

Email: [Oregontolling@odot.oregon.gov](mailto:Oregontolling@odot.oregon.gov)

Mandy Putney  
Oregon Department of Transportation Urban Mobility Office  
355 Capitol Street NE, MS 11  
Salem, OR 97301

Thank you for the opportunity to comment on the I-205 Toll Project Draft Environmental Analysis (EA) published by the Oregon Department of Transportation (ODOT) in February 2023.

Clackamas Community College is proud to have three campuses in Clackamas County - Oregon City, Wilsonville, and Milwaukie. Last year, we served nearly 20,000 students at the college, and we employ nearly 1,000 people.

Community colleges serve students at all education and skill levels, educating students with the greatest barriers to attaining post-secondary education and training. Many of our students experience low income and financial challenges. In our 2022 fall student survey, 50% or more students reported these barriers:

- Work outside of college (73%)
- Difficulty paying for tuition and fees (64%)
- Household finances [rent, bills, groceries] (61%)
- Mental health issues (59%)
- Difficulty paying for books and supplies (57%)
- Family responsibilities/childcare (54%)

As you can see, our students are already struggling to pay for living expenses as well as the cost of higher education. Adding a toll on I-205 will add another barrier that may prevent students from starting, continuing, or completing their education. We often say our students are one flat tire away from having to leave college. We might add: Our students may be one toll away from having to quit their dreams of a better future for themselves and their families.

If the I-205 toll continues to be implemented, I implore you to include community college students in your toll program "to help lessen burdens and negative impacts." Clackamas Community College strives to remove barriers for our students, and I ask that ODOT do the same.

Thank you for your consideration.



Dr. Tim Cook  
President, Clackamas Community College

**ODOT I-205 Toll EA - RECORD #1729 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Dan

**Last Name :** Halverstadt

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Hello, I'm very concerned about the toll proposal on the 205, it would hinder me to get to work in a more timely fashion, as well as the rest of my staff that pays taxes in this county. I believe that it would greatly be a waste of both time and resources that it don't think Oregon has at the moment. Nobody that I have spoken too is about this project is for it as well.



**ODOT I-205 Toll EA - RECORD #1730 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Shelby

**Last Name :** Hampton

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** The proposed toll would place in due cost burden on people who have service and health care jobs and must work in person. I work in healthcare and have to make visits to patients home and sometimes have to cross bridges multiple times in one day

**ODOT I-205 Toll EA - RECORD #1731 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Jerry

**Last Name :** Hansen

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Stop this tolling idea NOW!!! We have not voted on this. This will force me onto side streets to avoid the tolls, and destroy West Linn and Oregon City neighborhood livability.

**ODOT I-205 Toll EA - RECORD #1732 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** P

**Last Name :** Harfst

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** We already pay for our roads with our extremely high income taxes and have for years. All government knows how to do is spend more money not wisely use the money they have already been given. I cannot afford to pay tolls. Once tolls are put in place they are never taken away. Stop throwing my money away. Maybe instead of giving homeless people that come from all over our country to Oregon because we do STUPID things like allow them to put up a tent anywhere, do drugs on our streets (get a clue here - this is why our crime rate is so high!) and now you want to give them \$1000 a month so they can buy more drugs? Are you kidding me? Enlarge our and start helping the working man for a change!

**ODOT I-205 Toll EA - RECORD #1733 DETAIL****Submission Date :** 3/8/2023**First Name :** Justin**Last Name :** Harmon**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I do not support the Oregon Tolling Program. We should not have toll roads in Oregon and the program should be terminated. As an Oregon taxpayer I already pay enough money in my vehicle registration fees and gas tax to pay for road repairs and improvements. Having toll roads will negatively affect working class people that use state highways as transportation to get to and from work. Many people will avoid toll roads and use local roads, which will increase maintenance costs for local governments to maintain roads and deal with increased traffic congestion.

<b>ODOT I-205 Toll EA - RECORD #1734 DETAIL</b>
---

**Submission Date :** 4/16/2023

**First Name :** Gary

**Last Name :** Harris

**Affiliation :** ABATE

**Submission Method :** Web comment form

**Q3. Comments :** Dear ODOT and Oregon State Legislature,  
We the people of Oregon do NOT want tolls in this state! This is the consensus that I get when asking Oregon voters to sign the IP4 petition. I am opposed to tolls being placed/forced on us! We are already taxed beyond reason. Can't you in the government be just a little frugal with budgeting and spending. Quit wasting taxpayer money, PLEASE!

**ODOT I-205 Toll EA - RECORD #1735 DETAIL****Submission Date :** 4/4/2023**First Name :** Joe**Last Name :** Harsany**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I am voicing my opinion of strongly opposing tolling I205 or any other interstate or highway in the metro area. Not only does tolling disproportionately hurt lower income residents, it will burden all of the surface streets and residential areas with significantly more traffic as people try to navigate around tolling areas. Please reconsider the current plan. An alternative to tolling is to determine a way to implement a road use tax for EVs who currently don't contribute any revenue to road maintenance. As more people start driving EVs, this revenue source will become more lucrative.

**ODOT I-205 Toll EA - RECORD #1736 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Brett

**Last Name :** Hartt

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Why are we paying tolls on a road that we already pay for with our gas tax? Go ahead and Toll but I want my gas tax money back. Also you are discriminating against lower income families since they will not be able to use the freeway. Complete government overreach especially since it was voted down by the people of Oregon!

**ODOT I-205 Toll EA - RECORD #1737 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Maria

**Last Name :** Harvey

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** The projection that this bridge toll will solve the road problems for this area is difficult to believe. The amount of traffic that will increase is not. The nonconcrete nature of the environmental report submit make me think the report was written by a Chat bot. The report planned in the future to give low income family a discount without submitting details of the discount and how it would be implemented is an red flag.. Often these plans never come to tuition. I'm concerned that the traffic on the local road is grossly under written. I fell that traffic would back up pass Lake Oswego. In addition, place toll on this bridge could lead to placing tolls on any road construction project. Especially when you start talking about the toll bridge s money maker. What happen to all the money we pay in taxes to keep our roads and bridge build and maintained. Play. Some tools on this bridge is a bad idea.



**ODOT I-205 Toll EA - RECORD #1738 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Wendy

**Last Name :** Hays

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** As a resident of West Linn, I am very concerned about the neighborhood roads being used to avoid the toll. Children and residents will be at risk of this congestion of side roads (Ek Rd. Borland, Rd, Willamette area and 10th street exit) and Gladstone exit. A couple other things I would like to have done: • Conduct an Environmental Impact Statement (EIS) for the tolling project, which would require additional analysis and more public outreach and community involvement; and • Extend the public comment period for an additional 30 days (for a total of 90 days) and conduct another public hearing during non-working hours so people who work a standard work schedule are able to participate. Thank you for the opportunity to share my concerns.

**ODOT I-205 Toll EA - RECORD #1739 DETAIL**

**Submission Date :** 3/8/2023

**First Name :** Cliff

**Last Name :** Heaberlin

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I commute on I-205 daily and am fully supportive of tolling.

<b>ODOT I-205 Toll EA - RECORD #1740 DETAIL</b>
---

**Submission Date :** 4/10/2023

**First Name :** Janet

**Last Name :** Hebdon

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** You're spending our money to take our moeny.

**ODOT I-205 Toll EA - RECORD #1741 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Janet

**Last Name :** Hebdon

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Toll project.....The economy is already soooo bad and now another way to take my money. This idea is ridiculous This is a burden for all but you are killing those already struggling they have to get to work and you're charging them to get there. We will all try to get around the tolls but the best way will be to vote out the guilty.

**ODOT I-205 Toll EA - RECORD #1742 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Kim

**Last Name :** Hebrard

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** No tolls on I205 or any other roadway in this state!

**ODOT I-205 Toll EA - RECORD #1743 DETAIL**

**Submission Date :** 3/12/2023

**First Name :** Lora

**Last Name :** Hecht

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** #1 It is a total tax on workers & #2 creating another bureaucracy and all of the waste that another government agency brings.

[ ], age 78 and still paying considerable taxes for working my entire life with husband still working at age 79.

**ODOT I-205 Toll EA - RECORD #1744 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Dan and Lora

**Last Name :** Hecht

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** We are super taxed already and inflation is already taking a TOLL on all of us. We cross the oregon city bridge almost every weekday and drive highway 43 to get there. Extra toll and extra traffic. The old bridge will be backed up with super stressed drivers. The low income workers from the gardeners, retirement homes, Mary's Woods, to service workers do not live in West Linn or Lake Oswego and must pass over the tolling areas. We all know one more tax or fee or toll leads to more increases. Just to implement and manage creating another bureaucracy is horrific. Stop this nonsense...

**ODOT I-205 Toll EA - RECORD #1745 DETAIL**

**Submission Date :** 4/2/2023

**First Name :** David

**Last Name :** Henry

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I am absolutely against the tolling of I-205 or I-5. It will not reduce traffic and will actually add additional traffic to neighborhoods. It will also add additional financial burden to people trying to get to and from work. Oregon is already one of the most taxed states in the union. Government needs to do more with the money they currently get.



**ODOT I-205 Toll EA - RECORD #1746 DETAIL**

**Submission Date :** 4/8/2023

**First Name :** Debra

**Last Name :** Henry

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I understand the need for the projects that are sited but do not feel that the tolling of I-205 & I-5 are the means to the end. You are asking people like us to pay to visit our family members which sometimes occurs as many as 4 times in a week. That is a significant amount of money. We can not always time these "visits" to non peak hours. Using surface streets, such as crossing via the Ross Island or Sellwood Bridges would increase out travel time significantly, not to mention the effects of gas mileage and increased fuel consumption. I see nothing that holds the government accountable for how these "toll funds" are used other that it has to be an ODOT project. Surely, there is another way to fund these projects.

**ODOT I-205 Toll EA - RECORD #1747 DETAIL**

**Submission Date :** 3/26/2023

**First Name :** John

**Last Name :** Herrmann

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I have been driving in Oregon since 1976. Since 1980, most of my jobs entailed driving daily up to hundred of miles. Ultimately my career and business as a commercial construction sales organization has driving as a primary activity. My business employs 6 other people all but one of whom has driving as a primary feature if tge project. That said, we are not doing commerce by driving. We get from point a to b to then discuss business activity. The materials we sell already get road taxed. There are many layers of tax that we pay as part of doing business, buying fuel, buying tires every few years and all of the associated expenses related to our business activities. We also generate taxes from our purchases, phone use (our second business spend) in as well as all associated business taxes. I believe the tolls proposed are too high. I believe there is already money in the system to provide for some if iur road infrastructure needs. It would seem a simple equation to just tax users. If we, the people want something new and we vote the project in with tolls as part of the funding, then yes, tolls are good. My opposition to the toll as i see it (for existing infrastructure improvement) is because i have no faith in any agency in the state or local government using the money efficiently. I am not confident in the projects that the toll revenue would not be managed by the politics if the day rather than the immediate and long term needs of the people if the state of Oregon. No on tolls

**ODOT I-205 Toll EA - RECORD #1748 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Beverly

**Last Name :** Hess

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Hello. Thank you for the opportunity to comment on the forthcoming toll on the Abernethy Bridge. My concern is that the Arch Bridge will be negatively impacted by the increase of drivers trying to bypass the toll. Are there any plans to protect it from wear and tear, damage, decline? Could it perhaps be turned into a pedestrian bridge, for walkers and bicyclists? Thank you!

**ODOT I-205 Toll EA - RECORD #1749 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Darcie

**Last Name :** Hildreth

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolling roads that have been in place for years is regressive taxation and benefits NO ONE with the exception of the corporate owned construction companies. This ridiculous idea will only cause more harm to those of us who are living on the edge already. It will also harm local small business (which is probably one of the main ideas for this....destroying small business). I purposely shop and bank LOCAL my bank has a branch in West Linn but with this tax I will have to find a new bank so as not to have to pay a toll just to get to the bank. I also shop at a LOCALLY OWNED grocery store in West Linn. They will also lose business from those who, like me, try to shop local. As a fourth generation Oregonian I OPPOSE THIS TAX WITH EVERY FIBER OF MY BEING AND WILL FIGHT IT UNTIL IT IS GONE!

**ODOT I-205 Toll EA - RECORD #1750 DETAIL****Submission Date :** 4/10/2023**First Name :** Sharon**Last Name :** Hill**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** To ODOT I am writing to give my opinion and concerns about the I-205 tolling project. I am totally against it. I know this will put an added burden on citizens, with high inflation and gas prices already we can't afford it. We already have the gas tax, the transit tax, the added registration tax fee. Not only will it put a huge burden on those with lower incomes or fixed incomes, it will put a burden on everyone. Some have to drive it twice a day to get to and home from work. It will also put a burden and extra traffic on side roads for those that can't afford it and are trying to avoid the added fee. This is all a bad idea!! People are really struggling to get by as it is, we can NOT afford another fee. Please listen to the people, we can't afford it.

**ODOT I-205 Toll EA - RECORD #1751 DETAIL**

**Submission Date :** 3/24/2023  
**First Name :** Curtis  
**Last Name :** Hinkle  
**Affiliation :** homeowner  
**Submission Method :** Web comment form

**Q3. Comments :** Sirs, Our family STRONGLY OPPOSE the projected toll on i205. By odots own admission on ALL tolls collected verses ANY, IF ANY traffic reduction, reduced congestion, enviro benefits, and less economic activity Oregonians will be 29 million dollars worse off each year then they are now. 2.20 to 4.00\$ a trip or you kidding me? Residents cant afford 1500 to 2000\$ more a year for this!! Add 5cents to the gas tax, charge evs special rate, use federal funds. The toll doggers and added congestion, not counting business's that will close will be a huge deal, ILL NEVER DRIVE DOWN THERE, please stop this toll project.

**ODOT I-205 Toll EA - RECORD #1752 DETAIL**

**Submission Date :** 3/9/2023

**First Name :** Denise

**Last Name :** Hinkle

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** This has been voted on so many times and the election votes still say NO. The only Tolling should be the bridges that go across the Columbia River. This tolling will cause traffic head aches for people of Oregon City, Lake Oswego, West Linn, Canby, Beaver creek, Molalla, Mulino. 213 will be a mess for the people that do not want to pay tolls and go around it. Metro Says that wont happen and in fact they state it will be better for the cities around the tolls. is say LIES!!!! But yet Metro & ODOT keep insisting on TOLLS. we all ready pay to MANY TAXES as it is. Metro should not have been allowed into Clackamas County. we are being taxed to death by you government. there is no Public Transportation in some areas, for example where I live in Mulino. There is no Bus Transportation, so when the this event starts all areas around the toll do not even have the road structure to handle all the traffic that will trying to go around. Also safety will be an issue for the population due to the roads around will not be updated for the emergencies that will happen. so in other words the INFUSTRUCTURE will no be able to handle this.

**ODOT I-205 Toll EA - RECORD #1753 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Joanne

**Last Name :** Hodor

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** We will never use it. Tolling is an inefficient, confusing way to fund roads. We set our google maps to "no toll roads" and avoid them universally. I'd rather drive a few more miles then deal with them.



**ODOT I-205 Toll EA - RECORD #1754 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Greg

**Last Name :** Hoedl

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** The financial incentives for the state may be attractive for the state. However, the local impact as local residents navigate in their area will present practical and financial inequities. Exempting the local communities from the gainful plan of Metro seems like a reasonable win, win solution in the mitigation of opposition. As a local community citizen, I register my opposition to the locating of tolling on the bridge that spans the divide between West Linn and Oregon City. The remaining historic bridge access was not designed to replace the 205 bridge but will certainly become a choke point in avoidance of the tolls. Perhaps locating the money making scheme at the 205 divide between Oregon and Washington would have been a better choice. Hum?

**ODOT I-205 Toll EA - RECORD #1755 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Gary

**Last Name :** Hoffman

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Hi there, My wife and I both use 205 to get to work and our completely against a toll. We already pay a lot of money in gas, deq, dmv, oregon state tax etc. Having a toll is adding on to what is already an extreme financial burden. If a toll was to be enacted, it should be after the new lanes are provided and only the new lane so that people have the option to bypass the charge. The excuse saying that its to get people off the road at high use times is just ridiculous. you penalize the people working and already supporting this state financially.

**ODOT I-205 Toll EA - RECORD #1756 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** John

**Last Name :** Holbrook

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** As someone who uses this highway everyday and as someone who has seen the failures of ODOT and the state of Oregon, this seems as a money grab and will affect the lower classes who rely on this highway everyday. Doing this project loses the faith of the everyday workers who are already under pressure from inflation.

**ODOT I-205 Toll EA - RECORD #1757 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Stephanie

**Last Name :** Holladay

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Hello -- I am reading the update you just sent about the possible tolls proposed for I-5 including one at the Boone Bridge in Wilsonville. I will share a sentence you included in that update and point out one glaring omission: "We want a future where travelers in and around Portland can count on a safe, predictable trip, anytime of day." You forgot to include a very important word - AFFORDABLE. No one will care whether or not a trip is safe or predictable if they cannot afford to be on the road at that time of day. The lack of affordability will in itself create unpredictability because people will no longer be able to plan on reaching scheduled services or having those services reach them in a predictable manner. Businesses that deliver goods to homes will not want to pay a hefty toll to use a bridge and may delay delivery of things like food, medicines, mail, tutoring, yard care, etc. Businesses you and your family use right now may no longer be there because their employees may be forced to quit if they cannot afford to get to work. Please reconsider this tolling idea as it is bound to put people out of business because commerce around Wilsonville will no longer be affordable. Thank you for considering why you chose to omit the word "affordable".

**ODOT I-205 Toll EA - RECORD #1758 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Julie

**Last Name :** Hollister

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I do not believe that enough thought has been put into this project as to the impact it WILL cause on the local streets in both West Linn and Oregon City. I travel from OC to Lake Oswego daily and it is already a cluster at times and by forcing people to find other means and ways to avoid your Toll (not the peoples toll) you will be creating a hardship on both Business & travelers.  
VOTE NO!!!!!!

**ODOT I-205 Toll EA - RECORD #1759 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Andy

**Last Name :** Holthouse

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** No Tolls Anywhere!Senior Citizen on fixed income.I'll cut through neighborhoods to avoid the tolls as I'm retired and have more time than money.Is it worth it? I say NO!

**ODOT I-205 Toll EA - RECORD #1760 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Andy

**Last Name :** Holthouse

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Why don't you people at ODOT wake up and realize you will be affected by tolls too even though you may live in Salem.  
Everything commercial trucks haul through the toll zones will be taxed and that tax will be passed on to the retailer who then will pass it on to the consumer in the form of higher prices.  
Isn't our food expensive enough?  
Someday you ODOT employees will find yourselves no longer employed by ODOT and you too will suffer due to the inflation this will cause.  
**NO TOLL ROADS IN OREGON!**

**ODOT I-205 Toll EA - RECORD #1761 DETAIL**

**Submission Date :** 4/8/2023

**First Name :** Andy

**Last Name :** Holthouse

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** Hi, this concerns I-205 toll project. I just wanted to give my opinion, for what it's worth. I'm a citizen of Oregon City, and my wife and I have lived here since June of 1996. And we use the I-205 Bridge quite a bit back and forth, even though we're both retired. But we're on social security, and we have doctor appointments and shopping and all kinds of stuff we have to do. And we go Northbound from Oregon City on I-205. We go southbound on I-205 going to Tualatin. So, this is would be an extra expense. We don't need another monthly bill. We don't need it, we don't want it, not necessary. You can get your money for your projects from other sources, from the State and Federal government. President Biden seems to be free with handing out federal funds these days, so send your request to him in Washington, DC. and Congress. Stop trying to get more money from us poor folks. I drive an older car truck, it's 24 years old, I can't afford a new one. I can't afford tolls. My name is {}, I live in Oregon City, and my phone number is {} And, yes, I would like to hear from somebody. Feel free to call anytime, generally speaking, between nine AM and nine PM. Weekdays weekend, doesn't matter.



**ODOT I-205 Toll EA - RECORD #1762 DETAIL**

**Submission Date :** 2/25/2023

**First Name :** Helen

**Last Name :** Holzgrafe

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Please NO TOLLING. This will cause hardship on everyone in the area as well a travelers. I have already mapped out and am practicing my side street bypass routes for the tolls. Everyone I know is doing it. You will drive up street traffic and make congestion worse everywhere but the empty 205 and 5 around Portland. Stop this nonsense. TOLLING is bad for all.

**ODOT I-205 Toll EA - RECORD #1763 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Tabitha

**Last Name :** Hood

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Good day, As a resident of Clackamas County who frequently travels through the portion of proposed tolls, I feel like tolling could cause more harm than good. Tolling a section of highway that has few options for avoiding is clever on the county's part. It would be incredibly expensive, time consuming and inconvenient for drivers, especially freight carriers, to avoid the tolled section. This would not deter people from avoiding it though. People could cut through on Hwy 99 through Canby, which would put a lot of stress and congestion in that area, where accidents are already plentiful. People could also jump over the Hwy 43 bridge and take backroads around the tolls, putting more stress and congestion on Oregon City and the West Linn neighborhoods that people would be cutting through. Businesses would also be facing more administrative hurdles as they would have to process and/or reimburse the toll fees associated with normal business operations, that was not a problem before. This would cause service related businesses to increase their rates to make up for the administrative burden. I encourage you to find a different way to fund the project. Tolling is not an Oregonian solution.

**ODOT I-205 Toll EA - RECORD #1764 DETAIL**

**Submission Date :** 4/11/2023

**First Name :** Sean

**Last Name :** Houghtaling

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** To whom it may concern,  
I am a Clackamas County resident in the City of West Linn.  
I am concerned about the proposed tolling project and impact it will have on increased traffic and congestion in our neighborhoods and local roads.  
As the County has recommended, I support and request that ODOT:  
Conduct an Environmental Impact Statement (EIS) for the tolling project.  
Extend the comment deadline an additional 30 days for other residents to have time to respond with their concerns and questions.  
I would prefer to have no tolls at all, but regardless of that, it is imperative these infrastructure projects do not unduly burden local residents.  
Thank you,

**ODOT I-205 Toll EA - RECORD #1765 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Aaron

**Last Name :** Howard

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** My name is [ ] and I both live in and own a business in West Linn. The proposed tolling on I205 will directly negatively impact both my business and my home life. I ask that you discontinue any plans to add tolling on I205 as it will force many vehicles only already clogged Borland Rd and Willamette Falls Dr.  
Please listen to the people in our community and discontinue plans to toll.

**ODOT I-205 Toll EA - RECORD #1766 DETAIL**

**Submission Date :** 3/25/2023  
**First Name :** Jodie  
**Last Name :** Hull  
**Affiliation :**  
**Submission Method :** Web comment form  
**Q3. Comments :** No tolls in Oregon!

**ODOT I-205 Toll EA - RECORD #1767 DETAIL**

**Submission Date :** 3/2/2023

**First Name :** Donna

**Last Name :** Hunt

**Affiliation :** none

**Submission Method :** Web comment form

**Q3. Comments :** This toll is unfairly affecting local residents. We personally would have a toll to go and visit my husband's parents who are in their 80's. We each live on just opposite sides of the toll. And no, to pay a monthly fee for a permit is not a solution. It will definitely affect my husband's and my decisions about doing business with places on the I-5 side of town if we have to pay a toll to get there as well. This will also cause congestion for Hwy 99 as people will choose to take that route to Salem if this occurs. There is already too much wasteful spending that could be curbed in lieu of a toll.

**ODOT I-205 Toll EA - RECORD #1768 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Lourra

**Last Name :** Imamura

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** This is unacceptable. We already pay enough in taxes that are supposed to cover our road repairs and expansions.

**ODOT I-205 Toll EA - RECORD #1769 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Amy

**Last Name :** Ingham

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I know ODOT has received numerous comments voicing opposition to tolling I-205, I-5 and beyond. The fact that ODOT is not willing to listen or act upon concerns of the communities affected by the immense problems that will be created by tolling is appalling. My concerns are the same as most people who live in the areas affected.

Decreased safety on county and city roadways

Environmental impacts

Massive increase in diversion traffic from I-205 into neighborhoods on roads that are inadequate to accommodate the increased load.

Evaluate & provide funding to cover the cost of repairing those roads experiencing the increase in traffic.

Inadequate plans to reduce negative impacts of the project (known as mitigation measures), and plans to begin tolling before mitigation measures are in place.

Decreased property values

Trying to force residents of Clackamas County to use public transportation instead of driving cars when there is no public transportation available to much of the county's residents.

Answer the question of why this isn't being done first in an area that does have public transit options in place like Hwy 26.

I want ODOT to:

Conduct an Environmental Impact Statement (EIS) for the tolling project, which would require additional analysis and more public outreach and community involvement

Extend the public comment period for an additional 30 days (for a total of 90 days) and conduct another public hearing during non-working hours so people who work a standard work schedule are able to participate.

Provide meaningful answers to the many questions that are currently being diverted, ignored and brushed off.

Thank you.



**ODOT I-205 Toll EA - RECORD #1770 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** J

**Last Name :** J

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** We already pay taxes for our roads. There already is the ORSTT. Adding a toll is double dipping into tax payers dollars for roads that we already pay for. Saying that there is not enough money for road improvements is absurd with the amount of taxes we already pay for.

**ODOT I-205 Toll EA - RECORD #1771 DETAIL**

**Submission Date :** 2/23/2023  
**First Name :** Frank  
**Last Name :** J Perruccio  
**Affiliation :**  
**Submission Method :** Toll program email

**Q3. Comments :** There is nothing fair and equitable about taxation without representation. Tolls are not wanted by the people, so the people will be coming after the jobs of those who insist on ignoring the will of the people. We will demand a vote before Tolls. Tolls may deture some from using the tolled roads, but the last thing they'll do is respond the way you think they will. The people are laser focused on removing you from your jobs. Any reduction in congestion on highways will directly contribute to more congestion on secondary roads. Then you'll have succeeded in angering those people too. They will join the people already coming for your jobs. Some people will decide to leave the workforce. Tax revenue will suffer. Businesses will be forced to close. More revenue lost. The revenue projections that you expect from tolls will never materialize, far from it. You will lose your jobs. Oregonians hate being shafted, we will come for your jobs. The people will do everything we can to make sure that you can't find other jobs in Oregon. There are right ways to go about solving congestion problems, and there are wrong ways. You have chosen the wrong way. Your lack of vision, and the skills needed to solve our congestion problems, without ignoring the will of the people, deems you unqualified to hold the positions that you do. Look at the DC Beltway for reference on how to solve congestion without losing your job. You're welcome, for my doing your jobs for you.

**ODOT I-205 Toll EA - RECORD #1772 DETAIL****Submission Date :** 2/21/2023**First Name :** Kimberly**Last Name :** Jackman**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** As a resident of Oregon for my whole life. We have enough that we pay for as it is trying to make ends meet. This would just put another Financial hardship hanging over my head. I do not agree with this at all and I know others do not agree with it. A lot of the reason for the congestion is due to the fact that we have people moving into Oregon from other states and Oregon has grown from that. Our taxes in Oregon are so high it's unbelievable and the things that we are charged for I think this is a hardship on the residents of Oregon and I do not believe in tolls

**ODOT I-205 Toll EA - RECORD #1773 DETAIL****Submission Date :** 4/14/2023**First Name :** Thomas**Last Name :** James**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** Tolls should be equal for all users. Tolls should help pay for the bridge and road improvements, but once the work is completed the tolls should be kept until the work is paid off, then the tolls should be removed. I have experienced tolls in Denver and Illinois and will support tolls for improvements, such as bridge work and road widening, but do not believe tolls should be used to fund ODOT or regular road maintenance. Again, tolls should be the same for everyone and collected only until the projects are paid off.

**ODOT I-205 Toll EA - RECORD #1774 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** James

**Last Name :** Jenkins

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I do not believe this will have any positive impact to traffic flow. Let's call this what it is, a tax increase or money grab. Nothing more.

**ODOT I-205 Toll EA - RECORD #1775 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** JAMES

**Last Name :** JENKINS

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** The Toll will have no impact to traffic flow! If anything, it will funnel more traffic to the more dangerous I-5 going through Portland. Let's call this what it is, a money grab. Whether the money is needed for highway work or other projects. Let's just call it what it REALLY is, and not what they want us to think.

**ODOT I-205 Toll EA - RECORD #1776 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Jay

**Last Name :** Jewess

**Affiliation :** Concerned Oregon citizen

**Submission Method :** Web comment form

**Q3. Comments :** Prior to implementing this toll project, more should be done to help citizens be provided with alternative means of public transportation, enhanced infrastructure and in building mitigations to reduce the negative impacts of added congestion on local roads.- The location of planned tolling gantries will greatly increase the local traffic and congestion in West Linn and Oregon City. This will severely impact these localities, add pollution to the area, and cause safety issues due to added traffic in residential communities. Alternative locations for tolling gantries should be investigated.- An environmental impact study should be completed prior to this project. The diversion traffic impact (congestion, pollution, wear and tear on local infrastructure) as well as impact to schools (ie. Athey Creek) and communities in the area needs to be analyzed and investigated.- An additional 30 to 60 days should be added to comment period.- As a military veteran retiree, I have to travel to the west side (Tualatin) and downtown Portland for medical appointments and therapy. Living on a fixed income, my family and others in similar situation will be severely impacted financially...there are no alternative transportation means to get to these medical appointments/therapy, If mitigations cannot be put in place, alternative ideas such as providing residents from OC and West Linn should receive a significant discount on tolling. - Additional outreach, engagement and communication should be conducted... current ODOT efforts at outreach have been wholly inadequate.

**ODOT I-205 Toll EA - RECORD #1777 DETAIL**

**Submission Date :** 2/19/2023  
**First Name :** Charles  
**Last Name :** Johnson  
**Affiliation :** Voter  
**Submission Method :** Web comment form

**Q3. Comments :** The Environmental Assessment statement on the ODOT website states that there are 2 alternatives being considered: Build and No Build. It goes on to say that they expect to see a 14 minute time savings at afternoon peak hours and 4 minute time savings at morning peak hours by 2024. With the anticipated construction, I am skeptical, but regardless of that it simply isn't worth it for such little gain: I urge the adoption of the No Build alternative. Furthermore I believe that no system has successfully built its way out of congestion: after the difficulties incurred with the construction of improvements, usage simply expands beyond the new capacity and issues are simply displaced to elsewhere in the system, both on and off the freeways. 217 is a prime example where past projects have proved inadequate to handle eventual growth and the process is now being repeated (and without tolling being considered I might add). The I5 seismic upgrades to the Marquam bridge were accomplished without tolls by the setting of judicious priorities and budgeting. The Abernathy bridge improvements ought to be undertaken in like fashion. As a cautionary example, historically the Mt. Hood freeway project was halted due to opposition (the on- and offramp vestiges off of the Marquam are still there) and all the planning efforts went for naught. What was being touted as necessary and wonderful then never came into existence, and we're still OK. Like other uniquely Oregonian approaches such as no sales tax and not pumping our own gas, the initiation of tolling as a source of revenue can and ought to be discontinued as well, immediately, before more effort and expenditure is expended. Keep our freeways free!



**ODOT I-205 Toll EA - RECORD #1778 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Timothy

**Last Name :** Johnson

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolling Portland freeways is a very stupid idea. I won't use a tolled freeway, I'll use surface streets instead. Oregon taxes are already way too high, we don't need more taxes, we need more efficient and effective government.

**ODOT I-205 Toll EA - RECORD #1779 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Chris

**Last Name :** Jones

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I already paid for that and now you greedy bastards want to rent it back to me? Go fuck yourself!

**ODOT I-205 Toll EA - RECORD #1780 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Judy

**Last Name :** Large

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :**

I live in this area and can tell you from our Hamlet meetings over the years that the side roads like Johnson, Rosemont, Childs and Borland are already crowded during rush hour due to people short cutting to get off 205. Proposed tolling will cause these roads to become very congested with people traveling in speeds way beyond the speed limit. I think more people will use this tactic of cutting off 205 and crowd the side roads. These roads were originally made for farmers and still have tractors and farm equipment on them along with school busses and locals. Tolling will put these people who live here into the congestion and frustration mix. And the speeds will increase. Hello we already have too many accidents on Stafford, Johnson and Childs due to impatient folks. Please reconsider this tolling and really study these side road traffic patterns. I walk daily up on Stafford and on Rosemont along the path and for years have seen speeders. A few years back my neighbor and I would stand up on Stafford by the Bridge where the county had a "your speed is" flashing sign. Approximately 1/3 of folks were going upwards and beyond 50. I'm positive tolling will increase traffic and there will be more accidents and problems as a result of the tolling. Please take time to evaluate these side roads. Not once, or twice but over a few weeks of time at minimum.  
Thank you

**ODOT I-205 Toll EA - RECORD #1781 DETAIL**

**Submission Date :** 4/7/2023

**First Name :**

**Last Name :** Julie.blue05@yahoo.com

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I am very disappointed to hear that ODOT is even considering a possible toll on I-205.  
Families have been struggling to get by long before the pandemic, but since 2020 it has been significantly harder for many more. We know that added costs to day-to-day life affects marginalized residents more than others. I plead for you to take our community into consideration. I work with low income families. This would negatively affect them greatly.

**ODOT I-205 Toll EA - RECORD #1782 DETAIL**

**Submission Date :** 3/7/2023  
**First Name :** William  
**Last Name :** Kaiser  
**Affiliation :**  
**Submission Method :** Web comment form  
**Q3. Comments :** Totally unfair no way

**ODOT I-205 Toll EA - RECORD #1783 DETAIL****Submission Date :** 2/21/2023**First Name :** Michael**Last Name :** Kaplan**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I am against tolling for 2 main reasons. The first is disproportionate impact on those already hard hit by inflation. The 2nd reason is -depending on locations of tolling- the possible cut through traffic to evade tolls in already overburdened neighborhoods such as Lair Hill.

**ODOT I-205 Toll EA - RECORD #1784 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Joan

**Last Name :** Kapowich

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I am submitting a comment about tolling In my opinion it is reasonable to charge tolls to drivers who use the roads. There should be a way for very low income folks to pay a lesser amount. Possibly link it to food stamp eligible folks do that their amount is capped within a year? Drivers should pay costs of roads as should businesses like heavy trucks etc whose use bridges. Thank you for the chance to submit an email opinion.

**ODOT I-205 Toll EA - RECORD #1785 DETAIL****Submission Date :** 4/5/2023**First Name :** Rob**Last Name :** Kappa**Affiliation :****Submission Method :** Voicemail**Q3. Comments :** Yes, my name is [] and I live in Milwaukie, Oregon and if you want my address is [], phone number []. This is about the I-205 tolling. I'm in favor of it, it's going to help pay for some of our roads, they do it in the East Coast, in the mid-west, and we can certainly do it too. So that's my comment. Again, the number is []. Thank you.



**ODOT I-205 Toll EA - RECORD #1786 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Heath

**Last Name :** Karn

**Affiliation :** Private

**Submission Method :** Web comment form

**Q3. Comments :** Installing a Toll on this bridge is outrageous! There is no reason for this, and it will only benefit our corrupt state government while hurting our local tax payers. I 100% disagree with allowing this bridge toll. Toll the bridges crossing state borders first. Leave the locals alone!

**ODOT I-205 Toll EA - RECORD #1787 DETAIL****Submission Date :** 2/26/2023**First Name :** James**Last Name :** Keen**Affiliation :****Submission Method :** Web comment form**Q3. Comments :**

Sirs. I know you have already started the tolling project on I 205 in Oregon City/West Linn. It seems to me that you have already made up your mind the tolling without any opinion of the public. You say the money is going for highway maintainence. I would like to know where all the money has gone from the super high gas tax. It is unfair to do this. Either you get the tolls and do away with the gas tax ore vice versa. We work hard for what we have and this is only for the Metro area. But your minds are made up. It doesn't matter what we say.

**ODOT I-205 Toll EA - RECORD #1788 DETAIL****Submission Date :** 4/20/2023**First Name :** Michael**Last Name :** Kehoe**Affiliation :****Submission Method :** Toll program email**Q3. Comments :** No matter how many articles you publish telling us all how wonderful tolling is, no one believes this crap and 90% of us are against it. This will ruin the neighbors along 205 and will unfairly punish the already financially less fortunate. Take your tolling to Texas or some other state and leave us alone. We've already paid for our freeways! Why should we forced to pay again.

**ODOT I-205 Toll EA - RECORD #1789 DETAIL**

**Submission Date :** 4/11/2023  
**First Name :** Mike & Amy  
**Last Name :** Keller  
**Affiliation :**  
**Submission Method :** Toll program email

**Q3. Comments :** As a resident of Clackamas County, we are deeply concerned about the impact of the proposed project on county residents and businesses.

• **Safety on county and city roadways:**

The roadways in Clackamas County have already seen a major increase of usage, in most cases adding 15 minutes plus to an average commute. By placing a toll on the I-205/Abernethy and Tualatin River bridges, this will force more traffic onto the surrounding/surface streets causing more congestion and stand still traffic. This increases the risk of accidents especially where there is pedestrian/bicycle traffic.

• **Environmental impacts:**

Idling traffic causes more pollution than flowing traffic. Not only will this cause more air pollution in communities/neighborhoods, it will also cause wear and tear on more surface streets that the state, county or city will be responsible for repairing at additional costs that most likely are not available in the allocated budgets.

• **Inadequate plans to reduce negative impacts of the project (known as mitigation measures)**

Small businesses will suffer as the congested roads will not allow potential customers to safely enter or exit parking lots. Tolling will cause havoc on already congested side/surface streets as well as create a safety issue for pedestrians/bicyclists in these areas. This will also effect the employees of such businesses as wages will not reflect the cost of paying this toll just to get to work.

Transportation companies will pass this cost onto consumers, whom have already seen the price of goods (food/household items etc.) increase well over 20% this past couple of years.

• **Plans to begin tolling before mitigation measures are in place:**

As a tax payer, it is alarming that state officials are not operating within a budget. I might be misspoken, however I remember reading somewhere that it is unknown where the funding for this project will come from. It is frustrating to watch time and time again for officials to just spend and expect taxpayers to bail these projects out financially. This is a form of taxation without representation. It happens continually in the State of Oregon (ex. adding an additional \$.50 per gallon of gas for road taxes without a vote).

With the growth Oregon has experienced and is experiencing within certain counties, the tax dollars from developments/property taxes on this new housing, new drivers usage of gas and that tax collected, DMV registration tax on obtaining a drivers license or registration, etc. should be the revenue used to pay for this project.

This proposal by the State is not in the best interest of constituents of Clackamas County.

Resident of Clackamas County

**ODOT I-205 Toll EA - RECORD #1790 DETAIL****Submission Date :** 4/4/2023**First Name :** Kim**Last Name :** Kelley**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** Hello -I understand you are seeking public opinion to earnestly understand impact. Of all the roadways, why would you pick the most congested bridge in SW metro area? Currently this is a pinch point for traffic and even with the "relief" of the Oregon City bridge, the traffic growing and continues to affect livability. As you likely know, the Abernathy bridge is how we cross the river to McLoughlin and back and forth, having a toll on a bridge is most punitive to the local residents. I am asking as a concerned resident for you to complete and EPA impact study and seek opinion longer, this is the first I've heard that the construction is related to toll bridge.

**ODOT I-205 Toll EA - RECORD #1791 DETAIL****Submission Date :** 4/4/2023**First Name :** James**Last Name :** Kelly**Affiliation :** none**Submission Method :** Web comment form**Q3. Comments :** I do not support any type of tolling, ODOT gets it's funding from the state. Our tax dollars already support the state, we don't need to collect more from drivers, you just need to use your existing funding more efficiently. I am against any and all efforts to make drivers pay twice for something they have already funded and that's exactly what this tolling proposal does.

**ODOT I-205 Toll EA - RECORD #1792 DETAIL****Submission Date :** 4/4/2023**First Name :** Kenneth**Last Name :** Kent**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** Adding a toll to an existing freeway in an area that lacks adequate alternate routes is not reasonable. The proposed third lane is already needed on this section of 205 and should not be considered for tolling. A toll makes more sense when new facilities are constructed or when carpool lanes/express lanes are provided, or a significant increase in capacity is provided. A third lane will not add enough capacity. Impacts to surrounding road should be evaluated and should be adequate to handle additional traffic that will result from avoidance of tolls. Many of the surrounding rural road in the vicinity of the project already have safety and capacity issues and there is not funding to improve those roads. We should be encouraging carpooling.

**ODOT I-205 Toll EA - RECORD #1793 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Adam

**Last Name :** Kern

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** The only two spots on the entire map that are going to bleed dry the poor residents of those areas are right next to each other? What about at least trying to spread out the soul sucking toll booths so the burden is not on our shoulders alone?



**ODOT I-205 Toll EA - RECORD #1794 DETAIL**

**Submission Date :** 3/28/2023

**First Name :** Nelle

**Last Name :** Kesterson

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :**

I believe the toll tax is an unreasonable burden to the middle and working class citizens of Oregon. ODOT needs to do better. This is a misguided approach for tax revenue. If this were a reasonable approach then it would be voted on as are so many increased taxes - schools, parks, etc. If ODOT were honest, each toll booth spot would be clearly identified early in planning and this tax would go to vote. Long term tolls are harmful, punitive and wrong. The very wealthy will pay the same toll tax as a struggling working class or over burdened middle class citizens. The poor will receive subsidies. \$575.00 yearly toll tax estimate is pennies to the wealthy but a very real burden to an average citizen. And ODOT is foolishly spending much of this revenue on collecting the toll, not on improvements. I205 will become traffic relief highways for the wealthy after tolls shove so many average drivers down side roads. Of course the wealthy benefit again. The poor have subsidies (and they should) so they can drive down I205 with the rich. ODOT has viable options that are far less punitive to average people and less costly collection costs.

1. Increase the frequency of license tabs to yearly. Tax according to the value of each car slanting increase taxes on the wealthy. This will include taxes for EV cars. The system for collecting is already in place.
2. Increase gas tax. The system for collecting is already in place.

2. Consider the damage studded tires do to our roads and set a discouraging tax on studded tires. I understand the need for revenue. I'm not balking at increased gas taxes or increased license tabs or short term tolls to pay for a specific project. I do agree car pool lanes are appropriate and would support a short term toll on I205 specific to adding car pool lanes to congested sections. I do not think ODOT has anywhere near majority support, but will citizens even be given the chance to vote on ODOT's toll plans?

A very dissatisfied voting citizen.

**ODOT I-205 Toll EA - RECORD #1795 DETAIL**

**Submission Date :** 3/31/2023

**First Name :** Nelle

**Last Name :** Kesterson

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** ODOT staff should read what people are saying about tolls for taxation. Here's a link.  
[https://www.portlandtribune.com/business/graphic-heres-what-portland-tribune-readers-think-of-tolls-in-oregon/article\\_7b3125e8-ca72-11ed-a3e3-23925f4cd7d7.html](https://www.portlandtribune.com/business/graphic-heres-what-portland-tribune-readers-think-of-tolls-in-oregon/article_7b3125e8-ca72-11ed-a3e3-23925f4cd7d7.html)  
Maybe that is why ODOT does not want citizen representation thru a vote on whether to tax by tolls. Like 90% of the people, I don't want tolls, but I am willing to support other taxes to increase revenue for ODOT and road maintenance and improvements.  
Tolls will cause secondary damage to highway 99, highway 213 and many side roads that will make driving, walking and biking far LESS safe and MORE of a clogged up mess. Then ODOT will need more money to fix the negative fall out from the tolls.  
I've been reading on ODOT's toll plans and how other citizens feel. From what I hear, ODOT does not care or value their paying taxpayers opinions. Tolls for taxation is extremely unpopular even among people open to increased taxes for the projects.  
When I email ODOT I either get a canned email back or just no response. I used to have a positive opinion of ODOT because I saw good road work. I am now very disappointed in ODOT's total disregard for citizens opinions. I believe now ODOTs desire is to shove tolls down the our citizens against the will of the people.  
I've heard from others about the "public meetings". ODOT does not want to hear from their average citizens dislike and disapproval for tolls. ODOT only wants to hear what they want to hear and disregard the rest.  
People coming back from ODOT meetings saying they were totally ignored and marginalized during the public meetings. ODOT has an agenda to use tolls no matter how their citizens feel about tolls.  
Tolls are so wrong. The negative fallout from drivers avoiding tolls is so obvious to all but single minded ODOT staff. Tolls will result in higher taxes to clean up the mess caused by tolls.  
Please respond without the canned info emails.

**ODOT I-205 Toll EA - RECORD #1796 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** CHARLES

**Last Name :** KIDDER

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I am OK with tolls to pay for improvements. I am NOT OK with giving free passes to some people because it's unfair to people like me who pay our fair share, and it invites frauds and cheats with wide open arms.

**ODOT I-205 Toll EA - RECORD #1797 DETAIL**

**Submission Date :** 3/26/2023

**First Name :** Kellie

**Last Name :** Kiest

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** NO TOLLING! Oregon ranks #1 for high taxes on the Middle Class! It is the middle class that drive to work! This UNNECESSARY TAX will significantly impact our daughters who live and work in the Metro Area. Oregon already collects more taxes than it needs--KICKER REFUND!

**ODOT I-205 Toll EA - RECORD #1798 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Linda

**Last Name :** Kildow

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Toll are unfair. Residents do not have the option of using mass transit between Gladstone and the west side via I-205 or many of the other areas where you are currently planning to put tolls. The side streets will be majorly affected. I know you are supposed to make accommodations for the extra traffic on the side streets, but there is no way you can make a big enough change. 99E between Oregon City and Salem will be slammed with traffic. Do you plan to widen 99E?

**ODOT I-205 Toll EA - RECORD #1799 DETAIL****Submission Date :** 3/31/2023**First Name :** Nancy**Last Name :** Kissel**Affiliation :** None**Submission Method :** Web comment form**Q3. Comments :** I do not understand how charging a toll will alleviate congestion; unless your goal is to stop low income citizens from traveling between states. This will also reduce traveling between states for activities like shopping, dining, and recreation. Unless your goal is to stop travel of lower income citizens, who struggle to fill the gas tank, much less paying tolls to travel to visit family or friends. This might reduce some congestion, but impact on businesses will be huge.

**ODOT I-205 Toll EA - RECORD #1800 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Leah

**Last Name :** Klein

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Our daughter lives right over the river off of 43 in WL. My husband and I and our kids go over 205 "bridge", over the Willamette river several times daily, to help with grandchildren daycare and regular family visits. We all believe making it a toll road would be very unfair to us. You will absolutely negatively impact the Sellwood neighborhood and the Sellwood bridge, as this will cause thousands of people to use this alternate route into and out of WL, LO, etc.

**ODOT I-205 Toll EA - RECORD #1801 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Justice

**Last Name :** Knight

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** There is NO NEED for tolling when there's wasted funds on needless projects!!



**ODOT I-205 Toll EA - RECORD #1802 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Sara

**Last Name :** Knudson

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolling can be very useful- but not when there are tolls on every highway! At least one highway route needs to remain toll free. Traffic will absolutely be pushed to the side streets. I'm from Northern VA, we had both options, and both were used which saved side streets from becoming the only free option.

**ODOT I-205 Toll EA - RECORD #1803 DETAIL****Submission Date :** 4/9/2023**First Name :** Jeffrey**Last Name :** Kohne**Affiliation :** individual**Submission Method :** Web comment form

**Q3. Comments :** I am strongly against the current tolling strategy for I205 (on the bridges crossing the Tualatin River and Willamette River). I believe tolling will send cars onto the side streets looking to save a buck. The neighborhood I live in is on of those routes, and the increase in traffic will lower our quality of life and reduce our property values. I'd rather see tolling on bridges where there are no bypass options. Such as tolling both the I5 and I205 bridges over the Columbia River. Or tolling both the Abernethy and Arch Bridge. Or, increased tax revenue somehow. Just don't toll in such a way that cars can avoid tolls using back roads and alternate routes.

**ODOT I-205 Toll EA - RECORD #1804 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Allan

**Last Name :** Konrad

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I strongly OPPOSE tolls on oregon highways, especially I-5.

**ODOT I-205 Toll EA - RECORD #1805 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Kathryn

**Last Name :** Kostow

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :**

Dear Madam or Sir at ODOT,  
I wish to comment on your plan to toll I-205 in the area around West Linn and Oregon City. I am a resident of Oregon City, since 1996.  
I do not have a problem with the idea of tolling I-205, I-5, I-217 or I-405. Heavy users should pay for the highways. And I agree with programs that encourage the use of mass transportation in the Portland Metro area, including commuter trains and buses. And I agree that there are improvements needed to improve I-5 for traffic, and to improve all our highways and bridges for safety.  
However, I do worry about the impact of your current plan on the local, side-road traffic in West Linn and Oregon City. This includes traffic on state highways 43 (which includes our Arch Bridge) and 99E through Oregon City, which are under ODOT management jurisdiction. People WILL try to avoid the tolls and WILL divert into our neighborhoods. I believe your current proposals will only divert I-205 traffic, including over-sized vehicles such as semis and long-haulers, onto local and residential streets, including HWYs 43 and 99E. As you know, the HWY 43/Arch Bridge route puts traffic onto Main Street into Oregon City. Our town is just a little town with a little Main Street. People walk here -- with children, dogs, and bikes. Our restaurants have sidewalk sitting areas, a few feet from the streets. Large trucks do not fit on these streets. Heavy traffic does not fit on these streets. Large vehicles do not fit on the historic Arch Bridge. You need to think about how you are going to mitigate these predictable problems. You could include restrictions on the size of vehicles allowed on the Arch Bridge (needs to be smaller than current allowances), or on heavy traffic in our towns (local traffic only?). But you need to do something, especially for the preservation of historic Oregon City and of West Linn's historic Willamette Village. We were not meant to carry the traffic weight of I-205, which if you remember is why I-205 was built in the first place. So, come on, people. Let's see your mitigation plan! I cannot support your proposal until these issues are specifically and effectively addressed.  
Sincerely,

**ODOT I-205 Toll EA - RECORD #1807 DETAIL****Submission Date :** 2/21/2023**First Name :** Charlotte**Last Name :** Krayenbuhl**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I am opposed to ALL forms of tolling on the I205 and I5 freeways that are being proposed. I live across the river in Vancouver but frequently cross the bridges for shopping, dining and formerly working (now Retired). If these tolls go through, I will not be so free in my visits to Oregon businesses. This will also cause many Vancouver residents to quit and/or turn down jobs across the river due to one more thing to make it difficult to commute. There must be better ways to tax drivers that drive more to fund upgrades. I prefer across state line MAX lines to alleviate traffic.

**ODOT I-205 Toll EA - RECORD #1808 DETAIL**

**Submission Date :** 3/8/2023  
**First Name :** Richard & Tamara  
**Last Name :** Krippaehne  
**Affiliation :**  
**Submission Method :** Toll program email

**Q3. Comments :** ODOT Tolling Committee:  
Clackamas Commissioners Tootie Smith, Paul Savas, Martha Shrader, Mark Shull, Ben West:  
Metro Councilors Christine Lewis, Lynn Peterson, Ashton Simpson, Gerritt Rosenthal; Juan Carlos Gonzales, Mary Nolan, Duncan Hwang: Oregon State Senator Rob Wagner:  
Oregon State Representative Jules Walters:  
We are writing to express our concern about proposed tolling on I-205 in Clackamas County. We live in the Willamette district of West Linn a short distance off of Willamette Falls Drive. We are native Oregonians, have lived in West Linn since 1992, and drive the I-205 freeway and Borland Road/Willamette Falls Drive every day. We experience first-hand the impact of alternate-route driving due to congestion on the freeway. On many days, eastbound traffic backs up from 10th Street approximately 2 miles to the west. Westbound traffic backs up on Willamette Falls Drive from 10th Street half-way to Oregon City. Our freeway system does not have capacity to accommodate the population using it. The region continues to grow, and no amount of social engineering (tolling) will reduce the need to get around. We feel quite certain tolling will severely and negatively affect our neighborhood. We anticipate drivers taking Borland Road/Willamette Falls Drive to avoid paying tolls on the freeway, making it extremely difficult if not impossible to get into and out of our neighborhood to carry out normal daily activities. Also, tolling on the I-205 system from Tualatin to Clackamas unfairly burdens the local residents who more frequently need to use that portion of the freeway. We need the freeway system to get to and from work, and there are no reasonable alternatives to travel through and within the region. Many people do not have a choice of workday hours and do not have the flexibility to alter their driving patterns. Mass transit is not an option because the system does not provide an efficient way to get around. We strongly oppose tolling on our freeways and feel adding capacity (more lanes) to the freeway system would be a better use of taxpayers' resources.  
Please support us in maintaining a livable community by opposing the proposed tolling on local freeways.  
Sincerely,

**ODOT I-205 Toll EA - RECORD #1809 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Jennifer

**Last Name :** Kuball

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** We DO NOT support this tiling project! It will hurt us financially and within our communities. There is not enough public transportation options to support the locations of these tolls. Oregon's cost of living has skyrocketed, and people will turn to our community streets to avoid the tolls. These routes can't handle that kind of traffic-- and will be awful for residents! The cost will be awful too and is unduly unfair to us. Stop these tolls!

**ODOT I-205 Toll EA - RECORD #1810 DETAIL****Submission Date :** 3/30/2023**First Name :** Chandan**Last Name :** Kundapur**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** Oregon taxes me heavily all for the privilege of staying in a city infested with crime and drug abuse with little civic infrastructure. Please dont rub salt on the injury and toll us further for use of roads. Make better use of the taxes you already collect rather than spending it to make Portland a magnet for more homelessness.



**ODOT I-205 Toll EA - RECORD #1811 DETAIL****Submission Date :** 2/22/2023**First Name :** Joe**Last Name :** Kunkel**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** As a native Oregonian, I have seen this State and our community grow and change dramatically over my lifetime. Tolling on Portland-area freeways is one change I am emphatically opposed to. First, taxes are already far too high, and perhaps our beaurecrats would look at "re-allocating" existing resources. The impact these tolls will have on surrounding neighborhoods is huge, as people will find alternative routes, pushing traffic onto routes not prepared for it. Finally, I object to the process (or lack thereof) involved here. Call it a toll, but it's a tax. Put it to the voters and let them decide - we all know how that will turn out - maybe you all should listen to the community rather than insist you 'know what is best for us'. LET US VOTE!

**ODOT I-205 Toll EA - RECORD #1813 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Cynthia

**Last Name :** Brown

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** People are struggling to put food on the table; DO NOT add tolls to the mix! Oregon already has one of the highest cost of livings (I heard 5th?) in the nation - DO NOT make it worse!!! I paid ~\$263 to get my license plates renewed and pass DEQ for a 27-yo car; you people just don't know when to quit.Thanks for4 listening (if you are).

<b>ODOT I-205 Toll EA - RECORD #1814 DETAIL</b>
---

**Submission Date :** 3/25/2023

**First Name :** Robbin

**Last Name :** Lake

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** No to road or bridge tolling. We already pay SO MUCH in taxes. You guys need to figure it out. You have enough money - use it wisely.

**ODOT I-205 Toll EA - RECORD #1815 DETAIL****Submission Date :** 2/21/2023**First Name :** John**Last Name :** Lane**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I believe it is wrong for the State of Oregon to charge people to drive on the Interstate Highway System. And if a citizen's business warrants trips up and down the I-5 and I-205 corridors, that will multiply the individual's cost. (Some of the trips are for medical treatments, making the toll an even worse burden.) And if the person making the trips has a low income, the toll will be an even heavier burden. Additionally, to add stops at toll booths, where traffic is already demanding serious time and fuel, is creating more of a problem. Even if toll payments can be set up electronically, note that there are numerous people who might not have knowledge of or access to computers and computer skills. The whole concept of making toll roads out of the interstate freeways is WRONG, and makes a statement that the people are here to support the government - contrary to the American principle that the government is here to serve the people. The State of Oregon is already collecting income tax, property tax, fuel tax, etc. More taxes are not warranted. It is this kind of government thinking that is making many Counties want to leave the State of Oregon.

<b>ODOT I-205 Toll EA - RECORD #1816 DETAIL</b>
---

<b>Submission Date :</b>	2/23/2023
<b>First Name :</b>	Richard
<b>Last Name :</b>	Lang
<b>Affiliation :</b>	
<b>Submission Method :</b>	Web comment form
<b>Q3. Comments :</b>	You guys really suck at doing your job this time

**ODOT I-205 Toll EA - RECORD #1817 DETAIL****Submission Date :** 4/10/2023**First Name :** Pamela**Last Name :** Langer**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** Oregon government has lived within its means for years. I am 75 and have NEVER had to have a road tolled in this state. It is NO time to start now. Multnomah county and this state have run thousands of people out of this state because of the crime and exhorabant taxing put upon people. Il am sure there are much better ideas than to toll ANY bridge or road. I am curious about the people you have advising you. They have advised you WRONG! Cut something.

**ODOT I-205 Toll EA - RECORD #1818 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Matt

**Last Name :** Langer

**Affiliation :** Sentinel Self Storage

**Submission Method :** Toll program email

**Q3. Comments :** We are 5th Generation Oregonians who frequently use I205 and we've paid taxes for generations. Some in our family are grandparents who have grandkids that live near these bridges you intend to toll so it will cost more just to visit grandkids.  
Please do NOT Toll our roads that we paid for already with our tax dollars.  
Please re-evaluate your goals here.

**ODOT I-205 Toll EA - RECORD #1819 DETAIL****Submission Date :** 3/7/2023**First Name :** Trudy**Last Name :** Langston**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I oppose the tolling. Hardship on hard working citizens. And what about the students coming to CCC? They certainly cannot afford the toll. Then the traffic increase on the side streets will be unbearable and accidents will increase. We are struggling so much right now with living in this state. Everything is so expensive, rent, food, and gas. What is happening with the lotto money? Are tax money you already receive? No one wants to explain where the money is going. Time to start the roll back of taxation.



<b>ODOT I-205 Toll EA - RECORD #1820 DETAIL</b>
---

**Submission Date :** 4/5/2023

**First Name :** David W

**Last Name :** Langtry

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I do not support tolls on the I 205. They are not fair to lower income families.

**ODOT I-205 Toll EA - RECORD #1821 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Lidia

**Last Name :** Larson

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Why were projected repairs not planned? Does planning not use projections and capital repair and replace from existing budgets? All an additional tax will due is burden people in the area with additional cost of living expenses when it is already at an all time high. People will be forced to the side streets causing more congestion and you will limit jobs because people will want to avoid the fee.

**ODOT I-205 Toll EA - RECORD #1822 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Cheryl

**Last Name :** Larson

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I STRONGLY OBJECT to ODOT's plans to toll I-205. ODOT is getting the cart before the horse! Plans to begin tolling BEFORE mitigation measures are in place is absolutely crazy. ODOT just wants to toll to make money to repair our damaged highways and are not concerned about the impact their plan will do to the community. If you would get rid of a few of ODOT's higher ups, you would have enough money to fix our roads without tolling! The entire thought of tolling is absolutely ridiculous and not in the best interests of our environment or traffic jams.

**ODOT I-205 Toll EA - RECORD #1823 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Michael

**Last Name :** Lawson

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** No on tolls. Plenty of money in budget; if spent wisely and efficiently to improve roads. Tolls are a tax on the poor. Only the well off can use them. It will create twice as much congestion and government bureaucracy and greed will find ways to skim money. NO WAY

**ODOT I-205 Toll EA - RECORD #1824 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Eric

**Last Name :** Leatham

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I think that tolling is a good option to fund road improvements but need to include the impacts on neighborhoods for people that try to avoid the tolls. Tolling for bridges is easily understandable and limits avoidance.

<b>ODOT I-205 Toll EA - RECORD #1825 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Jay

**Last Name :** LeDoux

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** To those who seem determined to force this toll upon us, As residents of Oregon City, I and my family are stakeholders in this situation and discussion. We're feeling ignored and frustrated. Your own traffic experts have admitted that, if a toll zone is placed starting at the Abernathy Bridge here, our already crowded traffic will increase dramatically as drivers exit the freeway to avoid the tolls. Traffic from the 98E exit through downtown Oregon City will be, at times, bumper to bumper and standstill. The one road that runs alongside the interstate through West Linn (which already experiences frequent traffic congestion) will turn into a "substitute highway" as drivers evade tolls. The route that is needed to avoid your proposed tolling will take them through several residential neighborhoods. I, and my family, and our fellow reasonable citizens, beg you to reconsider your plans. Is this really based on good traffic science? Or are you really just trying to punish drivers and force people into slow and time-wasting public transit? Consider how many are going to be hurt. Heavy traffic moved into residential areas may have a human toll, I terms of kids being hurt or killed. Please stop this madness.  
Respectfully,

**ODOT I-205 Toll EA - RECORD #1826 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Rose

**Last Name :** Lefebvre

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** This idea is stupid. I would rather add a little extra to taxes than have to be bothered with tolls every time. I have seen how bad it backs things up and affects the income of seniors like me, who live on Social Security!! I am a big NO!!!!

**ODOT I-205 Toll EA - RECORD #1827 DETAIL**

**Submission Date :** 3/11/2023  
**First Name :** Greg  
**Last Name :** Lehman  
**Affiliation :** Rascal Palace Music  
**Submission Method :** Web comment form

**Q3. Comments :** You will destroy my neighborhood for the sake of charging a few dollars to toll a highway because of your incompetent budget planning. Didn't you know that these bridges needed repair or these highways needed help? Why did you not figure out how to get the money other than a toll. The air quality will be unacceptable for our schools. There will be no way to actually get to our home. We have a child that is differently abled and we fought and saved to get him to a school that is inclusive. I do not want to give that up because I worry about his safety and the air that he breathes or the fact that I cannot get him to his various appointments on time because of the traffic debacle. Here is how you get the money... take the salary for the people that are on your staff that did not budget for this and use that to offset the cost of the roads. You're welcome.



**ODOT I-205 Toll EA - RECORD #1828 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Melissa

**Last Name :** Leland

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** This is so stupid. The district already pockets so much money. You will clogg up side streets bc no one will pay the money. I'm a small business owner and we pay so much in tax and then again personal tax. No way should there be a toll. No way! People will rebel. People are already moving away. Taxes will go with them!!!

**ODOT I-205 Toll EA - RECORD #1829 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Anthony

**Last Name :** Lenoci

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** This is a terrible idea that will only cause stress and confusion.

**ODOT I-205 Toll EA - RECORD #1830 DETAIL****Submission Date :** 4/4/2023**First Name :** Michelle**Last Name :** Lequin**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I am very concerned about the impact of the I-205 tolling project. The disruption caused by construction, the economic impact on those who must pay the tolls—many of whom are required to travel during high usage times in order to commute to and from work—and the impact on residential and business routes as drivers seek to avoid the freeway, will all create serious problems. I also feel that an Environmental Impact Statement study should be conducted in order to address some of these problems more fully. I think that ODOT's actions and schedules are overlooking key issues, and are likely to negatively impact residents and business owners in the Clackamas, Washington, and Multnomah county areas.

**ODOT I-205 Toll EA - RECORD #1831 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** kyle

**Last Name :** lewis

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I don't know a whole lot about the project or quite why it is being considered. Paying federal taxes as well as state income taxes is hard enough but to add toll fee on a road I use almost daily would be an added expense that I do not want. Side roads in the area are already bad enough. Thank you for your time.

**ODOT I-205 Toll EA - RECORD #1832 DETAIL****Submission Date :** 4/4/2023**First Name :** Michael**Last Name :** Liddy**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I oppose the introduction of a toll to any portion of Oregon roads. I'd much rather see money that is already available be used more effectively. This state wastes exorbitant amounts of money paying for and defending corruption, especially in terms of policing. Take that money and use it for the people actually footing the bill. Stop trying to fleece people who have already paid their dues via taxes.

**ODOT I-205 Toll EA - RECORD #1833 DETAIL****Submission Date :** 3/7/2023**First Name :** Julie**Last Name :** Liebertz**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** Tolling Oregonians is just another form of taxation that I do not consent to. We are already taxed at unbelievably high rates, inflation is skyrocketing and our infrastructure is in shambles. Oregon receives enormous amounts of taxes from its residents and I am confident that if spending were appropriated correctly, and there was true accountability, we would have the funding necessary for projects such as these. The consequences of Oregon's misuse and abuse of multiple taxes it brings in shouldn't be relegated to Oregonians and travelers to fund this. I vehemently oppose any toll projects in this state as a means for a slush fund for our irresponsible government, which holds zero accountability for spending.

<b>ODOT I-205 Toll EA - RECORD #1834 DETAIL</b>
---

<b>Submission Date :</b>	4/5/2023
<b>First Name :</b>	Darline
<b>Last Name :</b>	Locati
<b>Affiliation :</b>	
<b>Submission Method :</b>	Toll program email
<b>Q3. Comments :</b>	NO Definitely NO

**ODOT I-205 Toll EA - RECORD #1835 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Mary

**Last Name :** Loomis

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** If you are going to have the bridge a toll - it needs to be every vehicle. No adding this to DMV. You have to do better than the Sellwood bridge. A bridge that I cross once every 5 years but it's on my DMV registration for 10 years. So unfair. Don't let any county out of it. Look at San Francisco. Rental cars have to be in 1 lane. I was back east & it billed the rental car company & I paid for it. But for companies that make many trips every day, you have to have an unlimited monthly pass. Yes there will be vehicles that have no license plates. Out of state plates that have expired. Some plates are not registered to an owner (yep I had a hit & run do that to me). I went through a tunnel to get to NYC, got a bill for that one. Everyone did. But you paid to go in but not leaving. You need a toll unless you Already have the funds for fixing or replacement. Think a head on when the future holds in vehicles traveling this bridge. Think to the future. Want to add a train to the route? At least the bike's & people walking are safe in the very middle of the bridge.



**ODOT I-205 Toll EA - RECORD #1836 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Gary

**Last Name :** Lord

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** In the discussion about highway tolls I haven't heard any proposals for toll bypass lanes or highways allowing drivers to choose to pay a toll or not pay a toll. I think this is the best option giving drivers a choice. Requiring all drivers no choice but to pay a toll to travel on public highways is or can be a financial hardship for many getting to and from work on a daily basis. Thank you.

**ODOT I-205 Toll EA - RECORD #1838 DETAIL**

**Submission Date :** 3/17/2023

**First Name :** Jordan

**Last Name :** Lund

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** To be clear, I don't oppose tolling IN GENERAL. If we need to pay for a bridge or a tunnel, a toll seems to be a good way to do it. Heck, set up a reader board with a \$ countdown and gamify that. Whoever the last person to pay the toll is wins a prize. But it has to have a fixed goal and it has to have some kind of fixed end point. We have a history in this country of keeping tolls and taxes long after the original project has been paid, sometimes multiple times. Posting up a toll to "reduce congestion" is nebulous at best. Who measures it? What counts as a success? Is there a plan to roll it back if you achieve the goal? In this case with ODOT, they are putting the tolls in places where there is no bus service, so the idea of reduced congestion, out of the box, is complete nonsense. All it will do is move the congestion to small, city streets, less capable of handling the traffic.

**ODOT I-205 Toll EA - RECORD #1839 DETAIL****Submission Date :** 4/4/2023**First Name :** Kirstyn**Last Name :** Lundquist**Affiliation :****Submission Method :** Toll program email**Q3. Comments :** This is such a bad idea for Oregon and especially the Clackamas area. This will impact those who travel everyday on the freeway for work. Most that use this everyday cannot afford to pay these new tolls. The Government Wastes so much money every year and now want to charge for roads. It is unbelievable that this would even be considered.

<b>ODOT I-205 Toll EA - RECORD #1840 DETAIL</b>
---

<b>Submission Date :</b>	4/4/2023
<b>First Name :</b>	Greg
<b>Last Name :</b>	Lyman
<b>Affiliation :</b>	
<b>Submission Method :</b>	Web comment form
<b>Q3. Comments :</b>	No toll roads or highways

<b>ODOT I-205 Toll EA - RECORD #1841 DETAIL</b>
---

**Submission Date :** 4/18/2023

**First Name :** James

**Last Name :** Maciokas

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** What is the anticipated annual gross revenue from tolling? What % of the gross revenue will be used up to administer the tolling?

**ODOT I-205 Toll EA - RECORD #1842 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Kelly

**Last Name :** Mackin

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I saw growing up that bridges and tunnels in the NY area were erected to pay for bridges and tunnels, as well as highways. The promise then was that as soon as the roads were paid for, the tolls would be removed. It now costs \$50.00 to travel from NJ to Long Island, none of the tolls have ever been removed, I would support bond issues to pay for specific road projects, which is the way this should be done. I do not support any tolls on Oregon roads because I have seen with my own eyes that they never go away.

**ODOT I-205 Toll EA - RECORD #1843 DETAIL****Submission Date :** 3/7/2023**First Name :** Bonnie**Last Name :** Madsen**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I absolutely object the thought of tolling ANY Oregon road! Oregon can't control it's spending and uses our tax dollars for your little pet projects. Every time you politicians and bureaucrats have a pet project you want to MAKE us pay for things we have no interest or desire to contribute to. People are already leaving Oregon and you think that we are willing to pay for this? You are all delusional to think ANY OF US want this! All you are doing is causing more people to leave Oregon. Look at what is happening to California and New York, they are hemorrhaging people...a thousand a day! Don't go forward with this tolling project, people will rebel and just leave. I know I and my family will.

**ODOT I-205 Toll EA - RECORD #1844 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Bonnie

**Last Name :** Madsen

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** First of all I want to show my displeasure that the email notifying me of an in person or online public meeting set for today 4/4 between 3-6, was just emailed to me today. I am a working citizen of Clackamas County and did not receive the email until I got home and checked my email at 6:30 pm. Most of us that are concerned about being charged for using public roads, is because we use them TO GO TO WORK AND EARN A LIVING. I'm getting tired of paying for everything for this state. You tax the crap out of us and still want us to pay more by making us pay to drive on the highway. Why don't you learn to manage your money and use what you have, like I, as a responsible home-owning adult has to do? I can't get money from others, if I don't have the money to buy something then I cannot buy it. It's that simple. This idea to toll 205 or any stretch of road just shows me that the radical democrats continue to destroy this beautiful state. You are just like spoiled children, wanting more money and thinking that your parents have deep pockets. Well, I'm a parent that will tell my children "No" because I draw the line here and I will not be taken advantage of.



**ODOT I-205 Toll EA - RECORD #1846 DETAIL**

**Submission Date :** 2/28/2023  
**First Name :** John  
**Last Name :** Malowney  
**Affiliation :** Pissed Off Oregon Tax Payers (POOTP)  
**Submission Method :** Web comment form

**Q3. Comments :** Simply put; ODOT's Oregon Tolling plan is nothing more than yet another attempt of becoming the latest State of Oregon money gap filling measures due to the State's continual out of control fiscal spending bailout policies! Years ago Oregon Tax Payers were 'promised the moon' if we would simply approve the Oregon Lottery which we did. Following that was a similar campaign regarding the legalization of marijuana. Both initiatives were obviously approved and have far and away exceeded the state's projected revenue projections, while here we go again! The state of Oregon has some of the highest gasoline/diesel taxes in the nation in addition of vehicle Registration fees, (\$348/2yr. for EVs) while our streets and roads are pot hole riddled due to one excuse after another; lack of funding/staffing, poor weather conditions, number of vehicles, etc., all of which contribute to the state's general fund. ODOT's spokesperson stated; "the worse thing about the proposed Tolling initiative is simply paying the Toll" in addition to an additional brainiac statement that; "Portland is one of the last large Metropolitan areas in the nation to implement Tolling" making Oregon no worse than any other state is brilliantly ridiculous! The added vehicular congestion, physical/mental and financial anguish of the state's proposed tolling levy in addition to a significant reduction in air quality caused by thousands of cars annually idling in line at the various Tolling booths, far exceeds the UNNECESSARY projected revenue stream that the State's Legislators can not wait to frivolously spend on various other special interest projects. The Oregon Legislators need to remove their heads from the rectums and take pride in the fact that Oregon is NOT LIKE every other state in the Union and stop this Tolling initiative in it's tracks as compared to thousands of automobiles!

**ODOT I-205 Toll EA - RECORD #1847 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Judi

**Last Name :** Mandl

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I certainly wouldnt want to live in the neighborhoods around the tolls. I for one will be avoiding the toll and cruising through those neighborhoods.

**ODOT I-205 Toll EA - RECORD #1848 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Steven

**Last Name :** Mare

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Why add a third lane when the tolling system will be in place to reduce traffic volumes/congestion? Keep the tolling system/demand pricing and scrap the unnecessary capacity expansion.

**ODOT I-205 Toll EA - RECORD #1849 DETAIL****Submission Date :** 2/25/2023**First Name :** Steve**Last Name :** Marker**Affiliation :****Submission Method :** Voicemail**Q3. Comments :** Hi, this is Councilor [] from the city at Fairview. I can't believe that you guys would want tolling after this winter weather event that we had, that you guys couldn't even turn around and get ice off of our main freeways. This is unbelievable for a group like yours to not turn around and be able to handle the needs of Oregonians. My number is []. Thank you.

**ODOT I-205 Toll EA - RECORD #1850 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Nathan

**Last Name :** Marks

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** As a Clackamas County resident, I do not support this toll program in any way. This is harmful to lower income individuals who need to commute through this area. Additionally it will impact Oregon City and West Linn significantly, the individuals there and the businesses. Our taxes pay for roads, not tolls.

**ODOT I-205 Toll EA - RECORD #1851 DETAIL****Submission Date :** 4/6/2023**First Name :** Adelina**Last Name :** Mart**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I'm really concerned that a use based toll system is going to lead to more income inequality and homelessness in my community. Folks in Oregon City/Molina/etc area are typically lower income compared to folks living on the west side. This toll will tax people that live here, a little further away where housing is a little more affordable. Add a daily toll to get to work, and any savings you made living here is gone. People are struggling to meet basic needs, and toll is going to be another expense that folks can't afford. I'm not pleased with a toll, I'd much rather everyone pay more in gas tax, licensing tax, car sales tax, which does not discriminate on where you live and is paid by all. I don't live in all of Oregon, but the taxes I pay goes to fix roads in all of Oregon. I pay for roads in Bend, because I want nice roads in all our state, even if I rarely use it. In the same way, I think a tax that is paid by all Oregonians, or a tri-county gas tax or licensing tax would make a lot more sense. The toll will cause many folks to use other roads to avoid paying, which will lead to plenty of wear and tear on other roads. Our roads are one system, and we should think of paying for them as one system if we want to maintain high quality throughout oregon. I'm against a toll, but I'm not against finding other tax based funding streams. Tax based funding systems could also allow for a progressive tax that is income based and doesn't tax lower income folks unfairly.

<b>ODOT I-205 Toll EA - RECORD #1852 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Scott

**Last Name :** Martin

**Affiliation :** Self

**Submission Method :** Web comment form

**Q3. Comments :** Please - No tolls on I-205. Charge higher car registration fees or gas taxes both of which promote alternative sources of transportation and/or reduced use of fossil fuels.

**ODOT I-205 Toll EA - RECORD #1853 DETAIL**

**Submission Date :** 3/1/2023

**First Name :** Karen

**Last Name :** Martin

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** OMG! How can you even think of having 2 tolls between Oregon City and Wilsonville . . . . unbelievable to even be proposing to have a toll over the Tualatin River. No one is showing any common sense here!DO NOT DO THIS.



**ODOT I-205 Toll EA - RECORD #1854 DETAIL**

**Submission Date :** 4/2/2023

**First Name :** Holly

**Last Name :** Martin

**Affiliation :** Elk Pass Nursery

**Submission Method :** Web comment form

**Q3. Comments :** Another reason not to patronize the Portland Metro businesses and its arts community. You are proposing increasing the cost of access and it will have an impact. Unbelievable that ODOT is moving ahead with tolling. Another drain upon citizen's pocketbooks during record inflation and economic hard times. This when the state of Oregon has had record tax collection and there is a lot of federal money sloshing around that was sold as INFRASTRUCTURE, which at its most basic level means roads. The government's basic duty to its citizenry is education, defense and major infrastructure. That should be first and everything else second. Why are not the proposed improvements not being paid for by existing funds? Priorities, people! Feel free to put this in your next budget request.

**ODOT I-205 Toll EA - RECORD #1855 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Dan

**Last Name :** Martin

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Absolutely NO TOLL Roads in Oregon!!I-205 should have been made into 4-6 lanes each way years ago. And plenty of money has been paid to the state of Oregon through fuel taxes and property taxes and state income taxes for DECADES!!Quit wasting our money.

**ODOT I-205 Toll EA - RECORD #1856 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Scott

**Last Name :** Maslen

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** This is total BS!!!! Stop the ridiculous taxation on the people of Oregon and start spending the money you take in RESPONSIBLY!! This should be voted on by the citizens, NOT just mandated.

**ODOT I-205 Toll EA - RECORD #1857 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Bill

**Last Name :** Mason

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** As a resident of the Milwaukie area I have a need to travel North-South which is only reasonably accessed via I-205. Travel times are not at my picking. This leaves me caught up in your 'toll peak' times. ODOT has provided no reasonable North-South access to the citizens of I-205 Oregon City to Tualatin areas other than I-205 and now you want to toll the only reasonable access to these areas.

The impact on the whole area will be negative as many vehicles will attempt to bypass the toll sections of I-205 and this will move traffic into residential neighborhoods. This will be a pollution and safety impact to these areas.

You claim you have mitigation measures to resolve this but plan on implementing the tolling before these measures are in place. This is unacceptable. Nor have the citizens of these areas had a chance to approve these measures. There is no alternative transportation in this area other than personal vehicle.

Years into this project you cannot tell us what these toll fees will be, again this is unacceptable and any fee adds a financial impact to me and my family. We are not made of money and I don't want to hear about your low income plan; it won't help me. These tolls do not help the citizens of Oregon.

Scrap this plan totally. No on I-205 Tolling.

**ODOT I-205 Toll EA - RECORD #1858 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Mary Jane

**Last Name :** Mathews

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Please stop Tolling Roads in Oregon. We have a way now to get road taxes DMV we do not need another expensive way to get more money for our roads.

**ODOT I-205 Toll EA - RECORD #1859 DETAIL**

**Submission Date :** 4/20/2023  
**First Name :** David and Deb  
**Last Name :** Mauk  
**Affiliation :**  
**Submission Method :** Toll program email

**Q3. Comments :** To be successful in fulfilling its mission, ODOT needs to reconsider the role of tolling in delivering on that promise. It needs to fully demonstrate that tolling is superior to an existing, ready-to-roll, cost-effective alternative - vehicle registration fees - in achieving its objectives. Tolling by all appearances looks like a preordained solution, not the best solution, for equitably reducing congestion, limiting neighborhood rerouting, improving the environment, & supporting safe travel & economic growth that 'keeps Oregon moving.' Tolling is but one option on the transportation table, not the main course, nor the pedestal on which that table rests. It makes sense to postpone tolling beyond the I-5 Columbia bridge until these issues are more fully addressed.

**ODOT I-205 Toll EA - RECORD #1860 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Eileen

**Last Name :** McCafferty

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** My name is [], and I'd like to know how can you toll us if you're on low income? And why can't you let us, the Abernathy, be okay? We don't need it. Thanks.

**ODOT I-205 Toll EA - RECORD #1861 DETAIL**

**Submission Date :** 4/14/2023  
**First Name :** Marta  
**Last Name :** Eichenlaub  
**Affiliation :**  
**Submission Method :** Toll program email

**Q3. Comments :** I am a single senior citizen watching every single penny to stay in my home for the last 28 years in West Linn. It is all I can do to pay my property taxes and keep my nostrils above water. My budget is extremely tight. I don't drive long distances, but I do travel up the 205 freeway in both directions 3 or 4 exits to do my grocery shopping and run other errands. I can't afford to be tolled for these small trips. I cannot. It's a burden. I've heard that West Linn was chosen for tolling because in ODOT's opinion we are all wealthy and can easily afford to be tolled numerous times daily. I am letting you know that that opinion is false. There are many people who will be harmed by this toll, me included. Why not toll between Washington State and Oregon State if you must? Many people in Washington live there because the property taxes are lower and work in Oregon because the pay is better. Wouldn't that make more sense instead of killing neighborhoods? I'm beside myself with worry about being taxed (by tolling) more. I want to stay in my home. This tolling of every movement by car will make my life very difficult. And I know I am not the only one in this position. I disagree with ODOT's assumptions.



**ODOT I-205 Toll EA - RECORD #1862 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Robert

**Last Name :** McCarthy

**Affiliation :** Bolton Neighborhood Association

**Submission Method :** Toll program email

**Q3. Comments :** Hannah, I appreciate the invitation. However, in the four meetings I attended not once did I feel heard, nor I believe did the other participants. No paraphrasing of concerns. No acknowledgement. Just, thanks for your time. Nowhere do I see were any suggestions made by participants are included in current plans. As a change management consultant in private practice for 35 years it is clear, when participants don't feel heard, the process of public involvement, public or any other kind, is fatally flawed. You can test this perception by asking the participated who have attended your many meeting the simple question; on a scale of 1-7, "To what extent did you feel heard?"

**ODOT I-205 Toll EA - RECORD #1863 DETAIL**

**Submission Date :** 4/4/2023  
**First Name :** Toni  
**Last Name :** McClendon  
**Affiliation :**  
**Submission Method :** Toll program email

**Q3. Comments :** I understand tolling for the two bridges that are being rebuilt. I do not think I-5 and I-205 should be toll roads as a whole. I think the traffic will reroute through the neighborhoods around the two freeways. Already when they get slow and backed up, traffic seems to clog up neighborhood streets. Why can't the state think about a long term solution by building a new toll road west of Portland and returning to I-5 above Vancouver. That would take the traffic completely around Portland for those who want to continue north or south beyond Portland. I don't think the current plan will solve the problem in the long run. Thanks,

**ODOT I-205 Toll EA - RECORD #1864 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** ACACIA

**Last Name :** MCGUIRE

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Until ODOT can determine what the plan is for all of the traffic diversion that will absolutely happen from people who are not used to paying tolls, they should not go forward with tolling. I know it's hard to know what the exact impact will be but there is no way to estimate no impact. And waiting until it's done is too late.

**ODOT I-205 Toll EA - RECORD #1865 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Matthew

**Last Name :** McHarness

**Affiliation :** none

**Submission Method :** Web comment form

**Q3. Comments :** A classic example of group-think. Ignore everything the local communities worry about and simply proceed because a meeting somewhere came up with the great idea. Classic. I wish those who came up with this idea bore the cost of the damage to the local communities. But, sadly, no. Classic group-think. What a waste.

**ODOT I-205 Toll EA - RECORD #1866 DETAIL****Submission Date :** 4/9/2023**First Name :** Michael**Last Name :** McKee**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I have lived in states that have these tolling programs, WA and CA. They make traffic even worse and then present a solution at \$1.00 per mile or more to use the lanes. This is just another tax. Stop these kinds of programs! you are making it harder and harder on we the people, who have to pay for this!

**ODOT I-205 Toll EA - RECORD #1867 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** M

**Last Name :** McMillian

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** The toll would cause a high financial burden to individuals and families of low income, thereby limiting their access to gainful employment thus leading to undue hardship and even homelessness. This seems at odds with governor's plans for affordable housing as it would reduce individuals disposable income. For those on the edge this would be disasterous.

**ODOT I-205 Toll EA - RECORD #1868 DETAIL**

**Submission Date :** 3/10/2023

**First Name :** Rhonda

**Last Name :** McNeal

**Affiliation :** Ladybug

**Submission Method :** Web comment form

**Q3. Comments :** NO TOLL ON ANY OF OREGON ROADWAYS. GOVERNMENT ABUSES THE PEOPLES MONEY AT EVERY OPPORTUNITY NOW.THIS IS AS INTELLIGENT AS REALLOCATING OMMP REHAB FUNDS TO ANIMAL SHELTERS OR PAYING DRUG ADDICTS \$1000 A MONTH TO DO DRUGS. ALL MONEY COLLECTED IN THE PAST FOR ROAD IMPROVEMENTS HAS ENDED UP WASTED PROJECTS NEVER GET FINISHED. OREGON GOVERNMENT SHOULD FIX WHAT YOU HAVE ALREADY BROKEN STATEWIDE. ELITE GREEDY OLIGARCHS AND POLITICIANS STEAL MOST OF OUR MONEY NOW. NO ON TOLL ROADS IN OREGON LEARN TO BUDGET THE BILLIONS YOU ALREADY HAVE.

**ODOT I-205 Toll EA - RECORD #1869 DETAIL****Submission Date :** 3/7/2023**First Name :** Patricia**Last Name :** McQuillin Voss**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I am opposed to tolls of any kind on Interstates 205 and 5. I think it will disproportionately affect lower income drivers as well as disrupt the adjacent neighborhood roads with higher traffic, increasing the risk for personal and property damage. Build more routes that can accommodate the current and projected increase in population--increase the gasoline tax to fund this. Increase the tax on electric cars as well.



**ODOT I-205 Toll EA - RECORD #1870 DETAIL****Submission Date :** 3/12/2023**First Name :** Shannon**Last Name :** Meisinger**Affiliation :****Submission Method :** Web comment form**Q3. Comments :**

If you actually do care what Oregonians think of the tolling plan, read some of the many social media threads about this topic, on Facebook, Nextdoor, etc. Oregonians are increasingly deciding to leave the State they love, because Oregon is being mismanaged to such a degree that people who are financially able to move (and able to pay taxes), are deciding that their futures will be brighter elsewhere. Oregonians are already suffering the after-effects of the prolonged lockdowns, the widespread rise in crime, increasingly unaffordable housing costs, and now inflation. The fact that ODOT now plans to toll our highways, is shocking. And their suggestion to avoid congestion pricing by taking public transportation or adjusting travel times, is as clueless and out of touch as Marie Antoinette's suggestion to "Let them eat cake!" Is ODOT unaware of the number of Oregon communities with no access whatsoever to public transportation? Let a member of ODOT come to my address, and try to take public transportation anywhere. And do they truly believe that most Oregonians get to set their own work hours? This plan is unreasonable, poorly thought out, and yet another mismanagement of taxpayer funds for a project that will hurt more Oregonians than it will help. Adding one tolled lane during rush hours would be bad enough, since only the wealthiest would have the extra money to spend for that purpose, but it would certainly be better than tolling all lanes with an unavoidable extra expense Oregonians can not afford. This is a BAD plan, and it should be recognized as such, and abandoned.

**ODOT I-205 Toll EA - RECORD #1871 DETAIL****Submission Date :** 3/7/2023**First Name :** Traci**Last Name :** Mennis**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I am very much opposed to tolling on I-205. As a resident of West Linn, this toll would be unreasonable for my daily travels. Something as simple as picking up a prescription at the Rite-Aid in Oregon City would cause me to pay a toll x 2. There are no public transportation options for this route. In addition, tolling will have a detrimental impact on the existing roads in West Linn and Oregon City as drivers jump off the freeway in order to avoid the tolls. Traffic on Willamette Falls Dr., Hwy 43 and the Arch Bridge will be chaotic. I have lived in Oregon my whole life. Historically traffic on I5 between the Rose Garden and Vancouver has been terrible. Wouldn't it make more sense to start tolling there rather than in our suburban area? I am 100% against the tolling of I205. Thank you

**ODOT I-205 Toll EA - RECORD #1872 DETAIL****Submission Date :** 2/21/2023**First Name :** Traci**Last Name :** Mennis**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** Please put me down as 100% against the tolling on I-205. I live in West Linn and can only imagine the nightmare that tolling will cause to our community. People will jump off the freeway and take side streets to avoid the toll; the Arch Bridge will be unable to handle the increase in traffic. The toll is unfair to residents of the area as they go about their daily lives. I will have to pay a roundtrip toll to simply go to Rite-Aid in Oregon City to pick up a prescription. There are no public transit options in this area. I have lived in the Portland area my entire life. And in these 60+ years, the biggest traffic logjam has been the I-5 Interstate bridge. Why not start there? I find it ridiculous that our suburban freeway is where ODOT has chosen to begin tolls. Please stop this!

**ODOT I-205 Toll EA - RECORD #1873 DETAIL****Submission Date :** 4/5/2023**First Name :** Traci**Last Name :** Mennis**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I am against the tolling of I-205. As a resident of West Linn, this toll will greatly affect me. Something as simple as going to the Rite-Aid in Oregon City to pick up a prescription will likely cost more in tolls than the prescription itself. I believe it is especially unfair for citizens of WL and OC as there are no public transportation options available. Additionally, nothing has been done to address the traffic on side streets resulting from the tolls. Vehicles will clog neighborhood streets in order to avoid the tolls. The Arch Bridge in OC will become a nightmare. Tolling has not been well thought out and needs to be forgotten or at least placed on hold. Thank you

<b>ODOT I-205 Toll EA - RECORD #1874 DETAIL</b>
---

**Submission Date :** 3/26/2023

**First Name :** alexandra

**Last Name :** Merrin

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I am deeply concerned and disgusted with ODOT. As a taxpaying citizen in the State of Oregon for fifty-seven years, I have faithfully paid YOU and Trimet taxes for as long as that has been required. Your instituting tolls without any regard to the economic impact this will have on our low income and senior population is an inconsiderate, dysfunctional tragedy. I hope we do have an election over this issue so Oregon's TAXPAYING CITIZENS have a voice in this decision. I'm confident you will see a great turnout ....And, rightly so.

**ODOT I-205 Toll EA - RECORD #1875 DETAIL**

**Submission Date :** 2/27/2023

**First Name :** Lyn

**Last Name :** Met

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Hello [ ], Thank you for listening to me on the phone this morning and your willingness to send this message to the right people. We oppose tolling Oregon freeways, specifically I205 and I5. It was obvious this was happening when our main roads were repainted to reduce the number of traffic lanes, and not fix the potholes! We cannot afford to fund more and more projects. If tolling Oregon's freeways is the answer to reducing traffic, then what a thoughtless solution, since many of us cannot afford a toll tax. What can we do to stop this? Yes, I've heard, gas revenue is down and inflation rising. Oregon increased the cost of licensing all vehicles and charge more for electric vehicles. The cost of driver's licenses have also increased. Portland has the light rail and bus systems that millions of tax dollars were spent, yet are not full because of the high crime. This doesn't include the wasteful spending on I-5 bridge planning, and then tossed. The government's solution is to take more money from the people!!! How about reduce spending?

**ODOT I-205 Toll EA - RECORD #1876 DETAIL****Submission Date :** 3/7/2023**First Name :** Paul**Last Name :** Metteer**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** This should be on the ballot for the electorate to vote to deny or approve. It really feels like the State of Oregon and County of Clackamas are forcing tolling/taxation without a vote. The tolling plans should be halted until the various localities can vote on tolls/taxation.

**ODOT I-205 Toll EA - RECORD #1877 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Daniel

**Last Name :** Meyer

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolling will not reduce the volume of people who need to travel our highways. Consider HOV lanes or paid fast lanes. The neighborhoods will be flooded with cars trying out side streets to beat the tolls. For many with limited income this will be a heavy burden.



**ODOT I-205 Toll EA - RECORD #1878 DETAIL**

**Submission Date :** 3/29/2023

**First Name :** Carolyn

**Last Name :** Meyer

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** The afternoon hours for high traffic actually start between 2 and 3 pm

**ODOT I-205 Toll EA - RECORD #1879 DETAIL**

**Submission Date :** 4/3/2023

**First Name :** Eugene

**Last Name :** Meyer

**Affiliation :** Pacific Seafood

**Submission Method :** Web comment form

**Q3. Comments :** How about we melt down and sell the gold pioneer on top of the Capitol building and put up a small flagpole. Then we could sell off the marble walls and replace them with sheetrock. Reduce frivolous government spending and use that and that type of money to take care of Oregon citizens that are the backbone of our state. We could do this instead of burdening those backbone folks. That would also help the folks who live in Canby, Hubbard and Woodburn not be subjected to increased congestion from Salem folks avoiding the toll fee. I live in Keizer and work in Clackamas. I use highway 99 to commute because it is a nicer drive and I do not like using the freeway. So, yes I have my own selfish reasons but I too am subjected to the never ending increasing costs of everything. And now this. Frustrated.

**ODOT I-205 Toll EA - RECORD #1880 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** John

**Last Name :** Michael Williams

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Hello. I am very strongly opposed to the disruption of travel on I-205 which will result from changing the route into a toll-road. It is difficult to understand ODOT's rationale in proposing such a change in I-205, which I travel occasionally. Perhaps ODOT should be disbanded and replaced with a more intelligent system?

**ODOT I-205 Toll EA - RECORD #1881 DETAIL****Submission Date :** 4/13/2023**First Name :** Lois**Last Name :** Miller**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I am writing to express my great concern for public safety at the intersection of Stafford Road and Johnson Road if tolling for 205 is implemented. Over the years there have been many accidents around that intersection. When the traffic is heavy, long lines form as drivers try to turn either onto or off of Johnson from Stafford. It is a dangerous intersection now and will only be made worse with an increase in traffic.

**ODOT I-205 Toll EA - RECORD #1882 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Ann

**Last Name :** Miller

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I live in the Willamette area of West Linn and I am opposed to tolling because of the undue hardship it will impose on residents in my area.>From 4 o'clock on we currently have congestion along Willamette Falls Drive resulting from rush hour traffic. This problem would increase with people attempting to avoid tolls. Theoretically tolling would discourage rush hour travel but this ignores the fact that in our community, built along the river, we have only 2 routes available, the Abernathy Bridge or the narrow Oregon City bridge. The expectation that we would avoid rush hour tolling by delaying a work commute, leaving our kids at school, skipping medical appointments etc. is unrealistic. These are not discretionary activities.. The environmental study talks about mitigating congestion, THERE ARE NO ALTERNATIVES FOR US TO CROSS THE RIVER1The current congestion can result in a 10 minute errand taking 30 minutes. Fly a drone for a week over the intersection of Willamette Falls Drive and Hwy 43and witness the madness. Tolling is a problem, not a solution.  
Sincerely,

**ODOT I-205 Toll EA - RECORD #1883 DETAIL****Submission Date :** 4/9/2023**First Name :** Doug**Last Name :** Millican**Affiliation :****Submission Method :** Web comment form**Q3. Comments :**

It is so wrong that public opinion seemed to have been significantly ignored by ODOT and other Oregon State officials with regard to the decision to begin tolling I205 in Clackamas County. I appreciate the opportunity now to voice my opinion. Please do not initiate tolls for this area. The surrounding area is not suited to absorb the additional traffic created by vehicles trying to avoid paying tolls, one of which I am. I will never pay a toll regardless of how congested the surface streets become as a result. Don't you see that it will be a huge mess? I strongly encourage you to go back to the drawing board to work on trying to use our existing tax base to pay for our road improvements like you always have before. I have lived in Clackamas County my entire life and all the existing vehicle infrastructure has been funded by other means, never by a toll. If it is so crucial now to get it paid for by tolls, how did we ever get roads and bridges built in the first place? The kicker, along with other existing taxes, would easily pay for it... Problem solved. In addition, it appears you are already spending money you don't have by starting the Abernethy bridge renovation project, prior to tolling, which you claim is critical and the only way (you have determined) to pay for it, from what I understand.

**ODOT I-205 Toll EA - RECORD #1884 DETAIL****Submission Date :** 4/5/2023**First Name :** Amy**Last Name :** Milligan**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** Friends and neighbors continue to sadly put their homes on the market, and move out of state due to Oregon having the highest income tax rate in the nation, and out of control crime and homelessness. I too plan to leave the state next year after my daughter graduates high school. Citizens are beyond frustrated that governing bodies clearly fail to utilize tax dollars in a prudent or responsible manner. Now the government wants to bilk us further when residents and visitors alike can see with their own eyes that tax revenue is not being used wisely. Our roads ARE third world. I have had to replace my tires so often it's become a financial burden. The potholes and garbage/debris from people living on the streets creates a danger for drivers. I can't move away fast enough, as I have zero faith in local or state government to accomplish anything that actually benefits hard working, over taxed citizens. Furthermore, if these tolls are put in place over the Tualatin river, many drivers will simply skirt the tolls by diverting onto the 43 which is already overly congested. I live in Happy Valley, and will shop less in Lake Oswego, or at Bridgeport Village. It might behoove the powers that be to analyze how to divert funding from "no strings" entitlement programs toward upgrading our transportation system before more high earners flee the area. One day, there won't be enough of a tax base to fund much of anything. By the way, isn't the state eligible for monies set aside by Biden's massive infrastructure bill? All in all, I-205 tolls are simply bad policy and will punish low income commuters while negatively impacting cities such as West Linn and Oregon City.

**ODOT I-205 Toll EA - RECORD #1885 DETAIL****Submission Date :** 2/27/2023**First Name :** Richard**Last Name :** Mills**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** Oregon is already one of the most expensive states to live in. We have some of the highest gas tax. Tolls may make sense for electric vehicles or hybrids since they pay less in gas tax. Oregon has, for the first experienced a net out migration. It is going to get worse if you keep increasing taxes.



**ODOT I-205 Toll EA - RECORD #1886 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Joan

**Last Name :** Miner

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I appreciate the chance to give input. I believe seismic improvements are necessary. I believe that tolling is away to cover these costs. I suggest a method to have a reduced toll for Oregon residents whose annual income falls below a certain level.

**ODOT I-205 Toll EA - RECORD #1887 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Robert

**Last Name :** Minor

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** The opposition to the current tolling plan is enormous for so many reasons. Instead of restating what has been said by many may I suggest a alternative? Go ahead and establish tolling but only on the third lane. Express tolling will not face such extreme opposition, will allow ODOT to test a new revenue source and will minimize impacts to neighborhoods. In addition ODOT will show that they have actually listened to the public and responded with a plan that will be less impactful.

**ODOT I-205 Toll EA - RECORD #1888 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Kimberly

**Last Name :** Mitchael

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** This project is ridiculous. We already pay for the roads in our taxes. Why punish those who live in this area?! So aggravating.

**ODOT I-205 Toll EA - RECORD #1889 DETAIL****Submission Date :** 3/20/2023**First Name :** Robert**Last Name :** Moller**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** Stop the tolling plan. This is simply a money grab. If it were truly to be used only to pay for the repairs to the bridges then the revenue would be designated only for those uses and there would be a sunset clause indicating when the tolling would cease after the repairs were paid off.

**ODOT I-205 Toll EA - RECORD #1890 DETAIL**

**Submission Date :** 3/27/2023

**First Name :** Marilyn

**Last Name :** Montecucco

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** My experience with tolls: the road or bridge is built BEFORE it is tolled. Then the driver has a great reason to use the new road or bridge, it's doing the job it is engineered to do. To speed up travel time. If your intent is to keep people off the road to speed up travel time because only the rich will pay the toll you are discriminating against everyone else.

**ODOT I-205 Toll EA - RECORD #1891 DETAIL****Submission Date :** 3/7/2023**First Name :** George**Last Name :** Montejano**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I am fully against a toll road. Our property taxes are already high enough and yet my neighborhood is pack with homeless people. Now you want me to be more poor by charging me to drive on already public freeway in order for me to get to work, in which I have to show up to to pay my mortgage/property taxes/income tax. It doesn't make sense to make a toll if you can't offer us a safe alternative to get to work. The max is a joke, none of the homeless pay on there and now it's dangerous to get on. There's no policing on the MAX and that it's wasted tax dollars right there. Please do the right thing and use tax payers money responsibly, that will bettter the wellbeing of the taxpayers. Not the corporations/corrupt lobbied government or the homeless

**ODOT I-205 Toll EA - RECORD #1892 DETAIL****Submission Date :** 3/7/2023**First Name :** Jill**Last Name :** Monti**Affiliation :** None**Submission Method :** Web comment form

**Q3. Comments :** I am highly in favor of tolling over I-5 and I-205. I do not mind paying when I go to Vancouver to the casino or other destinations. But I have a disgust over the traffic jam that is created between residents of Washington between the two states strictly for work and to shop tax free. I pay tolls when I visit other states and their infrastructure and highways/bi-ways are amazing. Start with Washington residents instead starting with local. For informational purposes I am a second generation Portlander but Oregon Trail descendant. So my roots are deep here and I hate what the traffic has become.

<b>ODOT I-205 Toll EA - RECORD #1893 DETAIL</b>
---

**Submission Date :** 3/7/2023

**First Name :** Pamela

**Last Name :** Montoya

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I support the Toll project. I think the revenue that will be created will help fund needed repairs and reduce congestion. Thank you.



**ODOT I-205 Toll EA - RECORD #1894 DETAIL****Submission Date :** 4/3/2023**First Name :** Carole**Last Name :** Moore**Affiliation :****Submission Method :** Toll program email**Q3. Comments :** This is a terrible idea. All the proof you need is to look at other states that have implemented same. Once in place, it never ends. Oregon taxes are already high AND mis-used and wasted. And drivers will find ways to divert to other roads to avoid. You are opening a Trojan horse, that will create more resentment and anger from your constituents. You should have known better. Bad ideas always breed other problems.

**ODOT I-205 Toll EA - RECORD #1895 DETAIL****Submission Date :** 4/4/2023**First Name :** Walter**Last Name :** Moore**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** Bad idea. Hurts seniors and low income people. It will also put more cars and trucks on side roads and neighborhoods. Mcloughlin,82nd Ave, Hwy 224, and Hwy 43. Also Borland Rd and Hwy 99E

**ODOT I-205 Toll EA - RECORD #1896 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** James

**Last Name :** Moore

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I am a 5th generation Oregonian and live in unincorporated Clackamas County. Everyone I have spoken to feel this type of tolling is completely unfair and will create a massive traffic congestion in Clackamas, Oregon City, and West Linn. We have already paid for these roads many years ago, and it is completely unfair to the ordinary tax payer to enforce something like this without a vote of the people that pay your salaries. I have traveled to East Coast often on business and have personally seen the traffic and confusion related to tolling. Tolling will not solve our traffic problems, only more roads and traffic lanes will help. Stop allowing new construction without new roads, it just doesn't make sense. Thank you,

**ODOT I-205 Toll EA - RECORD #1897 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Jordan

**Last Name :** Morrow

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Please do not toll our highways that have already been paid for. The profits from the tolls will not be put to good use. This will only increase traffic in west linn and Oregon city which will make those areas less safe from traffic accidents and congestion. More time for the public to comment would be beneficial or better yet put trolling on the ballot and see it get rejected. Oregonians do not want tolls.

<b>ODOT I-205 Toll EA - RECORD #1898 DETAIL</b>
---

<b>Submission Date :</b>	2/27/2023
<b>First Name :</b>	Edwin
<b>Last Name :</b>	Morterud
<b>Affiliation :</b>	Voter
<b>Submission Method :</b>	Web comment form
<b>Q3. Comments :</b>	No tolls in Clackamas County ! Our livability depends on access to both sides of Willamette and Columbia rivers.

**ODOT I-205 Toll EA - RECORD #1899 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Deanna

**Last Name :** Mulder

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I have elderly parents that live in Beaverton and I live in the Jennings Lodge area. The quickest route to them is taking 205 to I5 to 27. However I do not like the fact that I would be charged a toll fee twice to get to them. It seems totally unjust that I would be charge a toll twice to get to them and then again twice to get home. At what I have seen the cost of the tolls, it could cost me up to more than \$8 for one trip. Having to make daily trips out there would be cost prohibitive and would force me to find alternative routes. In addition mt son and his family live in the Sunset neighborhood, I often have to make trips to pick up kids from school or watch kids. I could not afford the tolls to do this. This is just a couple of examples where the tolls would impact me. As someone who is on a fixed income I do not see where I am supposed to come up with additional funds to pay these tolls. It feels like ODOT decided this is what they wanted to do and doesn't care about our opinions or how we are supposed to pay for the tolls. I felt the need to comment but also feel like this will once again fall on deaf ears.

**ODOT I-205 Toll EA - RECORD #1900 DETAIL**

**Submission Date :** 4/9/2023

**First Name :** Karyn

**Last Name :** Munfofd

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Adding tolls would increase traffic through neighborhood streets, threatening safety of bicyclers and pedestrians using those streets and jeopardizing livability while increasing pollution in those neighborhoods. Frankly, it is a Draconian idea. The solution to paying for these projects is already in place...President Biden has already given money for this project...work within these perimeters without squandering and wasting money. If need be, increase gas tax would be more likely to reduce traffic in general, while still putting \$\$\$ in state coffers for pet projects.

**ODOT I-205 Toll EA - RECORD #1901 DETAIL****Submission Date :** 4/4/2023**First Name :** Ryan**Last Name :** Mushlitz**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I am NOT a supporter as all. As a resident of West Linn, I don't know anyone that supports this project, and the negative impacts it will have on traffic, congestion, and accidents in the local areas around the freeway. I have listened in on several city meetings, and other local residents like Oregon City seem to have major concerns as well. Sadly, I think the lack of support has been very visible and clear..yet the project keeps moving forward. Please scrap this project!



**ODOT I-205 Toll EA - RECORD #1902 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Robert

**Last Name :** Myers

**Affiliation :** None

**Submission Method :** Web comment form

**Q3. Comments :** This needs to be voted on by the people and not decided on by ODOT! It is a major change to our lifestyle in Oregon and is NOT what Oregonians want. This is not New Jersey. We have open lands and enjoy a sense of freedom here in the west. This will pit tremendous financial strain on local commuters by selecting these two sites. It will also divert a ton of traffic to side roads in order to avoid tolls. If the voters agree then so be it, but this huge change to Oregon should not be decided upon by bureaucrats alone. Find another way to fund your seismic updates to bridges. This is not a climate change issue at all.

**ODOT I-205 Toll EA - RECORD #1903 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** N/A

**Last Name :** N/A

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Customer is a senior, 75 years of age. She needs go on the bridge to get to doctor, pharmacy, services. Can't ride a bike and there is no reliable public transportation. She does not see how it will reduce traffic and how traffic won't be pushed onto side streets. Does not see that funds will help side streets where there is a problem, specifically such as OR43 Willamette Falls Drive, Oregon City Main St and old bridge. She does not think the traffic will go down an it will be a massive headache.

**ODOT I-205 Toll EA - RECORD #1904 DETAIL****Submission Date :** 4/20/2023**First Name :** Jeff**Last Name :** Nagata**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** For Brendan Finn in the Urban Mobility Office. Saw the interview on "The Story" on KGW. There were some comments on toll fees, and any possible relief on toll fees for senior citizens, whom many are on fixed budgets but drive the Interstates. Maybe a tiered rate for seniors over 60 years old, something to give them a break on cost as most seniors are on fixed budgets when retired, e.g. vehicles owned by seniors 66+ would be no toll fee, then tier down the fee for seniors 60-65. People are retiring later in life, so assuming most seniors under the age of 65 may still be working, 66 would be good age to start a no toll fee tier. As an incentive to increase the interest in the general population to purchase electric or hybrid vehicles, offer them free toll fees in the State of Oregon as part of their purchase of an environmental friendly vehicle registered in Oregon. As an example, check on the country of Norway. Not only do they offer the waiver of the VAT tax for purchase of an electric vehicle, they offer some tax incentives in owning an electric vehicle, and more importantly they offer free highway, bridge and tunnel tolls to add to the incentives to encourage owning electric vehicles. When we were there visiting family 5 years ago, there were many electric and hybrid vehicles on the road, outnumbering gas/diesel vehicles. And, this is in a country that produces much of Europe's oil and gas for export. If toll fees are inevitable for Oregon, maybe some added and creative incentives would help "sell" or soften the message on toll fees on our Interstates. Thank you.

**ODOT I-205 Toll EA - RECORD #1905 DETAIL****Submission Date :** 3/24/2023**First Name :** Irene**Last Name :** Neil**Affiliation :****Submission Method :** Voicemail

**Q3. Comments :** Hi, my name is Irene Neil and my comment is for the people who are determining if there should be a toll road here in Oregon. And I actually live near Portland so I would probably be affected somewhere along the way. I want this not to happen and it doesn't matter which committee I talked to, I just want my voice heard. I don't want a toll road. We don't need them we are getting along just fine and dandy. So, no toll roads. Thank you very much. Goodbye.

**ODOT I-205 Toll EA - RECORD #1906 DETAIL****Submission Date :** 2/24/2023**First Name :** Greg**Last Name :** Nelson**Affiliation :** N/A - I am a retired, 40-year resident of Oregon**Submission Method :** Web comment form

**Q3. Comments :** Many members of the Oregon House and Senate have painted a rosy picture of the benefits of tolling Interstate 205, but it an unrealistically rosy picture of the results of tolling. What they do not say is as important as what they do say, namely, why the so-called improvements in travel times and safety will occur. Tolling will not suddenly make traffic disappear; it will have to go somewhere. The real reason for the "improvements" is that drivers will seek alternate routes, namely, side streets in various neighborhoods, which will then become congested and potentially more dangerous, thereby negating the supposed benefits of tolling. Our know-it-all, arrogant legislators should put the tolling issue to a vote and let the proposed "tolled" voters decide. I believe that some other, equitable solutions to raise needed revenue might be an additional tax on gas (which would encourage the use of electric vehicles), or an added registration fee on all vehicles (gas and electric), or a mileage tax to be assessed at vehicle registration renewal time. There may be other potential methods as well. Let the voters have a say in where their money goes and how their state is run.

**ODOT I-205 Toll EA - RECORD #1908 DETAIL****Submission Date :** 4/4/2023**First Name :** Richard**Last Name :** Nelson**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I am strongly opposed to the proposed toll additions to I-205. One of the major reasons I-205 was constructed was to provide a north/south alternative for traffic between Tualatin and I-5 north of Vancouver and improved access to communities east and west of I-205 in the area north of the Abernathy bridge. Tolls on I-205 will increase traffic on I-5 north and south and increase already high rush hour traffic. I-205 tolling should be evaluated in the context of the entire I-205 and I-5 corridors. The EA should be a full EIS that evaluates all north-south and east or west corridors between Tualatin and I-5 north of Vancouver (at the location where I-205 connects to I-5)

**ODOT I-205 Toll EA - RECORD #1909 DETAIL**

**Submission Date :** 4/7/2023  
**First Name :** Jodi & Allen  
**Last Name :** Nelson  
**Affiliation :**  
**Submission Method :** Toll program email

**Q3. Comments :** We are residents of Clackamas County, near Milwaukie and Clackamas. We are retired senior citizens who travel I-205 and and highway 224 twice a month at least, for health issues. We are opposed to the citizens of Clackamas County bearing the burden of tolls just because we live in and must travel in the area to attend to our everyday lives. The burden of paying a toll on a daily or weekly basis is simply unfair. Some of our concerns are listed here:

1. Driver's attempting to avoid tolls will re-route through residential neighborhoods, causing additional wear and tear to roads, cause congestion and dangerous circumstances for residents and their children.
2. Tolls must be evenly distributed among users. It's a cop-out to place the financial burden on those living in the near vicinity when people all over Oregon use I-5 for PDX travel. How about the airport paying up.
3. If implemented, toll payment stations should be placed near Wilsonville as I-5 users clog both I-5 and I-205,
4. Low wage earners who live out of their work area, would be unfairly penalized as commuters.

Turning I-205 into a toll highway is a bad idea that would be unfairly and unevenly financed on the backs of those living in the area.  
Thank you,

**ODOT I-205 Toll EA - RECORD #1910 DETAIL****Submission Date :** 3/31/2023**First Name :** Kathleen**Last Name :** Neys Hove**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** Please don't toll - raise necessary funds via higher gas tax or fee on electric vehicles. Tolling will cause us to no longer utilize Wilsonville and Tualatin businesses, causing financial harm to businesses who will lose customers. It will also make our 99E route even more dangerous due to additional large volume of vehicles going this way to avoid the toll.



**ODOT I-205 Toll EA - RECORD #1911 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Erin

**Last Name :** Nielson

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :**

Good morning.

The toll road in the section of the 205 fwy will inspire an impactful increase of drivers choosing residential roads, including Bryant Rd, a thoroughfare for many LO-WL commuters already.

I live on Bryant Rd, and the impact of increased trips affects safety and comfort, walkability of the neighborhood, attractiveness of the neighborhood, and consequently affects home values.

Tolling new roads or tolling a faster lane is the only way to include tolls. Attaching a toll to the section of 205 mostly affects local traffic. The logic is thin, and optics are punitive and desperate, not well thought through, so therefore acceptance and understanding will be minimal.

**ODOT I-205 Toll EA - RECORD #1912 DETAIL**

**Submission Date :** 4/5/2023  
**First Name :** Kathryn  
**Last Name :** Notson  
**Affiliation :** None  
**Submission Method :** Web comment form

**Q3. Comments :** I oppose tolling on I-205. When people start driving off the freeway, they will use neighborhood surface streets. Not only that, they will use other state highways or former state highways, such as 82nd Ave. of Roses (formerly Hwy. 213). When Tri-Met built their Green MAX line along I-205, they assumed it would shift passengers off the 72-Killingsworth bus line to the Green MAX line. That did not happen. People continued to use the 72-Killingsworth bus line. Since ODOT transmitted jurisdiction of 82nd Ave. of Roses (formerly Hwy. 213) to PBOT in 2022, PBOT is now faced with improving 82nd Ave. on an accelerated timeline to begin construction by 2026-2030. Whatever is constructed on 82nd Ave. of Roses, it won't be able to absorb the impact of traffic shifted to it due to tolling anywhere on I-205. It will adversely impact 82nd Ave. of Roses. Tri-Met also wants to upgrade the 72-Killingsworth bus line like their Division FX2 bus line simultaneously. I know that 82nd Ave. of Roses will be absorbing increased traffic from I-205 if tolling is implemented. Tolling impacts are not being considered REGIONALLY, only LOCALLY. S. Macadam Ave. (Hwy. 43) will also be impacted from Lake Oswego to Portland, as well as McLoughlin Blvd. (Hwy 99E).

**ODOT I-205 Toll EA - RECORD #1913 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Brenda

**Last Name :** Nuding

**Affiliation :** home owner in area

**Submission Method :** Web comment form

**Q3. Comments :** Hi,My family lives near where the toll will be installed. I believe it will adversely affect our community by putting more cars on local roads not designed to handle increased traffic. I am strongly against toll roads in Oregon, as we pay high taxes and gas tax to cover road costs already. Please listen to the community!!

**ODOT I-205 Toll EA - RECORD #1914 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Josh

**Last Name :** Oakley

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** This project will destroy smaller community roads and infrastructure. 99E in Canby is the worst road in the state and ODOT refuses to fix this. I wonder the shape these roads will be in after all the traffic is diverted down 99E. ODOT should fix these other roads that will see a significant usage increase before considering tolling any road.

**ODOT I-205 Toll EA - RECORD #1915 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Don

**Last Name :** Ollila

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I don't like the idea of tolling. If this is a revenue problem, perhaps look at those not paying income or property tax and figure that out. If this is a volume of traffic problem, tolling the freeways just moves the problem to local roads. Volume will not necessarily be impacted by tolling roads. What would be impacted is either reducing the number of exits, adding additional freeways or widening the freeway. People still have to get from point a to point b so tolling will just move traffic from freeways to local road if traffic is positively impacted at all. Tolls are not a good idea. Washington who has heavier traffic does not toll. Tolling is a poor short term solution to the traffic problem.

<b>ODOT I-205 Toll EA - RECORD #1916 DETAIL</b>
---

**Submission Date :** 4/11/2023

**First Name :** Jill

**Last Name :** Olson

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I am very concerned about the proposed tolling projects and it's potential impacts. This is a regressive fee and impacts the people who can least afford it the most. There are no light rail options along 205 which would provide an alternative method of transportation. There are many people that would be forced to pay this fee regularly due to work and school. The proposed toll would be a great financial hardship for many and I truly hope it is reconsidered.

**ODOT I-205 Toll EA - RECORD #1917 DETAIL****Submission Date :** 4/5/2023**First Name :** Dennis**Last Name :** Olson**Affiliation :****Submission Method :** Voicemail

**Q3. Comments :** My name is [], resident of the Tualatin area. My comment today has to do with the tolling on I-205. I went to the library like the posted message in the paper said that you folks would be there between 10 and 2 today. I got there at 12:30 and you guys were gone, so I'm a little distressed and upset about that. Funds ought not be used for this project and it ought not go forward. It has a negative impact on many many residents, very troubling to older residents that go to the hospital a number of times, on a fixed income you pay more for gas, it's hard on old people on a fixed income. In my opinion, all the funds and effort directed towards this I-205 tolling project ought be put in with the new I-5 bridge, and the approach is to start in Washington County to relieve stress if that's what you're truly interested in. Put your effort into a new I-5 bridge from Portland to Vancouver. Leave the tolling off. I don't believe it's legal to have tolls on federally funded highways. I'm a distressed and upset taxpayer.

**ODOT I-205 Toll EA - RECORD #1918 DETAIL****Submission Date :** 3/20/2023**First Name :** Robert**Last Name :** Opgenorth**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** The taxpayers don't want tolling. Why won't ODOT listen. Maybe it's time to fire all of ODOT management and start over, or pass a constitutional amendment to ban tolling of public roads in Oregon.



<b>ODOT I-205 Toll EA - RECORD #1919 DETAIL</b>
---

**Submission Date :** 4/4/2023

**First Name :** Nick

**Last Name :** Orfanakis

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** As a resident of Clackamas Cty I support tolling but I must add that mitigation efforts must include segmenting traffic on Stafford Rd. During much of the day it is dangerous/very difficult to enter and leave the road for residents with driveways connecting directly to Stafford. This is in addition to the problems with the intersections at Childs and Johnson.  
Thank you,

**ODOT I-205 Toll EA - RECORD #1920 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Frank

**Last Name :** Pacosa

**Affiliation :** Retired homeowner

**Submission Method :** Web comment form

**Q3. Comments :** I strongly support tolling. ODOT is not recognizing clearly established studies that widening does not improve traffic like I 5 to 84 interchange. Tolling will improve traffic lessen global warming impact and make drivers who use it pay for it. Gas tax does pay enough for earthquake needed improvements.

<b>ODOT I-205 Toll EA - RECORD #1921 DETAIL</b>
---

**Submission Date :** 4/4/2023

**First Name :** Lisa

**Last Name :** Palmer

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I work in Beaverton, and the imposition of further expense in just being employed is disheartening. This should be paid for in taxes, as the functioning and economic benefit of the entire area is impacted by the improvements the fees are intended to offset - so should not be borne only by the people who have no alternative but to drive over these roads at this specific time in history.

**ODOT I-205 Toll EA - RECORD #1922 DETAIL**

**Submission Date :** 3/13/2023  
**First Name :** Alex  
**Last Name :** Pandzik  
**Affiliation :** CLACKAMAS COMMUNITY HEALTH  
**Submission Method :** Web comment form  
**Q3. Comments :** Hello,

I am expressing my concern about the effect of expensive tolls on our patients' ability to attend appointments and on our staff when faced with twice daily tolls to come to work. This may cause some of our already thin staff to find work with more local organizations to avoid driving and further affect our health centers patient care access.

Also, there is little realistic alternative for travel between Oregon City and Happy Valley. What exists isn't made for extensive traffic and adds > 15 minutes to a unidirectional commute.

Sincerely,

[ ] FNP Clackamas Health Centers

<b>ODOT I-205 Toll EA - RECORD #1923 DETAIL</b>
---

**Submission Date :** 4/4/2023

**First Name :** ray

**Last Name :** parke

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** there are bad ideas and horrendously bad! tolling on 205 falls into the latter category. traffic will be a mess. you can't see this? sheesh!

<b>ODOT I-205 Toll EA - RECORD #1925 DETAIL</b>
---

<b>Submission Date :</b>	4/4/2023
<b>First Name :</b>	Terry
<b>Last Name :</b>	Parker
<b>Affiliation :</b>	
<b>Submission Method :</b>	Toll program email

### Q3. Comments :

Per a recent survey, 90 percent of Oregonians object to tolling the roadways. Where is the political representation for this overwhelming super majority? History clearly demonstrates higher rates of personal mobility (such as driving) significantly contributes to greater economic productivity which in turn generates family wage jobs. In a conversation about six months ago with a popular brand name new car dealer, I was told the payroll for just the service department at the dealership is over six million dollars a year. The technicians make a hundred thousand or more a year. Additionally, more than 10% of the jobs in Oregon are tied to the auto industry. It is clear that motor vehicle usage keeps the economy humming forward.

The oppressive political bias and progressive dictatorial anti-car/car-hater mindset and discrimination coming from Salem MUST come to an end. Motor vehicle users are subsidizing too many other forms of transportation thereby siphoning off revenues that should only be going to fund streets, roads and highways specifically for just the users who are paying the taxes. It is time to stop targeting motorists with the discriminatory fleecing and extortion of taxes and fees that are being siphoned off to fund alternative mode infrastructure. This includes the social engineering fleecing of drivers by tolling the roadways.

Bicyclist advocates, in particular the outspoken ones, have become hypocritical freeloaders in that while they demean drivers, they benefit from the tax on fuel consumption and miles driven which pays for the privileged infrastructure specifically designed for bicycle travel. Instead of allowing the bicycling community to just provide "lip service" for what they clamor for, it is way past due time to require the freeloading adult bicyclists to pay their own way (possibly with registration and license fees) for the "privileged" and specialized infrastructure bicyclists utilize. This MUST include all bike lanes and trails, bike parking, bike bridges and the removal of traffic lanes to accommodate bicycle infrastructure, etc.. The old adage that most bicyclists also have a car simply doesn't spread the mustard any more. Parked cars on streets and in driveways do not help fund infrastructure.

Moreover, even with millions of motorist paid tax dollars spent on bicycle infrastructure in Portland, per counts by PBOT, there was a 46% drop in cyclists between 2013 and 2022, and a 37% drop between 2019 and 2022. Why continue funding this decline for freeloaders when more money is needed for roads and bridges? Starting with electric bicycles, adult bicyclists should be paying registration and license fees for their bikes, possibly even with some of the revenue being utilized to expand freeway capacity thereby taking more traffic off some surface streets that could make riding a bike safer - be it bicyclists actually abide by all traffic laws like they expect motorists to do. Bicycle registration and licenses for school age kids could be handled through the public schools at discount or possibly in some cases for free. This won't cover all the costs for bicycle infrastructure, but it is a healthy well intended start.

Likewise, public transit needs to become far more financially self-sustainable with a fare structure that not only pays for operations and transit vehicles, but also helps to pay for roadway maintenance. One two-axle transit bus does as much damage to the roadways as 1200 cars. As an example, on 82nd Avenue in where TriMet made 223 trips a day in 2019, it would have taken 267,600 cars in a 24 hour period traveling the entire length of the street to do the same amount of roadway wear and tear. Pre-pandemic transit fares barely covered 25% of TriMet's operating costs. Today's fares cover only about 19% or less of the operating costs. Making passenger car and light truck drivers pay for the heavy wear and tear buses do to the roads is discriminatory.

The only way to establish genuine authentic equity and total transport user accountability for all is to end the milking of motorist paid taxes and fees that bankrolls an infinite on tap ATM for alternative mode infrastructure, and require alternative transport mode users to pay the costs for what they exclusively utilize. Paying for what is being utilized also must include electric car and vehicle users paying their share with an electricity consumption fee, a electric grid upgrade fee and a road tax, all of which all be paid when charging a vehicle.

And finally, if you want to bring climate change into the dialogue, start with an open conversation about the underlying cause of climate change. Per the scientific community, the human population of the Earth became

unsustainable in 1970. Yet the politicians continue to promote growth while being mum to this underlying cause of climate change. In closing, tolling the Interstates needs to be round filed. Furthermore, if a new I-5 Columbia River Crossing requires tolling (WHICH I STRONGLY DISAGREE WITH), then the users of all modes including bicyclists and transit riders also must be required to pay a toll, and the I-205 bridge as an alternate route needs to remain free of ant tolling. In ODOTs language, any shift of traffic from I-5 to I-205 should only be viewed as tolling providing a congestion reduction program on I-5.  
Senior Citizen and Lifetime Portlander



**ODOT I-205 Toll EA - RECORD #1926 DETAIL****Submission Date :** 4/4/2023**First Name :** Jennifer**Last Name :** Patton**Affiliation :****Submission Method :** Toll program email**Q3. Comments :** I do not support tolls on 205. Oregon is one of the highest taxed areas in the US. Particularly the tri-county area. We do not need more money taken from our pockets. Perhaps you could toll the new lane you want to add. People that are willing to pay can pay to miss traffic. Just saw some of that in California over spring break.

**ODOT I-205 Toll EA - RECORD #1927 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Brooke

**Last Name :** Pearson Newberg

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I am very much against tolling 205. It is effectively trapping residents in their communities. We will not be able to drive our kids to sports or activities or run errands in surrounding areas. In our own communities the surface streets will be overwhelmed with people trying to avoid the tolls making it a nightmare to get around our own communities. There is no plan to address the communities affected and the impact that it will have. The taxes have been pain on the roads with already additional fees added in other places to go toward roads. This should not be an agenda.

**ODOT I-205 Toll EA - RECORD #1928 DETAIL**

**Submission Date :** 4/12/2023

**First Name :** Arlene

**Last Name :** Pena

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I believe that tolls are usually enacted on new bridges to help pay for them. Tolls are not used after a bridge is already paid for. I believe that enough taxes are collected, and that there is already funds for improvements.

**ODOT I-205 Toll EA - RECORD #1929 DETAIL**

**Submission Date :** 3/9/2023

**First Name :** Greg

**Last Name :** Perdue

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolling is such a bad idea. A lot of the residents of clackams County work out side of the county. This will cause great hard ship for us that travel for work. Can we screw Oregon up even more.

**ODOT I-205 Toll EA - RECORD #1930 DETAIL****Submission Date :** 3/1/2023**First Name :** Jeremy**Last Name :** Perin**Affiliation :** Public**Submission Method :** Web comment form**Q3. Comments :** Why are you even asking are opinion? You have already started the work no matter what we want. I feel there should be no toll . It's hard enough right now trying to make it without paying 5 dollars a day to travel to work. I have already cut lunch out and eat one meal a day because inflation now you are try to take even more. Thanks for not thinking about us working class.

**ODOT I-205 Toll EA - RECORD #1931 DETAIL**

**Submission Date :** 4/1/2023

**First Name :** Jed

**Last Name :** Peterson

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I have lived in many parts of this country. I grew up in the Pacific Northwest and I have always enjoyed that we didn't have toll roads. We already pay for our roads through our registration process and gas taxes. Adding another tax doesn't make sense. We need more accountability. Roads are not being repaired and instead there is already an investment in a toll build out that hasn't been approved. This is an inappropriate use of our tax money. Toll roads are inefficient by their nature. Those trying to avoid the tolls will flood the local streets that are not designed to take that kind of pressure off the main thoroughfares. These tolls will not discourage driving but will only make it more accessible to those with more means. This is a regressive tax. Shame on you for trying to force this through.

**ODOT I-205 Toll EA - RECORD #1932 DETAIL**

**Submission Date :** 3/8/2023

**First Name :** Sherry

**Last Name :** Phillips

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I believe tolling on roadways in oregon will only drive populations to move from the metro or leave oregon altogether thus destroying the economy

<b>ODOT I-205 Toll EA - RECORD #1933 DETAIL</b>
---

**Submission Date :** 4/3/2023

**First Name :** Carolyn

**Last Name :** Phillips

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I do not support the installation of tolls across 205 or I-5. It will slow traffic, cause motorists to find alternate routes to avoid paying the toll, possibly going through residential neighborhoods. Find the money elsewhere.



**ODOT I-205 Toll EA - RECORD #1934 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Sally

**Last Name :** Pierce

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Support tolling via a FastTrak responder for a carpool lane. Charge based on traffic patterns. I had a responder years ago. Loved it. I think this is a good compromise given that mass transit options are not always available.

**ODOT I-205 Toll EA - RECORD #1935 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Daniel

**Last Name :** Pierce

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** Hello. Yes, this has to do with the 205 tolling with ODOT. I wanted to fully disclose that I do not support this. My name is []. I live in Clackamas County in Oregon City. There is a lot that I do not like about this, do not want to continue with this. I feel like it's being forced upon us and trying a last ditch effort to try to get this snuck in in the last little bit. So I don't know how much detail you want on the message, but in a lot of ways, especially in the areas that I'm at, there is two lanes on that 205 and you can't take half the lanes away and expect that not to have a negative impact on Oregon City as a whole, West Linn, all the other surrounding areas as well. On top of that, it's literally eliminating 50% of the road for a huge amount of the people's commute time and an area to be able to go through that. There's plenty of other issues. I hope I get a call back from you guys. I'd love to go into a little bit more. My number is [] (925) 786-0710. Thank you very much.

**ODOT I-205 Toll EA - RECORD #1936 DETAIL**

**Submission Date :** 4/2/2023

**First Name :** Philip

**Last Name :** Pirrotta

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :**

1. Tolling usually starts with a plan to pay for new infrastructure but actually limits its use causing a long term disaster for the state.
  2. Trucks and cars avoid and/or drive around the tolls creating extra costs for the towns and cities that must absorb all the extra traffic and build roads to support it. Plus, every toll plaza eventually creates its own bottleneck. Toll plazas should never be in or around busy major cities
  3. At the same time when there is actually a growing need for more highways and bridges, the government gets fooled into thinking the tolling is working. Instead, it impedes the needed use of those facilities and the future need for more roads and bridges due to population increase. For example, Interstate I-5 should already have a parallel Interstate on the East side of the mountains from southern California to Canada. If that had been built I-5 would not be bottlenecked and would have a reliever interstate during the annual closures from weather and accidents.
  4. After the toll bridge or road is theoretically paid off the toll never goes away because the agencies and bureaucracy collecting and distributing money, without the profit motive of capitalistic businesses, will have grown so large it needs the money to just keep itself going and expanding.
  5. I am a retired domestic and international airline pilot and have been both based in and traveled to many cities noting that those without tolls were in much better shape than those that became addicted to tolling. Tolls never go away and are a burden to those that live near them. It limits the local people from the freedom of local travel. It creates extra costs for the town, village, or city they live in. Do not destroy the long term future of Oregon and the Portland area for a very short-term appearance of a gain. It is a trap.
- Sincerely,

**ODOT I-205 Toll EA - RECORD #1937 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Rene

**Last Name :** Pizzo

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** The tolling project is not ready to be moved forward. The needed infrastructure to move people off I-205 during congestion periods which is most of the day nowadays is not in place. You need to have inexpensive, safe, and readily available public transportation in place BEFORE the tolling project begins. There needs to be available housing as well as affordable housing closer to peoples' workplaces so they don't need to live further out and commute to work. There needs to be continued flexibility by employers for employees able to work from home to continue doing so or to work around peak travel times. There need to be viable alternatives for those of us who cannot easily get around from routes as simple as Oregon City to West Linn or West Linn to Milwaukie.  
The proposed cost alone for people who do not have the choice to avoid peak congestion travel is exorbitant at the rumored \$7 per day.  
Please stop the current tolling plans and look at the big picture by putting needed infrastructure in place first.  
Thank you.

**ODOT I-205 Toll EA - RECORD #1938 DETAIL**

**Submission Date :** 3/9/2023

**First Name :** Bruce

**Last Name :** Platt

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** No Tolls, we pay taxes for our roads, quit wasting money

<b>ODOT I-205 Toll EA - RECORD #1939 DETAIL</b>
---

<b>Submission Date :</b>	3/10/2023
<b>First Name :</b>	Kelly
<b>Last Name :</b>	Poindexter
<b>Affiliation :</b>	
<b>Submission Method :</b>	Web comment form
<b>Q3. Comments :</b>	Please stop the madness

**ODOT I-205 Toll EA - RECORD #1940 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Dylan

**Last Name :** Pollock

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** It seems to me that adding an additional \$20 to our DOT car registration every 2 year for only "Portland Metro" registered vehicles would take care of the money deficit. The Tolls equipment proposed is an expensive way to collect. This also is extremely burdensome for individuals who can ONLY use I-205 to commute.

**ODOT I-205 Toll EA - RECORD #1941 DETAIL****Submission Date :** 3/7/2023**First Name :** William**Last Name :** Polly**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I-205 tolling will adversely affect the quality of life for every resident that lives near or travels on it. This is just another "Vehicle Tax" on Oregonians who already pay some of the highest gas taxes in the country. There are better ways to relieve congestion other than a peak time travel penalty. Any money given to ODOT is simply wasted on salaries, PERS benefits, and prevailing wage (union) governmental corruption.



**ODOT I-205 Toll EA - RECORD #1942 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Bianca

**Last Name :** Pyko

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Do not toll our roads. You already cannot maintain our roads properly with the funds given and more taxing should not occur in our state. We already get taxed a high amount and have to do DEQ testing that is not required in most states. First fix the pot-holes and make it so we can see the lines in the road as the paint is so poor you cannot see it at night or in the rain and it is dangerous. During a time where most are struggling to afford the increases to cost of living in our region, this is not the time to add on a fee that will burden our lower income residents more than anyone else.

**ODOT I-205 Toll EA - RECORD #1943 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Richard

**Last Name :** Quackenbush

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I am for tolling as it is an equitable way of funding road improvements.

**ODOT I-205 Toll EA - RECORD #1944 DETAIL**

**Submission Date :** 4/8/2023

**First Name :** Norene

**Last Name :** Quam

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I live in Charbonneau, a community of mostly senior citizens. I am a very active senior citizen and I travel the Boones Bridge multiple times a week. It is the ONLY available way to get to Wilsonville where I bank, buy groceries, get gas, pick up prescriptions, use the library, attend fitness classes, stop at the post office, visit friends, etc. I am on a fixed income and having to pay a toll every time I left my home to go literally anywhere would be a serious hardship. A toll in the area at issue would also create a hardship for service people who come out to assist Charbonneau residents. My house cleaner, my handyman and my yard helper would either decline to come out and pay the toll or they would tack the cost on to what they charge me. I know that Charbonneau residents already schedule their trips over the bridge to avoid high traffic times. If forcing drivers to adjust their travel times is one of the goals of tolling, I believe everyone who has that option already does so. I understand the need for ODOT to raise funds, but putting a toll in I-5 at the Boones Bridge location would not only have a devastating financial impact on the Charbonneau residents, I believe it would create even more traffic nightmares than already exist. PLEASE reconsider placing a toll on the Boones Bridge.

**ODOT I-205 Toll EA - RECORD #1945 DETAIL**

**Submission Date :** 3/30/2023

**First Name :** Dave

**Last Name :** Quinn

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Please do not toll. There are many people hurting for money!! Please tax EV's since they are not contributing to the gas tax!!

**ODOT I-205 Toll EA - RECORD #1946 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** John

**Last Name :** Ramirez

**Affiliation :** Pacific Northwest Electric Inc.

**Submission Method :** Web comment form

**Q3. Comments :** Why are you criminals robbing us tax payers who have paid for these freeways hundreds of times over and you have not improved these roads in nearly 1/2 a century. The voters should have the last say. Our business uses these freeways daily and will have to pass these costs onto our clients who are already over burdened in this terrible economy.

**ODOT I-205 Toll EA - RECORD #1947 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Shelley

**Last Name :** Ramirez

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** It is infuriating that you have forced this toll on all of us who are already struggling in this extremely weak economy. We have already paid for these freeways and you have never done anything to improve them. How come there is no toll near Portland? Or Salem? Or Eugene? Because you are punishing Clackamas County. I cannot get out of this state fast enough. And I know that my comment or any of the other negative comments you get will make a bit of difference. You do what you want to do regardless and never let the citizens vote on these kinds of things.

**ODOT I-205 Toll EA - RECORD #1948 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** William

**Last Name :** Ramirez

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** While ODOT is requesting comments on the impact of Tolling Interstate 205, I have the feeling that ODOT is going through the motions and is not paying attention to or responding to the comments that it receives. My belief is that ODOT believes that it is conducting a marketing campaign which will lead Oregonians to support tolling. I do not support tolling for the following reasons. I do not believe that tolling will reduce traffic congestion on 205. This is for the simple reason is that there are no viable alternatives for driving on 205. Public transportation is infrequent in the area and is unreliable. I believe that tolling will result in diversion of traffic that will overload local roads and lead to congestion and further deterioration of roads which are already in need of repair; I refer particularly to Highway 43 and Willamette Fall boulevard. I am disappointed to learn that the tolls will not fund highway improvements in the affected area but will be used in other areas and for purposes other than reducing automobile traffic. The mayors of West Linn and Oregon City have commented on tolling and ODOT has not provided an acceptable response to their comments. I have attended several meetings with ODOT representatives to discuss my concern and I got a response similar to the response ODOT representative gave the major. All fluff and no substance.  
Best regards,

**ODOT I-205 Toll EA - RECORD #1949 DETAIL****Submission Date :** 4/4/2023**First Name :** Brian**Last Name :** Randall**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I think overall ODOT is a pretty decent organization besides the idiots who made employees get covid shots. That was so damn stupid. I bet the same idiots are pushing this as well. If you were a private company you would be bankrupt. Run your department more like a company and less like a drain on tax payers.



**ODOT I-205 Toll EA - RECORD #1950 DETAIL**

**Submission Date :** 4/5/2023

**First Name :**

**Last Name :** rdtorelli

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I live in Clark County and work in portland. This would be a huge financial burden to have to pay four tolls a day. People have to be at work at a certain time of day. How would tolling reduce congestion when the same people have to be at work at the same time they do now. It doesn't change the time I need to be at work. It just costs me money. This would be a huge mistake and a terrible idea.

**ODOT I-205 Toll EA - RECORD #1951 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Kevin

**Last Name :** Renfro

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Tolling I205 will have detrimental impacts on the community and should not be done. Tolling will only create traffic congestion, unnecessarily extending commute times. It will also detract from businesses. I'm sure others, in addition to myself, will avoid any area involving a toll. The cons far outweigh the pros and I am not sure why this is even being considered. Thank you.

**ODOT I-205 Toll EA - RECORD #1952 DETAIL****Submission Date :** 4/10/2023**First Name :** Keith**Last Name :** Rex**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** I believe the two biggest issues with interstate traffic in the Portland metro area is the bottleneck on I-5 in the downtown area where it is reduced to two lanes in each direction, which causes the greatest backup in the area, and the two-lane section of I-205 being addressed with the current construction upgrades of I-205. I am concerned about the variable tolling becoming excessive during peak rush hour times. It would be helpful to know what toll rates are being considered, a time-frame for the funding of projects through tolling, and to know what continuous tolling revenue will be used for.

**ODOT I-205 Toll EA - RECORD #1953 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Paul

**Last Name :** Reyes

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** We the people voted that we do not want our hwys tolled. The message was a resounding no, yet here you are doing it anyway. This is wrong on so many levels, but like Joe Biden say" I don't work for you" also applies to ODOT.

**ODOT I-205 Toll EA - RECORD #1954 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** David

**Last Name :** Reynolds

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :**

I think tolling is a very bad idea. It will have a significant number of negative effects that cannot be offset by the increased revenue from the tolls. 1. It has an overburdening effect on the poor, costing them significantly greater percentage of their potential income, even with discounts, many of whom would not even know how to access those discounts. 2. It will greatly increase local street traffic and congestion by people trying to avoid paying a toll. The point of a freeway is A. to be free to access. B. To decrease local street congestion. Neither of these goals is accomplished through this plan for paying for the bridge improvements. 3. A significant amount of the revenue from the tolls will be siphoned off to pay for the tolling booths and operators and the private company running the process. 4. It will increase congestion on the freeways themselves as people have to stop to pay tolls. 5. The only people benefiting from the tolling systems in California are the companies and employees running the tolling booths. 6. Promises that the revenues will go to Clackamas County are worthless. because: a. While on the surface this creates excess revenue, in fact it is not budget neutral. b. Clackamas County does not need this additional revenue. They need to live within their existing budgets and not be given the idea that anytime they want to increase their revenue, all they have to do is toll another road. Clackamas County is already doing a crappy job of managing the money they get for roads and are not keeping up the roads they have. Throwing more money at them won't fix that problem. They need to be held accountable for what they already have, not given more money to spend willy-nilly. c. This would just reinforce the idea that they can spend money however they want and then find new ways to tax the public to make up what they want. 7. Given that this is an interstate highway, the feds should be paying for most of the upgrades.

**ODOT I-205 Toll EA - RECORD #1955 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Edward

**Last Name :** Riebhoff

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** The State of Oregon makes enough money off of gas tax. As a person that has trouble making ends meet, a toll on 205, that I would have to travel through twice a day, it would put further financial burden on me.

**ODOT I-205 Toll EA - RECORD #1956 DETAIL****Submission Date :** 3/18/2023**First Name :** Fiona**Last Name :** Robbins**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** Your attempts to spin this positively for drivers ring hollow with those of us forced to pay the highest of your toll revenue. So, workers like myself, of modest income tending patients 8-5 at a care facility are exploited further – both directly by toll and by still higher prices at the register because truckers must pass on their own tolling costs.

**ODOT I-205 Toll EA - RECORD #1957 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Jennifer

**Last Name :** Roholt

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :**

1. This toll will cause undue burden on those commuters who regularly have to travel into the metro area, the toll project does not account for the fact that most people who commute, do so out of necessity, often people are living outside of the metro area because of the expensive cost of living in the city, which has pushed many people to the suburban and more rural parts surrounding the metro area. It will cost me \$312 dollars a year at the lowest, and \$520, I make decent money that I can cover that cost as a two-income household, but thinking about average minimum wage workers, single income parents, who often commute because of the cost of living and access to good jobs that is a significant crunch on finances per month. - you have failed to address how this is a regressive charge to those who have least financial security in our community.

2. Charging higher rates for people who have no control over their working hours that are often set by the businesses they work for, and saying people should just "commute during non-busy hours," when most people who commute do not work the type of jobs that allow that flexibility is insulting. - you have not addressed how people should go about changing this to avoid higher costs!

3. Referring to alternative commuting options, when current commuting options do not provide nearly enough variety of routes to accommodate many areas people are trying to get to, nor accounts for the time-cost of taking public transportation that is not light rail/max. There is no alternative outside of buses that follow the I205-corridor, with current bus schedules most people would have to add anywhere from 1.5-2 hours to their commute to account for time cost, bus transfers, and bus schedules that are not flexible, especially in rural parts of the county. You have not addressed the lack of available alternatives and the poor execution of current public transportation that will not be able to make up for the needs this toll road would create (even if people were able to sink the time-cost). Light rail would be the most obvious alternative to add if this toll road must be done, we need legitimate options for mass transportation, and funding that is not targeted at the poor.

4. Hours people commute are inflexible not just because of their job, if people have childcare needs, or children in school there are fixed times children can get on their buses to school or be let into their schools, parents are often beholden to school schedules, even if parents are flexible with work schedules, they cannot leave their children alone at home to commute outside of peak hours, without violating the law. This will add significant stress especially to single-parents with limited childcare options, who have to wait till their children are safely under care or at school before they can commute to their jobs - typically during peak hours, which now places significant financial cost on households who are more likely to live in poverty and earn lower wages. You have not address inflexibility and undue burden on these populations. This plan moved forward as a community attempt to reduce the traffic impact, but it has instead moved the impact to people who can least afford the cost, and removed the shared community cost. This is ill-planned and will create more harm to the community, much more than traffic congestion, move toward more realistic mass transportation options instead putting this on people who are just trying to get to work and do their jobs.



**ODOT I-205 Toll EA - RECORD #1958 DETAIL**

**Submission Date :** 3/13/2023

**First Name :** DA

**Last Name :** Rome

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolling these bridges will unfairly impact the citizens that work and live in near these bridges. Oregon already has one of the highest taxing rates in the United States and should look for other ways to pay for these improvements. In addition, only a small portion of the tolling funds will be returned to Clackamas County with the remaining funds to go the State of Oregon. The State government needs to learn to work within their financial means and stop looking to the citizens to pay for their lofty, unnecessary, hidden programs and projects. We have to live within our means which seems to shrinks every time the State has a whim.

**ODOT I-205 Toll EA - RECORD #1959 DETAIL****Submission Date :** 3/7/2023**First Name :** Rachel**Last Name :** Ross**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** Hello, Will the toll cost be discounted for people who live near the tolling station as we are disproportionately affected by the cost, as are the businesses we frequent. If I live in West Linn and grocery shop at Fred Meyers in Oregon City, am I now going to frequent that business less because of the added cost? West Linn and Oregon City residents and businesses are very interconnected. Is this being taken into consideration?

**ODOT I-205 Toll EA - RECORD #1960 DETAIL**

**Submission Date :** 3/28/2023

**First Name :** Cynthia

**Last Name :** Rountree

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Tolling is an abusive tax and a causes a hardship for drivers.  
I prefer to pay highway taxes through the Oregon STT tax withholding like I have been doing.  
It's not safe for me to use public transit since I'm high risk for Covid.  
Assuming a majority of taxpayers will switch to public transit is unrealistic on your part.  
I've always been proud and happy to live in a state where there is no highway tolling.  
Regards,  
Voter in Salem, OR

**ODOT I-205 Toll EA - RECORD #1961 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Caitlin

**Last Name :** Royal

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** Hello, my name is []. I'm a resident, Clackamas County and I actively work in and around the area with which that the toll is being proposed. And I'd like to say, and comment, that I do not want this at any point in time. I think this is a gross misuse of public funds. And, I think that nobody, not one single person, that I've ever talk to you about this, has thought that this is a good idea. And I just like it to be noted that the community does not think that this is a good idea. I'd like to ask that you conduct an environmental impact statement and extend public comment period for an additional 30 days.

**ODOT I-205 Toll EA - RECORD #1962 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Robert

**Last Name :** Rubenstein

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I am opposed to the imposition of any tolls on I-205. I travel on the proposed tolled area several times per week. Nothing about the project will benefit me personally. I am elderly and my income is low. Public transportation and bicycling are not viable options for me. Personally I will find ways to drive around the tolling booths. Doing so will increase traffic on city streets in the area.

**ODOT I-205 Toll EA - RECORD #1963 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Rick

**Last Name :** Rudisel

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** heard you are still taking public comment on toll roads. im sure MOST comments are AGAINST TOLL ROADS.  
If you honestly need more money, increase the gas tax. it will cost MILLIONS OF DOLLARS TO BUILD AND OPERATE TOLL BOOTHSbefore odot makes a dime on them. you claim it is to make drivers of electric cars pay. im in favor of that. have them report to a DEQ test area every 2 yearslike i do. record their odometer reading. charge them a fair cost per mile fee. no one can be against that many reps in salem are against the toll road plan. i sent this email to them:thank you for sponsoring SB 993 to ban tolling. I thought everyone knew the three things alloregonians hate: sales taxes, pumping your own gas, and toll roads. im irritated about them jamming toll roads down our throats because anything which so adversely affectsyour life or your wallet, you should be able to vote on it. apparently ODOT forgot toll roads are to pay for NEW construction only. then when that is paid for, the toll goes away.  
i was a kid during the 1960s and can remember dad paying a toll on the interstate bridge. i personally paid tolls on the astoria bridge. ODOT would have plenty of money if they spent it only on roads for motor vehicles. ODOT: before you build another pedestrian bridge, fix a few potholes. thank you,

**ODOT I-205 Toll EA - RECORD #1964 DETAIL**

**Submission Date :** 4/6/2023

**First Name :** Erin

**Last Name :** Ruff

**Affiliation :** Resident

**Submission Method :** Web comment form

**Q3. Comments :** I support the requests of Clackamas County and ask that you: Conduct an Environmental Impact Statement (EIS) for the tolling project, which would require additional analysis and more public outreach and community involvement; and Extend the public comment period for an additional 30 days (for a total of 90 days) and conduct another public hearing during nonworking hours so people who work a standard work schedule are able to participate.

<b>ODOT I-205 Toll EA - RECORD #1965 DETAIL</b>
---

<b>Submission Date :</b>	4/5/2023
<b>First Name :</b>	Paul
<b>Last Name :</b>	Rummell
<b>Affiliation :</b>	
<b>Submission Method :</b>	Web comment form
<b>Q3. Comments :</b>	NO Tolls



**ODOT I-205 Toll EA - RECORD #1966 DETAIL**

**Submission Date :** 4/3/2023

**First Name :** Theresa

**Last Name :** Russio

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolling is ridiculous in my opinion. It penalizes all that use 205 to go anywhere. In my case all physicians appointments, to visit grand children, to go to the store or airport. I am almost 70 and have been retired for 5 years on a fixed income. I do not even buy coffee from any of the coffee outlets as it is too expensive. Eating out is limited to once or twice a month. I will expected to pay a toll to visit my grandchildren's home, or go to physicians appt which total at least the equivalent of a meal out every few days. That is impossible for people without a job. Or a lower income

**ODOT I-205 Toll EA - RECORD #1967 DETAIL**

**Submission Date :** 4/4/2023  
**First Name :** Scott  
**Last Name :** Santangelo  
**Affiliation :** Private Citizen  
**Submission Method :** Web comment form

**Q3. Comments :** I believe that this is another form of tax that is hurting the people who work. In your Q & A there are to many vague, not answered questions. I believe you need to study the fixes you have implemented on streets that have caused congestion, accidents, deaths to pedestrians, before routing more traffic to streets because of your poor failed plans and the improper use of funds for roads that aren't being fixed. This should go to a vote of the people not a legislative vote where 70% of the people voting don't live in the area. Fairness be told if your tolling toll all areas, 26 in Bend, I-5 in Southern Oregon, 99 in The Valley etc....

<b>ODOT I-205 Toll EA - RECORD #1968 DETAIL</b>
---

**Submission Date :** 4/4/2023

**First Name :** Ryan

**Last Name :** Sauvageau

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I am against tolling I-205. I would avoid the area if it went into effect. We should eliminate head count at ODOT instead.  
Thank you,

**ODOT I-205 Toll EA - RECORD #1969 DETAIL****Submission Date :** 4/19/2023**First Name :** Chris**Last Name :** Sauvageau**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** Putting in tolling will guarantee that I will be avoiding the Portland area altogether. People move here from California and try to make Oregon like "back home." We don't want any of this. Governments and agencies are unable to conceive of tightening their belts or "making do" with what they have. Everyone else does, so why can't government?

**ODOT I-205 Toll EA - RECORD #1970 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Sharann

**Last Name :** Schaffer

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** This will cause major traffic issues. There's already traffic issues in this area and you want to cause more. Not only will it cause traffic issues on i205 but the adjoining neighborhood streets. There are several of us around still who remember what it was like before i205 and that's what is going to happen. The negative impact on the environment with cars sitting in traffic idling... the smog that it will cause. Come on it doesn't take a rocket scientist to figure out how bad this will be

<b>ODOT I-205 Toll EA - RECORD #1971 DETAIL</b>
---

<b>Submission Date :</b>	4/4/2023
<b>First Name :</b>	Bill
<b>Last Name :</b>	Schmidt
<b>Affiliation :</b>	
<b>Submission Method :</b>	Toll program email
<b>Q3. Comments :</b>	Please Don't, Please

**ODOT I-205 Toll EA - RECORD #1972 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Michael

**Last Name :** Schneider

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Tolling the 205 is an unfair way of raiding the capital required for maintenance and improvements.

This unfairly taxes certain communities more than others.

Having lived in Chicagoland, tolls are a terrible inconvenience.

LAWBREAKERS WITHOUT LISCENCE PLATES WONT PAY THE TOLL

BUT EVERY LAW ABIDING CITIZEN WILL.

Thank you for your time.

<b>ODOT I-205 Toll EA - RECORD #1973 DETAIL</b>
---

**Submission Date :** 3/16/2023

**First Name :** Judy

**Last Name :** Schrader

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** My suggestion is to toll I 205 from the Washington state line to the California state line. You could use a lower toll, and everyone would be paying for the road improvements. It would also cut down, hopefully, on the locals using the back roads thru Willamette, to escape the tolls. Wouldn't hurt to toll I 5 too so all of I 205 traffic doesn't go, there []. Oregon City



<b>ODOT I-205 Toll EA - RECORD #1974 DETAIL</b>
---

<b>Submission Date :</b>	4/5/2023
<b>First Name :</b>	Peter
<b>Last Name :</b>	Schraner
<b>Affiliation :</b>	long time local resident and business owner
<b>Submission Method :</b>	Web comment form
<b>Q3. Comments :</b>	Please do not toll our roads.

<b>ODOT I-205 Toll EA - RECORD #1975 DETAIL</b>
---

**Submission Date :** 4/4/2023

**First Name :** Rick

**Last Name :** Scott

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Toll I5 at entrances into Oregon. That would be two. Not in the middle of the state. You'll pocket more money and hurt Oregonians less.

**ODOT I-205 Toll EA - RECORD #1976 DETAIL**

**Submission Date :** 4/11/2023

**First Name :** Dean

**Last Name :** Scrutton

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** ODOT,  
Please consider another method than toll roads for revenue streams. This is an unfair approach and will fall hardest on people who can't afford it. In addition, the traffic from drivers diverting to local roads will threaten our small businesses in Oregon City. We may need a new approach to revenue streams with the increase in electric vehicles, this is NOT the route to go.

<b>ODOT I-205 Toll EA - RECORD #1977 DETAIL</b>
---

**Submission Date :** 3/7/2023

**First Name :** Judy

**Last Name :** Selander

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** No tolls in the metro area!! Instead, add more buses and reward people for getting out of their cars.

**ODOT I-205 Toll EA - RECORD #1978 DETAIL**

**Submission Date :** 4/5/2023

**First Name :**

**Last Name :** s-gilman@juno.com

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** This project should be suspended until it goes on the ballot so voters can vote on it. It is NOT acceptable for a variety of reasons that have already been discussed. It is unfair to motorists who must use the tolled routes and comes as a price that will affect households. We pay gas tax to build and repair roads and do not need another tax or poll in this state. You want more money go after the bikes and electric cars that don't pay gas tax but use the roads and bridges. They don't pay for road repair, upgrades, bike lanes or tags. WHY? We who live in rural areas without public transportation have no choice but to drive or quit work. People can only pay so much before it effects their income.

**ODOT I-205 Toll EA - RECORD #1979 DETAIL**

**Submission Date :** 3/8/2023

**First Name :** Baxter

**Last Name :** Shaffer

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Why doesn't ODOT listen to the initial opinions on I205? Tolling is fine for the new lanes, but DO NOT TOLL the existing lanes. That would be an equitable solution for low income people that can't afford tolling for work, school and other necessities. There is no public transit between where they plan to toll. Side streets are minimal to navigate around. ODOT should have left the third lanes on I205 between W Linn and Stafford when they build them for resurfacing 205. Should have made those lanes permanent. Tolling for 205 should end when the project is paid for and not serve as a revenue source for any other projects. I could afford the tolls, but I will REFUSE to use the freeway and go via side streets. Maybe it's time to move to Washington where they do know how to do tolling right.

**ODOT I-205 Toll EA - RECORD #1980 DETAIL****Submission Date :** 2/27/2023**First Name :** Dan**Last Name :** Shaw**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** The Toll is a bad Idea it will cause more hardship and other problems for the motoring public. Help congregation on 205 by forcing drivers to use other roads causing congestion makes sense, not. This would not be needed if we had people that actually cared for us in charge. People with common sense could have fix the problem years ago.

<b>ODOT I-205 Toll EA - RECORD #1981 DETAIL</b>
---

**Submission Date :** 4/18/2023

**First Name :** Theodore

**Last Name :** Sittser

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I have an 82 year old wife who is disabled. We have no practical choices for public transit and will be very affected by hop off traffic for those wanting to avoid tolls. We will be very negatively affected by inadequate planning for mitigation of these two issues.



<b>ODOT I-205 Toll EA - RECORD #1982 DETAIL</b>
---

**Submission Date :** 3/26/2023

**First Name :** Karl

**Last Name :** Skou

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Money from toll roads are generally fettered away. Once a toll is put on a road or bridge it is never removed like the bridge of the Gods the toll neverends. It is a never ending expense for anyone that has to use these roads to go to work. Toll roads are the worst roads I have ever traveled on.

<b>ODOT I-205 Toll EA - RECORD #1983 DETAIL</b>
---

**Submission Date :** 4/5/2023

**First Name :** Lisa

**Last Name :** Slusser

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** It seems like it is going to increase off highway traffic and that poor old bridge into West Linn from OC is going to be so crowded. It's going to be a pain to get anywhere, but I'm not sure how else it could possibly be paid for, so I'm all for tolling the highway.

**ODOT I-205 Toll EA - RECORD #1984 DETAIL****Submission Date :** 3/24/2023**First Name :** Mark**Last Name :** Smith**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** Tolling stations create congestion, reduce fuel efficiency, increase emissions. Hypocritical to deliberately impose higher emissions and reduced efficiency, while imposing strict "climate mandates" elsewhere ? Yes! Oregon is already one of the highest taxed states in the country. I'd suggest finding funding from existing revenue sources. Tough choices need to be made in order to ensure fiscal stability without raising taxes even higher.

<b>ODOT I-205 Toll EA - RECORD #1985 DETAIL</b>
---

**Submission Date :** 3/24/2023  
**First Name :** Craig  
**Last Name :** Smith  
**Affiliation :**  
**Submission Method :** Web comment form  
**Q3. Comments :** I vote for no tolling on any Oregon bridges.

<b>ODOT I-205 Toll EA - RECORD #1986 DETAIL</b>
---

**Submission Date :** 3/24/2023  
**First Name :** Sylfa  
**Last Name :** Smith  
**Affiliation :**  
**Submission Method :** Web comment form  
**Q3. Comments :** Please no tolling for any bridges in Oregon

**ODOT I-205 Toll EA - RECORD #1987 DETAIL**

**Submission Date :** 3/24/2023  
**First Name :** Josh  
**Last Name :** Smith  
**Affiliation :**  
**Submission Method :** Web comment form  
**Q3. Comments :** Please no tolling on any bridges in Oregon

<b>ODOT I-205 Toll EA - RECORD #1988 DETAIL</b>
---

<b>Submission Date :</b>	3/24/2023
<b>First Name :</b>	Luisa
<b>Last Name :</b>	Smith
<b>Affiliation :</b>	
<b>Submission Method :</b>	Web comment form
<b>Q3. Comments :</b>	Please no tolling on any bridges in Oregon

**ODOT I-205 Toll EA - RECORD #1989 DETAIL**

**Submission Date :** 3/24/2023  
**First Name :** Camille  
**Last Name :** Smith  
**Affiliation :**  
**Submission Method :** Web comment form  
**Q3. Comments :** Please no tolling on any bridges in Oregon



**ODOT I-205 Toll EA - RECORD #1990 DETAIL**

**Submission Date :** 3/28/2023

**First Name :** Kevin

**Last Name :** Smith

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I am writing this short letter to express my deep concern for my family and those in my community who will be adversely affected by ODOT's decision to install tolling stations on I5 and I205. By their own admission ODOT's plan will not add a benefit to our community or state, and will in fact, create a greater financial burden without any discernible plan to fix this problem. This is outlined in their own report (Appendix F, I205 Toll Economic Technical Report). To make it clear, I am opposed to any tolling on our local highways, and especially tolling that provides no clear benefit and only additional costs to our community and state.

Sincerely,

[ ] Resident, Oregon City and Clackamas County

**ODOT I-205 Toll EA - RECORD #1991 DETAIL****Submission Date :** 4/4/2023**First Name :** Frank**Last Name :** Smith**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** Hello, While we don't live in Clackamas County, we live 1 block from the border, and our family is one of the many that would be harmed by the proposed tolling of I-205. Tolling highways is essentially adding a regressive tax on the working poor, which is inconsistent with our region's stated progressive values, and it is morally wrong. I have written ODOT as well to share my opinions, but really, they don't seem open to proposing alternatives to tolling – just what may be well intentioned but misguided approaches to make it sound better while instituting unwelcome tolls. Clackamas County and areas nearby have many working folks that need to drive 205 to their jobs, and don't have the luxury of effectively utilizing mass transit or surface streets to meet their transportation needs. While there was a proposal to allow the working poor to essentially ask to pay less, forcing hard working people to beg for assistance is outright demeaning – not to mention this population that would be most harmed by tolling is likely the least prone to ask for the help, or have so many responsibilities that the inevitable request process will be yet another onerous burden on them. They don't need to be shamed for doing everything they can to make ends meet in a high cost metro area! Instituting this new fee will inevitably add to surface street congestion from folks seeking to avoid the tolls – offsetting the vehicle registration fees the counties in the metro area assess – so to some extent, tolling will just divert the impact of travel without likely reducing it. This will end up eventually resulting in the need for counties to make up for needed revenue to repair more heavily damaged surface streets. I know, the budgets for bridges and highway repairs aren't keeping up with inflation and dwindling gas taxes, but there has to be more equitable ways for the need for revenue to better reflect this area's stated care for the working class and working poor. As it is, the new registration fees have gone up dramatically, and actually, now to some extent disincentivize fuel efficient and electric vehicle adoption – same for the OreEGO program. Thank you for allowing for public comment.

**ODOT I-205 Toll EA - RECORD #1992 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Carrol

**Last Name :** Smith

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I live in West Linn. Our local roads do not have the capacity to handle the additional traffic that will increase during the years that tolling on the 205 is limited to the section from Hwy 213 to the Tualatin bridge (Stafford Rd). This problem has not been taken into consideration by ODOT.  
Against tolls for just one section of 205

**ODOT I-205 Toll EA - RECORD #1993 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Elaina

**Last Name :** Snow

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** To whom it may concern. I am a resident from Oregon city. Myself and many of my friends, family, and associates are against this plan for a toll bridge. Implementing a toll bridge will have many consequences. To start a toll bridge is classist - many people are struggling with inflation. It is effecting gas, food, and overall cost of living. People trying to survive by any means necessary living pay check to paycheck. A couple dollars to to cross the bridge here and there will add up. There are people that do not have a spare a couple hundred dollars at the end of the month. People are taking work where they can find it. Myself included I would spend 1.5-2 hours one-way trying to get to work. It was the only option for me at the time. Forcing people to pay to get to work is an additional influence hurting our economy. Especially a toll bridge on both sides to and from work/home. I at least ask that you reconsider people that have to work and drive during rush hour getting an additional discount. Many jobs don't offer the option to drive to workout outside of rush our traffic. Moreover, adding a toll bridge even with an express/ prepaid lane will cause more traffic. We have seen the traffic levels increasing over the years adding more stops will only be inconvenient to traffic flow. Forcing people to pay is not going to limit them driving during rush hour. The driving is not an option. People need to get kids to childcare, to get to work, to take care of family. Those rush-hour times are not people out having fun they're doing what they have to do to survive. As a resident born and raised here. I ask you to reconsider your decision about how this will effect the residents around here, and life overall. Thank you for your time and consideration.

**ODOT I-205 Toll EA - RECORD #1994 DETAIL****Submission Date :** 4/4/2023**First Name :** Joshua**Last Name :** Spann**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** Hello, We already have a gas tax, emission tax on vehicles in Clackamas County and some of the highest property tax rates in the country. If the State government cannot budget enough for infrastructure, and instead blow funding on ridiculous art & initiative projects, then why should you expect ordinary Oregonians to put up with a toll. One of the best things about Oregon, unlike other states, is that all roads are free to travel on. It allows all Oregonians to travel freely across the state. Unlike other states, free roads allow Oregonian's to explore this beautiful state without worrying about running into tolls. Once you break the seal of introducing tolls, it's only a matter of time before other tolls pop up. I would also question ODOT's decision to put a toll specifically on I-205. I-205 services some of Portland's poorer neighborhoods, so putting a toll there is a tax on the poor, and minority neighborhoods. Furthermore, if ODOT is really worrying about bottlenecking traffic, then they should be aware that most Oregonian's who can't afford to travel down I-205 are going to be looking for new routes, which is only going to clog the 5 and surrounding neighborhoods. ODOT, reconsider and cancel your plans. Keep Oregon roads free.

**ODOT I-205 Toll EA - RECORD #1995 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Susan

**Last Name :** Sperou

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Hi, I believe this is another way of taxing the citizens of Clackamas. It is how Oregon goes around the process of voting on taxes to just implement them with out our say so. We need to vote more responsible people into office to limit taxes. All the taxes that I pay goes for things I am against. Even though Oregon does not have a sales tax it seems we pay more taxes than states that do. I am completely against this.

**ODOT I-205 Toll EA - RECORD #1996 DETAIL****Submission Date :** 3/8/2023**First Name :** Jay**Last Name :** Spillum**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** Please don't toll Oregon roads. East coast anger is not what we need here. I live on NE Territorial Rd in Canby. I may not be able to get out of my driveway when everyone cuts through to and from 99 to get around this. Pay for this the old fashioned way please. Tolls limit freedom of movement and therefore my and everyone else's freedom. Poor people will have to go out of their way. Other roads will be clogged and my property values will go down. Shame on you ODOT for turning Oregon into an East coast toilet of tolls! This should never have been considered seriously. I am a native Oregonian and really do not want this here.

**ODOT I-205 Toll EA - RECORD #1997 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Jacob

**Last Name :** Spindel

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Please do NOT add any new tolls to our highways. This issue has been discussed at length by many in our community, and at least from what I have seen, reactions to the tolling plan have been 100% negative. If you are really that desperate for cash for transportation purposes, take it out of Trimet's budget. Trimet is a complete sham and should be defunded anyway.



**ODOT I-205 Toll EA - RECORD #1998 DETAIL**

**Submission Date :** 3/28/2023

**First Name :** Vincent

**Last Name :** Sprawkins

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Pertaining to this stupid idea about tolling, when is enough taxes on the People enough. We are getting taxed right out of our homes. It is not our fault that the Government cannot handle the money that they have. Maybe if they would not pay such high wages and have so many benefits and Pers, they could afford to fix the roads and do all their projects. You people just sit back and try to figure out a way to tax the people a little more and ending up causing people to move to another State. We are tired of the way that ODOT is being run as well of, the Government.

**ODOT I-205 Toll EA - RECORD #1999 DETAIL****Submission Date :** 3/9/2023**First Name :** Louis**Last Name :** Starelli**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** NO TOLLS!! I already get ripped off for my electricity, now you want to rip me off for driving to and from college, and then work?!? I am away from my house and family at least 13 hours a day, trying to better myself and make ends meet, just barely. I have three kids, a wife and am a single income family, and you want to do THIS?!? stop the madness. further more we will never even consider the tri-met system because it is a violent cesspool regarding transportation. And I don't want my family to get assaulted or stabbed, or even looked at while they make their normal transits throughout the day. What this really is, is Portland, ideals hemorrhaging all over the connected areas.

<b>ODOT I-205 Toll EA - RECORD #2000 DETAIL</b>
---

**Submission Date :** 4/6/2023

**First Name :** Nick

**Last Name :** Stevenson

**Affiliation :** PECO Inc.

**Submission Method :** Web comment form

**Q3. Comments :** PECO is an Aerospace and Defense manufacturing company located in Clackamas, with approximately 250 employees. A significant portion of our workforce lives in areas that would be impacted by this toll. I have personally discussed this topic with many of them and they have expressed the impact this will have financially on them and if this is approved as outlined, will force them to find employment in areas not impacted by this. As the leader/President of our company, I fear this will impact our ability to grow/scale-up as we need to meet the demands of our industry post-COVID. I ask that you please reconsider adding a toll on the I205 section of our community. Thank you

**ODOT I-205 Toll EA - RECORD #2001 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Kathleen

**Last Name :** Stewart

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I am severely immune compromised and cannot attend in person. I am generally in favor of tolls because those who do not use the road are not required to pay. However I am against the current I205 tolling for these reasons:1. I205 does not compare equally to other tolling sites in the country probably used for comparison. There are no close-by alternate routes other than through residential streets. Even accessing 99E almost always requires going through residential streets.2. With 2 tolling spots, many people will need to pay 4 tolls a day to drive to work, unless they use alternate routes.3. If replacing the bridge is an emergency, other funding rather than tolling should be used so all citizens pay a portion of the cost. Everyone benefits from commerce and supply vehicles that use I205.4. Tolls will hurt lower income citizens the most.Thank you5. Drivers using residential streets to avoid tolls will add additional exhaust fumes to neighborhoods where citizens live and okay.

**ODOT I-205 Toll EA - RECORD #2002 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** KATHLEEN

**Last Name :** STEWART

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Please extend the comment period. I have been unsure where to comment and am now learning the avenues to use. This is of VITAL interest to me. The tolling will affect me most of every day. Thank you.

**ODOT I-205 Toll EA - RECORD #2003 DETAIL**

**Submission Date :** 4/7/2023

**First Name :** Linda

**Last Name :** Stigall

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I am not for toll roads. Many people will be using the same route everyday and will have to pay a toll each way. I myself have family that live where I would have to pay a toll to visit them, and some family members I would have to pay two tolls to visit them - paying (4) toll fees. These tolls fees will be a strain on our finances - we the people are having a hard time as it is. Tolling will cause congestion on back roads and neighborhoods, and probably more accidents. Oregon should find other ways to raise taxes. We the people did not even vote on this!!!!

**ODOT I-205 Toll EA - RECORD #2004 DETAIL****Submission Date :** 3/27/2023**First Name :** Linda**Last Name :** Stone**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I am opposed to any tolls on I-205 or I-5. I think this would be very much of a hardship for lower to middle class commuters. In a period of inflation, where paychecks are spread thin, this is a bad idea. I would be in support of a class action suit if these tolls are implemented. Find other ways to reduce traffic congestion, other than punishing middle-class workers. Better incentives on electric cars, electric car only lanes, HOV lanes, etc. Thank you for your consideration.

**ODOT I-205 Toll EA - RECORD #2005 DETAIL**

**Submission Date :** 4/4/2023  
**First Name :** Shawne  
**Last Name :** Stone  
**Affiliation :** private voting citizen  
**Submission Method :** Web comment form

**Q3. Comments :** I am extremely concerned about this project for many reasons...1) Have you seen the traffic on 205 - even on Sunday already? The locations that you are proposing are already safety hazards and adding tolling to these spots will add another element of hazard. I lived in San Francisco for many years and am very familiar with what tolling does - no matter how smoothly people say it will be and the idea that it does not cause a backup - yes it does.2) What are the environmental implications since the project would change everything from water runoff to more oil on roads, etc. in these locations?3) I work in Clackamas and now have a senior citizen mother in Wilsonville - I cannot afford to pay these tolls five days a week, and I know there are many people in the same position. I really don't want to have to move, but feel that this, along with all of the other costs that have been added, is just going to make it so I have to sell my home and move toward Molalla - definitely not what I want to do. Is there a plan for the residents of West Linn that are going to be penalized for living there by this toll?Thank you for listening.



**ODOT I-205 Toll EA - RECORD #2006 DETAIL**

**Submission Date :** 3/3/2023

**First Name :** David

**Last Name :** Strantz

**Affiliation :** Toll bridge ODOT

**Submission Method :** Web comment form

**Q3. Comments :** I visited Florida and every Resident knew how to get around the BOOTHS. This will totally congest the side streets. Also the tolling was to make people use public transportation---WELL there is not facilities in the Abernathy area. GOD bless the HOUSE\_ODOT blocker BILL

**ODOT I-205 Toll EA - RECORD #2007 DETAIL**

**Submission Date :** 3/24/2023

**First Name :** Gary

**Last Name :** Streat

**Affiliation :** Retired

**Submission Method :** Web comment form

**Q3. Comments :** Oregons ODOT is famously incompetent and wasteful, we dont need more taxes and fees and now tolls, we need accountability from ODOT. Fix that first!

<b>ODOT I-205 Toll EA - RECORD #2008 DETAIL</b>
---

<b>Submission Date :</b>	4/11/2023
<b>First Name :</b>	Roman
<b>Last Name :</b>	Streed
<b>Affiliation :</b>	
<b>Submission Method :</b>	Toll program email
<b>Q3. Comments :</b>	Absolutely positively NO more taxation without a vote

<b>ODOT I-205 Toll EA - RECORD #2009 DETAIL</b>
---

**Submission Date :** 3/7/2023

**First Name :** Deborah

**Last Name :** Stuart

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I do not want a toll charge on our roads. It would put hardship on those that need to drive but do not have the extra funds to cover such charges.

<b>ODOT I-205 Toll EA - RECORD #2010 DETAIL</b>
---

**Submission Date :** 4/4/2023

**First Name :** Andrew

**Last Name :** Suchocki

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Hi. I do not object to tolling on 205. Oregon City, where I work, will absolutely become a cut through for people to avoid tolls. Locating them closer to the Gladstone exit will make a big difference.  
Again, no objection to tolls. It's the 'where' that's the issue. Unless you have data showing Oregon City streets won't be impacted- not sure how that's possible though...Anyway, thank you.

**ODOT I-205 Toll EA - RECORD #2011 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Scott

**Last Name :** Sullivan

**Affiliation :** none

**Submission Method :** Web comment form

**Q3. Comments :** I do not oppose tolls if they are paying for added lanes to speed up traffic or other infrastructure that lightens the load of traffic. If toll lanes were involved for those who wish to pay that would be ideal. Leave other lanes toll free.

**ODOT I-205 Toll EA - RECORD #2012 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Steve

**Last Name :** Svehaug

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** WHY toll I-205?? If it is to be tolled it should start at where it branches off of I-5 not all the way down by Oregon City area! If you toll I-205 then you should toll I-405 too!! then lets see how that would go with voters!

**ODOT I-205 Toll EA - RECORD #2013 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** jay

**Last Name :** swenson

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :**

NO TOLLING ON 205. many reasons why!

1. Why should the taxpayers be charged for the use of a road that has been paid for for years!... And was under built at the time of the build. One of the two major bottle necks in all of the i5 corridor!

2. The main job of odot is to build roads! Their hasn't been a major road built in decades, yet we have hundreds of odot workers costing taxpayers millions of dollars a year for too many on the payroll. If y'all want to make/ save money for taxpayers then we should start by trimming the fat!



**ODOT I-205 Toll EA - RECORD #2014 DETAIL**

**Submission Date :** 4/4/2023  
**First Name :** Jeremy  
**Last Name :** Tallmadge  
**Affiliation :**  
**Submission Method :** Toll program email

**Q3. Comments :** This plan to roll and place the financial burden primarily on two communities, without a vote, is irresponsible and the perfect example of a lack of representation in Oregon. I've spent years in states with tolling and never have I experienced a single state that places the burden on those who don't have a say and even more so, don't have these so-called 'public transportation' options Oregon tries to promote. Oregon City and West Linn are not Portland. Oregon is the perfect example of mismanagement of financial resources and this is yet another example. If Oregon has a toll, it should be on the interstate bridges, highways on the Oregon/California border and possibly the Idaho border. But to tax residents of two communities, especially without a vote, is unfortunate and the new reality of Oregon. It is plans like this that prevent me, and many of my friends, family and colleagues, from voting in a manner that Oregon is used to. I truly hope Oregon discontinues this plan as this will be one more reason to lose all trust and faith in this state.  
No tolling without a vote.

**ODOT I-205 Toll EA - RECORD #2015 DETAIL****Submission Date :** 2/21/2023**First Name :** Brandon**Last Name :** Tate**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I adamantly oppose this project. The state is responsible to its citizens to find an alternate method of easing traffic congestion and funding highway maintenance. The Project will disproportionately affect the residents of clackamas county and those on the southern border of multnomah county. It is evident the project group is ignoring the fact that drivers will "off load" from the freeway onto surface streets. Ask any resident of a metro area with tolls. It saddens and angers me that in one of the highest taxed states of the union, our leadership continues to require more money from the pockets of private citizens. More and more and more. I'm requesting the project to find alternative funding options that includes but not limited to taxing interstate commerce; out of state vehicles; but most importantly exempting Oregon plated non-commercial vehicles. Portland is in shambles and high income earners are leaving the metro area. Tolling freeways will be another form of catalyst to turn our community into one of exodus. I'm ashamed of our state leadership and the members of this project advocating for tolling of private citizens using the roads they've already paid for in taxes and fees.

**ODOT I-205 Toll EA - RECORD #2016 DETAIL**

**Submission Date :** 2/22/2023

**First Name :** Mary Ann

**Last Name :** Tautfest

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I oppose toll bridges. Oregon is refreshing because we can travel without the added expense and trouble I don't see the advantages that states with toll fees have over us. I feel this issue should require the approval of our citizens. We need to vote on this huge change. Thanks for asking.

**ODOT I-205 Toll EA - RECORD #2017 DETAIL****Submission Date :** 3/3/2023**First Name :** Ronald**Last Name :** Taylor**Affiliation :** none**Submission Method :** Web comment form**Q3. Comments :** Howdy, I am against any tolling. These roads were bought and paid for years ago and the big gas taxes should be enough to maintain and improve them as needed. I see so much waste and mismanagement of funds in ODOT. I would like not give them another dime. A toll would hurt, I drive the road to volunteer, I am forced to buy the gas, but I will have to find a away around the toll bridge. How's that gonna help the environment or safety? Please find another way.

<b>ODOT I-205 Toll EA - RECORD #2018 DETAIL</b>
---

**Submission Date :** 3/7/2023

**First Name :** Scott

**Last Name :** Tepavich

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** ODOT is a department of the state government. Your funding comes from tax payers and the feds (which in turn is funded by the tax payers). We have repeatedly voiced we do not want this project to go through. I personally have sent feedback on why this is not a good idea. Yet this persists. At a minimum, do not put tolls between exit 8 and exit 11 on I-205. If you do, we the people of Clackamas county will not sit idly by.

**ODOT I-205 Toll EA - RECORD #2019 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Mike

**Last Name :** Thayer

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** To whom it may concern,  
I am totally against tolling on I-205. Too many taxes, restrictions ect. For residents that live in West Linn and Oregon City surrounding areas this is a major change that will affect all of our lives. Year in and year out our taxes, property taxes go up and up. Now with record inflation residents need lower taxes, not more fee's in the form of tolling where we drive every day. Side roads will become even more busy with traffic patterns that would develop. Safety issues with more people trying to save money will result because of diversions caused by this idea. I feel that over the past twenty years I have paid my fair share of transportation cost as well as costs to run the Federal and State governments.  
The majority of citizens in the most affected areas, West Linn, Oregon City, Gladstone ect. are against this idea. When will the local elected public officials and citizens in these communities be listened too? Stop making our standard of living decrease because of higher costs! I would like to see government's imprint become smaller and less expensive for the citizens that the government is suppose to represent. This is just one more bad idea to make the government creep larger.  
Sincerely, long time resident

<b>ODOT I-205 Toll EA - RECORD #2020 DETAIL</b>
---

<b>Submission Date :</b>	3/16/2023
<b>First Name :</b>	Madison
<b>Last Name :</b>	Thesing
<b>Affiliation :</b>	City of Lake Oswego
<b>Submission Method :</b>	Letter
<b>Q3. Comments :</b>	Hello, Attached is a letter from our City Engineer/Public Works Director, Erica Rooney PE, in regards to the comment period for tolling and land use. Please let me know if you have any questions or follow up. Thank you for your attention and consideration. Sincerely,
<b>Attachments :</b>	City_of_Lake_Oswego_ODOT_Land_Use_Commment_3.15.23_SIGNED_.pdf (3 mb)



March 15, 2023

Roseann O'Laughlin  
Oregon Department of Transportation  
355 Capitol Street NE  
Salem, OR 97301

Sent via email to email: [OHPmanager@odot.Oregon.gov](mailto:OHPmanager@odot.Oregon.gov)

Dear Ms. O'Laughlin:

Thank you for the opportunity to provide comment regarding the Oregon Department of Transportation's proposed determination that the Toll Program is not a program that will affect land use. However, it is our understanding that the Toll Program can and will have a significant effect on land use. This is true of tolling any facility will have a direct impact on a jurisdiction's present or future land uses identified in their adopted Transportation System Plan and Comprehensive Plan.

On February 1, 2023, ODOT provided notice to the Department of Land Conservation and Development (DLCD) that Director Strickler will issue a determination that its statewide tolling program is not a "program affecting land use" and therefore does not fall within the agency's state agency coordination duties. As described in the notice and in Goal 6 (Tolling and Congestion Pricing) of the Oregon Highway Plan (OHP)<sup>1</sup>, the Tolling Program will oversee two types of tolling: (1) tolling, which charges fees to generate revenue to be used for specific infrastructure; and (2) congestion pricing, which charges variable fees in an effort to alter a driver's mode choice or travel behavior.

Tolling and congestion pricing both have been observed by ODOT to create diversion issues. Diversion has been defined as "choosing an alternative to paying a toll and is inherent when tolling implemented, as most motorists are sensitive to toll rates."<sup>2</sup> After ODOT completed the Portland Metro Area Value Pricing Feasibility Analysis, the Oregon Transportation Commission

---

<sup>1</sup> Oregon Highway Plan Policy Amendment, *Goal 6: Tolling and Congestion Pricing*, 2023, page 1, [https://www.oregon.gov/odot/Planning/Documents/OHP\\_Goal\\_6\\_Policy.pdf](https://www.oregon.gov/odot/Planning/Documents/OHP_Goal_6_Policy.pdf), (accessed March 14, 2023).

<sup>2</sup> Prepared for ODOT by Cambridge Systematics, Inc., *Tolling and Congestion Pricing Research and Policy Support: Congestion Pricing White Paper*, 2017, page 20, <https://www.oregon.gov/odot/KOM/Tolling-White-Paper.pdf>, (accessed March 14, 2023).



directed ODOT to consider the three following priority issues as they progressed in the process to begin tolling on I-5 and I-205:

- Impacts of tolling on communities experiencing low income
- The need for improved transit and other transportation choices
- The potential for highway pricing to cause traffic to divert to local streets<sup>3</sup>

As explained in ODOT's Portland Metro Area Value Pricing Feasibility Analysis, diversion impacts to adjacent roadways are directly correlated to the means and process of setting rates, where "appropriate rate setting through dynamic pricing could maximize flow on the priced portion of the facility and reduce the incidence of diversion."<sup>4</sup>

While the final toll rates will be established by the Oregon Transportation Commission, the proposed tolling program, as described in the notice to the DLCD, "... will consist of the necessary processes and systems to set toll rates... manage toll equity programs (such as low income and other programs that may provide discounts or exemptions to certain users)... and other functions necessary to run a toll system."<sup>5</sup> These programmatic elements associated with tolling have the potential to significantly affect how users will interact with the regional transportation network. They are not, as the notice argues, "back room" functions.

It is known that tolling and congestion pricing can impact the nearby existing transportation networks, and therefore land use. Due to this fact, Statewide Planning Goal 12 requires the evaluation of impacts to transportation systems in the land use planning context. One purpose of Statewide Planning Goal 12, as implemented through the Oregon Administrative Rules, is to "Protect the functions of existing and planned transportation facilities, corridors, and sites..."<sup>6</sup>

As described in the Oregon Highway Plan, the purpose of Congestion Pricing is to "encourage motorists to plan travel in advance to use the roadway during less-congested periods or use a different mode..."<sup>7</sup> ODOT's intent to toll all lanes of an interstate ensures that motorists do not have a choice to continue traveling on the facility without paying a fee. Under this approach, the only alternatives available to the motorists would be: choose a different travel time of day (if possible) for a lower price, choose a different mode if one is available and provides a similar travel time, or choose a different roadway and route all together. The act of tolling and congestion pricing will no doubt change the travel behavior of some; however, as noted

<sup>3</sup> Oregon Department of Transportation. *I-205 Toll Project Environmental Assessment*, 2023, page 1-2, [https://www.oregon.gov/odot/tolling/Documents/I-205%20Toll%20Project%20Environmental%20Assessment\\_508.pdf](https://www.oregon.gov/odot/tolling/Documents/I-205%20Toll%20Project%20Environmental%20Assessment_508.pdf), (accessed March 14, 2023).

<sup>4</sup> Prepared for ODOT by WSP USA, Inc. & DKS, *Portland Metro Area Value Pricing Feasibility Analysis*, 2018, page 6, [https://www.oregon.gov/odot/tolling/Resources/History/TechnicalMemo4\\_Evaluation.pdf](https://www.oregon.gov/odot/tolling/Resources/History/TechnicalMemo4_Evaluation.pdf), (accessed March 14, 2023).

<sup>5</sup> Oregon Department of Transportation, *Tolling Notice to DLCD*, pages 2-3, [https://www.oregon.gov/odot/Planning/Documents/Tolling\\_Notify\\_to\\_DLCD.pdf](https://www.oregon.gov/odot/Planning/Documents/Tolling_Notify_to_DLCD.pdf), (accessed March 14, 2023).

<sup>6</sup> OAR 660-012-000 (1)(i), <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=292986>.

<sup>7</sup> Oregon Highway Plan Policy Amendment, page 1-2.

previously, diversion "... is inherent when tolling is implemented..." and, if tolling is implemented in areas with limited alternative travel options (transit/bicycle/pedestrian), diversion would be expected to increase the usage of adjacent transportation facilities. These adjacent transportation facilities are, in most cases, maintained by local jurisdictions, which must plan for these facilities in their transportation system plans.

Per Oregon Administrative Rules, all transportation system plans must comply with Statewide Planning Goal 12<sup>8</sup>. Per *Columbia Pacific Bldg. v. City of Portland*, "the performance standards' of an 'existing or planned transportation facility' 'identified in [a] TSP' must, by law, comply with all of Goal 12's requirements."<sup>9</sup> Since the act of tolling or implementing congestion pricing on a facility may impact adjacent facilities, there would be the potential for impacts to the performance standards of existing or planned transportation facilities, thereby clearly affecting land use.

The State's Transportation Planning Rule<sup>10</sup> and the Oregon Highway Plan Policy 1F Revisions already define what constitutes a "significant effect" on any particular transportation facility. In particular, Action 1F.5 in the Oregon Highway Plan Policy 1F Revisions, as adopted by the Oregon Transportation Commission, provides that actions that increase traffic on a facility by more than 1,000 average daily trips have a significant effect due to the degradation of the facility and would be subject to processes for resolution.<sup>11</sup>

ODOT has stated that the purpose of the tolling program is to both raise revenue and manage congestion. While the notice provided by ODOT states that the tolling program does not include any physical infrastructure on the highway, and that any land use impact for physical infrastructure will be determined as with any other construction project, this conclusion fails to account at all for the impact congestion management could have on land use. Again, the Portland Metro Area Value Pricing Feasibility Analysis identified that the rate setting itself could be used to address diversion impacts, which would also involve the processes and systems to set those rates.

Additionally, while the notice provided by ODOT states that all of their current programs that generate revenue do not affect land use, the tolling program and the impacts that can be tied to congestion management are fundamentally different. The other programs cited by ODOT in their notice (fuel taxes, weight mile taxes, OReGO, and DMV fees) are poor comparisons to the

<sup>8</sup> OAR 660-012-0025 (2), <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=175279>.

<sup>9</sup> 289 Or. App. 739 (Or. Ct. App. 2018), <https://casetext.com/case/columbia-pac-bldg-trades-council-v-city-of-portland-1>.

<sup>10</sup> OAR 660-012-0060, <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=292996>.

<sup>11</sup> Oregon Highway Plan Policy 1F Revisions, *1999 Oregon Highway Plan: Highway Mobility Policy*, 2011, pages 12-13, <https://www.oregon.gov/odot/Planning/OHP%20Registry/OHP-Policy-1F-Mobility-Standards-Amendments.pdf>, (accessed March 14, 2023).

tolling program, as they lack the known effect of causing diversion from a facility and impacting land use on local agency transportation facilities.

Generally, the assumptions involving tolling and congestion management already account for impacts to local transportation infrastructure, which implicates local transportation system plans, as well as any modal plans. As such, coordination, as it pertains to the tolling program, is needed, particularly related to those processes and systems that will set toll rates. Without coordination and the opportunity to evaluate actions that may cause diversion onto other transportation facilities, local agencies are left with no real meaningful opportunity to evaluate the land use impacts on facilities under their jurisdiction.

ODOT's State Agency Coordination Plan should be updated to reflect that the tolling program does affect land use and should be developed to review and address this impact.

Sincerely,

A handwritten signature in black ink that reads "Erica Rooney". The signature is fluid and cursive, with the first name "Erica" being more prominent than the last name "Rooney".

Erica Rooney  
City Engineer | Public Works Director

**ODOT I-205 Toll EA - RECORD #2022 DETAIL****Submission Date :** 3/14/2023**First Name :** Sara**Last Name :** Thompson**Affiliation :****Submission Method :** Web comment form**Q3. Comments :**

I believe that a toll road system on both I205 and I5 from the Washington state line down to Wilsonville will disproportionately impact the poor. It has been proven that Toll roads do not discourage use but further penalize those that need to go from place-to-place impacting lower income homes at a disproportionate level. Oregon has a gas tax currently that is ~11cents per gallon less than Washington and 20 cents per gallon less than California. Increase the gas tax if a usage tax is necessary but leave road tolling alone. A gas tax increase achieves your usage taxation and instigation of ride share alternatives for those that have the option. The cost to implement a road tolling system, enforce it, invoice users, collect from those who cannot or choose not to pay etc. would absorb several years of any gains while hurting the lower income families that depend on these roadways to get to work, school, medical appointments etc. Requiring payment for passage on both north to south highways across the Portland Metro area forces those who are unable to afford the toll to slog along surface streets, extending the time their engines run and reducing the fuel efficiency of their vehicles. If someone is working in an area with limited public transportation but is required to pass through the city to arrive at their destination this toll prevents that from happening efficiently for those who cannot afford to pay the price. The state should be more forthcoming with their modeling, the cost of implementation of this project and also their data to support this change. Too much is being kicked down the road, fear of public outcry has been the reason why none of these details are being made public. Yet this is our moment to comment on a project that you have already pushed 90% down the track. A goal of improving travel down I5 and I205 is a obscure idea, improve it for who? Those who have the luxury of disposable income to pay for smoother travel while those who don't are left to travel at non opportune times for their daily schedules, slog along surface streets? it does not seem equitable. The city needs to sort out another way of solving their congestion problems caused by the growing population to such a small condensed area. The real issue is that perhaps Portland Metro has more than reached residential capacity and growth including vertical growth is only exacerbating this issue.

<b>ODOT I-205 Toll EA - RECORD #2023 DETAIL</b>
---

<b>Submission Date :</b>	4/4/2023
<b>First Name :</b>	Meg
<b>Last Name :</b>	Thompson
<b>Affiliation :</b>	
<b>Submission Method :</b>	Toll program email
<b>Q3. Comments :</b>	Please support I 205 tolling on Oregon City bridge area!

**ODOT I-205 Toll EA - RECORD #2024 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Thor

**Last Name :** Thorson

**Affiliation :** retired citizen of Tualatin

**Submission Method :** Web comment form

**Q3. Comments :** I just a few minutes ago sent comments via email to oregontolling@odot.oregon.gov I strongly oppose the tolling effort. I feel it is a tax and the citizens had no voice in the decision. As a resident of east Tualatin my concern is with the disregard to the impact tolling will have on local community streets. Currently, afternoon commuters on I-5 south use the Tualatin exit and side streets to avoid traffic issues when going south to Wilsonville. Traffic on Borland Road and 65th comes to a stand still as commuters bail off I-5 and use these two roads to commute to Wilsonville or to get onto I-205. With the tolling effort this traffic will only get worse as commuters will use these roads to avoid tolls fees. To my knowledge the City or State have no plans to address this increased local traffic. I also am on a fixed income and cannot continue to pay more fees. I also have concerns with traffic and emergency vehicles trying to get to Meridan Park Hospital!! When traffic backs up on Nyberg Road due to commuters using the side streets, there is no way for emergency vehicles to access the Hospital as the bridge over Nyberg Creek is a single lane road and will be blocked by traffic. Please consult with the Hospital on this issue.

**ODOT I-205 Toll EA - RECORD #2025 DETAIL****Submission Date :** 4/4/2023**First Name :** Thor**Last Name :** Thorson**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** ODOT and legislators I have been a resident in Tualatin since 1980. In 1980 there was one stop and go light in the city! Today as with many places in the Metro area traffic is a major issue. I live near Borland Road and 65 th Ave. in Tualatin (east of I-5). Traffic in this area is nearly impossible after 2:30 pm due to traffic going south on I-5 to Wilsonville. When this traffic stops on I-5 south, travelers get off at the Tualatin exit to travel south on 65th Ave or Boones Ferry Road. At times traffic backs up onto the Tualatin east freeway off ramp. Traffic is bad now and I KNOW it will get worse once tolling on I-205 is in place. NO changes that I know of are planned for this increased community traffic! I strongly oppose tolling on this section of I-205!! To me tolling appears nothing more than a tax which citizens had no voice in. Since I live near the I-5 and I-205 intersection I use I-205 as a "local" road for travel and NOT as a commuter road. I am retired and on fixed income and cannot afford another TAX. I have heard that tolling is going to happen!!! and that the only issues are how much to charge, when to charge it. I sincerely hope the legislature can review what they have allowed to happen, If you are going to toll, put the toll on the I-5 and I-205 bridges that bridge the Columbia River and collect \$ from the Washington commuters and not long term Oregonians who have already paid enough.

**ODOT I-205 Toll EA - RECORD #2026 DETAIL****Submission Date :** 4/4/2023**First Name :** Anol**Last Name :** Thrift**Affiliation :****Submission Method :** Web comment form**Q3. Comments :**

Dear ODOT, I am an Oregon City resident through and through, having lived in this lovely city since I was a child, attending schools at Mt. Pleasant, Gardiner, Oregon City High School, and Clackamas Community College, and my children doing the same. I have seen this city go from a small country suburb of Portland to a modern industrial and residential place. My concern I have with the I-205 tolls is that, unlike tolls of the east coast or Midwest, we Oregon City residents are on a partial island of land due to the rivers that surround us. To go to the surrounding towns of West Linn, Tualatin, Lake Oswego, or Tigard one must cross a river, and for most of us, that crossing occurs on the Abernathy Bridge. By imposing a toll, the only other option to directly get to West Linn is via the Arch Bridge and downtown Oregon City. This area is already riddled with traffic issues on both the Oregon City and West Linn sides of the Arch Bridge, resulting in already long wait times between Main St. in Oregon City and Willamette Falls Drive in West Linn. I foresee this to just become a greater obstacle for drivers, business owners, property owners, and residents. Businesses will suffer because residents are not able to enjoy restaurants and shopping without additional fees or horrendous traffic. Imposing a toll with no other viable option for those who travel in and around Oregon City results in monopolistic road rules where citizens have one option and that is to give their money to ODOT, even though their taxes already paid the cost of building the roads and bridges they use today.



<b>ODOT I-205 Toll EA - RECORD #2027 DETAIL</b>
---

**Submission Date :** 4/9/2023

**First Name :** Julie

**Last Name :** Thurber

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I think this toll is crazy unfair. The only people you will hurt are the people making minimum wage and HAVE to go to work. People who make your coffee. Serve you dinner , care for your elderly mother! Round up your grocery's so you don't have to even go to the store . I could go on and on. Those people make little and can hardly pay for their rent. Now you want to add another TAX! You can't ride the max along 205! There is no great options for people! Not alone are the people who live on the road that now will go around the toll by using many apps on their phone. Those roads were not meant for heavy traffic but it will happen. Once again OR. Is side stepping things just to add another tax on people, and we could not even vote on the issue.

**ODOT I-205 Toll EA - RECORD #2028 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Denise

**Last Name :** Torj

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I strongly oppose the tolling project that is being proposed. Oregonians are already being taxed in every direction and we do not need to pay more taxes or fees. The other reason I oppose it is that there are no other alternate routes to get from south Milwaukie, where I live, to the southern WESTSIDE (west Linn, lake Oswego, Sherwood, etc) than accessing I-205. The burden on Oregon families are too much. Please take the \$1,000 the state is proposing to give low income and homeless people each month and use that to improve our infrastructure.

**ODOT I-205 Toll EA - RECORD #2029 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Alex

**Last Name :** Torres

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** My comment will likely be in the minority.WE NEED THE TOLL. Infrastructure is failing and further every car on the road adds to our climate crisis. We really need checks and balances in order to enhance our infrastructure while making those that drive without thought something to pause and think about.In marketing they say that an unhappy person tells 12 people while a happy one tells 2. I expect my approval of the toll to fall in the bottom 10%, but having lived in otger states that implemented tolling, the population always rejects it and then begrudgingly accepts it.Please approve the toll and help our community develop the right behaviors and resources.Thank you!!!

**ODOT I-205 Toll EA - RECORD #2030 DETAIL**

**Submission Date :** 4/3/2023

**First Name :** Todd

**Last Name :** Trimble

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** In 2022 I paid the state of Oregon \$9000 in taxes. Now you want to toll my commute to work? This is non-sense.

**ODOT I-205 Toll EA - RECORD #2031 DETAIL**

**Submission Date :** 3/24/2023  
**First Name :** Flor  
**Last Name :** tuanda  
**Affiliation :**  
**Submission Method :** Web comment form  
**Q3. Comments :** Please no tolling on any bridges in Oregon

**ODOT I-205 Toll EA - RECORD #2032 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Terry

**Last Name :** Turner

**Affiliation :** Resident

**Submission Method :** Web comment form

**Q3. Comments :** I am opposed to open ended tolling on I-205. Why no tolling on 217? I would be more accepting if there was a sunset for the toll when the project is paid, and if local residents that will be impacted by increased surface street traffic get a price break.

**ODOT I-205 Toll EA - RECORD #2033 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Ralph

**Last Name :** Tuttle

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** The toll depends on the price per trip; and assuming the transponder will be the same if tolls are implemented on the I5 and WA/OR bridges. I believe the added lanes on the I205 section between stafford and the abernethy bridge would just move the congestion to crossing the bridge. may help in the southbound direction.

**ODOT I-205 Toll EA - RECORD #2034 DETAIL****Submission Date :** 4/17/2023**First Name :** Barbara**Last Name :** Twitchell**Affiliation :****Submission Method :** Voicemail

**Q3. Comments :** Hello, my name is [] and I'm a resident of Clackamas County and I'm calling regarding the proposed toll on I-205. This will be, for all of the departments, RTAC, VTAC, whatever was mentioned in the message before. This is an unfair toll. We've already paid for these highways with our gasoline tax with our taxes. To pay for these roads, you're not making them any wider. You're not helping with the traffic congestion, what you're doing is going to throw traffic off into residential areas and it's going to bankrupt families that can't afford \$8 to go to and from work every day. This has not been given to the voters, it's not going up for a vote. It's been done by bureaucracy. And it's not fair to us. I think there are other ways that you can fill your purse gap, and then you can fill your bad decision making gaps... once again put it on the residents that already paid for these roads. I can't state strongly enough how stupid this plan is and how detrimental to the citizens of Oregon. Thank you for your time.



**ODOT I-205 Toll EA - RECORD #2035 DETAIL**

**Submission Date :** 3/15/2023

**First Name :** Dave

**Last Name :** V

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** If vehicles are hit with tolls, not one dime should go to anything but lane and bridge improvements. No bike trails, etc. By the way, what happened to all those trillions the Feds spent for "infrastructure?" Yeah, that's what I thought.

**ODOT I-205 Toll EA - RECORD #2036 DETAIL****Submission Date :** 4/4/2023**First Name :** Louise**Last Name :** V**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** I think it's terrible and truly unfair. My son lives in Wilsonville and I live at the Johnson Mobile Estates. He's my caregiver and needs to come if I have any issue or just to check on me 2-3 days a week. You are going to charge him a very high price both ways if he needs to get down here for an emergency to me or just to check on me or take me to the doctor. Also, he would need to wait in line just to get through the toll booth. I am truly ashamed and disappointed in all of you who put high costs over people and families.

**ODOT I-205 Toll EA - RECORD #2037 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Jason

**Last Name :** Van Camp

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** No tolls. NO.TOLLS. The people have spoken. You are our representatives. Represent us, or step down. NO TOLLS. Find your money elsewhere.

**ODOT I-205 Toll EA - RECORD #2038 DETAIL**

**Submission Date :** 3/28/2023

**First Name :** Laurie

**Last Name :** Vandeberghe

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Why should we pay a toll? Are you going to take away the gas tax? It should be one or the other not both? I live in Wilsonville all my Dr's and family live in SE I won't be able to go see them. I live on a fixed income. You have wasted millions of money and have not done a darn thing. I've watched some of your meetings you need to keep to stay on topic. Don't care about your golf tournament in June. This tolling should go to the people for a vote.

**ODOT I-205 Toll EA - RECORD #2039 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Lyneil

**Last Name :** Vandermolen

**Affiliation :** taxpayer

**Submission Method :** Web comment form

**Q3. Comments :** To Whom it May Concern: I don't want to pay extra to use bridges that were to have been paid off already. Stafford Road is already a freeway between 5:30 am and 7:00 with thousands more per day set to clog the side roads to avoid the road toll. This is the deep state in action, especially the ludicrous idea of using a social justice pricing system to use the bridge. We are already reeling with the high costs of this wasteful, Democrat-run state. I can't absorb extra costs. STOP the tolls now.Expecting better.

**ODOT I-205 Toll EA - RECORD #2042 DETAIL**

**Submission Date :** 4/8/2023

**First Name :** John

**Last Name :** Velehradsky

**Affiliation :** Professional Engineer

**Submission Method :** Web comment form

**Q3. Comments :** Based on my infrequent travel on I-5 and I-205, I would likely avoid those routes in favor of alternatives. I oppose tolling in general, and I believe that the imposition of tolls on these highway segments would be the beginning of an ODOT scheme of eventually using tolls in addition to their forms of taxation. NO TOLLS!

**ODOT I-205 Toll EA - RECORD #2043 DETAIL****Submission Date :** 4/4/2023**First Name :** Ryan**Last Name :** Rustrum**Affiliation :****Submission Method :** Toll program email**Q3. Comments :** Please do not toll the highway, it will cause more traffic, strain people's money they don't have, cause a backup on the side roads, cause more pollution on the environment. Oregon is one of the highest taxed states in America. Utilize the money you have and spend it wisely. (Born and raised Oregonian and resident)

**ODOT I-205 Toll EA - RECORD #2044 DETAIL**

**Submission Date :** 2/25/2023

**First Name :** Jon

**Last Name :** Voeller

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** As a taxpayer on a fixed income I already provide our Local, State and Federal Government enough in tax dollars! (Spend it wisely)No Tolls!



**ODOT I-205 Toll EA - RECORD #2045 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Curtis

**Last Name :** Wada

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** What good is widening the Abernathy Bridge when it goes back down in lanes as soon as you get off the bridge? You then create a bottleneck at both ends of the bridge? Then you want us yo pay to get through the mess?

**ODOT I-205 Toll EA - RECORD #2046 DETAIL**

**Submission Date :** 2/24/2023  
**First Name :** Ana  
**Last Name :** Waen  
**Affiliation :**  
**Submission Method :** Web comment form  
**Q3. Comments :** No!!! No tolls

**ODOT I-205 Toll EA - RECORD #2047 DETAIL**

**Submission Date :** 2/21/2023

**First Name :**

**Last Name :** Wales

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** This will push traffic to other area roads causing more congestion on already full freeways. So many area roads are over capacity, are congestion pricing coming to them all?

<b>ODOT I-205 Toll EA - RECORD #2048 DETAIL</b>
---

**Submission Date :** 3/7/2023

**First Name :** Dan

**Last Name :** Walker

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I am 100% against tolls. Our tax dollars get squandered bad enough without tolls.

**ODOT I-205 Toll EA - RECORD #2049 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Kim

**Last Name :** Wallis

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Abandon this IDIOTIC tolling idea! Oregonian already pay too much in fuel taxes and license fees. We don't need ODOT to bleed us dry with tolls. I don't trust ODOT to administer any kind of program after watching the Newberg Bypass fiasco and the total disaster that has been the Amazon warehouse roundabout shitshow on Hwy219 at Butteville Road in Woodburn. Hell, you can't even do a good job of fixing potholes on the roadways. Why would the public trust you with tolling?

**ODOT I-205 Toll EA - RECORD #2050 DETAIL**

**Submission Date :** 4/11/2023

**First Name :** Ron

**Last Name :** Wanek

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** The argument can always be made that tolls were put in place to finance the original construction of the highway or bridge. And when continued after being paid off, the same argument is made for the costs of maintenance, including repairs to the road surface, guard rails, and signs; upkeep of signs; mowing of grassy areas; removing winter precipitation; and handling mishaps and other emergencies. Yet, the existing taxes on fuels, car registration and income can already take care of most cost. Oregon has not even tax the electric vehicle for its share of the revenue for roads. Whenever there's a captive revenue stream, there also needs to be mechanisms to deal with that. Include toll collectors, electronic mechanisms (readers, cameras, transponders) and a staff to enforce violations of these tolls...there is a plethora of personnel needed just to address those things, and they need to be paid, at that...as do the HR personnel to hire, fire, promote, and do that payroll. Also once these tolls are in place what prevents the tolls from increasing in cost each year or even from month to month.

<b>ODOT I-205 Toll EA - RECORD #2051 DETAIL</b>
---

<b>Submission Date :</b>	4/4/2023
<b>First Name :</b>	Nathan
<b>Last Name :</b>	Ware
<b>Affiliation :</b>	None
<b>Submission Method :</b>	Web comment form
<b>Q3. Comments :</b>	This cannot happen. Please don't let them do this.

**ODOT I-205 Toll EA - RECORD #2052 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Trent

**Last Name :** Warness

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** ODOT Agency, The idea of tolling this small section of 205 as a start is going to have an adverse effect upon the greater Oregon City/West Linn community. The fact that ODOT is going to wait to see what happens with regards to added congestion to 213, 99E, and 43 is mind boggling. I believe the first thing drivers are going to do is to find every all any routes that can be taken that do not have a toll on them. This approach is insulting as the perception is ODOT does not care as long as they get their TOLLS. 213, 99E and 43 already has more traffic on it than it can handle now, and once TOLLS are in place, the traffic will be unimaginable. ODOT had better come up with plans for local traffic mitigation to make the idea of TOLLS respectable to the public that TOLLS are affecting. With inflation, fuel prices, and the overall cost of everything, it's awesome that a government agency is looking to gouge the taxpayers they are supposed to actually serve. ODOT is claiming they need these TOLLS to cover expenses for future maintenance/upgrades. As a taxpayer, I have to live within my means, budget my income so I can pay bills, save for the future as I can't just charge my employer more money because I want to spend more. WHY hasn't ODOT and State government planned and saved money to account for these maintenance/upgrade costs? The reason is they can always come back to the golden goose taxpayer and require more taxes/fess without any accountability. These TOLLS must stop and ODOT must be held accountable that they have not planned, budgeted and save for the future like the taxpayers they take money from do.



**ODOT I-205 Toll EA - RECORD #2053 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** James

**Last Name :** Watkins

**Affiliation :** Home Owner

**Submission Method :** Web comment form

**Q3. Comments :** This toll project is nothing more than a money scheme. The amount of traffic is very small compared to other major cities and for short periods of the day. Who will be hurt the most? The lower class who have no alternative and will have to choose to go to work or pay some bills. Minorities and POC will also be adversely affected. In other major cities, there are roadways running along side of toll roads to provide those who cannot afford heavy costs to get to an from work or other parts of town. This project just shifts the problem to the surface streets as people will travel though Canby, Lake Oswego, and other smaller cities to avoid the tolls, thereby shifting problems to the cities and creating more surface street traffic. This project must be stopped and perhaps widen the freeway, using our existing tax dollars for the use of all Oregonians, not just the rich ones or those who can afford to pay the tolls. Rich people will pay, poor people cannot.

**ODOT I-205 Toll EA - RECORD #2054 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Toni

**Last Name :** Watkins-Cline

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** The I-205 Tolling Project is truly one of the worst ideas to ever come along for those of us who live in the area. There are simply no feasible alternative routes one could take to avoid it. Congestion on the one other bridge and routes to it will be overwhelming. Tolling may work in other places but not here. It is infuriating that we were not asked to vote on it. There is no chance it would pass if you ask those of us who will actually have to deal with it on a daily basis. Please put a STOP to it!!!

**ODOT I-205 Toll EA - RECORD #2055 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Haley

**Last Name :** Watt

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolling unfairly affects poor citizens. We are already getting taxed like crazy.  
This isn't the way!

**ODOT I-205 Toll EA - RECORD #2056 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Marsha

**Last Name :** Webb

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** This will shift even more traffic onto Borland Road, because folks are trying to avoid the tolls. At times, Borland Road is already bumper to bumper at 5 mph. As a resident of this area, I don't want the extra traffic, or noise, or exhaust smells. If you're going to roll, roll all roads, or roll none.

**ODOT I-205 Toll EA - RECORD #2057 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Chelsea

**Last Name :** Weber

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolls in Clackamas County would be devastating to our residents. We are taxed too much as it is and the money already going to ODOT seems to be mismanaged and misappropriated (especially with the duplicate traffic signs in the Redland area, it's a ridiculous waste). I believe tolls will only force people onto the back roads more to avoid paying, which will cause more traffic in other areas and more wear and tear on those roads. Please listen to your community members and stop taxing us to death.

**ODOT I-205 Toll EA - RECORD #2058 DETAIL****Submission Date :** 3/9/2023**First Name :** Dieter**Last Name :** Weber**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I am on Medicare and have a fixed income. I don't travel much but when I do, it's mostly doctor visits and to see my grand children. Road tolls are yet another drain on my finances along w/ rising gas prices, inflation of groceries as well as property tax and utility increases. All these added costs are a clear sign that my government (Federal and local) is poorly managing and mismanaging taxes we already pay. Tolling Oregon highways is a band aid instead of a solution.

<b>ODOT I-205 Toll EA - RECORD #2059 DETAIL</b>
---

**Submission Date :** 3/5/2023

**First Name :** Peter

**Last Name :** Welch

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I strongly oppose tolling! Mileage, registration, gas, electric charging or tire taxes would all be preferable.

**ODOT I-205 Toll EA - RECORD #2060 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** Steve

**Last Name :** Welter

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Please do not go forward with tolling our roads. This will severely limit where I go for the resources that I use.



**ODOT I-205 Toll EA - RECORD #2061 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Gordon

**Last Name :** Westfall

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** Hi, my name is [] and I live in Gladstone. I've lived here all my life and I raised my children here. It's a beautiful city. Traffic is getting worse. The thing I see with the tolls is I see everybody getting off the freeway congesting all of the roads that are going into Portland, which is Oakfield Road, River Road, and McLaughlin Blvd. We're going to see more accidents, higher insurance, more pollution. We're going to see more people getting hurt because they're be more traffic and more people hit by cars. We'll deal with time issues, it's a terrible environmental disaster waiting to happen. You think it's going to free up the freeway? No. The freeway is going to stay clogged and then the city streets are going to stay clogged, and then the pollution is going to get worse. Car accidents. No one's going to stop shop. No one's going to stop to get off the freeway and clog traffic. Everyone wants to go home after work, so no one's going to benefit except for the teachers unions and their stocks and pension plans. This has nothing to do with curbing traffic at all because traffic will only get worse. It's a terrible idea. I've said no to the tolls. Most likely the people that push the tolls won't even be effected by it because they don't live in those communities.

**ODOT I-205 Toll EA - RECORD #2062 DETAIL****Submission Date :** 3/9/2023**First Name :** Natasha**Last Name :** White**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I think this should be voted upon by the public and not just a unilateral decision. The economy was hit hard the last few years with COVID and to add this without public input is ridiculous! I think you have a responsibility to ask the public. I am absolutely not for it, as it will impact my daily commute and add a significant cost to my budget.

**ODOT I-205 Toll EA - RECORD #2063 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Philos

**Last Name :** Whitesky

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I oppose the tolling plan. We already have too many taxes. 200 billion to ukrain and we have to pay a road toll to use the highways in our cities? Something is seriously wrong here. Do better!

**ODOT I-205 Toll EA - RECORD #2064 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Jeff

**Last Name :** Whitlock

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I love the idea of the toll road. 2 main reasons. #1 reduced traffic on I205 during peak times#2 it is fair to have the people who use the road pay a larger part of the cost.

**ODOT I-205 Toll EA - RECORD #2065 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** REBECCA

**Last Name :** WIDMARK

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** NO TOLLS!The Federal Government passed a infrastructure bill that the tax payers will be paying for years. These funds should be used to fund all roads and bridges! we do not need tolls!! Tolls hurt the working class. that must travel this bridge everyday to and from work. Inflation has already hurt us (the working class) with the cost of gas, food and utilities. NO tolls!

**ODOT I-205 Toll EA - RECORD #2066 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Becky

**Last Name :** Widmark

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Why don't you let the people vote on this? Instead of cramming this thru like you really care about what people need. Why are you not using the infrastructure money? Trillions of monies that we the people are already paying for! Or was that all just a Big Lie? Where are the gas tax monies going to? Variable rate tolls are just a way to stick it to the working class once again. Most people don't have a choice what time they travel to work. The same people are being affected now, with the construction are the same ones that will be paying these tolls. Where if the fairness? Everyone talks about being equality. But seems like that is only one sided. Let us vote!!!!!! If you are so desperate for more money toll the bridges between states, not the people that live and work here and already pay our fair share.

**ODOT I-205 Toll EA - RECORD #2068 DETAIL****Submission Date :** 4/5/2023**First Name :** Joshua**Last Name :** Wieland**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** Tolls are a bad idea. We are already paying a premium in taxes, on our property and gasoline to fund PUBLIC roadways. If a private road were being constructed, the PRIVATE company could chose to toll the roadway. There is no reason to establish tolls on a public right of way. DO NOT TOLL our public roads

**ODOT I-205 Toll EA - RECORD #2069 DETAIL****Submission Date :** 3/7/2023**First Name :** Darren**Last Name :** Williams**Affiliation :** An Oregon Taxpayer**Submission Method :** Web comment form**Q3. Comments :** You have got to be kidding us Oregonians. We have already paid for these roads. It will clog the arterials and more importantly. IT HURTS THE POOR THE MOST. Only the upper income can afford to pay for tolls. You ODOT are another GREEDY government agency. I used to like ODOT but how quickly Greed seeps into Government agencies Budgetary Wants!!!



<b>ODOT I-205 Toll EA - RECORD #2070 DETAIL</b>
---

**Submission Date :** 2/21/2023

**First Name :** Colleen

**Last Name :** Williams

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** First we get screwed on vehicle registration. Next is tolls. Is there any point at which this stops?

<b>ODOT I-205 Toll EA - RECORD #2071 DETAIL</b>
---

**Submission Date :** 4/5/2023

**First Name :** Molly

**Last Name :** Williams

**Affiliation :** Friends of the Trolley Trail

**Submission Method :** Web comment form

**Q3. Comments :** I am portesting the polls on the 205 bridge over the Willamette. This will impact neighborhoods in Oregon City and West Linn because traffic will avoid the tolls and go through the cities. Plus, it will financially and unfairly impact those who use the bridge to go to work.

**ODOT I-205 Toll EA - RECORD #2072 DETAIL****Submission Date :** 4/11/2023**First Name :** Carl**Last Name :** Williamson**Affiliation :****Submission Method :** Web comment form**Q3. Comments :**  
Super disappointed with tolls coming to 205 location because I work for a living and use the west linn bridge to get to 205 on/off ramps to travel to work. Not only will the cost impact my cost of living by reducing my discretionary income it will destroy my home value and kill commerce in Oregon city. Extremely disappointed in seeing this decision being made that impacts our community and my family's personal lives.

**ODOT I-205 Toll EA - RECORD #2073 DETAIL****Submission Date :** 3/7/2023**First Name :** Victoria**Last Name :** Wood**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** My main concern about tolling is having a toll just to cross the Abernethy bridge from Oregon City to West Linn. There is no other way to cross the Willamette other than the Sellwood bridge or the tiny, narrow Oregon City Arch bridge (which is already very overcrowded). It would negatively affect businesses in OC and WL as well as seniors like myself visiting family and caring for grandchildren. Is it possible to have the toll "sensors" located north of the Oregon City and south of the West Linn entrances to the bridge?

**ODOT I-205 Toll EA - RECORD #2074 DETAIL**

**Submission Date :** 4/3/2023

**First Name :** Ann

**Last Name :** Wray

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** absolutely not . Highways were designed to relieve the traffic on surface street for safely and efficiency of movement. The toll will divert highway traffic back to surface streets and it makes no sense at all.

**ODOT I-205 Toll EA - RECORD #2076 DETAIL****Submission Date :** 4/4/2023**First Name :** Tony**Last Name :** Zadan**Affiliation :****Submission Method :** Toll program email**Q3. Comments :** I vote no on tolling. Times are already financially tough with inflation. From where I live, where I work, and where I pick up/drop off my son, I will be passing through tolls 4-5 times a day. My family is on a fixed income and can't afford any more financial burdens.

**ODOT I-205 Toll EA - RECORD #2077 DETAIL**

**Submission Date :** 4/5/2023

**First Name :** Anthony

**Last Name :** Zeigler

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolls on road usage for normal individuals are very bad ideas. I realize you need to phase out the gas tax due to electric vehicles, and I also realize it would be nice to keep the the revenue tied to the usage - but you have to consider the cost of complexity. It's much easier to support the roads via a tax on the community. It will be cheaper and less complicated than maintaining a toll system, and less headaches to the individuals who use the roads. Keep Oregon Simple - do not implement road tolls.

**ODOT I-205 Toll EA - RECORD #2078 DETAIL**

**Submission Date :** 3/7/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Currently my ex uses that stretch of freeway to drop my kiddos off at a place we designated as a safe drop. This is twice a week. I'm really scared that if there are tolls he'll either put the strain on me or something even worse. Is there a way this kind of situation can be discounted or even excluded from tolls? He's driving from oregon city to wilsonville so alternate routes aren't abundant. Also because of the nature of my question can it be kept off public records or anonymous? Thank you



**ODOT I-205 Toll EA - RECORD #2079 DETAIL**

**Submission Date :** 2/21/2023  
**First Name :**  
**Last Name :**  
**Affiliation :**  
**Submission Method :** Web comment form  
**Q3. Comments :** No toll!

**ODOT I-205 Toll EA - RECORD #2080 DETAIL**

**Submission Date :** 2/21/2023  
**First Name :**  
**Last Name :**  
**Affiliation :**  
**Submission Method :** Web comment form  
**Q3. Comments :** No toll!

**ODOT I-205 Toll EA - RECORD #2081 DETAIL**

**Submission Date :** 2/21/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** NO ON TOLL, this is just gonna create side street congestion. Go toll the or/wa bridges!

**ODOT I-205 Toll EA - RECORD #2082 DETAIL**

**Submission Date :** 2/21/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** We already pay taxes for road improvements. You can't keep adding taxes endlessly. People can't afford to live and now they will have to pay extra in order to drive to work to make wages that barely sustain them. What about people whose jobs is to drive such as taxi drivers, Uber, delivery drivers, and other various transportations jobs. They will be unfairly affected by the tolling.

**ODOT I-205 Toll EA - RECORD #2083 DETAIL**

**Submission Date :** 2/24/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** As a life-long Oregonian and retiree I demand this tolling project be stopped due to undo financial hardships on Oregonians. It is unconscionable that regulators could even think to implement tolling as people struggle to make ends meet, put food on the table and provide affordable housing for their families. Tolling will only add one more financial hardship that Oregonians can't afford!! Wake up ODOT!!! Do the right thing and stop this project!!!

**ODOT I-205 Toll EA - RECORD #2084 DETAIL**

**Submission Date :** 2/25/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** Hello, long time resident of Clackamas County, actually lifetime resident of Clackamas County. I am calling to basically express my views on tolling. We already pay enough money in local, state, and government taxes. You know, we often see tax dollars not being spent wisely and so at this time, I do not support any tolling whatsoever in Clackamas County or in the State of Oregon. Thank you.

**ODOT I-205 Toll EA - RECORD #2085 DETAIL****Submission Date :** 3/3/2023**First Name :** Mary Jane**Last Name :** Mathews**Affiliation :****Submission Method :** Letter**Q3. Comments :** Dear ODOT,  
No one wants toll roads. We are not New Jersey. Please stop! we have a way to get road tax DMV registration fees. We do not need a way to get more. It only adds more money to another agency or business that rips people off.  
Thank you for listening,**Attachments :** CI00161816\_Tolling.pdf (161 kb)

Feb 2023

Polk County Museum Com.

Cable yarder or donkey and 10000 OR 972

Dear, GDOT Director

No one wants toll roads

in Oregon we are not

mass dig. Please stop!

We have a long to go road tax

DMV registers, we don't need

another way to get more - it

only adds more money to

another agency or business that

rip people off.

Thank you for listening

May you be a better person



GDOT

355 - Capital St NE

MS11

Salem, OR 97301-3871

USA





**ODOT I-205 Toll EA - RECORD #2086 DETAIL**

**Submission Date :** 3/3/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** The customer state the nature of efforts offended him given the current circumstances (economic/governmentally). He said there need to be a different way to get money from people. Need to do a better job of getting information out to people, especially if it goes to a vote. It should automatically go to vote.

**ODOT I-205 Toll EA - RECORD #2087 DETAIL**

**Submission Date :** 3/7/2023

**First Name :** David

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** What an absolutely terrible idea. No one wants toll roads, you will just move traffic somewhere else. Vote NO.

**ODOT I-205 Toll EA - RECORD #2088 DETAIL**

**Submission Date :** 3/7/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Waste of money. Its hard enough surviving right now in this economy and you all want more \$ from us taxpayers for what? You already piss away what we pay in. Cut us some slack. How much more blood can you drain from us daily working citizens to keep paying more of your benefits and wages while we keep loosing more of ours. You will kill peoples lively hoods by putting the toll in. Hasn't the government done enough screwing us over. You all say its going to benefit this or that. Actions speak louder than words and Ive seen no action by any government in years helping and benefiting the people around. stop padding your pocket and be fair to those out there. Instead of a toll why not hire honest hardworking people to work the government offices that are fare instead of crooked ones. There's a thought. You might actually save \$ instead of pissing it away which the govt is so damn good at.

**ODOT I-205 Toll EA - RECORD #2089 DETAIL**

**Submission Date :** 3/10/2023

**First Name :** Jereme

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Odot already over charges for the bad service they provide. I am against any additional tax they try and levy, including any form of toll system. If odot were better with money i might think this is a good idea. But history has proven odot will only squander any money they get.

ODOT I-205 Toll EA - RECORD #2090 DETAIL

**Submission Date :** 3/14/2023  
**First Name :** Suzie  
**Last Name :**  
**Affiliation :**  
**Submission Method :** Web comment form  
**Q3. Comments :** These are the top ten reasons for accidents in Portland. I KNOW I'm a native senior! ... been rear-ended FIVE times from TRANSPLANTS!!! ... and I've been bullied off the road for THESE reasons in the link below. NO WAY is Congestion cause the problems!!! [https://www.mayorlaw.com/top-10-causes-auto-accidents-Portland/Toll these speeders/tailgaters/phone users AND THEY WILL GO AROUND!!! Destroy Oregon city!!](https://www.mayorlaw.com/top-10-causes-auto-accidents-Portland/Toll%20these%20speeders/tailgaters/phone%20users%20AND%20THEY%20WILL%20GO%20AROUND!!!%20Destroy%20Oregon%20city!!) live less than mile from 205. Used to hear sirens once a month or so (lived at residence Clackamas Co. here 32 years!!!) Now I hear sirens every day!!! RUDE SELFISH DRIVERS!!! TICKETS will Make Money...tolls will DRIVE THEM AROUND!!! FINE THEM AND MAKE MONEY!!! TRAFFIC COPS!!!

**ODOT I-205 Toll EA - RECORD #2091 DETAIL**

**Submission Date :** 4/14/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolling is the last refuge of scoundrels. Always searching for ways to take more money from taxpayers. Tolling will not solve congestion problems as the state is not interested in creating more road capacity in any meaningful way.

**ODOT I-205 Toll EA - RECORD #2092 DETAIL**

**Submission Date :** 2/21/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** Yes, this is a comment pertaining to the tolling situation. We the people are entitled to vote, do you hear that? We the people are entitled to vote first before the big monster, ODOT takes over and does what they think they want to do. You need to respect the people, not just be another monster. Look what you did in Dundee, the sweet little wine town in Dundee. You've ruined it with massive amounts of light poles; you could have done every other one. You're a terribly wasteful monster. ODOT is a greedy monster and what's the rebate for people of lower income? Why not just have a path if they're certain lower income? What's this rebate crap? Whose stupid idea is that? And we're just, we're just absolutely horrified at ODOT. Again, the big greedy monster that doesn't listen to the people and goes and overrides what people, the voters, have to say. We're livid at the thought of you coming in and ruining our sweet little town in Oregon City. Absolutely mortified that our little town here is already passed to the gills to get through it, with the food courts and all of it. It's just a nightmare already to try to get off the hill. And you are going to make it a million times worse. Your crappy ideas make no sense at all. It's all about money, ODOT is a greedy monster, trying to get more money. No.

**ODOT I-205 Toll EA - RECORD #2093 DETAIL**

**Submission Date :** 2/21/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** I'm calling in response to the invitation for public feedback of your assessment study. As a resident of West Linn, I just think this is going to negatively impact our town a lot more than people are estimating, just with the diversion traffic alone, and the impact to people that don't have much of an option to get onto the highway from our point in town. Highway 43 is woefully neglected by ODOT, they continue to not support that part of the highway. And then tripling the amount of cars that are on there to divert around the tolls will make it even worse. Very few stoplights, a lot of intersections on there that will get clogged up, and that will spill over to diversion traffic in our little subdivision neighborhoods. So, I'm from the East Coast, I'm used to tolls. I see tolls where a new road is built, for additional lanes, for more than just a mile and a half. Those are equitable responses and it actually gives a service to the community. On the video it says that you are going to install the missing third lane. Even in the video you admit that it should've been done from the beginning, that it is missing and a deficiency. So charging us and creating this impact on our town to get us up to a condition we should've been at 20 years ago is pretty embarrassing and it's lowered a lot of our faith in ODOT which was already pretty low with the response from how you guys care for Highway 43 in West Linn. I'm sure nobody's going to listen to this, it'll probably auto delete....



**ODOT I-205 Toll EA - RECORD #2094 DETAIL**

**Submission Date :** 2/21/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Drivers who live in Oregon City/West Linn should have an exemption, or a break in the cost of the tolls. If not, back roads will be used to avoid the cost of travel. Adding additional lanes would be a welcome alternative. Tolls in other states (when we travel) have not resulted in less congestion.

**ODOT I-205 Toll EA - RECORD #2095 DETAIL**

**Submission Date :** 2/22/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** Thank you for this opportunity. I have lived in Oregon City for 45 years. My husband and I are in our seventies. Tolling in our area where we live will be devastating. It will be a hardship. I never thought I would see this day coming. The location is horrible for people in the community to have toll booths. I appreciate you letting us tell you how we feel about this. Thank you.

**ODOT I-205 Toll EA - RECORD #2096 DETAIL**

**Submission Date :** 2/23/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I don't support the tolls. Multnomah county has one of the highest taxes in the US. Politicians need to do a better job of allocating and distributing funds they're already getting, roads are included in that. Thank you for your time.

**ODOT I-205 Toll EA - RECORD #2098 DETAIL**

**Submission Date :** 3/1/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** You have done a terrible job informing the public of tolling. It's clear that non-native Oregonians are creating these ideas. The funds raised will be squandered by the inept leadership of ODOT. This is disgusting political activity that Oregonians did not get to vote on. Tolling should have been put to a public vote, and not a legislative decision. Legislators do not speak for the people. PACs influence their decisions. I am disgusted that I will need to pay a toll to visit my family in the Portland area. If you're going to toll, create it like California where there is a toll lane. Those who can't afford to pay don't have to pay a "privilege tax." The toll project needs to end now!!!!

**ODOT I-205 Toll EA - RECORD #2099 DETAIL**

**Submission Date :** 3/1/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Oregon State Legislature should not have had the power to approve HB 2017. They should not have the power to create tolling on Oregon roads and not instituted the Oregon Transportation Tax. There is corruption in the Political Action Committees within transportation. I am disgusted in how the tolling project is being created. This project is being created in a bureaucratic vacuum within ODOT. Your public communication is terrible for the Tolling Project. I had to do a search for Tolling in Oregon to find out you had a feedback window. Shame on you Tolling Project. This whole idea of tolling in Oregon is unacceptable!!!!

**ODOT I-205 Toll EA - RECORD #2100 DETAIL**

**Submission Date :** 3/7/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolling is just another money grab , because you don't know how to manage the money you have and spend too much on top heavy projects . You only ask for comments so you can check a box. I will stop using your roads and start using side roads

**ODOT I-205 Toll EA - RECORD #2101 DETAIL**

**Submission Date :** 3/7/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I believe tolling will have a severely negative impact on traffic conditions in the Portland Metro area, which is already ridden with major traffic problems already. Please don't toll these roads.

**ODOT I-205 Toll EA - RECORD #2102 DETAIL**

**Submission Date :** 3/7/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** The I-205 toll projects should not even happen. We already pay enough taxes to maintain the roads we drive on. Every year our taxes go up and it is insane. Not only that, I am a West Linn resident and often have to take I - 205 to quickly travel between West Linn and Oregon City. This toll would be put right smack in the middle and charge us local residents every time we hop on that highway even if it is for 30 second to a minute to reach the next exit. It is ridiculous! Also, people will avoid the toll and congest the West Linn roads that are already congested without the toll being there. This is toll is definitely one of the dumbest ideas and the biggest waste of money.



**ODOT I-205 Toll EA - RECORD #2103 DETAIL**

**Submission Date :** 3/7/2023  
**First Name :**  
**Last Name :**  
**Affiliation :**  
**Submission Method :** Web comment form  
**Q3. Comments :** HELL NO

**ODOT I-205 Toll EA - RECORD #2104 DETAIL**

**Submission Date :** 3/7/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** No Tolls is what's best for the community. Thank you.

**ODOT I-205 Toll EA - RECORD #2105 DETAIL**

**Submission Date :** 3/8/2023

**First Name :** Meka

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Putting a toll on a frequent traveled highway for local travel is just a bit ridiculous and unfair.

**ODOT I-205 Toll EA - RECORD #2106 DETAIL**

**Submission Date :** 3/8/2023

**First Name :** Jon

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** This is an absolute stupid idea! off highway traffic will be impassable. people will skirt the system. and you want to allow different prices for poor people!! thats bull shit! the burden is not on the people that pay their taxes only! one price for everyone!! try not wasting money on other unnecessary things instead of passing it on to the already over taxed public!!!

**ODOT I-205 Toll EA - RECORD #2107 DETAIL**

**Submission Date :** 3/8/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** Yes, I live right of 43 and go down to Oregon City frequently. Once their toll road is put in, I will no longer be able to go to a local shopping center where we shop frequently without paying a toll. I will not be able to get to my doctor without paying a toll. I will not be able to do errands that involve getting on the freeway. There is no other way for me to go across that bridge, or to go across the river without going on 205. This is an absolute disaster for the residents who live in Lake Oswego and Wilsonville. On the west side of that river. We will have to, it will cost a fortune. I'm also 87 years old, living on a fixed income with inflation. All I need is another fee to get to my shopping. This is so unfair what are we paying gasoline taxes for property taxes for this. This is unconscionable what you are doing to the citizens of these two cities. Thank you very much.

**ODOT I-205 Toll EA - RECORD #2108 DETAIL**

**Submission Date :** 3/9/2023

**First Name :** Kate

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I think this tolling plan is an absolutely horrible idea. In an area where I205 is already a choke point (Abernethy Bridge), this will force motorists onto surface streets through the communities of West Linn and Oregon City, which aren't capable of efficiently supporting the extra vehicle traffic. Not to mention, we already pay insane taxes in this state and now we will have to fork over MORE for these toll booths that no one wants? Living expenses here are already astronomical, housing costs are insane, the cost to register a vehicle is stupid, how are people supposed to afford to live here anymore? I am a single mom, I have a good job, a decent salary and I am still living paycheck to paycheck and trying to make ends meet. I don't know how other less fortunate families are supposed to survive. Also, did I mention that area already sucks for traffic and is a choke point that takes forever to get through?! And why is ODOT just now asking for public input when they have already started the project? Is it just to say they did but then they won't listen to any of the public outcry anyways? Everyone I talk to thinks it's a bunch of BS to do this to us.

**ODOT I-205 Toll EA - RECORD #2109 DETAIL**

**Submission Date :** 3/15/2023

**First Name :** Alex

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I realize you want to push everyone onto public transportation but this isn't realist. You only look at the areas right next to the bridge but never beyond. What about the people who live in the further out areas of Clackamas county that either have no public transportation or a that the public transportation is so bad that it takes 3 hours to get into work and I can't guarantee that it'll still be running on my way home. The people who live in these areas probably won't qualify for your free/reduces eligibility so we're going to be adding a few extra hundred dollars a month to the ever increasing bills we have with no government help whatsoever. I have only two ways to get into work getting on to I-5 from Aurora or hopping onto 205 from Oregon City then getting onto 205. Having to drive extra to avoid the tolls is going to mean that I run my engine longer, probably getting stuck in traffic of others avoiding the tolls and putting more air and noise pollutants into the neighborhood side streets.

**ODOT I-205 Toll EA - RECORD #2110 DETAIL**

**Submission Date :** 3/16/2023

**First Name :**

**Last Name :**

**Affiliation :** Citizen

**Submission Method :** Web comment form

**Q3. Comments :** More social engineering, thinly-disguised as traffic engineering. Given the record of tolled roads in the US, one must wonder what the actual motivations are for these efforts. If the actual goal is to reduce congestion, why are I-84 and US26 from Washington County not included? Or, for that matter, the Boone Bridge in Wisonville, which seems to be the anchor for massive congestion, both North- and South-bound through much of the day?



**ODOT I-205 Toll EA - RECORD #2111 DETAIL**

**Submission Date :** 3/19/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Lack of on going connection to the people of Oregon is likely to cost you your ability to toll roads. You did not even make this reply to you easy to do. We are all going to pay in lack of money for roads for what you have done. Find a way to have forums and town halls about what is happening in Seattle around tolling. MOST PEOPLE do not know that driving through Seattle will cost them a toll. Talk about what would of happened to Seattle with out tolls and what tolling in Seattle is like and what it has done for them. If you do not get it across enough, then the voters will block your money and it will be hard for you to do what you want/need to for the roads. Talk about the toll roads in the east and how they help to reduce taxes and improve the roads. On this and some other pages you are talking about the projects that you are currently doing. You must also talk about what you are prevented from doing because of lack of money. Show the people what lack of money means and what it can be with you having enough money to do what is wanted / needed. Make it plain to Portland people and even to those in Bend and Ashland.

<b>ODOT I-205 Toll EA - RECORD #2112 DETAIL</b>
---

**Submission Date :** 3/28/2023

**First Name :** Ken

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** ODOT has already wasted so many millions on this project already (previous bridge study) that no one believes a word that you say. All you are doing is acting as an additional revenue source for Oregon's leftist government. This will only hurt the people who can least afford it, and will have ZERO impact on reducing congestion.

**ODOT I-205 Toll EA - RECORD #2113 DETAIL**

**Submission Date :** 4/2/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** This is nothing more than a state agency finding yet another way to tax us. They can't raise taxes so they just do things like this (tolls) to steal more of our hard earned money. We didn't get a vote on it, it's nothing more than taxation without representation. ODOT already does such a poor job of spending OUR tax dollars, now rather than working within their budget they game the system like the thieves they are to steal from the public.

**ODOT I-205 Toll EA - RECORD #2114 DETAIL**

**Submission Date :** 4/3/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I am a daily user of I-205 for my 30 mile (one way) commute to work. I'm a middle class person and these proposed tolls will have a major effect on my available income. Salem gov't (and others) need to reorganize their spending priorities and find another way to pay for the upkeep of these roads without tolling (taxing) the middle and lower class people who need to use them just to make a living. Please help us.

**ODOT I-205 Toll EA - RECORD #2115 DETAIL****Submission Date :** 3/31/2023**First Name :** "Miss"**Last Name :** Bauer**Affiliation :****Submission Method :** Voicemail**Q3. Comments :** I'm 69. I've lived in Oregon all my life. I'm completely against the toll on 205. Portland is not a city back east, where there are tolls in New Jersey and New York. Portland is not a large city. We do not need that toll. My phone number is XXX-XXX-XXXX and I would like a phone call back, please, and I'll explain more. Thank you.

**ODOT I-205 Toll EA - RECORD #2116 DETAIL**

**Submission Date :** 4/4/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** ABSOLUTELY NO TO THE TOLL. We are already taxed enough for our roads/etc. Figure out how to spend the money you already get from us. This is just another way you are stealing our money. Enough is enough, stop the illegal tax. Society sees you are nothing more than thieves at this point.

**ODOT I-205 Toll EA - RECORD #2117 DETAIL**

**Submission Date :** 4/4/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolling on the poorer side of the Portland Metro area only is the most inconsiderate, biased, racist, misogynistic action that Oregon can take. There are plenty of other roads that are heavily utilized by more wealthy individuals that should be considered instead. Example: Hwy 26 from just past the zoo to Cornelius Pass? People will just take the back roads through neighborhoods to bypass the tolling.

**ODOT I-205 Toll EA - RECORD #2118 DETAIL**

**Submission Date :** 4/4/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I am very concerned about a toll. The West Linn and Oregon City communities have very strong ties. I work and live in Oregon City but my kids go to school and participate in sports in West Linn. Our family crosses the bridge approximately six times a day. Downtown Oregon City also relies heavily on West Linn residents to patronize our shops and restaurants. This toll would effectively cut off these two deeply intertwined communities. It would also create a traffic nightmare in downtown Oregon City as a result of the residents attempting to avoid the toll by going across the Oregon City Bridge.



**ODOT I-205 Toll EA - RECORD #2119 DETAIL**

**Submission Date :** 4/4/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** As someone who commutes from NE Portland to Oregon City via I-205, I will be directly impacted by the new highway tolling proposal. Tolling Proposal Comment: If tolling is inevitable in the Metro region, then roll it out for all highways at one time. It's hard to justify a phased approach that starts in the area with the least amount of alternative public transportation options. ODOT and State policy maker comment: Since everyone in this region benefits from the interstate highway system either directly or indirectly, then a statewide wheel-tax or increase of the gas tax would be the more fair options vs a highway specific toll system. Why should someone in Boring or Sandy who may not travel I-205 everyday but whose goods and services still arrive on the same highways as everyone else not have to pay their fair share for highway projects? Comment to Clackamas County leaders (past and present): You've had decades to implement alternative transportation plans in the County (e.g. light rail, etc.) and failed to make it happen. Clackamas County is part of the greater Metro region and County leaders resistance to this reality has left the residents with no other options than highway tolling.

**ODOT I-205 Toll EA - RECORD #2120 DETAIL**

**Submission Date :** 4/4/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** As a born-and-raised Oregonian, and a small business owner in West Linn, I have experienced a LOT of terrible governance from this state. I don't think I have experienced a policy where the negative impacts of its execution have been so dismissed by the politicians and bureaucrats pushing it forward. I have attended multiple ODOT presentations, leaving woefully unimpressed. Throughout my career, I know the important takeaways are not what is said, but what is not said. And the lack of transparency can only be interpreted as intentional. Among my concerns: \* ODOT claims that this toll program will produce a \$100m+ return, yet that the fees and mitigation plans have not been finalized. How is it then possible to boast about the amount that will be returned when the fees are supposedly still in flux? \* ODOT states that lower-income drivers will be subsidized to help offset the negative impact of the fees. If that is the case, what incentivizes subsidized drivers to drive during off peak times? 200% of the poverty rate can be anywhere from \$27k to \$55k+, depending on the number of family members. With the average salary in Oregon being \$59k, that could be a significant percentage of people. And who is paying for these subsidies? \* Why is it that every questionnaire distributed by ODOT does not allow the responder to request road capacity increases? This "putting the thumb on the scale" is pathetically obvious. \* When did it become the state government's role, much less an unelected bureaucracy like ODOT, to manipulate when, where, and how drivers should behave, else be financially punished? This is a blatant overreach. The role of the government is to serve the public, not the other way around.\* This state continues to milk its taxpayers, despite record state revenues. Stewardship of public funds has proven to be demonstrably bad, and yet another tax scheme (and this is a tax) is just throwing away money that the citizens can better spend themselves. Higher gas, income, corporate, and climate taxes have put enough of a financial burden on the citizens of this state. There is no more blood to draw from this stone.\* Our federal government already went into another \$2 trillion in debt for an infrastructure bill in 2021. Where has Oregon's portion been spent? Why isn't that funding being used to address the needs of commuters? If this terrible plan is pushed forward (which it appears to be, no matter what), it will only prove that public officials disdain the population they serve, and that there is no accountability in Oregon's government. After all, there is an agenda that must be followed, and the citizens obviously don't matter.

**ODOT I-205 Toll EA - RECORD #2121 DETAIL**

**Submission Date :** 4/5/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** This is punitive to people who live in the community area. The tax will offload traffic to avoid the tax and congest local traffic heavily and the tax will impact locals more heavily as that is their ingress/egress freeway area for their community it is greatly an unbalanced approach. All citizens with autos registered within 10 miles of any of the current egress/ingress ramps of I205 near the project should be exempted from the tax to compensate for the traffic morass and their reduced quality of life the tax imposes.

**ODOT I-205 Toll EA - RECORD #2122 DETAIL**

**Submission Date :** 4/4/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I am 73 years old and close to poverty. I live near West Linn in the Stafford Hamlet. With tolls, I will not be able to afford to drive to stores, Kaiser Hospital, County Offices. etc. Going on and off surface streets will add a lot of time to such trips. Surface streets will become crowded and slow and unsafe. There should at least be a price break for people like me!

**ODOT I-205 Toll EA - RECORD #2123 DETAIL**

**Submission Date :** 4/5/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** Yes, this message is regarding the I-205 toll project, to the attention of Mandy Putney. And I wanted to provide my comments that I am absolutely against the toll. I actually live in Multnomah County but I travel to church in Clackamas County. And I do not want to have to pay a toll to go to church. And I also don't think it's right that people who have to work and have to pass through that corridor, that they should have to pay a toll every day. The toll is not the answer. You may want to consider something like developing a lane that is just strictly for carpooling or something like that, two people only and charge them the toll so they can get to where they want to go faster. Bu everyone else, we shouldn't have to pay a toll. I hope it doesn't happen. Thank you.

**ODOT I-205 Toll EA - RECORD #2124 DETAIL**

**Submission Date :** 4/6/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I believe tolling should be postponed until the Boone's bridge is ready for tolling. If it is just the Abernathy Bridge, there will be traffic snafus at 205-Stafford, Willamette drive and the old Oregon City Bridge. Also, there needs to be some cost mitigation for those living in West Linn and working in Oregon City and vice-versa. The proposed costs do not seem equitable across the state. Tourists and long haul trucks would probably just go once on a day. Local people employed on the opposite sides of the river would bear the brunt of this cost.

**ODOT I-205 Toll EA - RECORD #2125 DETAIL**

**Submission Date :** 4/6/2023  
**First Name :** Stan  
**Last Name :**  
**Affiliation :**  
**Submission Method :** Voicemail  
**Q3. Comments :** Yeah, hello.

I see where you guys are going to start charging tolls on the highways. That is a disastrous move, it's not good. I don't care what the ramifications are for the benefits, but we don't need it here in Oregon. It's insane, it's greedy, I don't care what you think or what the environmentalists think or whatever. We don't need to be putting tolls on these highways. It's just going to cause more resentment and more of a controlled police state, so therefore. My name is [], I live in south in Corvallis. My phone number is []. If you get this message, that's fine. If you don't, that's fine, too, but I resent toll fees because allocation don't always go where they're supposed to or at least a pretty big percentage of them don't, and it just gets worse and worse, and then it's more greed.

If I could go on and on, but thanks, bye.

**ODOT I-205 Toll EA - RECORD #2126 DETAIL**

**Submission Date :** 4/9/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** It's regarding the freeway toll program. Eisenhower set that up in 1956 as an emergency route never been tolled. They create great havoc on the surface streets because they increased congestion. And the only freeway was the Pennsylvania turnpike, which had already been built and completed in 1946, which had a toll, and that was added to that freeway system. Thank you.



**ODOT I-205 Toll EA - RECORD #2127 DETAIL**

**Submission Date :** 4/9/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Shame on ODOT. We already paid the taxes to build it and pay the taxes to maintain it. Quit being so greedy.

**ODOT I-205 Toll EA - RECORD #2128 DETAIL**

**Submission Date :** 4/7/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** ODOT, I own a small business. I live in Multnomah County, but the majority of my business is in Washington, Clackamas Counties. You don't start a toll on a road that's been paid for for 40 years, you start a toll on a brand new road that you just made. No. You don't need to be doing a toll on I-205, that's stupid, nonsensical. It does not justify anything. You guys are incompetent. You built the road to nowhere in southeast Oregon a few years ago. If you guys would have some accountability, if the director would go look at projects, I see projects all over by ODOT, 47 trucks at a work site and one dude down in a hole the other guys standing around on their cell phones. So once I quit seeing that, then maybe you should come and ask me for more money via a toll booth. But right now, you're going to harm my business. It makes no sense to me that you're going to put a toll on a road that's been paid for for 40 years! Go to the East coast, figure out why they have tolls there and how they make them. They're either privately owned roads by private families or it's a brand new road that the toll pays for. You don't put a toll on a road that's over 40 years old! That's nonsensical, it's not right, and it's just money-grabbing trying to reach into my business pockets. Again, another incompetent agency in Oregon with no oversight or accountability for how you waste my money. Again, I propose that you have some supervisor go out and look at some of these big job site where you have 50 guys and 27 vehicles and only one dude operating one machine, and it's usually the guy under 30.

**ODOT I-205 Toll EA - RECORD #2129 DETAIL**

**Submission Date :** 4/14/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Kris Strickler of ODOT said "We need to guide those drivers back to the interstate or help them travel by other methods like transit or biking." in reference to alternate routes. This sounds uneducated. Freeways are for longer distances to places that bikes and transit don't go. And about guiding drivers back to the interstate - but you just said you don't want them on the interstate - you want to reduce congestion - it can't be both ways. Do you want them on or off?

**ODOT I-205 Toll EA - RECORD #2130 DETAIL**

**Submission Date :** 4/14/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** You say equity, but provide nothing to back it up. What about people whose jobs require driving throughout the workday, whose livelihood depends on traveling all day long? What about people who for disability purposes or the need to care for others like children, animals, elderly won't allow them to take transit? What about the person traveling from out of state with only enough \$ for gas - are you going to surprise them with a bill and call it equity?

**ODOT I-205 Toll EA - RECORD #2131 DETAIL**

**Submission Date :** 4/14/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** will there be warnings along the route that a toll route is ahead with enough time and information for non-local travelers to be able to make choices? It wouldn't be ethical to charge travelers who don't know about the toll until it is too late. travelers need to be given the choice to use something that costs or to make other plans. surprise unavoidable charges are unethical. perhaps illegal?

**ODOT I-205 Toll EA - RECORD #2132 DETAIL**

**Submission Date :** 4/14/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** you can't kick people off of a road until you have other reliable options in place. Transit with park and rides aren't really an option on these routes. So fix that first, then maybe people will use other options. oh wait - what you actually want is MONEY so nevermind. you will toll with no alternative options so people are forced to drive and pay. it all makes sense now.

**ODOT I-205 Toll EA - RECORD #2133 DETAIL**

**Submission Date :** 4/14/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** Right now, I do not want the I 205 toll project. Thank you.

**ODOT I-205 Toll EA - RECORD #2134 DETAIL**

**Submission Date :** 4/14/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** Yeah, I'm calling about the tolls. If you haven't given so much money to mass transit and bicycle paths, you might have enough money to fix the road. Not very many people ride mass transit, very low percentage.



**ODOT I-205 Toll EA - RECORD #2135 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Diane

**Last Name :**

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** Hello, my name is []. I'm out here in Sandy, Oregon, making my comment about the proposed toll road out there on the freeways. And I want this to be directed to the toll advisory committee, whatever that number was. But anyway, we're totally against it and recently I was driving from Sandy to Salem on Highway 99E around four in the afternoon. And the traffic hadn't even started for the five o'clocker's getting home from work and it was quite busy then. Where all the people that will be going to have to go through a toll road and it will cause a lot more traffic and disruption. So, we're all totally against that toll road so that I'm just wanting to let you know. And I don't need a response back, but I hope that I can count to say that, no, please do not put any more toll roads out there at all anywhere. Nowhere in Oregon, we do not want it. Thank you.

**ODOT I-205 Toll EA - RECORD #2137 DETAIL**

**Submission Date :** 4/19/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** The citizens in Oregon/Washington has suffer enough financially to make ends meet of supporting their family and paying taxes. Many families had to suffer bunking with families and friends to survive this economic catastrophe that the government and leaders of United States cause. We the citizen are living in poverty! We are becoming homeless because of decisions that is made. Our pay checks is already getting taxed triple, now ODOT and the governor wants to charge on the bridge that we the people commute to work to make a living!! We the people who works hard to service in the community so all needs are met by each individual who lives in this state! Why don't they fix the homeless problem and drug abuse! Use my tax dollars to invest in these young children who needs mental help! Focus on fixing the social problems! Instead leaders want to collect more money into their pocket, sitting behind a desk making stupid decisions on how to make everyone else more poor and increase the number of homelessness. Stop the toll charge! What happen to the American Dream!!? Now it's the American Poor!

**ODOT I-205 Toll EA - RECORD #2138 DETAIL****Submission Date :** 4/20/2023**First Name :** Christy**Last Name :****Affiliation :****Submission Method :** Voicemail

**Q3. Comments :** I do not do email so I can't respond to you that way. I'm 80. I have no social security of my own. I'm a full time caregiver and only get \$39,000 a year between me and husband. Special needs kid. I want no bridge tolls for seniors on limited income. It's the fastest way to get to care centers on the other side of the river. Had to go between Lake Oswego and the Pearl for a week and couldn't have afforded that if there was a toll. Tolls are prohibitive. Can't afford it.

**ODOT I-205 Toll EA - RECORD #2139 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** eric

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** I am opposed to your tolling of I-205. No matter what you call it or how you sugar-coat it a toll is still a tax. In 2017 the Oregon legislature approved HB 2017 for 5.3 billion dollars for transportation purposes in Oregon. One of the many projects included in those many projects of HB 2017 was the improvement of I-205 in the area you refer to in the assesment. What happened to the 5.3 billion dollars for these projects? Money seems to be the driving force of this tolling effort. Motorists in Oregon already pay fuel taxes to pay for the roads. They also pay DMV fees (also taxes) for various road construction projects. These roads are already paid for. Kris Strickler has indicated this project will reduce crashes by 26%. How can that possibly be proven? You can't fix stupid. How are you going to improve motorists driving habits by 26%? The assesment and Kris Strickler call for innovative solutions for the problems of I-205. Where is the mention of HB 2017 to pay for the project? Tolls (taxes) are mentioned. There seem to be a committee to come up with ways to tax the motorists in Oregon. I have not heard of a single way bicyclists are being taxed for the millions of dollars spent on their projects here in Oregon. When will they be paying their fair share of taxes for road improvement projects? Part of the reason for this project and others is to reduce congestion. Since the covid-19 epidemic, many more people are working from home and not driving as much and not contributing to traffic. Both the assesment and Kris Strickler refer to the I-205 toll (tax) as being equitable in one sentence. In a subsequent sentence variable-rates will be implemented. A low-income rate is mentioned. Why should low-income drivers pay less than others? Another rate is for off-peak hours. Why should different hours change the rate? All drivers should pay the same rate. In the assesment, toll booths are mentioned for the two bridges, Abernathy and Tualitin. What I can gather from the information given, there won't be toll booths but rather toll bars. Actual booths would slow down traffic, just what you are trying to avoid. You will implement a sticker system that will be scanned. I could not find the estimate on how much the administration of the sticker system will cost overall: from acquiring them, how drivers will get them, money collection, vehicles from out-of-state, drivers who can't and won't pay. Another part of the assesment and Kris Strickler refered to was the two bridges, Tualitin and Abernathy, being retrofitted to be earthquake-ready. It was not referred to as earthquake-proof. The earthquake expected in the area will be more than 7.0. No matter what is done to these bridges the chances of them withstanding a quake that large are remote. So that money will only be used to make you feel better about the bridges not collapsing. In conclusion, look to HB 2017(5.3 billion dollars) for the funds for these projects. The money has already been approved. Thanks for your time.

**ODOT I-205 Toll EA - RECORD #2140 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Anne  
**Last Name :**  
**Affiliation :**  
**Submission Method :** Accessible form  
**Q3. Comments :** Danger to neighborhoods

**ODOT I-205 Toll EA - RECORD #2141 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Stephen

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Sunset the toll. Once bonds paid off, tolls go away. But thanks for taking \$100 a month of my salary, NOT !

**ODOT I-205 Toll EA - RECORD #2142 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Kate

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** What is happening to all the money you receive for transportation, why toll when you already have a payroll tax going to transportation, why not increase this slightly and increase tax for those that have an electric car to match the gas tax. If you don't know the total cost of the i5 bridge why would we believe you on what you are charging. Your so called congestion toll or tax are only for those in a certain area, how is that fair, when the rest of oregon doesn't have a tax put on them! If this does not reduce congestion, then what? The people of oregon need to vote on all of this because your not listen to the people you represent! If you are listening to your representative and they want to tolls then move tolls out to Hillsboro or Portland area that agree to all of this since these reps seem to think they do and let's hear them scream about it! Why are you tolling all lanes? Why? No tolls in clackamas area or they will find away around them! Listen to us, please

**ODOT I-205 Toll EA - RECORD #2143 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Karen

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** As officials have declared. The stretch's of tolled areas do not have public transportation options. You are asking for neighborhoods and downtown OC to handle 100% traffic increase. Inflation and coming out of a pandemic is hard enough on families. Increasing this now is not right. Do what is right when 95% of the people are against it. I wouldn't mind a \$100.00 increase in vehicle registration as a means of support.



**ODOT I-205 Toll EA - RECORD #2144 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** David  
**Last Name :**  
**Affiliation :**  
**Submission Method :** Accessible form  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2145 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Scott

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** Being a West Linn resident I'm extremely concerned about the diversion of traffic to local streets. I feel like if this gets put in place the traffic will be so congested that I won't even be able to get off my street to get to work. I don't want to here the dictatorship of ODOT telling me to take public transportation or carpool either. I want to know is exactly where our billions of dollars of funds through the gas tax, upcoming infrastructure bill, ect. are currently being spent? We haven't had real infrastructure (freeways-ect) since the 80's Where is the money really going? Oh, that's right hundreds of thousands of dollars (at least) spent on things like useless speed advisory signs and filling a pot hole here and there. Not to mention that earthquake proofing a bridge would even be a guarantee. ODOT has no idea how to resolve this issue and Tolls is a ridiculous idea for this area. West Linn does not want to be ODOTS test site.

**ODOT I-205 Toll EA - RECORD #2146 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Pamela

**Last Name :**

**Affiliation :**

**Submission Method :** Accessible form

**Q3. Comments :** It would appear this assessment is too limited. Why are there only two Solutions? When approaching a problem, we need more than just 2 solutions. A "No Build" is NOT a Solution - it is a Dead End. There has to be a Solution which doesn't include tolling, and yet makes the necessary improvements possible, especially those for safety. We are Creative people and can come up with better and real solutions. Secondly, I am opposed to electronically "capturing" the toll. I do not want my information available for tracking. Thirdly, this is nothing more than Control, where the government by pricing controls my driving behavior. Thank you.

<b>ODOT I-205 Toll EA - RECORD #2147 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Margaret

**Last Name :** Tweet

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Not sure if the survey was accepted, or how many times the done button must be hit.

**ODOT I-205 Toll EA - RECORD #2148 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Kim

**Last Name :** Bria

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am located in the Willamette neighborhood adjacent to I-105. The EA indicates that businesses will flourish and there will be minimal to no impacts. On both businesses and residents. I cannot find where this data is referenced, as the opposite happens when commuters are in stalled traffic. They don't make "opportunity" stops at restaurants and businesses. They have families and homes to return to, which the increased traffic diverted onto Willamette Falls Drive will impact. I am asking for capitol improvement mitigation measures to prevent diversion off I-205. I am also asking for a more complete study that analyzes the negative impacts to businesses.

**ODOT I-205 Toll EA - RECORD #2149 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Leslie

**Last Name :** Robbins

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** ODOT is targeting West Linn residents who will be affected the most by this toll. Those who live on West Linn will have to pay the toll more than anyone else. Also traffic is already horrible and backed up across the Arch Bridge and those driving locally. This toll will not solve any of the issues it states it will solve. People still need to get to and from work, life is just going to get worse for people in the WL, Oregon City communities.

**ODOT I-205 Toll EA - RECORD #2150 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Patrick

**Last Name :** McCarthy

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Because locals will be forced to pay, or jam local streets, these tolls are very regressive taxes, wrapped and sold as an excise tax. Very interesting that Oregon is on the hook for a huge piece of proposed I5 bridge when it's use is dominated by WA residents and businesses...but no tolls there? If traffic mitigation is truly a goal...then provide one lane in each firection that is available only for congestion based toll payers or vehicles with 2 or more passengers. WA and CO do this. Give your drivers options.

**ODOT I-205 Toll EA - RECORD #2151 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Margaret

**Last Name :** Tweet

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Additional comment added to this survey. A key concern about tolling is limiting access to specialty medical facilities that serve the region like OHSU, hospitals for children and other medical care. Tolls could limit access to these needed services in the community, another reason I am very concerned about the high cost of tolls, and the impact on many residents in the area who cannot afford tolls. I favor NO TOLLS, NO BUILD (except for the projects including in the NO BUILD already) It is unfair to tie adequate roads with tolls when other means to fund tolls that do not cost as much could be utilized. With tolling, as much as 60% of tolls collected go to the operations of the tolls in WA state, leaving little funds for road improvements if over half of the tolls collected go toward collecting tolls. Until now, more direct and less costly means of raising funds for transportation projects have been successful. It is also concerning that the funds raised can go to purposes that serve few in the community such as light rail. The fixed route light rail system serves a small fraction of transportation needs in the region, and no freight. In contrast, roads serve all in a more flexible way allowing people to reach the goods, services, and recreation opportunities in the region. Light rail is so much more expensive than buses or vans, yet the funds collected could be diverted to costly light rail. Diverting toll funds from road users to non road uses, and the most expensive form of transit, light rail, is not forthright. The project is being presented as a road improvement program, yet the limits on how the funds can be used are lax. The FAQ section is especially vague about the costs of the tolls, and which roads and bridges will be tolled. The discussion of per mile fee for driving is not included, and should be as it is a kind of toll on top of the toll. More information should be disclosed to the public. Again, NO TOLLS, NO BUILD is the option that most residents can best afford.



**ODOT I-205 Toll EA - RECORD #2152 DETAIL****Submission Date :** 4/21/2023**First Name :** Melissa**Last Name :** Gonzales Ayon**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** This toll will affect how college students get to campus, I personally take i-5, switch to 205, then 213 to get to CCC and me and other students who travel along 205 can barely afford gas as it is. Adding a toll will make us spend more money on gas or on toll payments. Either way we get hit.

<b>ODOT I-205 Toll EA - RECORD #2153 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Brandon

**Last Name :** Liddycoat

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** What you guys are doing is wrong. You shouldn't roll the whole free way for all of the residents you should have just a toll lane. Instead of pricing people out of being able to drive there own cars to work make them pay to skip rush hour. You will make money either way but will still make the freeway accessible to those that can't afford your high tolls this is unfair and so wrong. Shame on you guys we all know this toll won't leave once the bridge is paid for.

<b>ODOT I-205 Toll EA - RECORD #2154 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Jenifer

**Last Name :** Douglas

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The toll will create nightmare conditions on neighborhoods as more people will choose surface streets to avoid tolls. Also tolls will cause undo burden on those of us that are forced to drive these areas daily

**ODOT I-205 Toll EA - RECORD #2155 DETAIL****Submission Date :** 4/21/2023**First Name :** Pat**Last Name :** Stauss**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** A toll will put all senior citizens who are already having financial issues with the increased food gas and normal living expenses in worse shape then they are now or prevent them from getting out of the house because they can not afford anymore decreases to their small financial income. No one is thinking of there elderly

**ODOT I-205 Toll EA - RECORD #2156 DETAIL****Submission Date :** 4/21/2023**First Name :** Janine**Last Name :** Belleque**Affiliation :** Oregon State Marine Board**Submission Method :** SurveyMonkey**Q3. Comments :** Proposed Section 4(f) de minimis Impact Determination for the Tualatin River Water Trail.

The Oregon State Marine Board's (OSMB) mission is "serving Oregon's recreational boating public through education, enforcement, access and environmental stewardship for a safe and enjoyable experience." The Tualatin River is one of two federally recognized water trails in Oregon. The river is used year around by both nonmotorized and motorized boats. Please note the February 14, 2023, letter to Tualatin Riverkeepers requesting concurrence with de minimis determination incorrectly stated the river is only open to nonmotorized boats. OSMB has by rule restricted towed watersports OAR 250-020-0033 (3) and 250-020-0370. Additionally, OSMB has restricted use of personal watercraft (jet skis) per OAR 250-021-0040(2). Motorized boats can and do operate on the Tualatin River. Motorized boats launch at Cook Park, Tualatin Community Park, and Stark (Rivergrove) boat ramps. The heaviest recreational boating use occurs May through October with summer months being the peak. The ODFW in-water work window is June 1-September 30, which falls within the highest recreational boating activity period. The in-water work window is approximately 17 weeks long. The proposed closure of the river for 20 weeks over the 2.5 years of construction during the in-water work window is nearly a 50% closure during this peak recreational boating period. This is a significant amount of time to have no access to the river around the construction zone and area up to the Lake Oswego low head dam.

The February 14 letter identifies that Stafford Road/Shipley Bridge is the closest site to the construction zone and is designated as difficult or undeveloped canoe and kayak access by Tualatin Riverkeepers. What is not mentioned is the location is a wide spot on the road, owned by Clackamas County roads and not an approved boating access site. The location has poor site distance in both directions, no shoulder and parking to use the access is approximately one-quarter mile away. This requires users to walk on and along the road. Paddlers in general do not go on the river by themselves. There are usually a couple boats and people on the water together. This is a serious safety concern and high risk of injury. It is only a matter of time before the County installs barriers to close the user-made access.

In 2021 OSMB began contacting ODOT about incorporating a boating access site into the bridge project to improve river access. We asked for an estimate to incorporate boating access into the design and no estimate was provided. This lost opportunity is what HB2835 (2019) was trying to prevent. There is a tremendous amount of energy happening along the Tualatin River to create, improve and expand nonmotorized boating access with the goal of equitable river access. The Tualatin River Trail has the potential to be the first accessible trail in the nation.

OSMB is working with and has had conversations with numerous local governments such as: Cities of West Linn, Tigard, Tualatin, Rivergrove, Hillsboro, King City, and Cornelius in addition to Washington and Clackamas Counties and Metro about recreational boating access and equitable access to the Tualatin River. The City of Tigard's proposed improvements are in the permitting phase, West Linn's are in the engineering phase, Tualatin's recently approved parks bond includes significant redesign and replacement of access at Tualatin Community Park, King City received a Metro grant for segment 1 Westside Trail, City of Rivergrove is repairing the bottom of their boat ramp.

OSMB does not support the de minimis impact determination and recommends ODOT mitigate for the impact and lost opportunity for equitable access to the Tualatin River.

<b>ODOT I-205 Toll EA - RECORD #2157 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Omar

**Last Name :** Sheikh

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** My comments concern the proposed expansion to I-205 and highway changes. The Toll Project's goal of reducing congestion seems unnecessary if there is an expansion to I-205. This toll project should also be used to encourage other forms of transportation across highways by making them safer and more convenient than cars. Otherwise, this project will not substantially reduce car usage and improve the environment. Furthermore, in conjunction with reducing car congestion, there should be efforts to improve non-car transportation. The tolling project includes provisions for highway improvements, which must include other forms of transportation. Per pages 3-5 and 3-6 of the Environmental Assessment, West Linn has limited transit coverage in addition to no I-205 transit service west of OR 43. Furthermore, there are no bus stops on I-205 or OR 213, which seems like an oversight. Therefore, transit and bicycle and pedestrian access should be improved. Pedestrian access can be improved through measures such as improving pedestrian crossings, creating crosswalks (raised or otherwise), and improving lighting per Pages 3-40 and 3-41 of the report.

**ODOT I-205 Toll EA - RECORD #2158 DETAIL****Submission Date :** 4/21/2023**First Name :** Michelle**Last Name :** MaaStorey**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** The economic impact on our family will be detrimental. The ability to pay just for fuel, groceries, medication and household necessities such as electric, water etc is already a challenge. We have paid for the roads many times over with taxes. This toll is wrong. For the sake of the children and seniors on fixed income. Tolls are wrong and undesired!!

**ODOT I-205 Toll EA - RECORD #2159 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Shatrine

**Last Name :** Krake

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** ODOT is not meeting their commitments to equity because many of our most vulnerable populations will be negatively impacted by this program and a low income toll program with discounts will not offset the negative health and safety impacts that they will face. An Environmental Impact Statement is essential before another progressive move is made.



**ODOT I-205 Toll EA - RECORD #2160 DETAIL****Submission Date :** 4/21/2023**First Name :** Linda**Last Name :** Henley**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I favor less congestion on our roads, but there's a right way to do it, and a wrong way. There are many more Equitable solutions than tolling. Both toll gantries were placed within West Linn's city limits. I'm a senior citizen on a fixed income, and I cross the toll gantries sites at least 5 times per week. The negative impacts of I-205 tolling will not be shared by anyone else in the region. It's not fair to us. Please continue to study more equitable funding sources for transportation. You should get GPS odometer software for vehicles, that tracks all miles driven in the state of Oregon. There wouldn't be bailout traffic and need for mitigation measures that way, as there would be no way around paying per mile driven. That seems a lot more fair to me than arbitrarily placing the entire state's tollbooths both in the same town. It's very predictable we'll soon be and watching crowds of drivers exit the toll road, and snarl up our local traffic just to avoid paying a few dollars. My other comments: 1 Delay tolling on 205 until the Regional Mobility Pricing (Toll) Project is completed, so that a complete picture of regional tolling in Oregon can be assessed. 2 Please reconsider the damaging effect multiple tolls each day will have on household and business finances, even for those not typically considered low income. There's no transit option here in West Linn. To get to the nearest grocery store or pharmacy, there is no option other than to drive. Tolling in this manner is like taxing people for breathing. 3 Conduct an Environmental Impact Statement (EIS) for the tolling project. We need more analysis, more community involvement, and more public outreach 4 Extend the public comment period for an additional 30 days (for a total of 90 days) and conduct more public hearings during off hours so that more of my neighbors are able to participate.

**ODOT I-205 Toll EA - RECORD #2161 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Debra

**Last Name :** Zavala

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I'm very concerned about Oregon city because cars will re route to avoid the tolls. Oregon city has hills like San Francisco and can't handle more traffic than it already has. It will be dangerous for those people using the public library that's on the main street hill . It will be dangerous for people trying to cross the highway. It will be dangerous for people trying to cross the train tracks in downtown Oregon City. I envision people being stuck on the train tracks because of the excess traffic and trying to get through to go to work. My husband will have to change routes and drive through Oregon City past the river and down to McLaughlin instead of taking the Abernathy on-ramp or 205 freeway. We are low income family and cannot afford the tolls. I'm very concerned about what this is going to do to Oregon City for foot traffic and for the people trying to drive. I don't want to have to drive through Oregon City to get to Clackamette Park and the river and the boat ramp. We go there often but we usually just jump on the exit that takes you over to McLaughlin. But now we won't. When I drive to Portland I'll have to take McLaughlin but go through downtown Oregon City to avoid that on-ramp which will have the toll to the Abernathy bridge Please do not make this area a toll bridge toll freeway because it's really going to impact our low income family and my kids who have autism Thank you

**ODOT I-205 Toll EA - RECORD #2162 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Christine

**Last Name :** Grimm

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** All segments of I205 need to be tolled. Otherwise, local communities will be unfairly impacted. I205 is a main commuter route, both north and southbound. Many drivers may try to avoid tolls by driving through neighborhoods and causing additional congestion. Therefore all motorists should bear the burden of the tolls, including ALL VEHICLES even those from out of state. And if I5 will have a toll/tolls, it should have tolls from the south end of Salem to the Washington state border, for the same reasons. Washington state has tolls on Hwy 16/Narrows Bridge and segments I405 and Hwy 520. All vehicles pay tolls for those areas.

**ODOT I-205 Toll EA - RECORD #2163 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Trevor

**Last Name :** Rowe

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The traffic analysis assumptions around the number of vehicles moving to adjacent roads to avoid tolling is unreasonably low. The 2045 Build volume increase on Borland (fig 3-4) does not accurately attribute the increased trips to the Borland/Stafford intersection and therefore the mitigation of that intersection and Borland Road are inadequate. The RTP projects referenced as Borland Road mitigation exist in both the Build and No Build option, so contributing to the RTP projects is not an adequate mitigation for executing the Build Option. Significantly more mitigation is needed at the Borland/Stafford intersection. This mitigation should be designed and implemented by the project. Additional pedestrian and bicycle safety mitigation is needed as a direct result of the Build alternative and the increase of traffic on non-Interstate roads because of toll avoidance. Mitigation measures should be conceived as a direct result of the proposed project and independent of the RTP project list. Accurate trip allocation to the Borland/Stafford area may cause intersection failure and unacceptable levels of service in the region and additional mitigation is needed. Options should be generated to reduce travel times and preserve the LOS at key intersections in the Stafford area - especially since the area is not part of a City which has been consulted as part of the technical analysis.

**ODOT I-205 Toll EA - RECORD #2164 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Shatrine

**Last Name :** Krake

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Hard working citizens cannot “choose” to drive to work at different times to avoid premium tolling costs as suggested in this report. To earn money, employees MUST work when they are scheduled, on what grounds does ODOT have to imply differently? Oregon City, West Linn, Lake Oswego, Tualatin, and Wilsonville have over 60% of their workforce commuting into their cities DAILY! With this small section of tolling activated, the impact will be disproportionate and inequitable on all peoples, households and businesses and see massive duress put on each community listed above, severely stunting workforce, economic growth and pandemic recovery. Show us the findings, show us the studies, prove to Oregonians that you did everything in your power to find the best solution for ALL because this EA report shows otherwise and paints a very bleak picture for the future of Oregon.

**ODOT I-205 Toll EA - RECORD #2165 DETAIL****Submission Date :** 4/21/2023**First Name :** Shatrine**Last Name :** Krake**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Per EA section comments on local business benefiting from Tolling's rerouting/diversion and that some roads will see an increase of rerouting by 30-100%. Show Oregonians factual data and more analysis to substantiate the conclusion that businesses will benefit from the additional congestion on the local system. Actual data, relative to businesses in recovery from a world-wide pandemic, must be presented to prove that a POSITIVE effect will take place for businesses in customer spending, income and employment increases due to rerouting/diversion. Data should be complete and inclusive of all three local commercial areas mentioned.

**ODOT I-205 Toll EA - RECORD #2166 DETAIL****Submission Date :** 4/21/2023**First Name :** Mike**Last Name :** Webber**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I question whether any of these environmental impact studies have included analysis by individuals who actually live and commute in the affected tolling areas, such as Stafford, West Linn, Lake Oswego, Wilsonville, Oregon City, Milwaukie, Gladstone, etc. Because we locals know how congested our current streets are already, before tolling the entire Interstate forces vast increases in the numbers of commuters and other drivers to our few side streets that are already at capacity throughout most of the day. We do not have access to ring roads or alternative arterials; geographically, we are locked into a narrow availability of traffic routes. Passing the cost of interstate highway improvements onto the shoulders of a small portion of Oregon's population via tolling all of the available lanes is already unfair; but even more ludicrous is the effect this will have on our quality of life. Hwy 43 has been a gridlocked, potholed, single-lane crumbling mess for decades; yet it is the only "arterial" outside of the interstates available to us to get to downtown and beyond. Now we are expected to pay tolls AND watch our only alternative travel routes driven to gridlock by faulty computer models and people who don't have a clue about the neighborhoods and cities their decisions are affecting? Please STOP and reassess this juggernaut of nonsense. Locals should not have to pay ANY tolls when we have no alternative routes, especially when increasing the gas tax and vehicle registration fees is a viable solution that ensures all Oregonians pay to improve our shared infrastructure.

**ODOT I-205 Toll EA - RECORD #2167 DETAIL****Submission Date :** 4/21/2023**First Name :** Debra**Last Name :** Sahleen**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The negative impact on local Oregon City residents who already experience up to 45 minute delays just trying to get across the river into West Linn to get onto I-205 during peak times will only get worse. Also the negative impact for the old part of West Linn, Willamette Drive, that is only 20 mph with many businesses and pedestrians cannot support the number of vehicles who will then use all the back roads to avoid the tolls. Of all the locations to put a toll I don't understand why I-5 isn't being considered as a more favorable location, anywhere on I-5 would be better than the current location being considered. This is so disrespectful of Historic Oregon City and West Linn, not to mention the Indeginous lands that are being impacted. Please reconsider this project and move it away from Oregon City.



**ODOT I-205 Toll EA - RECORD #2168 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Ann

**Last Name :** Hageman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I'm concerned about added traffic cutting through Bryant Road and Childs Road in Lake Oswego.

**ODOT I-205 Toll EA - RECORD #2169 DETAIL****Submission Date :** 4/21/2023**First Name :** Michael**Last Name :** Terry**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Hundreds of thousands of trips by Washingtonians are made every year to shop, dine, and recreate in Oregon. Washingtonians account for 35% of all retail revenue in Portland. Oregon has no sales tax. But, with these exorbitant tolls, any benefit of no sales tax is obviated. Oregon businesses WILL lose significant revenue if this toll is authorized. Finally, we are currently in a position where there are not enough workers to staff many, many business and governmental jobs. I have no doubt that a large percentage of Washingtonians who work in Oregon will re-evaluate paying even more taxes to Oregon without any benefit and seek work in Washington or other states. The result: Oregon will suffer even worse when trying to fully staff its businesses.

<b>ODOT I-205 Toll EA - RECORD #2170 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Laurie

**Last Name :** Thwaites

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Do not use tolls, the quality of life in my city of West Linn will be so adversely affected, and I'm sick at how you are ignoring this. If we need new roads, use taxes and build them, infrastructure is important. It is too easy to detour around 205, to avoid tolls, and clog up local roadways. Do not pay for this with tolls!!!

**ODOT I-205 Toll EA - RECORD #2171 DETAIL****Submission Date :** 4/21/2023**First Name :** Wayne**Last Name :** Klemme**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Why are these tolls necessary? These tolls are only going to add to the already horrible congestion near exits 9-12 off 205. The DOT's poor planning and road design should not be covered by making tax payers pay even more to use the roads they commute to work on. Neighborhood roads where children play and wait for their school buses on are now going to experience much higher traffic causing significantly more hazards. People are going to bypass these tolls. For the amount of taxes the working class and business already pay, there is no excuse to make us pay more to use the public roadways. The local governments are taxing the working class enough. Give me a freaking break.

**ODOT I-205 Toll EA - RECORD #2172 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Lawrence

**Last Name :** Brumitt

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I-205 tolling is a terrible idea, and will have long term catastrophic effects on the communities around the tolling areas. Increased and slowed traffic moving through communities to avoid the tolls will overburden the road infrastructures. Drivers made furious by the extra time taken out of their already taxed schedules will cause accidents, run over pedestrians and commit road rage assaults at a higher level in these communities. All of us who have to endure the situation will carry that anger and frustration home. Slowed idling cars in these high traffic areas will generate increased exhaust. This is an outright attack on lower income working people who lack the luxury of working from home. It is therefore inequitable, as more people in this class are BIPOC. Tolling is a terrible idea, and the plan should be abandoned immediately.

**ODOT I-205 Toll EA - RECORD #2173 DETAIL****Submission Date :** 4/21/2023**First Name :** Sarah**Last Name :** Gensler**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling doesn't eliminate traffic congestion, it merely changes where it occurs. It will cause tens of thousands of vehicles to DIVERT on to side roads to avoid the tolls. ODOT estimates at total of 130,000 vehicle diversions when all Portland area freeways are tolled. That is equivalent to every vehicle that crosses the Interstate Bridge on an average day, suddenly using side roads and making the neighborhood roads more congested and less safe.

Portland economist Joe Cortright revealed the information (here). There would be DOUBLE, variable rate tolling, one for a bridge and a second "per mile" toll for driving I-5 or I-205. During congested travel times, it could cost \$15.80 to use I-205 driving from Vancouver to Wilsonville.

**ODOT I-205 Toll EA - RECORD #2174 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Shatrine

**Last Name :** Krake

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We need a complete Environmental Impact Statement (EIS) process INTEGRATED with the Regional Mobility Pricing Project (RMPP) modeling data to identify the true impacts of this project and the regional program and to offer mitigations that address the impacts to our businesses and communities. The current EA report is not enough, nor will the revisions be. We must look at the full impact of Tolling and RMPP together in this large sector of impact.

<b>ODOT I-205 Toll EA - RECORD #2175 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Diane
<b>Last Name :</b>	Fries
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	HUGH FINANCIAL BURDEN!!



**ODOT I-205 Toll EA - RECORD #2176 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Donna

**Last Name :** Hiebert

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** In addition to the effect on our already-stressed household budget, I am concerned about the traffic congestion in and around these toll booth areas, the negative increased impact to the local biking, walking, and driving traffic in our communities, people rerouting their normal routes to avoid the tolls, which then also increases the traffic and the chance of more potential accidents ,injuries and even deaths from these extra cars and trucks clogging up the streets and I 205. In addition, Oregon is one of only a few states left without traffic tolls and we want to keep it that way.

<b>ODOT I-205 Toll EA - RECORD #2177 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Summer

**Last Name :** Sorensen

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** No tolls!!! Tolls should be put to a vote of citizens, and initiated in no other way!

**ODOT I-205 Toll EA - RECORD #2178 DETAIL****Submission Date :** 4/21/2023**First Name :** Mike**Last Name :** Murphy**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The State has already proven that they have poor oversight in the use of funds levied for the improvement of public roads, i.e., increased DMV fees, increased gas taxes, increased surcharges on development fees, etc. The addition of tolls is an end around attempt to levy a tax without sending it to a vote of the citizens of Oregon. The tolling scheme will have financial impacts on the citizens and businesses that live and work adjacent to the expansion of I-205, driving up the cost of traveling to and from work, going out to eat, going shopping, visiting friends and relatives, increasing wages and salaries to retain qualified employees negatively impacted by the tolls. The argument I have seen from supporters of the tolling schemes is they anticipate increased usage of Tri-Met for the lower-income population; this is a fallacy, as the level of service offered is inferior to that of the zones closer to the metropolitan core, and the safety aboard Tri-Met is continually declining. The safety of the neighborhoods adjacent to the tolled sections will be negatively impacted; Borland, Willamette Falls, Salamo, Hwy 43, Hwy 99, Stafford Road, the historic arch bridge, Ek road, Johnson road, Washington, Arlington, and countless smaller surface streets will all have exponential growth in traffic due to the ease at which navigation apps can be set to avoid tolls.

<b>ODOT I-205 Toll EA - RECORD #2179 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Wendy

**Last Name :** Nelson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling on I-205 will dump traffic onto already crowded surface streets. There are so few ways to cross the Willamette River, that I fear our Oregon City Arch Bridge will be overwhelmed with traffic.

**ODOT I-205 Toll EA - RECORD #2180 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Bobbie

**Last Name :** Hupp

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Main street in Oregon City is already very busy and All of the people who don't or can't afford tolls will clog Main Street. I'm worried that many of the local businesses will go iof business. I'm also worried that there will no many trucks along with cars trying to go through The local neighborhoods putting residents at risk and damaging local roads.

**ODOT I-205 Toll EA - RECORD #2181 DETAIL****Submission Date :** 4/21/2023**First Name :** Kimberly**Last Name :** Rudkin**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Many of us cannot alter if and when we drive because of work/school schedules and also due to work/school schedules and the nature of where we choose to place our children in school or due the nature of work (ie sales rep for state of Oregon), public transportation is not a feasible option. We have already had issues attracting business to and retaining businesses in Oregon City, this will have an impact on a population which is growing in population find work options or want to work here. There are also few options to avoid the tolls and our surface roads are already congested. There are fewer routes in/out of this area due to the River and rural nature of parts of our community. You are now going to cause unnecessary surface congestion when it's already hard to get around certain times of day. Our public transport is not equally accessible to all people in the community such as it might be in a more urban setting. Parts of our community are largely rural. While 205 is a major bypass for the east side, only tolling staffers to OC disproportionately places the financial burden on west Linn and Oregon city residents. Why are we responsible for largely funding improvements for an entire metro community. You should try this out on 217 first where there are more commuters and congestion and frankly, roadwork. You will stunt growth and the financial health of these communities. Please consider the impact on surface roads and the the financial impact on the residents of these communities as well as the feasibility of alternative routes or access to transportation in the context of most people not working where or near where they live in suburbs vs urban.

**ODOT I-205 Toll EA - RECORD #2182 DETAIL****Submission Date :** 4/21/2023**First Name :** Amy**Last Name :** Milam**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Imposing tolls in this economic environment is really tone deaf. People are struggling to keep food on the table. Word of more layoffs and stagflation really make this untenable. It seems that WA and OR have other money that could be used. WA has a surplus. You are going to add to the crushing economic circumstances of those who can least afford it.

**ODOT I-205 Toll EA - RECORD #2183 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Lynette

**Last Name :** Pierson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Positioning the northbound I-205 tolling gantry on the north side of Stafford Road will encourage diversion onto Stafford Road/Willamette Falls Drive which ODOT has acknowledged. The northbound I-205 tolling gantry should be located on the south side Stafford Road to reduce diversion. Not doing so, will have serious impact on the ability of residents to access the new Jr. High and services in downtown Willamette. A 31% increase in traffic through that area and no solutions offered for the 12th street intersection are not acceptable results of this project. Also, the cost of tolls on low income households who commute to work and have no options for remote work is an unfair burden on this section of our population. More should be done to minimize the impact on these households.



**ODOT I-205 Toll EA - RECORD #2184 DETAIL****Submission Date :** 4/21/2023**First Name :** Bheanzor**Last Name :** Ferrer**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :**  
I do not want tolls on the bridge. We have already voted against tolls. I moved from Portland to Clark County to get away from the drugs, violence, and homeless issues that plagued our streets after they put in the MAX. I know live in Clark County, but still work in Portland. \$15 TOLLS will harm all but the wealthiest families. It will be a regressive tax that most hard working families can't afford. ODOT will truly be creating "roads for the rich." I suggest the government use the money from vehicle registration instead.

**ODOT I-205 Toll EA - RECORD #2185 DETAIL****Submission Date :** 4/21/2023**First Name :** Carrie**Last Name :** Hilger**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I will drive as far as it takes thru every side road and housing development before I pay a toll. I would rather purchase more gas than pay a tole. This should NOT BE HAPPENING. It is financially detrimental to so many people trying to get to their job. If people can't afford to drive to work they will be forced out of work. This is asinine.

<b>ODOT I-205 Toll EA - RECORD #2186 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Steve
<b>Last Name :</b>	Koch
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey

### Q3. Comments :

First of all, shouldn't a survey of this nature have been done before engineering and construction was started? What is up with that? And didn't it have a toll at the bridge between Washington and Oregon? And is it there anymore? Why? Because people didn't like it for all the reason they will not like this one! Effects of the transportation system: rerouting and diversion. This one factor alone should have been enough of a deterrent to keep the project from going forward beyond planning. Diversion. That is the first thing that comes to mind when I think of a "toll" bridge is saving money. We pay income taxes, gas taxes, property taxes, etc. Big rigs pay use taxes. I'm sure there are other taxes businesses and individuals pay to help maintain the local government as a whole. And now you folks want to add another tax? Which, I would think is constitutionally illegal. Because those taxes levied are without representation. Seems to me an increase could be enacted without a vote of the public. So, when the ODOT creates another cash cow, the first thing that comes to mind is finding a way around the system to save me money. Which will impact all major side-street traffic. AND...local business. It will be a mess. And, btw, what is "active transportation"? Does that mean buses? I would wager that the percentage of population using buses that use the Abernathy bridge is less than 5%. And are the riders going to pay more for riding those buses to cover the toll? Talk about financial impact! Bikes and walking? Isn't there a sign on the on-ramps to the freeway that states "non-motorized vehicles prohibited"? Why in the world are bikes and walking even mentioned. And, if the signs weren't there, one would have to be in dire straights before taking their life in their hands by biking on a 6 lane freeway. In my estimation. How in the world will adding another lane to I205 impact I5? Traffic is traffic. If the state tourism department advertises to draw people to the state to play, work and live, they darn well should have talked to the state DOT to make sure they can accommodate the "traffic". Add to that the impact of asking visitors to pay a fee to use "our wonderful, beautiful state hwy's!" Freight - What? Our capitalistic economy, and "interstate" freeway system invites companies doing interstate and international business to "use" the system. Why is this even a question? These trucks will always be using the system. And thank God for them. We couldn't survive as a society without them! And if ODOT wants to charge them for use, they will only pass the cost onto the consumer. (another tax, yay!) Effects to local environment: smh - What!? Someone should have thought about these issues 50 years ago. People cause environmental impact. Lewis and Clark impacted the environment. If you don't want people to impact the environment, then ask them to leave the state. Or stop driving. I suggest the first ones to stop driving are the governor, the mayor(s) and all legislators, state, county and city employees. And can we please stop talking about climate change? If we were really concerned about this and "global warming" (snicker)...someone should have sued the federal government for spewing aluminum particulates into the atmosphere a long time ago! And we should enact a law disbanding ALL drive thrus and cars with AC and heaters. Has anyone ever done an environmental impact study on the amount of CO2 spewed into the air from all the cars waiting in drive thru lines with their heaters and AC going? Effects to built environments - Of course this will have an impact on ALL the items on the list. But the only thing to do is NOT do it. Effects to local communities - #1 diversion of traffic (see comments above). Of course this will impact local economies. How could it not? Diverted hwy traffic will clog intersections. Increase waiting times all along Willamette Drive, as if its not already out of control. Now you want to add more traffic? #2 - household economies: how could this NOT impact family budgets? No brainer. #3 - what the heck is environmental justice? I may be showing my ignorance, but really, what kind of Orwellian terminology is this? Google definition: Fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. This goal will be achieved when everyone enjoys: 1 the same degree of protection from environmental and health hazards, and 2 Equal access to the decision-making process to have a healthy environment in which to live, learn and work. (they forgot "play"). Okay, who are we trying to kid? The first injustice was that this whole project was shoved up our "rear-..." without prior authorization by the people who are going to pay for it! AND boy did ODOT miss the mark all along the way regarding this line item! It would take a whole

document all it's own to address every single aspect of EJ and how this project has missed the mark. (and I dare say, broken the law, if indeed, it exists as a ORS!) Let's take race for example. How in the world can anyone judge the impact an addition to a interstate road will have on ANY ethnic group with reliability or change to outcome? Are there going to be cameras specifically setup to snap photos of all occupants in every car? Will ODOT send out surveys asking every driver how their trip across the Abernathy Bridge impacted their visit to a family reunion? The addition of Environmental Justice to the list of concerns is absurd! Sounds nice, but really, in all seriousness, it is time to apply some common sense when the state considers projects that will impact the financial and livability outcomes of its citizens. And finally, Proposed mitigations - How about, after some initial thoughts about a project of such nature, that being the "toll" aspect, we "Just Say No". Thanks

**ODOT I-205 Toll EA - RECORD #2187 DETAIL****Submission Date :** 4/21/2023**First Name :** Amanda**Last Name :** Leto**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am a small business owner who uses I-5 and I-205 regularly as part of my commute. The nature of my work requires a significant amount of driving, so I am intimately familiar with the traffic issues that plague these roads. I have lived in Oregon for over 20 years, and I have seen the dramatic increase in Portland traffic since the late-90s, and particularly since the pandemic shut-down in 2020. I have very mixed feelings about a toll on I-5 and I-205. My biggest concerns are effects on congestion in other areas surrounding these roads, and the effects on the community, particularly those who have a lower-income and are already struggling with bills. There are numerous studies that show that tolls are regressive, disproportionately affecting lower-income households more than higher-income households. In the Environmental Assessment report for the I-205 tolls, there was mention of reducing tolls for households that are 200% or below the federal poverty line. Per the Living Wage Calculator project (<https://livingwage.mit.edu/states/41>), in 2023 in Portland Oregon, a household with two working adults and no children have to make \$62,566.40 annually just to meet basic standards of care. For folks who live in the gap between federal poverty and the actual living wage, this toll will be a burden. To ease that burden, I propose not only reducing the toll for households who make \$70,000 or less, but to have a higher toll rate for people who make \$200,000 or more. I also frequently travel along Highway 43 between Lake Oswego and I-205, Stafford Road near I-205, along 99E through Milwaukie and Oregon City, and Willamette Falls Drive, through West Linn. I am excited at the prospect of improvements to the onramps at I-205NB and Highway 43 (anyone who has taken the Highway 43 to I-205NB onramp knows how harrowing it can be). I am also glad to see seismic improvements to bridges along I-205. However, I am concerned with a potential increase in re-routing due to tolls onto smaller arterials. The Stafford Road entrance/exit onto I-205 is already a heavily congested area, and I am interested to see what mitigation plans look like for Borland Road/Willamette Falls Drive. In addition, I frequently use the I-205NB exit 10 offramp (I-205 and Highway 213). I have watched congestion build in the last 5-10 years at this interchange, and I am concerned about additional re-routing in this area to avoid tolls at the Abernathy Bridge. I would like to see how ODOT intends to mitigate traffic at this interchange and how to make this interchange safer.

**ODOT I-205 Toll EA - RECORD #2188 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Kendall

**Last Name :** Guisinger

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This proposition is a horrible idea that will negatively affect many of the families and businesses not only that are located in this area, but also the entire region as it is the main transportation route for folks to access the airport, hospitals, shopping and more. Adding a such a high toll to these existing roads will force many to use surface streets adding further congestion to already overused neighborhood streets that were never meant for such a high number of travelers. The cities and states approved too many new housing projects without considering the impact to these largely rural areas and tolling the main Hwy is not the right solution.

**ODOT I-205 Toll EA - RECORD #2189 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Andrea

**Last Name :** Downing

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** There are more than 75,000 Clark County residents that work in Oregon. Implementing these tolls will create hardship for the families already struggling under inflation. Further, it will not eliminate traffic congestion but rather divert it to side roads.



**ODOT I-205 Toll EA - RECORD #2190 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Patricia

**Last Name :** Heil

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Disgusted with the plans for tolls at the locations suggested. What a burden on the people using those local freeways every day. Please reconsider the negative effects on the people living in Clackamas County. I am sure you are all well aware of all the problems named by the citizens of Clackamas County!!!

**ODOT I-205 Toll EA - RECORD #2191 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Brian

**Last Name :** Batchley

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The tolls will wreak absolute havoc on the existing neighborhoods around it

**ODOT I-205 Toll EA - RECORD #2192 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Amy

**Last Name :** Ellsworth

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Transportation system - Tolling will impact the traffic to smaller roadways in the communities surrounding the tolls.

1. There is already a backflow of traffic to these streets and people will try to divert to the non-paying roadway.
2. The economy in smaller towns will be affected. People will not want to travel to these communities for restaurants, recreation or other activity due to the cost of tolls on the highway.
3. It has been proposed that the tolls will decrease the amount of people travelling to work in cars. Unfortunately, many middle class income earners need to travel to work via car as there are no other public transportation options. I, myself, am in healthcare and travel to St. Vincent daily from Oregon City.
4. Cost - I work so I can afford a home in Clackamas county and be able to live in the beautiful state of Oregon. My options are limited and I travel on 205 daily. The cost is estimated to be over \$3000 for me personally in addition to other taxes imposed.
5. In no other state is there a toll on both sides of the highway. This is just plain greed and inappropriate planning.

Funding from Federal Government for infrastructure, checks and balances  
There has been monies the federal government has given to the state of Oregon. Has any of this money been earmarked for the project? Who will be the checks and balances for this project? Will tolls go up if over budget. Overall, the people in the communities of Oregon City and West Linn will be affected the most by the tolls. There is no other option for me to get to work in a timely manner other than driving. It would take 3 hours on public transportation each way. Not to mention the increased cost to my household. It is unfair to think that this will not want people to move out of these communities and live somewhere else. ODOT needs to have a better plan and more research to support their current finding of the tollways in Oregon City/ West Linn funding the projects that have been initiated.

**ODOT I-205 Toll EA - RECORD #2194 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** John

**Last Name :** Chee

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Just stop it. Get some mental help. We don't need to take toll funds and fund "environmental justice". Stop it right now. Stop stop stop or their will be consequences.

<b>ODOT I-205 Toll EA - RECORD #2195 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Geoffrey

**Last Name :** Skelton

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am concerned as many are around me who may not have known how to respond or comment on the toll project. The concern I have is the congestion through neighborhoods in West Linn and Oregon City as people divert their routes to avoid payment of tolls. I'm also concerned about the devaluation on home values due to buyers concerns over constantly paying a toll.

**ODOT I-205 Toll EA - RECORD #2196 DETAIL****Submission Date :** 4/21/2023**First Name :** Amber**Last Name :** Gunter**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** We oppose tolling at I205. The current infrastructure that is in surrounding areas, which will have increased use, can not support the increased traffic. The highway also does have the infrastructure to support this compared to other states with tolls. The increased time and money does not support this.

<b>ODOT I-205 Toll EA - RECORD #2197 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Echo
<b>Last Name :</b>	Seaman
<b>Affiliation :</b>	No trolls! I mean tolls
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	No Tolls !

**ODOT I-205 Toll EA - RECORD #2198 DETAIL****Submission Date :** 4/21/2023**First Name :** Lance**Last Name :** Troutman**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** As a resident in West Linn that uses the 10th Street exit on a daily basis to move around, the proposed impact will be to a point that will have us strongly considering leaving the area. Knowing this would devalue our property, would look to join a class action suit to recover losses. We anticipate the delays on the back roads to destroy the quality of life, the economic impact on local business will be extreme to the point of many closures. The financial impact to such a very small portion of the community to fund the project is extreme in comparison to how other Road project in the past have been funded. With a toll that utilizes technology, I would want to know how much of the funds raised would end up in 3rd party providers pockets and their particular lobbying practices.



**ODOT I-205 Toll EA - RECORD #2199 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Kim

**Last Name :** Plutte

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I have strong concerns about the implementation of the proposed tolls. The residents of West Linn will get hit hard with these tolls and it feels extremely targeted. West Linn is a more affluent area and we are being taxed and penalized when these fees should be absorbed by everyone living in our State and driving on our roads. We have strong concerns about the devaluation of our home due to these tolls. People will not want to move into an area where they must adjust their daily routines to avoid traffic jams through neighborhoods to avoid tolls. Neighborhoods will become jammed with traffic creating increased risks to our children and pets. We are seriously considering moving out of State (as so many others have) due to the continuous heavy taxes and fees that are being forced upon Oregonian and especially those of us that you consider to have a higher income. We work hard, long days for our income to create a better life for ourselves and our families. We pay more than our fair share in taxes. To add yet another toll without even taking it to a vote is government run amok. Portland is now the second most heavily taxed city behind Manhattan. There are more people moving out of Oregon than moving in - surely that will reduce the congestion on the roads. Tolling is not the answer. Oregon mismanages its money so badly, the funds for your project are there. You just need cooperation and a deep dive and you will find your money. Quit targeting with your tolls, fees and taxes, or you won't have anyone left in this state to pay them.

**ODOT I-205 Toll EA - RECORD #2200 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** S.

**Last Name :** Bell

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I use 205 to go to church in West Linn, and to go to the Clackamas area to several Doctors in the Kaiser Hospital/facility off Sunnybrook & Sunnyside. As a senior, it places an added burden to pay tolls that I really can't afford. It would also add extra time to the commute during and after construction. I feel positive people will do their best to avoid paying these high tolls by finding other alternate routes, adding to the various cities budgets and concerns with the added, unnecessary, traffic through their cities. Add to that the actual of cost of setting up toll booths, hiring people to man them, and maintain them, the up-rooting of the actual construction and the many \$\$\$ to do this makes it seem this is in large part a way to keep people employed at the expense of people who must use these freeways to get to necessary places of business. It is a little late to be tearing roads, etc., up. This should have been considered when 205 was being built not when so many businesses have been established for years and depend on traffic for their livelihood. -- Save the toll for a new road - It should be more financially efficient in the long run. I've seen too many new roads being revised in just a few years, because of short term goals not well-thought out. Let's do some more study with new people for generating new ideas for the long term.

**ODOT I-205 Toll EA - RECORD #2201 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Melissa

**Last Name :** Sandgren

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The tolls will definitely increase side road use, as people, including myself will use those to escape the tolls. The heavy traffic through residential areas will create it's own problems. Frankly speaking, Oregonians are one of the highest taxed and are constantly being asked to give more. The working class, who are by and large the biggest supporters of our economy and the largest contributors of taxes, are tired of being taxed, or in this instance tolled to death. This is not being received well at all in the community, I can tell you. No matter how many surveys you do, it will still not be received well. Plainly speakly, people HATE it.. I'm just being honest and forthright. I have not met one clackamas county resident in favor of it. It was pushed through, like many projects nowadays, without voter approval. People are fed up with government overreach and overspending....this project fits that to a T. Please stop taxing Oregonians to death.

**ODOT I-205 Toll EA - RECORD #2202 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Madison

**Last Name :** Prater

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Why do you need tolls to take more money when you are making thousands of dollars a year in taxes and DMV fees? I don't see our roads being fixed with that money, so why do you need more money?

**ODOT I-205 Toll EA - RECORD #2203 DETAIL****Submission Date :** 4/21/2023**First Name :** Hanna**Last Name :** Dahl**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I don't think Washington residents should pay tolls. A large percentage of washingtonians have worked in Oregon and have been big Oregon tax contributors. 2.2 billion in the past 10 years has gone to Oregon State income tax from Washington residents who have to work in Oregon. You already lose money from your paycheck when you work in Oregon for Washington residents and now workers will lose more!? I am against the bill.

**ODOT I-205 Toll EA - RECORD #2204 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Russell

**Last Name :** Mouser

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The toll on the i205 bridge would be a huge burden on the community. It is totally unacceptable.

<b>ODOT I-205 Toll EA - RECORD #2205 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Audrianna

**Last Name :** Hicks

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The people already pay way too high of taxes to be paying a toll as well.

<b>ODOT I-205 Toll EA - RECORD #2206 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Shirley

**Last Name :** Peery

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** 1. All this will do is cause motorists to use surface streets, avoid the freeway which we have already paid for and endanger communities due to increased traffic. The tolls are just another way to hurt working people and their families. We already pay out the nose for more more government. Use the moneys you already have with more wisdom and stop demanding handouts from hard working people. Enough!



**ODOT I-205 Toll EA - RECORD #2207 DETAIL****Submission Date :** 4/21/2023**First Name :** Taylor**Last Name :** Walker**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This plan is not well thought out, that is putting it very lightly. It will not only create an absolute mess of downtown Oregon City/99E and Willamette Falls Drive in West Linn. As the traffic in these areas will be constant gridlock with drivers trying to avoid tolls. The placement of the toll booths/receptors certainly adds to this problem, as the placement is ludicrous. All while small locally owned businesses that are just finally recovering from the ridiculously over the top, uncalled for lock downs during the "pandemic" were finally just starting to get back on their feet and thrive again. This will ravage these small businesses. This will also destroy already struggling Oregonians who are currently stretched thin with inflation, crazy high rent/housing and some of the highest tax rates in the country. Another \$400-800 monthly to get to and from work/school/family/events etc will certainly cause further financial burden and may cause families to have to decide between groceries for the week or getting to work. God forbid it add to our already overwhelming homeless population that has already destroyed much of Oregon's beauty and sense of safety. The research has proven this will not alleviate congestion, it will just place it in other areas at too high of a cost for Oregonians. If there must be a toll, put it at the Columbia river bridge crossings where thousands of Washingtonians cross over state lines daily for work. That is the proper placement for tolls! NOT I-205 in OC/WL! This plan needs to be stopped NOW, listen to the people and do what is right. Don't add to our already crumbling previously wonderful and desirable state of Oregon.

**ODOT I-205 Toll EA - RECORD #2208 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Troy

**Last Name :** Wahl

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The tolling of these two bridges is a horrible idea for the following reasons: 1) It is a regressive tax 2) It will push traffic to city streets and likely increase traffic congestion throughout the region. 3) There is no mass transit (no Max or buses along the 205 corridor between I5 and Sunnyside Rd) in this area to mitigate the effects. So this aspect of the plan is a failure from the get go. 4) If tolled, these two bridges would be the only sections road within Oregon to be tolled. It would be better to eliminate the gas tax, and require all road vehicles to have a travel monitor which accesses a toll based on the distance travelled times a multiplier based on the vehicle's value (assuming wealthier individuals are more likely to own more valuable vehicles, this would make it a progressive tax). This proposal fixes the issue of declining revenue due declining gas consumption while fairly accessing those who use the roads regardless of the type of vehicle they drive.

**ODOT I-205 Toll EA - RECORD #2209 DETAIL****Submission Date :** 4/21/2023**First Name :** Dennis**Last Name :** Evans**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This plan is not well thought out, that is putting it very lightly. It will not only create an absolute mess of downtown Oregon City/99E and Willamette Falls Drive in West Linn. As the traffic in these areas will be constant gridlock with drivers trying to avoid tolls. The placement of the toll booths/receptors certainly adds to this problem, as the placement is ludicrous. All while small locally owned businesses that are just finally recovering from the ridiculously over the top, uncalled for lock downs during the "pandemic" were finally just starting to get back on their feet and thrive again. This will ravage these small businesses. This will also destroy already struggling Oregonians who are currently stretched thin with inflation, crazy high rent/housing and some of the highest tax rates in the country. Another \$400-800 monthly to get to and from work/school/family/events etc will certainly cause further financial burden and may cause families to have to decide between groceries for the week or getting to work. God forbid it add to our already overwhelming homeless population that has already destroyed much of Oregon's beauty and sense of safety. The research has proven this will not alleviate congestion, it will just place it in other areas at too high of a cost for Oregonians. If there must be a toll, put it at the Columbia river bridge crossings where thousands of Washingtonians cross over state lines daily for work. That is the proper placement for tolls! NOT I-205 in OC/WL! This plan needs to be stopped NOW, listen to the people and do what is right. Don't add to our already crumbling previously wonderful and desirable state of Oregon.

<b>ODOT I-205 Toll EA - RECORD #2210 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Melissa

**Last Name :** Chee

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Aside from their inefficiency, tolls make roadways less safe by disrupting traffic patterns. Traffic diversion is a serious problem, crowding secondary roads near toll facilities.

**ODOT I-205 Toll EA - RECORD #2211 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Lauren

**Last Name :** Shearer

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The transportation analysis needs to consider the financial cost to the citizens of Oregon City who will be essentially held hostage in their own community with no other convenient direct route in or out of the city. I work locally in Oregon City, but if I want to go to Clackamas for shopping, or to Portland to see my family, and I have to pay a toll to do so?? That's a huge unfair burden on everyone who lives in Oregon City.

**ODOT I-205 Toll EA - RECORD #2212 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Heidi

**Last Name :** Brown

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** For those of us that live locally near the toll, this is going to greatly impact all the side streets off 205. 99E is going to have horrible a traffic, downtown OC and the west Linn bridge will be horrendous (and it's already bad). Along with the extra cost to all the local people using these roads to go to work, get kids to school, go to the store! If you plan to toll a major interstate road you NEED to build a new one. Then have two options. It's unfair to make local citizens pay more money for trying to do basic life things like going to work, school, church, etc. please please do not toll these roads. This will be detrimental for Gladstone, Oregon city, and west Linn and our local smaller roads while everyone tries to avoid a toll.

<b>ODOT I-205 Toll EA - RECORD #2213 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Andrea

**Last Name :** Zaugg

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This toll will place an undue burden on families. Unless the toll is used to create ANOTHER route that drivers can access, all you are doing is placing undue burden on the citizens of this state, and especially Clackamas County.

<b>ODOT I-205 Toll EA - RECORD #2214 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Jennifer

**Last Name :** Roberts

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling 205 will create additional financial strains on people across our area that are already struggling from inflation and high taxes. The State already collects so many different types of taxes and has the money to pay for these improvements.



<b>ODOT I-205 Toll EA - RECORD #2215 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Amy

**Last Name :** Masters

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The proposed toll will have a negative impact on me and my community. We already struggle with traffic congestion on the side streets and Hwy 213 and this will make it worse as people use the alternate routes to avoid the toll area. It will have significant impact on those that commute even a short distance south on 205 but do not have good alternatives due to impact of non-local community use.

**ODOT I-205 Toll EA - RECORD #2216 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Tonia

**Last Name :** Lordy

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** An average increase in transportation costs by \$600/year???? really! have you seen the increase in gas prices in the last few years? have you seen the increase in our unhoused population in the last few years? why would you want to burden the system more? we have some of the highest gas prices in the country, where is that gas tax going to? do better! I live in the neighborhood that would be directly impacted by this change. Our side streets are already congested and the study sees more increase in the congestion? and ODOT will pay for the "fix" but in the mean time, suck it up residents...you will be sitting in traffic for the next few hours. Those 3 business districts that will supposedly benefit from the change in traffic patterns...are already congested with no parking as is. How many years will it take for ODOT to implement the "fix" widen the streets, increase available parking, and instal the additional traffic light/signs etc? There are different ways to fund this project...do the work

**ODOT I-205 Toll EA - RECORD #2217 DETAIL****Submission Date :** 4/21/2023**First Name :** Megan**Last Name :** Miller**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Putting in tolls on I205 is going to just bring traffic into the smaller neighborhoods in Oregon city. This causing more traffic and unsafe environments for kids to be outside playing as kids want to do. As a parent of a young child I want my kid to be able to play outside and not have to be fearful that they are going to get run over by a careless driver in a hurry to get around the tolls.

<b>ODOT I-205 Toll EA - RECORD #2218 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Paola
<b>Last Name :</b>	Soles
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	We can't afford this.

<b>ODOT I-205 Toll EA - RECORD #2219 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** M

**Last Name :** S

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am thrilled at the lane expansions being proposed. My only concern is that the revenue from the tolls will go into the maintenance of the roads only, not affecting/supporting the impacts it will have on local businesses by way of beautification, parking development, etc. I see this having a significant impact on downtown Oregon City & hope that it can be built into a further gem for the area rather than just a byway to avoid tolls.

**ODOT I-205 Toll EA - RECORD #2220 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Lisa

**Last Name :** Wolff

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I adamantly disagree with tolling the 205 bridge for a variety of reasons. If the toll is actually put into place, our family will move out of West Linn to avoid the tolls. My husband and I have to travel over the bridge to get to work 4 days a week, to take the kids to doctor appointments, and to extracurricular activities. We cross the river several times a day sometimes. This will place a large burden on our family's finances, as we have 3 vehicles that we will have to purchase tolls for. Tolling the bridge will result in us selling what was going to be our forever home and moving to the other side of the river to avoid the area and tolls altogether.

<b>ODOT I-205 Toll EA - RECORD #2221 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Adrienne

**Last Name :** Riggs

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** To avoid these high toll prices commuters will be using the side streets of Oregon City and West Linn which are mostly one lane and already congested. This will make out small cities unsafe

**ODOT I-205 Toll EA - RECORD #2222 DETAIL****Submission Date :** 4/21/2023**First Name :** Kelly**Last Name :** Andresen**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Our community is concerned with the affects on our neighbors - commuters bypassing 205 to avoid the toll. We are also concerned about the cost of this to the individuals using this freeway to get to our own jobs. Because of the additional expense, we too will be looking for alternate routes to avoid the toll. This puts extra strain on communities similar to ours. With the rise in cost of fuel, food, auto repairs and not having an additional raise in pay, this puts a strain on our family financially.



**ODOT I-205 Toll EA - RECORD #2223 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Jennifer

**Last Name :** Smith

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Very concerned about the toll. We are taxed so much already and families are struggling. We don't want to pay to use roads we already pay taxes for! We do not want to become like the East coast! No tolls!

**ODOT I-205 Toll EA - RECORD #2224 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Charles  
**Last Name :** Ormsby  
**Affiliation :** Former Chair Birdshill CPO/NA  
**Submission Method :** SurveyMonkey

**Q3. Comments :** 1. Corridor definition inadequate. Should be area defined plus territory in 2010 LOPTAAS streetcar study. Especially along OR43. 2. No definition of regional mobility for handicap. Example plot and execute a trip in a wheelchair from Clackamas County Public Services Bldg in Oregon City to Oregon Metro HQ in NE Portland OR. Use transit lines on east and west banks of Willamette River. Good Luck Beware of kill zones at mode transfer locales like Oregon City Transit Center, Lake Oswego Transit Center, Oak Grove Terminus of TriMet Orange Light Rail Station and Portland Transit Mall. 3. Dam failures on Clackamas River and likely obliteration of I-205 spans on Clackamas River and Willamette River (Abernathy Bridge). What is risk 2020-2050 of: 3A. M9.0+ CSZ Rupture 3B. Failure of Dams in Clackamas River Basin. 3B. Failure of Dams in Tualatin River Basin. 3C. Failure of dams in Willamette River Basin. Please show derivation so a person of modest intelligence can understand by following the calculation. Provide ALL BLESSED Dam Project safety inspection reports since 2000 as part of derivation. Map space of interactive map fails to illuminate this issue. 4. Catalogue the reports in the technical appendices. So a person can find them in 2050 . I am working on some of the items but am constrained by computer resources. 5. Technical compilers of reports need to be aware Microsoft Word has had the ability of creating an subject index since 2000. Try utilizing this feature. A list of contractions would also be nice. Use Google Plus Codes to index intersections described on report. I have mentioned this too many times in testimony to the Oregon Transportation Commission since 2019. Multiple reports in tech appendix excluded including Clackamas County Bike Safety Report circa 2013. Also OR43 corridor from Hawthorne Bridge in Portland south to OR99E needs to be detailed and examined. Issue get a 60ft articulated bus from Portland Transit Mall to Clackamas Community College. Note City of Lake Oswego continues to plan to ream transit riders due failure to plan for a large radius turn to accommodate 60ft bus at intersection of OR43 / B Avenue. Mile point OR43 06.04.

**ODOT I-205 Toll EA - RECORD #2225 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Lauren  
**Last Name :** Gile  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2226 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** christi

**Last Name :** ziegler

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** the bottle necks are already bad so this will be horrible. everyone will get off and take side streets. traffic jams on side steets and safety will be an added issue.

**ODOT I-205 Toll EA - RECORD #2227 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Emily

**Last Name :** Wright

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I don't think anyone who planned this can possibly live in this community. The Oregon City/Willamette/West Linn communities are tightly knit and have been for decades. Creating a toll is going to heavily impact the people moving among these communities off the freeway and on. I will have to either pay a toll or drive through increased traffic and congestion on the side streets to visit my family. We'll have to pay a toll to get my niece to her lessons. Please don't continue to ignore the community you are actually impacting. We do not want a toll.

**ODOT I-205 Toll EA - RECORD #2228 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Ron

**Last Name :** Yoder

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The proposed tolling points will destroy Oregon City local downtown traffic. Move the tolling to locations that will not encourage avoiding tolls by driving through Oregon City. Also closing the old Oregon City bridge is unfair. Locals use that bridge to get back and forth to West Linn and Lake Oswego. The second unfair issue is the cost of the toll and the impact on local Oregon City residents. We will be unfairly singled out for paying more tolls due the the tolling points being in our area.

<b>ODOT I-205 Toll EA - RECORD #2229 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Jeff

**Last Name :** Herbrand

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** With the tole bridge being located where it it, is specifically impacts 2 communities greater than any others. The tolls should have been placed at the head of the heys on the north bound and southbound to I5 or at the 205 and i84 interchange. Only way to make it less impactful to West Linn and Oregon City. Placing it where it currently sits will reduce property values and impact local small businesses in theses communities, as commuters will look at other alternatives to avoid the toll.

**ODOT I-205 Toll EA - RECORD #2230 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Ken  
**Last Name :** Dahl  
**Affiliation :** Oregon City Resident  
**Submission Method :** SurveyMonkey

**Q3. Comments :** 1. I strongly agree that the Bridge needs seismic improvements. 2. I strongly agree that I-205 needs to be improved to 3 lanes, as all other metro freeways have. 3. I strongly Disagree with Tolling (even on a trial basis) on I-205 and I-5. Tolling is Not what Citizens of Oregon or Clackamas County want. Let's put it to a Vote of the People! 4. Unfortunately, by the time the State asks for Public Comment, the decision has already been made. Has the Tolling Contract already been signed and the equipment ordered?



**ODOT I-205 Toll EA - RECORD #2231 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Amber

**Last Name :** Salvey

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Re-routing - avoiding the toll will create more traffic in our city and outlying areas. From OC to West Linn and From the 213 exit to Canby/Woodburn . These roads are already heavily traveled. A toll will only increase traffic to avoid tolling. Financing - blue collar workers who must travel this way daily - finances are already stretched thin with the inflated economy and all our- State income & property tax, gas tax, vehicle tag tax (which is lacking in being collected at this point) the toll is yet another tax hard working families can not afford. This bridge update and lane addition should have been budgeted to be paid with funds provided from tax. It's how I buy things - with a budget and savings. stop the taxing

**ODOT I-205 Toll EA - RECORD #2232 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Gaelen

**Last Name :** Watt

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling will increase traffic and ruin small neighborhoods. It hurts the poor.  
Find another way to pay for it. Or at least let people vote on this!!!!!!

<b>ODOT I-205 Toll EA - RECORD #2233 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Tracy
<b>Last Name :</b>	Jason
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Local businesses in West Linn will lose business.

**ODOT I-205 Toll EA - RECORD #2234 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Lisa

**Last Name :** Lee

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is will create hardship for many residents who are having a rough enough time after the pandemic . This will cause congestion to definitely a problem already and right over our waterways. The increased use of back roads to get around being tolled both through Canby, LO, and sellwood . Us Taxpayers are already taxed

**ODOT I-205 Toll EA - RECORD #2235 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Heather

**Last Name :** Rosen

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Creating a toll where there is no reasonable alternative route puts many local families in a financial strain. This economy is already tanking why add to it?

<b>ODOT I-205 Toll EA - RECORD #2236 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Alison

**Last Name :** Naylor

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling i205 will severely and negatively impact the surrounding areas. Please do not do this to us.

<b>ODOT I-205 Toll EA - RECORD #2237 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	K
<b>Last Name :</b>	B
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	No Tolls.

<b>ODOT I-205 Toll EA - RECORD #2238 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Jennifer
<b>Last Name :</b>	Richardson
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	This is another expense people don't need right now



**ODOT I-205 Toll EA - RECORD #2239 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Ivan

**Last Name :** Crumrine

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I, like the entire community is vehemently opposed to tolls. The end

**ODOT I-205 Toll EA - RECORD #2240 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Collin

**Last Name :** Fleming

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I support tolls on the I-205 corridor. Tolls are an equitable and fair way to pay for infrastructure.

**ODOT I-205 Toll EA - RECORD #2241 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Bill  
**Last Name :** Martin  
**Affiliation :** mad residents of canby  
**Submission Method :** SurveyMonkey

**Q3. Comments :** I'm a homeowner in Canby, I don't see this benefiting any surround town including Oregon city, Woodburn, Hubbard, lake Oswego, west Linn, due to the fact that everyone will be taking highway 43 or 99e or Ek rd to bypass the unnecessary tolls and that there will cause major back up on those roads and it's already bad. On the other hand why didn't this get put to a vote by Oregon residents to vote on probably because you know it would fail. We pay all these taxes like road tax and transit tax why aren't those funds going to fix the the bridges and the pot holes on 99E I have to dodge everyday. Shame on the state of Oregon for trying to squeeze more money out of the blue collar working folks that have to commute on 205 everyday just trying to make a living.

**ODOT I-205 Toll EA - RECORD #2242 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Karen

**Last Name :** Husky

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Local people will use the Oc/west linn bridge as an alternative and this will cause devastating consequences on downtown OC as well as the people of canemah and canby who already have a very heavy commute on hwy99

**ODOT I-205 Toll EA - RECORD #2243 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Brian

**Last Name :** Johnson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is going to create an unmitigated disaster in Oregon City traffic flow and an undue financial impact on its residents. It will also negatively impact Oregon City businesses. There is no aspect of this change that will contribute to the quality of life of Oregon City residents, businesses, or wildlife.

<b>ODOT I-205 Toll EA - RECORD #2244 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Brian

**Last Name :** Eldridge

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I'm against this toll for financial reasons (more money out of my pocket) and back road impact (driving around to avoid tolls)

**ODOT I-205 Toll EA - RECORD #2245 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Tony

**Last Name :** Helbling

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is a poorly planned project. Deep in the EA document, ODOT freely admits there will be increased traffic in rural communities both during the initial phase of tolling and long after. These communities might have supported if ODOT had considered the impacts to include funding the need infrastructure improvements for the communities. But you didn't. You are going to ram the traffic through these communities and let it be their problem. Horrible governance.

**ODOT I-205 Toll EA - RECORD #2246 DETAIL****Submission Date :** 4/21/2023**First Name :** Amneris**Last Name :** Jacobucci**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** "Nobody wants this except those that will never have to pay" as quoted by someone on Facebook. THIS REQUIRES A VOTE!!!! Yes there were public meetings and we all said that we didn't want it, and our voices were merely background noise. Government did not listen to the people! Either I go all the way around to get to Tualatin, "to stick it to the man", and waste gas or I pay the toll. You are TELLING me I have to pay more when I already pay A LOT of taxes to up keep these roads and they are still horrible. Government is currently moving forward with my tax dollars! Where are my taxes allocated and where will the toll fees be allocated?



**ODOT I-205 Toll EA - RECORD #2247 DETAIL****Submission Date :** 4/21/2023**First Name :** Daniel**Last Name :** Koskela**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I have zero faith that the state government will spend this money wisely and that none of the toll money collected will directly benefit me in any way.

**ODOT I-205 Toll EA - RECORD #2248 DETAIL****Submission Date :** 4/21/2023**First Name :** Phil**Last Name :** Badger**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** You can't build something without ANY input and then charge us to use it. That's unfair and sleazy. If you want to build a "Toll bridge" the only way to do that without being LYING SLEAZEBAGS is to ask us in advance if we would agree to pay a toll for a new bridge. Anything else is BLACKMAIL and EXTORTION. And we will fight you on court and we will win. So. "No" to your goddamn tolls. Or are you gonna start charging me to drive out of my own parking lot every morning. Get the F outta here.

**ODOT I-205 Toll EA - RECORD #2249 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** James

**Last Name :** Angus

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** There's no other route around this selected toll project area which is not fare to force the public to pay for this. Secondly I'm a contractor who's forced to drive i205 to get to projects I already don't want to work in that area but your making it worse with the possibility of the toll and eventually the people that live in lakes Oswego and tualatin will not have access to good service providers and contractors because of your tolls.

**ODOT I-205 Toll EA - RECORD #2250 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Tyler

**Last Name :** Keegan

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I'm currently barely making ends meet financially and can't fathom how I will now need to pay two tolls just to get to and from work. Also I live in Oregon city and am quite worried about how the extra traffic through downtown will be to avoid the bridge will be. Please don't toll the bridges. Please

**ODOT I-205 Toll EA - RECORD #2251 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Brooke

**Last Name :** Hazel

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I travel from Clackamas to West Linn for work everyday. There is no viable alternative for my route other than the Abernathy Bridge. Those of us that work in education and other public services don't have the option to work from home or alter our work hours to avoid congestion pricing. We don't work for private companies that would be able to mitigate the extra expense and the negative effect it will have on our family finances. I understand that there is no real way to stop these tolls, the plan was already pushed through. But I would ask that there be an exemption for those working in education, and other public service jobs that don't have any options to mitigate the impact of these tolls to create a more equitable fee structure. Thank you for your consideration.

**ODOT I-205 Toll EA - RECORD #2252 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** William

**Last Name :** Schlitt

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Put this to a vote, this is a forced tax without representation. Those who live in Oregon City and West Linn should be excluded in any toll fees as they are the ones affected most.

**ODOT I-205 Toll EA - RECORD #2253 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Bill  
**Last Name :** Osburn  
**Affiliation :** Me.Myself.I  
**Submission Method :** SurveyMonkey

**Q3. Comments :** Our tax dollars built these roads and maintain them already. The toll was not supported by any of the people, but only the government looking to steal more money out of our pockets.ODOT has not listen to people through this whole process, there is little to no support outside metro.

First I want to point out that as somebody who is active in the community and ran for public office, I have been to a lot of the meetings from the ground floor on the subject. There has been almost no support outside Metro and ODOT. There have been questions such as would you prefer a \$12 fee or a \$3 fee. Given that choice some may have chose the \$3 fee. This doesn't mean they support any but when given a no-win choice, picked the lesser of two evils. The other thing I want to point out is the main thing that is going to impact the environmental report is that the anticipated surface street overflow to avoid being taxed to use roads we already own. The meetings always overly underestimated what this will do to local communities. Gridlock will become the norm and cars and people overloading the arterial and feeder streets. These cars at idle will run at cooler temperatures and most likely expel more pollutants than at highway speed. They will be in neighborhoods where the exhaust will not dissipate as quickly before choking out residential areas and public pedestrian areas. The oil and other petroleum products used to lube and move the vehicles will gather on smaller streets in larger proportions at the slower speeds. This increased traffic will also multiply the chances for car vs pedestrian collisions. The reality is this whole project has been forced with we the people being against it for so many legitimate reasons the whole way. I don't expect this comment to change anything either as those with power have ignored those they swore to serve, the environmental study should never have been needed if they paid attention but here we are.

**ODOT I-205 Toll EA - RECORD #2254 DETAIL****Submission Date :** 4/21/2023**First Name :** Kelly**Last Name :** Walker**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This plan is not well thought out, that is putting it very lightly. It will not only create an absolute mess of downtown Oregon City/99E and Willamette Falls Drive in West Linn. As the traffic in these areas will be constant gridlock with drivers trying to avoid tolls. The placement of the toll booths/receptors certainly adds to this problem, as the placement is ludicrous. All while small locally owned businesses that are just finally recovering from the ridiculously over the top, uncalled for lock downs during the "pandemic" were finally just starting to get back on their feet and thrive again. This will ravage these small businesses. This will also destroy already struggling Oregonians who are currently stretched thin with inflation, crazy high rent/housing and some of the highest tax rates in the country. Another \$400-800 monthly to get to and from work/school/family/events etc will certainly cause further financial burden and may cause families to have to decide between groceries for the week or getting to work. God forbid it add to our already overwhelming homeless population that has already destroyed much of Oregon's beauty and sense of safety. The research has proven this will not alleviate congestion, it will just place it in other areas at too high of a cost for Oregonians. If there must be a toll, put it at the Columbia river bridge crossings where thousands of Washingtonians cross over state lines daily for work. That is the proper placement for tolls! NOT I-205 in OC/WL! This plan needs to be stopped NOW, listen to the people and do what is right. Don't add to our already crumbling previously wonderful and desirable state of Oregon.



**ODOT I-205 Toll EA - RECORD #2255 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Rachael

**Last Name :** Fisher

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls will disproportionately negatively impact the Oregon City and West Linn downtown communities and roads. The ability to utilize main roads will be greatly diminished as there will be much more volume on roads such as Stafford, Boreland, Willamette Falls Dr, Hwy 99, old OC bridge and Elligsen. Traffic is already bad on these roads and by making this exponentially worse, the special quality of life we enjoy and our ability to drive where we live will be tremendously and negatively impacted. The lack of input by our community prior to this decision being "baked" already by ODOT and the state is distributing. Your priorities and decisions clearly do not align with the communities you are supposed to serve and improve transportation for. Be ready for a fight here.

**ODOT I-205 Toll EA - RECORD #2256 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Isabel

**Last Name :** Fraijo

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We need to consider the fact that we are already being heavily taxed for things that should already include road construction, the cost that the tolls will have on the community will be detrimental to those commuting to work everyday. Many wont be able to afford things that can already barely afford (medical costs, bills, taxes, etc). Not only will this economically damage our community, traffic will migrate to a different place. People will try to avoid the toll and bog up other roads, defeating the purpose of lowering traffic rates. Instead of tolling the people, maybe we should be using the money from our state taxes. This new toll system is not fair to those already living in poverty.

**ODOT I-205 Toll EA - RECORD #2257 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Shelby  
**Last Name :** Hoeye  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :** NO TOLL!

**ODOT I-205 Toll EA - RECORD #2258 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Michelle  
**Last Name :** Shandy  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :** NO TOLLS!!!!!!!!!!!!!!!!!!!!

**ODOT I-205 Toll EA - RECORD #2259 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Melissa

**Last Name :** Jahn

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The analysis of this project needs to consider how the financial impact is going to effect local truckers and those who use that stretch of highway to get to and from work daily. It also needs to analyze how this will effect the roadways people will use to bypass the tolls. It will become and expense a lot of people cannot afford. We should be collecting the past due vehicle registration fees or charging those who live in Washington and work in Oregon to use or roads rather than it's working residence who already pay taxes to maintain them.

<b>ODOT I-205 Toll EA - RECORD #2260 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Lindsey
<b>Last Name :</b>	Griesenauer
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Worst thing you could ever do for Oregon keep making it go to hell with these great choices.

<b>ODOT I-205 Toll EA - RECORD #2261 DETAIL</b>
---

**Submission Date :** 4/21/2023  
**First Name :** Kim  
**Last Name :** Larson  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2262 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Jennifer

**Last Name :** Foster

**Affiliation :** resident

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling for this bridge will be catastrophic for the Oregon City and West Linn communities. The economic impact to families, especially lower income families will be significant. Downtown Oregon City businesses rely on customers from Oregon City, but also from Gladstone, West Linn and Lake Oswego. West Linn Willamette Falls businesses are the same, plus people that live in West Linn go to the drugstore, craft store, hospital, farm store, bank, hairdresser and Dutch Bros in Oregon City. Imagine the yearly big rivalry high school game of OC vs WL when all the parents from the visiting school have to pay the toll to get to the game. This is the WRONG place to put in this toll and the backlash from this will not be going away.



**ODOT I-205 Toll EA - RECORD #2263 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Corey

**Last Name :** Knowles

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The proposed tolls will put an undue burden on Oregon city tax payers. Implementing tolls without allowing a vote from citizens is wrong.

**ODOT I-205 Toll EA - RECORD #2264 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** duane  
**Last Name :** ilg  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

<b>ODOT I-205 Toll EA - RECORD #2265 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Ingrid

**Last Name :** Kraft

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I simply cannot afford to pay a huge toll to use the roads. Due to my work I sometimes am passing through several times a day. We all pay too many taxes. There is no more disposable money for the middle class.

**ODOT I-205 Toll EA - RECORD #2266 DETAIL****Submission Date :** 4/21/2023**First Name :** Lindsey**Last Name :** Dove**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This toll being placed among the OC/West Linn bridge will cause real havoc on not only the traffic in town but the finances for those who use this bridge on a day to day basis multiple times. I don't think we are considering the amount of traffic that is already built up on the old town OC/West Linn bridge and the amount of traffic that will now be added to that awful congestion. There are only two main routes for people to take to get from one city to the next. This toll will create a divide in the cities which could easily impact the economy and community of both towns which could be detrimental to future generations. Not only could it cause a divide but so many members of the community have intertwined their lives in between these cities that it could pull families apart from each other - "we can't come over today cause Johnny has a soccer game in Tigard and we aren't going to pay the toll twice" People and businesses go to and from these cities multiple times a day. You're taking away the convenience of child care, job opportunities, attending sporting events, and so much more. The community will be crushed if this toll gets put in. Please rethink this subject. We cannot allow this to happen. Think of the people it could negatively impact. Think of the dad who picks his daughter up from downtown OC and now the old town bridge is so backed up he doesn't get there in time and has to pay a late fee. Or the kid who wants to do dance with their cousins but the dance studio is across the bridge so mommy says no. Or the auntie who already struggles financially and now can't support her nephew at his baseball game because she can't pay that toll two more times this week. Think about the individual people it will impact.

**ODOT I-205 Toll EA - RECORD #2267 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Alexys

**Last Name :** Cordaway

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** With the tolls, people will use other routes (side roads/neighborhood roads) and will back up traffic exponentially in these areas. Please keep in mind with more traffic and people rushing their cars through these neighborhoods, there will be an increase in pedestrian-vehicle accidents. Also, the cost of the toll will have a huge impact on people who are already struggling to make ends meet. People need to use these roads to get to and from work in order to even make a living, which is already difficult with the increased cost of groceries, rent, gas, etc. And now you'll be adding to the strife by charging for tolls, just for people to try to get to work to make money to now pay for the toll AND things they're already struggling with. This project should have been stopped long before the work on it ever began. I hope that with the fees paid to this toll, you guys seriously keep up on all the nasty potholes and horrible roads here in Oregon City. We'll be expecting our crappy roads to be freshly-paved and potholes taken care of IMMEDIATELY after forming.

<b>ODOT I-205 Toll EA - RECORD #2268 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Melissa

**Last Name :** Kensler

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This will only make neighborhoods even more crowded than they already are. I already pay more than enough in taxes, manage the funds properly and stop taking the money I work hard for

**ODOT I-205 Toll EA - RECORD #2269 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** kathleen

**Last Name :** premo

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** i barely make ends meet. this is huge financial burden to me

**ODOT I-205 Toll EA - RECORD #2270 DETAIL****Submission Date :** 4/21/2023**First Name :** Jim**Last Name :** Smith**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Go fuck yourselves. We don't need tolls . We already pay too much in gas tax. Quit wasting money and use the funds available wisely. Signed, everyone.



<b>ODOT I-205 Toll EA - RECORD #2271 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Valerie
<b>Last Name :</b>	Vanderford
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	They need to consider the economic impact on the local communities and this commuting to work.

**ODOT I-205 Toll EA - RECORD #2272 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Jenny

**Last Name :** Mills

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am very concerned about the amount of traffic that will increase on our smaller hwy 213 and hwy 99 going south! The effects to our community will likely increase traffic and safety.

**ODOT I-205 Toll EA - RECORD #2273 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Jordan

**Last Name :** Fritzler

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This will be punishment to people that have to commute back and forth to work. It's one thing if the toll was in place to fund just the project, but we know it will always be there even after the project is funded. We all know that if tolls move forward at this location, it will be a gateway to tolls being used everywhere. This is just another way to tax the productive members of society and more inefficient government spending. Our roads are in terrible condition and it has only been getting worse over the years. Of course the only way to fix corrupt government spending is to tax people more.... We all know this will get passed because the people's voices are never heard. Again, this will be punishment for the work commuter and cause a huge traffic issue in side streets due to toll evasion.

**ODOT I-205 Toll EA - RECORD #2274 DETAIL****Submission Date :** 4/21/2023**First Name :** Tonya**Last Name :** Zwahlen**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :**  
I am a fourth generation Oregonian and I can barely pay my cost of living. The cost of the toll will mean I will have to move from my hometown where I have lived my whole life. It is disgusting to tax people that I've lived their whole lives out of their homes. My mother is 85 years old and still has to work 40 hours a week because she cannot afford property tax. Enough is enough!!!!

<b>ODOT I-205 Toll EA - RECORD #2275 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Kayla

**Last Name :** FLIKKEMA

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am concerned that tolling will detour people away from visiting our community and having a devastating effect on our small businesses in downtown Oregon City. I also feel as a OC resident that our family will be unfairly affected by this toll, as we travel to wilsonville daily for work. Even if we try and use side routes, or like many others will do to avoid the daily fare, it will overly burden small roads and create major traffic issues. I am also concerned that creating a toll it will disqualify us for any federal funding of repairs and improvements to the tolled areas.

<b>ODOT I-205 Toll EA - RECORD #2276 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Warner
<b>Last Name :</b>	Meek
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	No tolls in Oregon please. The roads are in need of repair please fix thanks.

**ODOT I-205 Toll EA - RECORD #2277 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** elise

**Last Name :** strasser

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Now is not the appropriate time to add more cost to individuals when we are already suffering with the rising cost of EVERYTHING. People do not always have a choice weather or not to use a toll rd. It seems absurd to be doing this right now. Also this project has been in the works for quite some time yet commenting has only been open for a short time. FEB 21-APRIL 21, 23. Seems to me the project has already been decided upon without full feedback from the citizens. WRONG!!!

**ODOT I-205 Toll EA - RECORD #2278 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Sara

**Last Name :** Sievers

**Affiliation :** citizen of oregon city

**Submission Method :** SurveyMonkey

**Q3. Comments :** The proposed tolling will cause a large impact on neighborhoods in the West Linn/Lake Oswego/Milwaukie neighborhoods as commuters try to avoid tolls by going surface street routes. There will be limited options on how one can avoid them. We go to church in West Linn and family lives in Wilsonville and lake Oswego, plus our work is also in Tigard and Lake Oswego which will necessitate longer commute times trying to navigate around tolling. This will be a large financial impact/burden on the citizens who live and work in this area at a time when we can least afford it. This needs to be voted on before implementation. Although many of us believe this has already been decided upon.



**ODOT I-205 Toll EA - RECORD #2279 DETAIL****Submission Date :** 4/21/2023**First Name :** Mark**Last Name :** Brown**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This Tolling plan needs major changes. The Oregon City and West Linn communities should not be the guinea pigs for this plan. Our community already experiences diversion from 205, as cars in congestion bail out to our local roads. This is not currently being addressed, and now it seems like tolling is going to make it much much worse. Cars in congested 205 traffic already bail out to our local roads. The West Linn Oregon City bridge already experiences extensive back ups at least 3 hours a day, which backs up and blocks other local streets, including my daughter. Her day at the high school ends at 3:05, but rush hour is already in effect then and she is usually delayed getting out of the school parking lot. All of our local connector roads (Stafford Road, Rosemont Road, Highway 43, and Willamette Falls Drive) already see major traffic backups, even without tolling. This is meant to be a regional traffic solution, but all the burdens fall on the residents of West Linn & Oregon City. I ask that all tolling revenues go directly to mitigation measures in West Linn and Oregon City. ODOT must do better at communicating with local governments. In April 2023, when the City of West Linn's paid traffic consultants asked ODOT for the traffic models, they were told to ask Metro. Metro sent the City back to ODOT, who admitted they had the models, but then failed to send them to the City for another 9 days. ODOT should conduct an Environmental Impact Statement (EIS) on its plans for I-205. I ask that you re-open the public comment period for an additional 90 days, for needed analysis, and so our neighbors have a chance to weigh in on this project that will have such a severe impact in our town. ODOT has admitted that "mitigation is needed," but then is silent about the actual steps to implement mitigation! I request a study to identify concrete mitigation measures in West Linn & Oregon City. I ask ODOT to specify which specific mitigation projects will be implemented, and the funding sources for each, so that the burden of this tolling plan does not fall only on the residents of West Linn & Oregon City. Thank you.

<b>ODOT I-205 Toll EA - RECORD #2280 DETAIL</b>
---

**Submission Date :** 4/21/2023  
**First Name :** Grant  
**Last Name :** Braun  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :** "Equity and Mobility"? Really? NO TOLL!

**ODOT I-205 Toll EA - RECORD #2281 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Sarah

**Last Name :** Morris

**Affiliation :** Citizen!

**Submission Method :** SurveyMonkey

**Q3. Comments :** These highways were built through tax revenue. Their improvement and maintenance already have an ongoing funding source: our tax dollars. To layer another tax (i.e. tolls) on top of this is unduly burdensome to the residents in the immediate area and violates the equal protections clause of the U.S. Constitution.

**ODOT I-205 Toll EA - RECORD #2282 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Jenny

**Last Name :** Sundahl

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling is not the answer. The cost to families will be too much. They will start using surface streets to avoid it causing further stress on those communities and their roads. You will only continue to add toll sections up all mentioned roads making commuted expensive for those of us who work in Portland. I will refuse to go anymore for pleasure. Others will do the same. The details for your plan seem to be up in the air. What's the concrete cost? Nobody seems to really know. The cost of collecting tolls historically takes a large percentage of your toll. At least everyone shares in a gas tax. The burden will be put on a few when it comes to a toll. Anyone who can will avoid the toll at all cost to protect the few precious dollars that they do manage to save.

<b>ODOT I-205 Toll EA - RECORD #2283 DETAIL</b>
---

**Submission Date :** 4/21/2023  
**First Name :** eric  
**Last Name :** heublein  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2284 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Zachary  
**Last Name :** Lauritzen  
**Affiliation :** Oregon Walks  
**Submission Method :** SurveyMonkey

**Q3. Comments :** These two sentences on page 3-10 truly struck a chord, "Regional daily VMT and VHT would be slightly lower overall and for highways under the Build Alternative compared to the No Build Alternative, as shown in Table 3-1. Daily VMT and VHT would be slightly higher for non-highway routes under the Build Alternative compared to the No Build Alternative." Are we seriously considering spending half a billion dollars to push more vehicles off the freeway and on to city streets? We are in the midst of record number of traffic injuries and fatalities and this project's long term result is to push fast-moving drivers onto surface streets! What could possibly go wrong? Unless this project fundamentally reduces OVERALL VMT and VHT, then why would we spend this kind of money? The chart on 3-13 really hits this home. There are some sections that will see more vehicles, other sections that will see fewer vehicles, but overall this won't get us any closer to climate goals and it will almost certainly move us further away from pedestrian/cyclist safety goals. It is astonishing to me that we are talking expanding freeways in the 21st Century. We KNOW the negative effects of freeways: pollution, noise, safety, incentivize sprawl (and, thus, further congestion), etc. If adding lanes is our solution to congestion then eventually--maybe not today, maybe not next year, but eventually--we will just be another Houston. Instead, drop the freeway expansion, do the congestion pricing to mitigate throughput delay, use that revenue to fund other transportation projects, and thus free up more flexible transportation dollars to do pedestrian, bicycle, and transit improvements that actually reduce VMT and VHT. Expanding freeways and pushing more vehicles onto local streets are fundamentally bad policy. It's not too late to do this differently.

**ODOT I-205 Toll EA - RECORD #2285 DETAIL****Submission Date :** 4/20/2023**First Name :** Jennifer**Last Name :** Koll**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :**

I write to share my profound doubt in the capacity of ODOT to effectively and efficiently carry out a project of this magnitude. I work in major construction project management and we are not permitted to do any kind of work without first conducting thorough and clear environmental assessments. The fact that ODOT has made plans and are ramming through this tolling project without such assessment conducted and approved should nullify ODOT's ability to continue with such a project. Regardless of the personal impact I will suffer from this project living in a community directly adjacent to I-205, the fact that considerations and mapping of tolling impact on local roads and communities was not considered and properly workshoped to mitigate shows this body (ODOT) and those who work for it have zero insight to the realities of this project. What is surprising is ODOT already has lessons learned to draw from — when the third lane was added to I-205 from Stafford road south to the I-5 interchange over 15 years ago, massive congestion was felt across Lake Oswego, Tualatin, West Linn, and Wilsonville roads as drivers chose to avoid the traffic caused by the construction delays. These local roads include SW Stafford Road, SW Wilsonville Road, SW Childs Road, Rosemont Road, Willamette Falls Drive, and Borland Road, to name a few. This takes a massive toll on the local infrastructure, causing damage to our neighborhoods that we cannot afford to pay for when caused by an outside entity. An increase in pollution to the Stafford Hamlet will cause irreparable damage to historic natural and rural areas of Clackamas County. What is most concerning about the environmental assessment are the conclusions made in regard to transportation and economics — correlation does not equal causation. The assessment does not do an adequate job in presenting data and research to support the claims contained therein, such as “drivers who use tolled routes save on transportation time and vehicle operations costs.” What are those vehicle operation costs? What data more broadly supports this claim? If it is gasoline costs ODOT is making reference to, what data was incorporated around the area's growing prevalence of electric or electric hybrid vehicles? It is also laughable the study concludes that by driving traffic onto local roads, this is somehow going to be a boon for local businesses. The whole point of avoiding tolls is to find another, faster route to one's destination, not to stop to shop and eat. At a local town hall meeting in 2022 held by then Congressional Representative Kurt Schrader, the director of Clackamas Town Center, a local mall, testified to the dramatic negative effects these tolls will have on their businesses. To avoid tolls, shoppers will elect to visit other shopping areas unencumbered by additional transportation fees, including skipping going to Clackamas from southern parts of the Metro area. The data collected as part of the economic assessment of the report is not thorough nor logical enough to support the positive claims contained therein. Overall, the data of the assessment is lacking and does not provide strong enough justification for the options evaluated. Such an assessment must consider all options, not just those that favor the will of ODOT to enact tolls. Lacking all options in this evaluation is a disservice to all Oregonians. My main recommendation is to re-engage evaluators, conduct an additional assessment, and do more to include local voices that know the area to have stronger quantitative and qualitative data feeding this assessment. To do otherwise would render any other project in any other sector null and void.

**ODOT I-205 Toll EA - RECORD #2286 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Alison

**Last Name :** Brown

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The toll at Abernathy bridge will cause the city of Oregon City greatly with decreased business at Main Street due to congestion, decreased air quality in our city because of stand still traffic and decreased safety navigating side streets. The toll will impact me greatly as a college student that would need to travel this direction to get to school and then back home. This toll puts an unfair burden on people that live in Oregon city.



<b>ODOT I-205 Toll EA - RECORD #2287 DETAIL</b>
---

**Submission Date :** 4/20/2023  
**First Name :** Michael  
**Last Name :** Brown  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2288 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Mitchell

**Last Name :** Brown

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I believe that the tolling will impact the environment. I believe that there will be diversion of traffic which will cause stand still traffic that will cause increased smog. Getting around my local area could be miserable This project is putting too large of an impact on Oregon city and west Linn residents. Why not use a statewide mileage tax by county. Or only toll the new third lane. I am opposed to tolling the entire Abernathy bridge

**ODOT I-205 Toll EA - RECORD #2289 DETAIL****Submission Date :** 4/20/2023**First Name :** Jill**Last Name :** Brown**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Further consideration needs to be placed on diversion. Tolling could greatly effect downtown OC traffic. We also run a business in Oregon city and the cost increase for our vehicles to use the tolling station will be too high. We are placing plans into place that we will close our business which has provided the state of Oregon 5-6 figure taxes from us yearly. Have u considered only tolling the new third lane? I have seen this done in Washington. I believe this method of tolls or doing a state wide tax on mileage is the only equitable way to charge people.

**ODOT I-205 Toll EA - RECORD #2290 DETAIL****Submission Date :** 4/20/2023**First Name :** Linda**Last Name :** Henley**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I favor less congestion on our roads, but there's a right way to do it, and a wrong way. There are many more Equitable solutions than tolling. Both toll gantries were placed within West Linn's city limits. I'm a senior citizen on a fixed income, and I cross the toll gantries sites at least 5 times per week. The negative impacts of I-205 tolling will not be shared by anyone else in the region. It's not fair to us. Please continue to study more equitable funding sources for transportation. You should get GPS odometer software for vehicles, that tracks all miles driven in the state of Oregon. There wouldn't be bailout traffic and need for mitigation measures that way, as there would be no way around paying per mile driven. That seems a lot more fair to me than arbitrarily placing 2 tollbooths for the entire state both in the same town, and watching everyone exit the toll road, and snarl up our local traffic just to avoid paying a few dollars. My other comments: 1 Delay tolling on 205 until the Regional Mobility Pricing (Toll) Project is completed, so that a complete picture of regional tolling in Oregon can be assessed. 2 Please reconsider the damaging effect multiple tolls each day will have on household and business finances, even for those not typically considered low income. There's no transit option here in West Linn. No other option than to drive to the nearest grocery store or pharmacy. Tolling in this manner is like taxing people for breathing. 4 Conduct an Environmental Impact Statement (EIS) for the tolling project. We need more analysis, more community involvement, and more public outreach 5 Extend the public comment period for an additional 30 days (for a total of 90 days) and conduct more public hearings during off hours so that more of my neighbors are able to participate.

**ODOT I-205 Toll EA - RECORD #2291 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Elsa

**Last Name :** Long

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The transportation analysis needs to consider how cars using other roads to avoid tolls will cause additional issues speeding in a residential neighborhood, endangering children and family residents on E. Gloucester Street in Gladstone, specifically between Oatfield Road and McLoughlin/99E, which includes a school zone that is currently very poorly signed. Lighted school zone signs and speed bumps should be considered as minimum mitigation tools.

<b>ODOT I-205 Toll EA - RECORD #2292 DETAIL</b>
---

**Submission Date :** 4/20/2023

**First Name :** Laura

**Last Name :** Greyerbiehl

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We live in rural Clackamas County between the Stafford and 10th St exits. We have deer, owls, coyotes dependent on our rural environment. With traffic pushed to side streets our rural 2 lane roads will be pushed to the brink. What studies are being done on the effect to wildlife? We are told that people will take TriMet rather than drive, but there are no sidewalks or street lights, and TriMet doesn't serve this area. How do you plan to measure an increase in use of TriMet.

**ODOT I-205 Toll EA - RECORD #2293 DETAIL****Submission Date :** 4/20/2023**First Name :** Paxton**Last Name :** Rothwell**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The State needs to conduct an Environmental Impact Study on this project. The scope is too large to just be addressed with an environmental analysis. I am worried that the State government is not looking out for the citizens' best interests in pursuing a project of this expense at this time (high inflation, previous project cost overruns, multiple hundreds of state owned highway bridges needing seismic upgrades throughout the state). Tolls should be implemented before building to see if additional lane miles are needed on this stretch of I-205. There has been very little public involvement in the creation of solutions to the bottleneck on this section of I-205. It feels as if ODOT and regional leaders have agreed for the citizens that a freeway expansion is the only option. I, like 30% of Oregonians, do not drive. This project will not benefit me whatsoever. In fact, due to the additional space to operate a vehicle, it will negatively affect my safety outside of a car when I visit communities in the project area. The State and regional leaders are making loaded decisions based on data created that backs up these decisions. This is not a fair, intelligent, public process. The State is forcing its citizens into this "investment" because freeways are what we have built and know how to build. We need reliable, frequent, and useful public transit. We don't need more of the same that has created a severed world where people are FORCED to own, fuel, maintain, insure, and operate a 3-9 thousand pound piece of machinery in order to pick their kids up from school or buy groceries. Only in the US and Canada are things as warped as they are that the citizenry need to operate dangerous machine in all weather, mental, and health conditions in order to participate in society. Obviously this comment has gone beyond the scope of this project, but it applies to every project involving more lane miles or more parking. Cars are not the answer to the many problems we have. Stop building space for them NOW! ODOT needs to present other options to address traffic in this area. A holistic approach needs to be taken. The approach presented in this EA is discriminatory against people who do not or cannot own and operate a motor vehicle. And it violates very basic civil rights.

<b>ODOT I-205 Toll EA - RECORD #2294 DETAIL</b>
---

**Submission Date :** 4/20/2023

**First Name :** Gary

**Last Name :** Wilson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I try not to drive into Portland any more than possible due to the crime and homeless population and lack of any politicians addressing any of the problems. If this tolling system goes in I'll make traveling to Oregon all but non existent.



**ODOT I-205 Toll EA - RECORD #2295 DETAIL****Submission Date :** 4/20/2023**First Name :** Hilary**Last Name :** Grey**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am trying to understand how putting a toll in an area that is already gridlocked most of the day will supposedly alleviate this? Not that I think we should be tolling at all, but why not at least put it farther up I-205 like an area past Sunnyside road where there is a much larger space between the freeway and the homes and businesses. And why do the people who have jobs and work normal business hours have to be hit with a higher toll cost. So once again the working person who already pays their taxes is getting hit with another "bill."

**ODOT I-205 Toll EA - RECORD #2296 DETAIL****Submission Date :** 4/21/2023**First Name :** Margaret**Last Name :** Tweet**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I support NO BUILD NO TOLLS alternative. 3 improvements are currently being constructed and included as part of the "No-Build" alternative, the Abernethy Bridge upgrade and interchange improvements at I-205 on-ramps and OR 43 E. Per the interactive map orange segment, New I-205 Capacity is Assumed in Both Alternatives. (build and No build). In addition to the Abernathy Bridge, under the Build and Toll plan, 8 other I-205 bridges would be upgraded or replaced to withstand a major earthquake. Seismic upgrades or replacements are costly, and may be unnecessary. Have there been any significant earthquakes in this area? That data wasn't included in the summaries about seismic improvements. The cost of tolling operations as high as 30-60% cost to charge and collect tolls, are not revealed on webpage. A gas tax costs about 1% to collect, far more efficient to fund road improvements. The costs of tolls as a means to limit driving for middle and low income drivers is unfair. Tolls are usually charged by the axle, so trucks will pay high tolls to travel on I-205, yet this is not explained in the economic impact section. Little information about tolling costs is provided. The home I own is 11 blocks from I-205 within the study area near Johnson Creek. The negative impacts from tolls and mitigation will further degrade the neighborhood if tolls extend North along I-205 as is being discussed. Drivers will divert to nearby neighborhoods to avoid the tolls. Many low and middle income families live in this area, and will face a heavy toll burden if I-205 tolls are imposed. Per the Economics section, "Tolling increases household transportation costs"... By how much? The FAQ explains that the toll rates are not decided yet. Mitigation suggestions to manage the likely diversion to neighborhood streets would make the neighborhood worse. Roundabouts take up valuable traffic space and safety shoulder space too. The curb of the roundabout is hazardous as many vehicles drive over the curb not realizing how high it is. Trucks are unstable with some wheels on a curb, and others on the road. In snow and icy conditions, the curb and entire roundabout may not be visible, which is hazardous. Additionally, drivers are not familiar with the variable rules for roundabouts. Accidents are a problem in roundabouts due to attempts to enter and exit a roundabout when in heavy traffic and drivers unfamiliar with roundabouts. The suggested traffic calming bump outs make roads too narrow to safely pass other vehicles, and can't be seen in snowy conditions. Flat tires from driving into a bump out are a problem I have witnessed, leaving drivers stranded. Narrowing the drivers' visual field by putting in trees is not as important as roads wide enough to travel safely and avoid an accident. Narrower roadways are not a good mitigation strategy either. Removing turn lanes is not a good mitigation strategy. It's better to use the space for improved traffic flow than to pave over turn lanes. Again, No Build NO tolls is the option I support so that more residents and businesses can access the roads.

**ODOT I-205 Toll EA - RECORD #2297 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Douglas

**Last Name :** Tweet

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls are a regressive taxation, which the poor can ill afford. Thus, these roads will be for the rich only. Everyone else will be forced to use side roads, causing increased congestion and pollution, as they must travel slowly in stop-and-go traffic. Furthermore, the "cost of collection" is typically very high, with little actually going to the supposed goals of the project. For example, in Seattle's I-405/SR 167 tolling system, the "cost of collection" was 68% of the total collected, according to a recent WSDOT report. Frankly, that is ridiculous and an enormous waste of the taxpayer's (toll-payer's) dollars. NO to all tolls in the Portland area!

**ODOT I-205 Toll EA - RECORD #2298 DETAIL****Submission Date :** 4/20/2023**First Name :** Bryan**Last Name :** Libel**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling I-205 will not fulfill ODOT's objectives to improve travel by managing traffic flow and raise revenue for infrastructure improvements. Whether it's commuting to and from work, going to medical appointments at Tualatin's or Oregon City's hospitals, or getting children to and from school or sporting activities, most travelers have inflexible schedules. Local residents will be disproportionately impacted by the toll costs because of their necessary use of I-205 through-out the day to go to and from school and school-related events, medical appointments, and countless errands (car dealerships for maintenance, Home Depot, grocery stores, Costco, Washington Square Mall, Clackamas Town Center, etc.) Tolling on I-205 will cause congestion in the surrounding communities when travelers seek to avoid toll costs by using alternate routes through Wilsonville, Oregon City, West Linn and Tualatin-- which undermines ODOT's tolling objective of reducing congestion. Moreover, there currently are no alternative modes of transportation for most travelers who regularly use a vehicle and I-205. Through its environmental assessment (EA), ODOT has not shown it has collected and/or studied enough data to know and fully understand the effects tolling I-205 will have on surrounding communities, their infrastructure, the local economy, and the financial impact on their citizens. As a result, ODOT is unable to know with reasonable confidence whether its EA sufficiently mitigates the adverse effects tolling will have on these categories (i.e., ODOT's EA does not demonstrate that ODOT knows the scope and cumulative impact these categories will have on local communities and its citizens).

**ODOT I-205 Toll EA - RECORD #2299 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Gary

**Last Name :** Harris

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Dear Oregon Dept. of Transportation, While gathering signatures for IP4 it strongly appears to me that the majority of people in Oregon and especially those in the Portland metropolitan area do NOT WANT any tolling of roads or bridges! Don't you get it? We do not want any tolling! That's right - NO TOLL ROADS or TOLL BRIDGES! Please listen to us, the public. No Tolls! Stop this plan now!

<b>ODOT I-205 Toll EA - RECORD #2300 DETAIL</b>
---

**Submission Date :** 4/20/2023

**First Name :** Amy

**Last Name :** Watts

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I oppose the toll project because I do not think the effects of the financial impact upon drivers and businesses along the proposed toll route can be adequately mitigated. Toll roads have a long-term impact that can not be directly known. We know there will be impact but not the full extent of it. Years from now, we could still be suffering from loss of funds to individuals and businesses that utilize these areas. The maintenance costs and natural hazards that will increase upon other roadways have also not been addressed properly when drivers try to avoid the tollroads.

**ODOT I-205 Toll EA - RECORD #2301 DETAIL****Submission Date :** 4/20/2023**First Name :** Amelia**Last Name :** Brown**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am a student at West Linn High School. Hundreds of my classmates walk across Highway 43 every day during lunch hour. I have seen. The traffic coming off I-205 is constantly getting worse, and the drivers are way more aggressive. They speed and run the red light where my classmates cross. It's unsafe as it is, and I am very worried about the safety issues from increasing re-routing and diversion off the freeway when these drivers try to save a few bucks on tolls by exiting the freeway to drive past my school and my neighborhood. Please consider additional mitigation at: the intersection of I-205 & Highway 43 (near West Linn High School the intersection of Rosemont Rd & Salamo Rd (at Rosemont Ridge Middle School) the intersection of Highway 43 at Bolton Primary School Also, please extend the public comment period for an additional 30 days. It doesn't seem fair that all the Tolling burdens will hurt West Linn & Oregon City. And remember that the toll money will be collected at tolling gantries in West Linn. Please direct this money to mitigation measures in West Linn and Oregon City, to make our towns safer!

<b>ODOT I-205 Toll EA - RECORD #2302 DETAIL</b>
---

**Submission Date :** 4/20/2023

**First Name :** Craig

**Last Name :** Wheeler

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I fear that the Toll Highways will divert greater amount of traffic on 99 through Canby. This highway is already not able to handle the current traffic at times during the day. Plus the added traffic would delay emergency vehicles traveling from one end of the city to the other.



**ODOT I-205 Toll EA - RECORD #2303 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** S

**Last Name :** M

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We've already paid for the bridge. Tolling it is theft. WE WILL NOT PAY TOLLS TO CROSS BETWEEN OREGON AND WASHINGTON. A toll on I-5 or I-205 across the Columbia is literally highway robbery.

<b>ODOT I-205 Toll EA - RECORD #2304 DETAIL</b>
---

<b>Submission Date :</b>	4/20/2023
<b>First Name :</b>	Carl
<b>Last Name :</b>	Lemmon
<b>Affiliation :</b>	taxpayer
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	This is a horrible waste of taxpayer money and needs to be stopped.

**ODOT I-205 Toll EA - RECORD #2305 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Matt

**Last Name :** Brown

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Our family is very concerned about safety on our roadways. The West Linn Oregon City bridge already experiences extensive back ups at least 3 hours a day, which backs up and blocks other local streets. Denise McGriff, the Mayor of Oregon City, said "What's not being acknowledged is the increased burden that diversion will cause on our jurisdictions. We have local streets; they're not designed to take that type of traffic, and we've been told that the proposal only deals with the regional system. It's not concerned about the local streets." ODOT has inadequate plans to reduce negative impacts of the project (mitigation), and has repeatedly failed to identify other measures, and I request that you take additional time to develop the following concrete measures: Please add traffic mitigation at the intersection of Stafford Rd & Borland Rd (Stafford Primary School, Trillium Creek Primary School, and Rosemont Ridge Middle School) Please add traffic mitigation at the intersection of Rosemont Rd & Bay Meadows Rd (Trillium Creek Primary School) Please add traffic mitigation at Rosemont Road, at the West Linn Adult Community Center Please add traffic mitigation at the intersection of Rosemont Rd & Salamo Rd (at Rosemont Ridge Middle School) Please add traffic mitigation at the intersection of I-205 & Highway 43 (near West Linn High School) Please add traffic mitigation at the I-205 & 10th Street interchange

**ODOT I-205 Toll EA - RECORD #2306 DETAIL**

**Submission Date :** 4/20/2023  
**First Name :** viriya  
**Last Name :** ung  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

<b>ODOT I-205 Toll EA - RECORD #2307 DETAIL</b>
---

**Submission Date :** 4/20/2023

**First Name :** Scott

**Last Name :** Lege

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I would like to see additional mitigation of increased traffic on the Oregon City Arch bridge. Many people will attempt to avoid tolls by taking alternate routes through Oregon City and West Linn, which create more traffic and additional safety hazards in Oregon City and West Linn. DO NOT TOLL THE ABERNATHY BRIDGE!

**ODOT I-205 Toll EA - RECORD #2308 DETAIL****Submission Date :** 4/20/2023**First Name :** George**Last Name :** Hacker**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** This project is a first step to adding more tolls on the I-5 and I-205 bridges between Oregon and Washington. It will negatively impact low and middle-class drivers who use Oregon freeways. The Portland metro area has suffered a decline for the last couple of years. This will exacerbate that trend.

<b>ODOT I-205 Toll EA - RECORD #2309 DETAIL</b>
---

**Submission Date :** 4/20/2023

**First Name :** Richard

**Last Name :** HIATT

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is clearly a tax on the poor and poorly thought out attack on motor vehicles.

**ODOT I-205 Toll EA - RECORD #2310 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Harrietta

**Last Name :** Niblack

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I would like to see NO tolls on any roadways between WA and OR.



**ODOT I-205 Toll EA - RECORD #2311 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Ron

**Last Name :** Schilling

**Affiliation :** 0

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling in the Portland area is a regressive tax on middle and lower income people. It is especially hard on retirees and those with disabilities. It unfairly penalizes those who have to go to work daily. It also is hard on those going to medical appointments because they'll have to pay a toll and a co-pay to their medical provider. It is bad for business adding to their costs. It will do little to alleviate traffic because people have to drive to work at the same time every day. It will actually make traffic worse on major streets that parallel the freeways because people will drive on them to avoid the tolls. I hope that there can be an initiative that stops tolling from being implemented.

**ODOT I-205 Toll EA - RECORD #2312 DETAIL****Submission Date :** 4/20/2023**First Name :** Cassandra**Last Name :** Platz**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I'm supportive of electronic tolling on I205 and I5. Although it seems counterintuitive, I hope tolling will eventually help to reduce traffic congestion on Stafford Road and Oregon 43. Additionally, as gas tax revenues decrease, we will need another source of revenue to pay for highway and bridge upgrades which are sorely needed.

**ODOT I-205 Toll EA - RECORD #2313 DETAIL****Submission Date :** 4/20/2023**First Name :** Janice**Last Name :** Manley**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** A representative from the state study was recently at a presentation at the WLACC recently. She said the reason for the toll was to recover gas tax losses from electric vehicles. Well, there other ways to get that money, and directly from those car owners, with a lot less hullabaloo. Electric cars also damage roads as they drive, they are heavier with the batteries, and can drive with studded tires. They currently do not pay for road wear and tear which is not fair. I live in West Linn just off Santa Anita. I-205 congestion already being diverted by GPS systems off Hwy. 43 (which became jammed up up from folks coming all the way from Portland on 43 to West Linn). They come up Hidden Springs Rd. to Santa Anita, then to Rosemont Rd, and go either N. or S. to get back to the freeway. To avoid the Stafford Rd. toll, they can then go on Boreland. Rd to I-5. This will only get worse . There are numerous pedestrian crosswalks which are also used by children at two schools along there and this has already become dangerous with cars not familiar with the hilly area with visibility issues at these crossings. So yes, congestion will lessen on I-205 but not because folks are getting out of their cars, but making our residential neighborhoods dangerous. The Hwy 43 redesign does not seem adequately address this as it only changes one point, and cars attempting to enter Hwy. 43 from Pimlico at the stop sign will face increased traffic jams. As a disabled senior, I am also concerned about getting to medical care at Willamette Falls medical complex in Oregon City. We only have the arch bridge, already horrible crowded, and I-205. To use I -205 I get on the the N. on-ramp that becomes the my exit to 99E in Oregon City, so I never even get in the thru traffic lane but would pay a toll, which would be true for many others. The same is true on the return trip as that on-ramp is the west Linn off-ramp. This trip to Oregon City is probably a large number of uses of I-205 here. I certainly will no longer shop in Oregon City, hurting them. Meals on Wheels has volunteer drivers that need to get between Oregon City and West Linn. It seems that the choice of where to toll was chosen first, then studies were designed to fit that. If the state wants to make money from the tolls, there were other places with less community impact and high traffic to achieve that. It seems the location was targeted from the start and then elaborate modeling created to show that point as the best place. Freeway travel is safer than on clogged city streets with probably more accidents, including pedestrians, resulting in injury or death, especially with even more non-local traffic on our streets.

**ODOT I-205 Toll EA - RECORD #2314 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** gina

**Last Name :** smith

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** No to Toll Roads...Tolls should not be allowed on highways and roads that have already been built and paid for. Tolling just this section may have some justifiable reasons behind it but will ultimately lead to tolling of nearly the entire freeway system in Portland. This will ultimately cripple traffic, separate families due to the fact that there are only 2 routes across the Columbia River, both of which are planned to have tolls added which will increase financial strain on households. Not everyone can live near where they work, so this will effectively reducing their income. Also, for those Washington residents who also work in Oregon are already paying more than their fair share into Oregon's tax system without any representation and very little return. Looking at Washington's financially-strained tolling system, it's also not a very efficient way of collecting revenue. On Seattle's I-405/SR-167 tolling system, the "cost of collection" was 68 percent of money collected, according to the most recent report to WSDOT. That's extremely inefficient, as the gas tax has a 1 percent cost of collection. Please do not go down this path. We must pursue other ways to reduce congestion and raise revenue for projects.

**ODOT I-205 Toll EA - RECORD #2315 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Jonathan

**Last Name :** Smith

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls should not be allowed on highways and roads that have already been built and paid for. This will ultimately cripple traffic, separate families due to the fact that there are only 2 routes across the Columbia River, both of which are planned to have tolls added which will increase financial strain on households. Find another way!

**ODOT I-205 Toll EA - RECORD #2316 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Eric

**Last Name :** Smith

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls should not be allowed on highways and roads that have already been built and paid for. Tolling just this section may have some justifiable reasons behind it but will ultimately lead to tolling of nearly the entire freeway system in Portland. This will ultimately cripple traffic, separate families due to the fact that there are only 2 routes across the Columbia River, both of which are planned to have tolls added which will increase financial strain on households. Not everyone can live near where they work, so this will effectively reducing their income. Also, for those Washington residents who also work in Oregon are already paying more than their fair share into Oregon's tax system without any representation and very little return. Looking at Washington's financially-strained tolling system, it's also not a very efficient way of collecting revenue. On Seattle's I-405/SR-167 tolling system, the "cost of collection" was 68 percent of money collected, according to the most recent report to WSDOT. That's extremely inefficient, as the gas tax has a 1 percent cost of collection. Please do not go down this path. We must pursue other avenues to reduce congestion and raise revenue for projects.

**ODOT I-205 Toll EA - RECORD #2317 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Amy

**Last Name :** Hayes

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Adding a toll to this section of I-205 will have a negative direct impact on middle and lower income families in this area. This is a suburban area comprised of largely families and low income people groups. Specifically, the small school at which I teach has many families whom would have to pay the toll 4 times a day to bring their children to and from school, greatly impacting their ability to participate in our program. Because of the high financial impact of the toll, already overcrowded streets in Oregon City will become completely undrivable with log-jammed traffic. The resulting frustrated drivers will then create less safely walkable neighborhoods and business areas. There is no acceptable benefit that outweighs these concerns for my work and living communities.

**ODOT I-205 Toll EA - RECORD #2318 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Christina

**Last Name :** Widme

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** NO on the toll for the Abernathy bridge ! That's not going to help with accommodating the whole of the population the drives everyday . Tolling ISN'T the answer !! try again as in make roads that can accommodate the whole of the population as in during an evacuation . Tolling is a failure just the same as the improvements to Cornelius pass and no plans in the next twenty years to make all the roads to the coast four lanes .. Failure !!



<b>ODOT I-205 Toll EA - RECORD #2319 DETAIL</b>
---

**Submission Date :** 4/20/2023

**First Name :** Edward

**Last Name :** Rhoads

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This project is unnecessary and costly waste of money with zero added transportation capacity.

**ODOT I-205 Toll EA - RECORD #2320 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Robert & Brenda

**Last Name :** Seemuth

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** ODOT estimates \$15 each way will harm families who aren't wealthy who work in Ore. WA workers already pay over \$300 million a year in Ore. Income Taxes. We are already paying more than our fair share. Potential \$15 each way tolls will harm all but the wealthiest families. It will be a regressive tax that most hardworking families can't afford.

**ODOT I-205 Toll EA - RECORD #2321 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Jovan

**Last Name :** Pettus

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I strongly OPPOSE any measure to toll any Interstate roads or state highways. Imposing a toll for public use does Not solve any issues concerning the environment and so-climate change. We already pay taxes for new roads, maintenance and road utilities. This will only hinder the citizens of the state who rely on the use of such roads for travel. Also, it would effectively raise the prices for goods and services when businesses that transport goods will have to incorporate the annual calculated costs to use these roads to deliver much needed consumer goods and materials which the consumer will have to pay. Our economy is on the verge of collapse and imposing any additional tax would only hurt the low and middle income working class which includes minorities and people of color who are already struggling to make ends meet due to the horrendous policies imposed by the Oregon legislators. We are not California and if the legislature continues to impose their tyranny then the working class people will start fleeing this state in droves just like they are in California. Then who would you tax then??

**ODOT I-205 Toll EA - RECORD #2322 DETAIL**

**Submission Date :** 4/20/2023  
**First Name :** Catherine  
**Last Name :** Ryan Gregory  
**Affiliation :**  
**Submission Method :** SurveyMonkey

**Q3. Comments :** I am not opposed to tolling overall. However, I would like to see local traffic mitigation measures in place \*before\* tolling is implemented. I expect to see a large increase in local traffic to avoid the toll gantries (e.g. bypassing that stretch of 205 along Stafford and Rosemont Roads). Those streets need significant improvements -- both to the roads themselves as well as usability concerns, such as sidewalks, pedestrian routes and possible speed reduction measures like roundabouts. These measures to keep West Linn local communities safe and usable should be in place before tolling begins. Thank you for your consideration. Sincerely, [ ]

**ODOT I-205 Toll EA - RECORD #2323 DETAIL****Submission Date :** 4/20/2023**First Name :** Cheryl**Last Name :** Prior**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I'm most concerned about negative financial impacts to local residents and businesses caused by increased traffic avoiding tolls. Also lack of public transportation options available to local communities needing to commute via I-205

**ODOT I-205 Toll EA - RECORD #2324 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Frances

**Last Name :** Davis

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The proposed tolling will have a negative impact on those who cannot vary their work hours and those who are wage employees and least able to pay for the use of their roads which tax dollars have already paid for.

**ODOT I-205 Toll EA - RECORD #2325 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Sandra

**Last Name :** White

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Do those in government want to just cause all Washingtonians to stay in WA? If so, move forward...however you lose all those who might decide it is better to find a job in WA or stay home, causing OR's economy to drop! Or, did you want all WA shoppers, travelers, entertainment seekers to take their budgeted spending to seek spending their money online, moving Northward or stop visiting OR ever again? If so, move ahead and charge people an exhorbitant fee and they will stop visiting the state...do you people NOT think about the huge economic injury this will cause to the workers who live in WA and HAVE to travel to OR for their jobs??? Robin Hood would have extracted MUCH LESS from the citizens than the people trying to force this on the people. NO TO THESE TOLLS!!!!!!!!!!!!!!

**ODOT I-205 Toll EA - RECORD #2326 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Joel

**Last Name :** Turvey

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The transportation analysis needs to consider how cars using other roads to avoid tolls could vastly increase traffic on Pimlico Drive, which intersects Highway 43/Willamette Drive. I have lived on Pimlico Dr. for 40 years. There is already a significant increase in traffic during the past few years. Also, the speed at which some of the vehicles drive is incredible, given that the speed limit is only 25mph. Speed bumps don't seem to help. We have had a significant number of families with younger and school age children move in during the past few years. With people avoiding the tolls, I fear that the traffic and speed will greatly increase and make it more hazardous for these kids when they are walking or waiting for the school bus. I can envision a LONG line up and down my street. Also, tolls are burdensome for the average working class families who may need to commute on I-205 five days a week. It is not fair that the cities of West Linn and Oregon City may bear the brunt of these taxes. Please find another source of revenue. At minimum, put the tolling project up for a vote by the people.



<b>ODOT I-205 Toll EA - RECORD #2327 DETAIL</b>
---

**Submission Date :** 4/20/2023

**First Name :** Yana

**Last Name :** Gaidaichuk

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** People can NOT afford this! This will cause chaos, and traffic like never seen before. Absolutely against this proposition!

**ODOT I-205 Toll EA - RECORD #2328 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Tamra

**Last Name :** Burleson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I would like to see this project go away because of the potential harm to the environment of traffic taking longer to pass through the area causing increase in emissions, sound and exposure to wildlife crossings that extra time entails. Because non-electric cars are going to be around for a long time, if we're honest

**ODOT I-205 Toll EA - RECORD #2329 DETAIL****Submission Date :** 4/20/2023**First Name :** Charlotte**Last Name :** Hottmann**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** All toll roads I have used in the eastern half of the US have reasonable alternate routes. There are no 'reasonable' alternate routes to this section of I-205. The public has been against this proposed toll road from the beginning, yet you have continued to push this through. With the out of control inflation and continued abuse by the democrats in the state of Oregon, this is one more abuse of power that is going to have a severely negative impact on the surrounding communities. The rich people of WestLinn and McMinnville may be able to afford the tolls, but the people outside of those communities who rely on that route for the daily commute or for conducting business in a reasonable timeframe will be taking the brunt of the tolls. Go back to wherever you came from. Oregon does not need your failed ideas and policies. I'm so disgusted every time I have to make a trip to the Portland metro area, seeing the filth and destruction along our highways byways, thanks to the current government decisions. Oregon used to be a beautiful state. Now it's a pit. Go on, do what you want, continue to destroy it. All you care about is your fat paycheck.

**ODOT I-205 Toll EA - RECORD #2330 DETAIL****Submission Date :** 4/20/2023**First Name :** Hunter**Last Name :** Williams**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling on I-205 will have a devastating impact on the local communities in this area. Tolls will cause people to reroute into neighborhood roads and the historic arch bridge which will greatly congest traffic within towns such as Oregon City and West Linn. This extra congestion will have a massive negative impact on air quality as cars sit idling for longer periods of time to avoid the tolls. Tolls will also harm these smaller towns financially which are home to many blue collar and lower income workers. With gas costs on the rise again, families cannot afford extra travel costs. On top of these issues, these towns will see less income from tourism as people avoid the area due to tolls surrounding the cities. Please reconsider these tolls for the damage they will do to the surrounding towns, their families, and the environment.

**ODOT I-205 Toll EA - RECORD #2331 DETAIL****Submission Date :** 4/20/2023**First Name :** Lonny**Last Name :** Webb**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This project will have a devastating effect on my private mental health practice. Patients coming from either direction will be punished with a toll that adds to the already difficult situation necessitating their treatment. We work with highly marginalized and at risk youth and families who struggle with serious mental illness. This project will require us moving our offices and change the dynamics of treatment for the foreseeable future. This project disproportionately impacts Buisness in the willamette area of west linn.

**ODOT I-205 Toll EA - RECORD #2332 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** John

**Last Name :** Woods

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Oregon Legislators and the Democrats have cheated lied and stolen from the people long enough. These roads have already been paid for, yet you thieves want more money. I will purposely drive around your stupid toll roads and not give you a cent.

**ODOT I-205 Toll EA - RECORD #2333 DETAIL****Submission Date :** 4/20/2023**First Name :** Paul**Last Name :** Ware**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** People will drive through the neighborhoods that go around the toll areas. We have all seen that before. The cost to the drivers to drive on roads that our tax dollars have already paid for is absurd! That is an additional out of pocket burden that we do not need with inflation going up and not down!

**ODOT I-205 Toll EA - RECORD #2334 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Robert

**Last Name :** Hooket

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** These tolls will create ridiculous traffic in West Linn and unfairly impact people of lesser means. This is a recipe for disaster.



**ODOT I-205 Toll EA - RECORD #2335 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Melissa

**Last Name :** Hill

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Will make a mess of neighborhood streets in West Linn, Oregon City, Canby, etc. and likely negatively impact traffic on I5, that is almost always a mess. Bad idea and bad location. Put a toll on people coming over the I5 or 205 bridge from WA!

**ODOT I-205 Toll EA - RECORD #2336 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Derek

**Last Name :** Becker

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling will make congestion worse on the surface streets and will adversely impact lower income commuters as well as fixed income seniors. And, yes we can build our way out of congestion. Add more freeway lanes.

**ODOT I-205 Toll EA - RECORD #2337 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** John

**Last Name :** Reed

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling as planned would destroy the livability of adjacent communities. Stop this tolling plan.

<b>ODOT I-205 Toll EA - RECORD #2338 DETAIL</b>
---

**Submission Date :** 4/20/2023

**First Name :** Breanna

**Last Name :** Brzezinski

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** There should not be a toll on a major way to get to the other side of town. There is no other option for people to get to that side of town, and any side streets or neighborhoods will be overrun by people. It will also cause significant financial stress on a lot of families who cannot afford to pay tolls

**ODOT I-205 Toll EA - RECORD #2339 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Mark

**Last Name :** Johnson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** You have plenty of statement and federal money to build a bridge. Once you toll you will never take it away. DO NOT TOLL OUR ROADS you greedy, grimey thieves.

**ODOT I-205 Toll EA - RECORD #2340 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** James

**Last Name :** McNeil

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The build up of traffic in local communities and the traffic accidents that will occur will negate any tolls when ODOT is sued over wrongful death lawsuits that will be filed by the families of lost and killed individuals due to traffic forced to go through these residential areas for the temporary financial relief of a bridge.

**ODOT I-205 Toll EA - RECORD #2341 DETAIL****Submission Date :** 4/20/2023**First Name :** Rob**Last Name :** Mager**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** People are struggling to survive as it is. Adding more expense to our family's expenses is just not good right now. Also how much fuel and carbon is going to be used hurting the environment for the construction of the toll readers and other equipment for the state to take more money from Oregon's struggling family's. This is a negative project that will increase traffic in unmetered streets and smaller byways as drivers avoid the tolls. I know I will and my family will as well.

**ODOT I-205 Toll EA - RECORD #2342 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** David

**Last Name :** Klaus

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Oregon already has some of the highest gasoline taxes in the nation to pay for roads. Why do we need an additional tax?



**ODOT I-205 Toll EA - RECORD #2343 DETAIL****Submission Date :** 4/20/2023**First Name :** Cydney**Last Name :** French**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The toll project proposed on I205 has created quite an uproar in the West Linn community. I believe this to be for many reasons. The impact of slowing down traffic on 205 in order to put in toll stations has larger, negative impacts than the amount of money that it would produce for the transportation department. 205 in this area has always been a slow down point for as long as I've lived in Portland, which has been since 1995. Travel between 205 and I5 generally gets clogged up in these areas where your proposals are showing on the Maps. The noise and pollution that slowing down vehicles and/or idling vehicles creates, is devastating to an already delicate ecosystem where these rivers join. These rivers include Willamette and Tualatin Rivers. In addition, the impact on our community financially would be substantial. While West Linn might be known as a wealthier community, there are plenty of us that struggle with the financial state of the world as it stands today after a pandemic. While improved roads are important, budgetary considerations aside, the overall impact of tolling stations would impact many surrounding communities beyond the ones where the offramp's allow people to exit. Many many people in Portland and Salem travel through these corridors's and will be impacted far and wide financially. This is not a small, reaching problem. While this is a creation to expand the budget, the negative impacts far outweigh the money that could be raised in another manner. At a time in the world, where we are already all struggling with the rising costs of gas, food, etc., the notion of adding another monthly expense for those of us that travel these corridors frequently, could be a breaking point for many. To toll this freeway is gross oversight in the general operations of transportation for many communities. Thank you for considering my comments and considering them in a real way. West Linn & Oregon City, Tualatin, Milwaukie and many surrounding plus impacted commuter communities are opposed to this tolling proposition. Please listen to the people.

**ODOT I-205 Toll EA - RECORD #2344 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Kim

**Last Name :** Rice

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Mobility is freedom. This toll tax will harm our families and communities that are already experiencing high cost of living.

**ODOT I-205 Toll EA - RECORD #2345 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Jacquelin

**Last Name :** Muro

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The economic impact this ludicrous project will affect all tax paying citizens in not only paying the tolls(taxation) but also in additional road repairs and maintenance on what will become overly used secondary roads, which will lead to traffic jams and hurt local businesses! No one wants the tolls.... ODOT has become a maniacal, bureaucratic, un-elected enterprise that is NOT listening to the public at all!!

<b>ODOT I-205 Toll EA - RECORD #2346 DETAIL</b>
---

**Submission Date :** 4/20/2023

**First Name :** Robyn

**Last Name :** West

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Do not toll I205. This will cause major congestion among all surface roads in the area, causing motorists to seek alternative routes.

**ODOT I-205 Toll EA - RECORD #2347 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Jonathan

**Last Name :** Jeseritz

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** You absolutely should add a third lane in the bottleneck. This should be funded with taxes you already collect. This should not be paid for via tolls, as that is excessive taxation. Use your transportation budget better. Less money to trimet rail. Working families should not have to pay even more just to get to work. The traffic created on the surface roads will be horrendous, and it's already bad. The surface roads will be significantly less safe with additional traffic. It is your job to represent us as citizens and tax payers. We already grossly overpay to live here.

<b>ODOT I-205 Toll EA - RECORD #2348 DETAIL</b>
---

**Submission Date :** 4/20/2023

**First Name :** Bernard

**Last Name :** Smits

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** As a potential of \$15 for tolling would definitely affect our household as one of us work in oregon and we have family over there to visit and we also do shopping there

**ODOT I-205 Toll EA - RECORD #2349 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** PAULINE

**Last Name :** WARREN

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** No more confisction of our families finances. No tolls for Washington residents at all.

**ODOT I-205 Toll EA - RECORD #2350 DETAIL****Submission Date :** 4/19/2023**First Name :** Melinda**Last Name :** Kainu**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Tolls are a regressive tax that most hard working families can't afford. Washington workers already pay over 300 million a year in Oregon income tax. We already pay more than our "fair share".



<b>ODOT I-205 Toll EA - RECORD #2351 DETAIL</b>
---

**Submission Date :** 4/19/2023

**First Name :** Helen

**Last Name :** Chan

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We live in Sherwood and my husband is working in Clackamas Monday to Friday. It will increase more financial burden on my life.

**ODOT I-205 Toll EA - RECORD #2352 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Tenny

**Last Name :** Chan

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I live in Sherwood and work in Clackamas Monday to Friday. It will increase more financial burden on my life.

<b>ODOT I-205 Toll EA - RECORD #2353 DETAIL</b>
---

**Submission Date :** 4/19/2023

**First Name :** Kevin

**Last Name :** Breuner

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This feels like a way to create even worse conditions on the Portland freeways, which is probably what government officials want.

**ODOT I-205 Toll EA - RECORD #2354 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Valerie

**Last Name :** Hooks

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is a tax on the poor and will unduly effect hardworking households who will now have added an expense to travel on top of high gas prices. No.

<b>ODOT I-205 Toll EA - RECORD #2355 DETAIL</b>
---

<b>Submission Date :</b>	4/19/2023
<b>First Name :</b>	Jeff
<b>Last Name :</b>	Latimer
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	We do not need any toll roads!

**ODOT I-205 Toll EA - RECORD #2356 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Samantha

**Last Name :** Shields

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This administration is all about diversity and inclusion but what tolling does is hurt low and middle income households. Also also part of the rules for the rolling program is once you start, you can't stop. You'll end up diverting traffic into neighborhoods cause more congestion. This is a terrible idea and goes against the culture in the PNW. We already pay taxes. Shame on you for trying to do this when the economy is in such a frail state.

**ODOT I-205 Toll EA - RECORD #2358 DETAIL**

**Submission Date :** 4/19/2023  
**First Name :** Stuart  
**Last Name :** Blighton  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :** Absolutely insane

**ODOT I-205 Toll EA - RECORD #2359 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Tana

**Last Name :** Ottinger

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** First off you people steal more money from your citizens that do nothing to better our lives our roads, the economy or the environment Period!! You are shredding the Constitution of the United States of America!!! You have become pimps for pedophiles. Now you think you can still our children!! You are all criminals and sick with no morals. Nothing you do betters anyone's life only yourselves!! Disgusting worthless and if we had legal voting none of you would be in Olyimpia or any political position!!!



**ODOT I-205 Toll EA - RECORD #2360 DETAIL****Submission Date :** 4/19/2023**First Name :** Peggy**Last Name :** Retzlaff**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** So many families are already hurting with the current economic situation. Working families do not need added fees for providing for their families. People will change their driving paths to reduce their cost of transportation. Local neighborhoods will be impacted with increased traffic

<b>ODOT I-205 Toll EA - RECORD #2361 DETAIL</b>
---

**Submission Date :** 4/19/2023

**First Name :** Kathy

**Last Name :** Karr

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I do not feel it is money well spent on the overall project and result gained. A third bridge is what I think we should consider instead.

<b>ODOT I-205 Toll EA - RECORD #2362 DETAIL</b>
---

**Submission Date :** 4/19/2023

**First Name :** Janette

**Last Name :** Chumley

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** It's hard to afford to go to work with gas prices and inflation and housing costs, now a toll to cross the River on top of paying income tax to work in a state we don't live in? Insane!

**ODOT I-205 Toll EA - RECORD #2363 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Tammy

**Last Name :** Johnson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The citizens in Oregon/Washington has suffer enough financially to make ends meet of supporting their family and paying taxes. Many families had to suffer bunking with families and friends to survive this economic catastrophe that the government and leaders of United States cause. We the citizen are living in poverty! We are becoming homeless because of decisions that is made. Our pay checks is already getting taxed triple, now ODOT and the governor wants to charge on the bridge that we the people commute to work to make a living!! We the people who works hard to service in the community so all needs are met by each individual who lives in this state! Why don't they fix the homeless problem and drug abuse! Use my tax dollars to invest in these young children who needs mental help! Focus on fixing the social problems! Instead leaders want to collect more money into their pocket, sitting behind a desk making stupid decisions on how to make everyone else more poor and increase the number of homelessness. Stop the toll charge! What happen to the American Dream!!? Now it's the American Poor!

**ODOT I-205 Toll EA - RECORD #2364 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Kristin

**Last Name :** Odell

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Traffic congestion on 99e and intersections without lights. South end rd and 99e difficult and dangerous now. As traffic increases to avoid tolls this will just make a bad intersection more dangerous

**ODOT I-205 Toll EA - RECORD #2365 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** C

**Last Name :** Lewis

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Charging a toll on the interstate highway system would unfairly deny workers and travellers who have already funded the very creation of the interstate highway system access to it. It's the poorest among us who need to travel for work or medical care, or any other reason, who would be denied access by reason of cost. \$30 to go from one side of the metro area to the other and return is astronomical. Minimum wage workers make \$30, after taxes, for 3 hours work. 3 hours. Not much will be left for food, rent, and utilities. Taxpayers already paid for these highways. We must not be expected to pay for them continually at this obscene rate.

<b>ODOT I-205 Toll EA - RECORD #2366 DETAIL</b>
---

**Submission Date :** 4/19/2023

**First Name :** Jeff

**Last Name :** Thiede

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling is a drag on traffic flow for locals AND especially for those that are not used to tolls when visiting or passing through town. If funds are needed for improving and expanding transportation resources to accommodate a growing population, add appropriate and responsible taxes at the pump in the local metropolitan areas. This will not slow down traffic due to toll booths, even if those are electrically managed.

<b>ODOT I-205 Toll EA - RECORD #2367 DETAIL</b>
---

<b>Submission Date :</b>	4/19/2023
<b>First Name :</b>	Rick
<b>Last Name :</b>	Erickson
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	The answer is still No No No



**ODOT I-205 Toll EA - RECORD #2368 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Jennifer

**Last Name :** Evans

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Why is there a need for an ongoing toll to make needed improvements on this stretch of freeway? Isn't there already budget for maintaining and improving interstate highways? Families are already paying extra for gas, and just about everything else, with price increases over the past few years. Adding a toll, especially a high one, will unfairly reserve these highways for the wealthy, cause congestion in other places, and open the door to tolls on other area freeways.

**ODOT I-205 Toll EA - RECORD #2369 DETAIL****Submission Date :** 4/19/2023**First Name :** Russell**Last Name :** Heinemann**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Human nature will lead drivers to try to avoid tolls. My concern is that much of the north bound traffic will divert through Canby. Currently many commuters enter Canby via Knights Bridge Road, then turn toward Territorial on Holly or Birch. Right on Territorial and connect with 99 North of Canby. All this traffic goes through residential areas. I fear tolls will increase that traffic. Others will exit at the Aloha exit and greatly increase the traffic through Canby on 99. Since Canby is split in two by 99 and the RR, that increased traffic will greatly impace the downtown area and cross town traffic. Also 99 isn't now a safe passage way for walkers or bicyclists. With increased traffic it will be even less safe. It just seems like this area is a test case for more tolling. If that is the case the State needs to vastly increase it's committment to upgrading existing secondary roads and routes like 99.

**ODOT I-205 Toll EA - RECORD #2370 DETAIL****Submission Date :** 4/19/2023**First Name :** Natalie**Last Name :** Whitney**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The proposed I-205 tolling would cause an extreme diversion of traffic to neighborhood surface streets surrounding the communities of Tualatin and West Linn. In particular, traffic diverted on to SW 65th and SW Borland roads in Tualatin, would cause hazardous traffic backups. Meridian Park Hospital is located at SW 65th and Borland Rd. The current infrastructure cannot provide safe & urgent access to the hospital, emergency room and surrounding medical facilities. The increased traffic that tolling would push onto these roads could easily cause loss of life in emergency situations. In addition, Bridgeport Elementary School is located at 56th and Borland Road. A significant number of Elementary aged children walk to and from school along & crossing Borland Road, from housing developments and low income apartments near the school. The school also has 2 Little League Baseball fields, one of which is situated approximately 30 feet from Borland Road. During the spring and summer months these fields are extremely busy with baseball practice and games for young children. The significant increase in traffic on Borland Road would create an extreme hazard for young baseball players, coaches and families attending the games. I urge you to reconsider the I-205 tolling project to keep our children and community safe. Thank you.

**ODOT I-205 Toll EA - RECORD #2371 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Robert

**Last Name :** Ferry

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** As a university researcher and designer involved in transportation infrastructure, I recognize that tolls can be an effective way to disincentivize driving in favor of more efficient and sustainable alternatives. However, this location does not have viable alternatives - no light rail, underdeveloped cycling networks, and the likelihood that current bus service will be slowed down due to traffic avoiding tolls. Please don't do this. I promise that if you understood the nuanced realities of the communities that will be impacted by these tolls on the ground rather than from a bird's-eye planning view that you would not proceed with tolling. PLEASE listen to these voices - no tolls.

<b>ODOT I-205 Toll EA - RECORD #2372 DETAIL</b>
---

<b>Submission Date :</b>	4/19/2023
<b>First Name :</b>	Caryn
<b>Last Name :</b>	Vitek
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Tolling is the most inefficient way to control traffic or raise funds.

**ODOT I-205 Toll EA - RECORD #2373 DETAIL**

**Submission Date :** 4/19/2023  
**First Name :** Steven  
**Last Name :** Weeks  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2374 DETAIL**

**Submission Date :** 4/19/2023  
**First Name :** Pat  
**Last Name :** Stupur  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2376 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Kenneth

**Last Name :** Smith

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Bad idea to charge tolls and divert highway traffic to local streets. Will gas taxes be reduced or is this a way to recover costs of wear and tear caused by EV?



**ODOT I-205 Toll EA - RECORD #2377 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Andy

**Last Name :** Bunch

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Inflation is rising much faster than income. People cannot afford these tolls. The effect will be to imprison low income people in their neighborhoods, which some would argue is your goal.

**ODOT I-205 Toll EA - RECORD #2378 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Anne

**Last Name :** ONeill

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am opposed to tolling on Oregon FREEways. The amount of tolling only makes living in the northwest that much more expensive. The slowdown to make payment will not improve traffic or the environment. Who in their right mind thinks charging more to conduct commerce or trying to make a living is a good thing?

**ODOT I-205 Toll EA - RECORD #2379 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Julie

**Last Name :** Longoria

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Vancouver does not want or need light rail - what we need is a third and fourth bridge - it's not fair to toll these bridges that have already been paid for! We don't want Portland crime and shouldn't be forced to pay for it through tolling. It's NOT fair

**ODOT I-205 Toll EA - RECORD #2380 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** James

**Last Name :** Clark

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am concerned that tolling will make travel between Oregon and Washington cost prohibitive for many families. Vancouver and Portland are one metro area in spite of the state border and some people have to travel across these bridges daily for work. Tolls are also a very inefficient way to pay for roads because the cost of collection can be 30-60%. Gas taxes are a much more efficient way to pay for roads because they have an extremely low cost of collection. Tolls are a waste of our money and we should NOT toll our freeways. Tolls will also cause people to divert to local streets which will create congestion and safety concerns.

<b>ODOT I-205 Toll EA - RECORD #2381 DETAIL</b>
---

**Submission Date :** 4/19/2023

**First Name :** Greg

**Last Name :** Gulliford

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** With the current inflation and tax increases I am very concerned with the financial impact this will have on families throughout SW Washington. The government is reaching too far with no accountability on over spending and taxation. The other issue deals with the safety concerns with traffic diversions in the local communities.

<b>ODOT I-205 Toll EA - RECORD #2382 DETAIL</b>
---

**Submission Date :** 4/19/2023

**First Name :** Amanda

**Last Name :** Lomax

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I do not support tolling on the interstate bridges! We are not Seattle! And I do not support wasteful spending when we have capable infrastructure already in place.

<b>ODOT I-205 Toll EA - RECORD #2383 DETAIL</b>
---

**Submission Date :** 4/19/2023

**First Name :** Kevin

**Last Name :** Reilly

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I do not support this, as it provides no solution, but rather penalizes hard working people who need to use this route, and will likely add additional traffic burden to alternative routes.

**ODOT I-205 Toll EA - RECORD #2384 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Pam

**Last Name :** Tronson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Opposed to any and all tolls as they restrict free travel and cause problems in areas that weren't designed to handle more traffic flow of those trying to avoid tolls. Please manage money better and understand the whole ESG and climate agenda are fabricated and actually cause problems.



**ODOT I-205 Toll EA - RECORD #2385 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Mike

**Last Name :** brodle

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The people are against the money stealing toll proposition. It is time for employee's to follow the rulers of the law.

**ODOT I-205 Toll EA - RECORD #2386 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Julius

**Last Name :** Locke

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The anticipated quantity and price of these tolls is outrageous. The average person is being taxed over 70% of what they earn. You are going to instigated increased violence as people become more desperate to survive. STOP STEALING FROM THE PEOPLE!

**ODOT I-205 Toll EA - RECORD #2387 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Gena

**Last Name :** Blum

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The transportation analysis needs to take in the current high cost of living in general and the extra cost this proposal will place on the shoulders of the average workers and on families. Tolls are a different name for tax, and people in Oregon and Washington DO NOT need any more of their money given to the government. I implore the committee to look for alternative ideas that do not cost communities. Thank you.

**ODOT I-205 Toll EA - RECORD #2388 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Vanessa

**Last Name :** Amundson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I object to tolling on any portion of Portland metro area freeways. As a person who must frequently travel to/through Portland, tolling will put a significant hardship on myself and my family. Further, my son-in-law who works at FedEx at the PDX airport, lives in Clark Count also, and will be significantly impacted by ANY tolling anywhere in the Portland Metro area. We already pay exorbitant taxes for the upkeep of our freeways and roads, and insist that you find a way to live within your means, without imposing tolls. We have to live within our family budget - you guys need to learn to do the same! Thank you for your attention.

**ODOT I-205 Toll EA - RECORD #2389 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Jeannine

**Last Name :** Long

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** You cannot toll working families along I-205 and I-5. My husband, daughter and many friends I know work in Portland and cannot afford to pay daily tolls. This will decimate our family and many others. Please, please, please do not do this. It's just not right.

**ODOT I-205 Toll EA - RECORD #2390 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Vicky

**Last Name :** Barbur

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I don't understand why this is being forced down our throats much like the MAX was - voters vote no and Oregon does it anyway. We pay plenty of taxes and do not need another money grab. Further, it will only increase congestion and traffic problems on side streets.

**ODOT I-205 Toll EA - RECORD #2391 DETAIL****Submission Date :** 4/19/2023**First Name :** Ben**Last Name :** McCune**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Hi there. I'm very much in favor of the project. In fact I would suggest that you allow room for the bridge to accommodate more lanes or MAX. However, I don't appreciate a toll system to pay for the project. We already pay a substantial amount in property taxes and in fuel taxes. Please find some other way to fund the project that doesn't adversely affect the locals considering the regional nature of this improvement. Thanks! Sincerely, XX

**ODOT I-205 Toll EA - RECORD #2392 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Bailey

**Last Name :** Court

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The Transportation Analysis needs to consider the increase of cars on the road if a third lane. If everything is left as is, people will tire of the congestion and find alternative ways to point B. Thinking work from home, carpooling, taking the bus or train. The toll bridge will slow down traffic and will hurt the lower and middle class. The build is not needed at this time. Money needs to go into alternative transportation. Perhaps more bus runs to metro stations. I have asthma and an increase of cars on the freeway will cause my symptoms to worsen. Please don't do this.



**ODOT I-205 Toll EA - RECORD #2393 DETAIL**

**Submission Date :** 4/19/2023  
**First Name :** Elisabeth  
**Last Name :** Court  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2394 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Emily

**Last Name :** Gill

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The proposed solutions seem very short-sighted. They rely on too many assumptions, and there is not enough consideration of known facts, studies or local resident feedback. The risk of real harm to countless residents, infrastructure elements, and local ecosystems is high with this change. The likelihood that all the predictions and mitigations pan out exactly as proposed is low. Effects could be devastating to individuals and families in ways not factored into the mitigation proposals because there are too many variables to perfectly factor in. Even in the best scenario, increasing costs and pressures on people (so that they cannot move about as freely as they otherwise could) is integral to your plan. With a higher burden on working-class people. Discounts based only on income levels cannot comprehensively account for every individual's situation and needs. More discussion and weighing of alternative options and compromises (such as a paid fast lane only) is warranted. Overall a slower, more ethical and transparent process is needed here. Unilaterally pushing forward with such an aggressive tolling plan is especially unjust when Oregon is already taxed heavily, and when the larger economic situation is squeezing so many of us. It is too blunt of a tool. This is a matter of grave importance that would be better put to a vote. Please slow down and listen to public concerns. Thank you for your efforts. I hope wisdom and justice will prevail.

**ODOT I-205 Toll EA - RECORD #2396 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Larry

**Last Name :** Coursey

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Your tolling project is nothing but an Eco-Religion obsession and totally unnecessary. It is actually an affront to God. And it is a RICO scheme to transfer money from one group to a Progressive Socialist preferred group. Shame on you all.

<b>ODOT I-205 Toll EA - RECORD #2397 DETAIL</b>
---

**Submission Date :** 4/19/2023

**First Name :** Jennifer

**Last Name :** Bowdon

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Please do not move forward with the tolling. This causes too much stress on Oregon City and community.

<b>ODOT I-205 Toll EA - RECORD #2398 DETAIL</b>
---

**Submission Date :** 4/19/2023

**First Name :** Steven

**Last Name :** Molin

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The proposed I-205 tolls, according to ODOT, will cost more in tolls and other costs than they will generate in benefits. This makes it a no-brainer: the current plan should be scrapped, and ODOT should start again, utilizing reputable independent economists to make sure that any future proposal will be a net positive for the community.

**ODOT I-205 Toll EA - RECORD #2399 DETAIL****Submission Date :** 4/19/2023**First Name :** Mike**Last Name :** Perrault**Affiliation :** Dem**Submission Method :** SurveyMonkey

**Q3. Comments :** The working class has been pushed farther and farther afield for decades and are forced to commute longer to get to work. Our wages aren't increasing apace with white collar workers either. Adding tolls on top of this is unjust and inequitable & it seems that's a feature in this system not a bug. Notice that there won't be tolls in more affluent areas. They can commute as they please, but yet again the working class will get squeezed

**ODOT I-205 Toll EA - RECORD #2400 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Mark

**Last Name :** Henry

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I pity the people who live on the alternate routes of the toll areas. Please find another way to raise money. I am totally against tolls.

<b>ODOT I-205 Toll EA - RECORD #2401 DETAIL</b>
---

**Submission Date :** 4/19/2023

**First Name :** Stephen

**Last Name :** Dabasinskad

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I strongly oppose the current proposed tolls on the new bridges. This would impose financial hardships for many people who live in Washington but work in Oregon.



<b>ODOT I-205 Toll EA - RECORD #2402 DETAIL</b>
---

**Submission Date :** 4/19/2023

**First Name :** Barbara

**Last Name :** Moore

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Concerned about the effect this will have on household finances. Especially for those who can't afford any extra expenses.

**ODOT I-205 Toll EA - RECORD #2403 DETAIL****Submission Date :** 4/19/2023**First Name :** Jacqueline**Last Name :** Greenwood**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This tolling project starting on I-205 near West Linn will have a great impact on our and others' household finances as well as quality of life. Traffic through our side streets is already horrific. To avoid the tolls people will increase their use of side streets including Highway 43, Willamette Falls Drive, Stafford and Rosemont Roads and all streets other than the freeway. People cannot themselves change their work times in order to commute at less expensive hours, or to doctor's appointments or other necessary trips. It will put a heavy financial burden on many, including my household to have to start paying tolls to go to work, to appointments, and trips for necessary items. Covid, inflation, and the economy has already hurt many, including my household. A fee to simply use the roads is a slap in the face to all of us who are barely getting by. From what I read, there will be a large swath of people who get a break on these tolls, and once again, the largest burden of these fees will be placed on the middle class. This will also potentially lose business for many places because people, including myself, will stop shopping in certain areas if it means paying a toll to get there. As we all know - Tolls will not help traffic, only divert it to other areas. Our household has already decided, if tolls go in, we will be moving out of the State of Oregon. Enough is enough.

<b>ODOT I-205 Toll EA - RECORD #2404 DETAIL</b>
---

**Submission Date :** 4/19/2023

**First Name :** Mike

**Last Name :** Jones

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am very concerned about the change to traffic patterns and the affects on the comunity and land values. I live on Rosemont Rd. and it is already very busy at rush hour. Stafford, Rosemont, Hwy 43, and the old Oregon City bridge will be greatly impacted by the tolls. Very concerned for how the tolls will change our community.

**ODOT I-205 Toll EA - RECORD #2405 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Judi

**Last Name :** Wheeler

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Living in Canby, I am most concerned about the extra traffic, including semi-trucks, that will be traveling highway 99E to avoid tolls. This main thoroughfare is already congested with before/after work traffic and is need of repairs. Adding the toll-avoiding traffic will only make highway 99E and other roads more dangerous, especially for first responders/emergency vehicles, pedestrians and those on bikes. Heaven forbid if there is an accident on 99E between Oregon City and Canby, no one will be going anywhere for awhile! We have many seniors, students and low-income residents who would really feel the affects of tolls, as they use I-205 to get to medical appointments, schools and work. The transportation analysis really needs to take these concerns into consideration in deciding options for funding the highway improvement projects. NO TOLLS PLEASE!!

<b>ODOT I-205 Toll EA - RECORD #2406 DETAIL</b>
---

<b>Submission Date :</b>	4/19/2023
<b>First Name :</b>	Angela
<b>Last Name :</b>	Hammond
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	I do NOT support tolling. We pay enough in taxes. Manage the money better if you need more!!

<b>ODOT I-205 Toll EA - RECORD #2407 DETAIL</b>
---

**Submission Date :** 4/19/2023  
**First Name :** Julie  
**Last Name :** Cady  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2408 DETAIL**

**Submission Date :** 4/19/2023  
**First Name :** DeeAnna  
**Last Name :** Janku  
**Affiliation :** mrsjanku@gmail.com  
**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling should be used to develop new projects, not maintain current road systems. Tolling the bridges has unfair impact on workers that rely on these bridges to commute from SW Washington to Oregon. We are already paying taxes without representation, that have recently been raised. These are also inefficient ways to collect money for the state. The average cost is more than 60% of the money collected. There are far better ways to make up revenue than tolling the roads. Effectively this affects working families the most and has been voted down multiple times. Please stop trying to push unwanted tolls on us!

**ODOT I-205 Toll EA - RECORD #2410 DETAIL****Submission Date :** 4/18/2023**First Name :** david**Last Name :** hegewald**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I want to know why you want to toll roads that I already helped pay for? I will use neighborhoods to avoid tolls. I will write all congresspeople to help overturn your plan.



**ODOT I-205 Toll EA - RECORD #2411 DETAIL****Submission Date :** 4/18/2023**First Name :** Aaron**Last Name :** Hessel**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This is going to destroy every major road in West Linn and much of Lake Oswego and Tualatin. The diversion of traffic onto Stafford, Borland, Ek, Schaeffer, Johnson, Willamette Falls, etc. is already bad during peak hours. The tolls will make traffic unsafe and unbearable on many of these rural and semi-rural roads, which already lack needed safety and functional aspects such as bike lanes, traffic circles, shoulders, etc. Residents of West Linn will bear a disproportionate amount of the financial and safety burden. Please stop the tolls.

**ODOT I-205 Toll EA - RECORD #2412 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Mark

**Last Name :** Miller

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** There are too many issues to address in one comment. Anything that reduces congestion and idling cars crawling along the freeway during each multi-hour rush is going to be positive on all aspects of air and life quality, so increasing traffic flow is a no-brainer, (provided a tolling scheme doesn't just push more vehicles to congested surface streets). However, the absurd amount of money being shoveled into that financial black hole of a tri-met light rail system that has been grossly sub-par with ridership since its inception, that not only will never pencil out, but it utilizes land better allocated to the things and commerce that would actually travel in that space, and the money spent would easily cover the cost of infinitely more useful transportation projects and thus negate the need for any tolling in the first place.

**ODOT I-205 Toll EA - RECORD #2413 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** S

**Last Name :** Dupont

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Those of us who have to go into pdx for work already pay Oregon state income tax without living there. Taxing us further on a daily basis is undue burden on our family finances. These bridges were already paid for by federal funds that came from taxpayers. This is extremely unfair and will impact those of us who can't work from home more than anyone else. Please reconsider who you are charging the tolls from.

**ODOT I-205 Toll EA - RECORD #2414 DETAIL****Submission Date :** 4/18/2023**First Name :** Alyssa**Last Name :** Bailey**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The transportation analysis needs to consider whether or not people's transportation habits will change when a toll is added to a section of their normal travel route. Have any other tolled highways that already exist seen that people change their driving behaviors based on variable-rate tolling? It seems that that assumption is that a toll will fix the congestion problems, but there is no evidence that driving behaviors change when a toll is introduced. It is more likely that driving on residential roads will increase when tolls are introduced. Also, as prices close to Portland increase and people move to places like Oregon City to avoid high housing prices, this toll will increase the cost of living in this region. The result will be that people have to leave the entire region to find both affordable housing and affordable transportation. The study also says that there is a 50 year window to upgrade the bridges. Why isn't there a plan to complete upgrades before completing the widening from 2 to 3 lanes in the areas that need to be widened? There is time to complete this project in phases that would not include tolls. Please do not implement tolls in a region that cannot support it.

<b>ODOT I-205 Toll EA - RECORD #2415 DETAIL</b>
---

**Submission Date :** 4/18/2023

**First Name :** Brian

**Last Name :** Blackwell

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The analysis needs to consider the economics of charging the citizens more and more taxes and tolls. Wages aren't going up and prices of daily life are skyrocketing.

**ODOT I-205 Toll EA - RECORD #2416 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Barbara

**Last Name :** Dobroth

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** If Dept of Human Services doesn't offer reimbursement for tolls, personal support workers (PSWs), will experience dissinsentive to support individuals with disabilities residing in West Linn, in particular. Feel certain many people will about tolling diverting to OC bridge to access Hwy 99 N. My credit union is on 99 so I will make no money on my acct as earned interest will go to tolls to cross bridge. Contrary to toll verbage I feel people will continue to devert to OC bridge, Hwy 43, Rosemont Rd, Salami to Willamette, etc to avoid tolling. There is no Costco, Target, Fred Meyer etc in West Linn so we divert or pay tills to get to any stores, restaurants and medical services in particular. West Linn is in a vulnerable location for those on fixed incomes = retired, disabled, low income. 3rd. Am concerned about the old watering trough on Sunset St. being vulnrabke to blasting for widening & changes in road route. Please protect & preserve this area. Important local history !

**ODOT I-205 Toll EA - RECORD #2417 DETAIL****Submission Date :** 4/18/2023**First Name :** Sam**Last Name :** Hall**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** We don't want tolls for bridges already paid for. You get a state tax and fuel taxes and a handful of other taxes to maintain the streets. Tax payers cannot always foot the bills by raising ways to get more money. Budget wiser please

**ODOT I-205 Toll EA - RECORD #2418 DETAIL**

**Submission Date :** 4/18/2023  
**First Name :** Karen  
**Last Name :** Price  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :** I cannot AFFORD to pay a toll everyday!



**ODOT I-205 Toll EA - RECORD #2419 DETAIL****Submission Date :** 4/18/2023**First Name :** Kimberly**Last Name :** Bushnell**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** People who live in one state and work in the other will bear an unfair proportion of these tolls. During a regular workweek, our household uses almost every one of the routes that are listed.

**ODOT I-205 Toll EA - RECORD #2420 DETAIL**

**Submission Date :** 4/18/2023  
**First Name :** Monica  
**Last Name :** Bircila  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2421 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Sean

**Last Name :** McClintock

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** For a massive proposed half-BILLION dollar project, for which you will likely overrun even those costs, the fact that you are not completing a full Environment Impact Statement is ludicrous. You EA only assessed tolls AND additional lanes against doing nothing. The EIS should evaluate tolling without adding additional highway capacity. I am deeply concerned about the additional vehicle miles traveled that the added capacity will cause. You continue to subscribe to the notion that adding capacity will reduce commute times. You can't stick your heads in the sand and ignore the reality of induced demand. Stop adding highway lanes and focus on improving mass and light modes of transit. Replace or reinforce the many, many existing bridges that are at risk of collapse. There are so many other priorities we should be spending our money on than adding 14 more miles of highway lanes.

**ODOT I-205 Toll EA - RECORD #2422 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Ryan

**Last Name :** Justus

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I live in Willamette and concerned this will cause traffic through my small neighborhood. People will avoid tolls and use Borland/willamette Falls causing traffic the roads aren't meant for especially since a new middle school is already being built and will cause more traffic already

**ODOT I-205 Toll EA - RECORD #2423 DETAIL****Submission Date :** 4/18/2023**First Name :** Todd**Last Name :** Hawes**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I would accept this only if you were to demolish the Marquam Bridge and I-5 along the east bank of the Willamette to I-84 and not rebuild the Interstate Bridge. I don't think it is unreasonable considering future tolling, a large percentage of downtown jobs are not returning, to direct through traffic away from the heart of Portland.

**ODOT I-205 Toll EA - RECORD #2424 DETAIL****Submission Date :** 4/18/2023**First Name :** Dick**Last Name :** Dominey**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I am concerned about rerouting of traffic to local roads and to unrolled bridges like the sellwood bridge which is already burdened with traffic jams. Or the old Oregon city bridge that will have trouble accommodating more traffic. Also I would hope that a toll lane could be aseed as an option and not have all lanes rolled since I heard that the fee might be 2.20 dollars both ways which may run over 500 dollars a year for some families. Would be interested in seeing congestion pricing as well. This is a very unpopular fee request as you are likely well aware

**ODOT I-205 Toll EA - RECORD #2425 DETAIL**

**Submission Date :** 4/18/2023  
**First Name :** Angie  
**Last Name :** Carrillo  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2426 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Nunya

**Last Name :** Biznes

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am against the toll on the highways. The current taxes we pay in gas are for the roads/bridges/infrastructure. The electric vehicles should also be paying to use the roads/infrastructure. As far as I understand, the electric car owners get a lot of tax benefits without the taxes others pay by purchasing gas. We need to make this equitable. I use one mile of the highway to go to work and back home. I live close to my work on purpose... to eliminate as much of the distance as possible of travel. I do not think its equitable for me to pay \$5 each way to travel one mile when another person can go many, many miles of travel for the same toll. Additionally, if a toll is implemented, I will go a farther distance to purchase goods and services to avoid a toll (which I know you want), but it will hurt the places I currently frequent (and it will be cheaper for me by not paying a toll, but the pollution you are trying to stop will increase). Lastly, I know you don't want to expand the number of lanes, but Portland is growing and no matter what, it will continue to grow despite the lack of roads. So why not get out in front of it and fix the problem and add more roads?



<b>ODOT I-205 Toll EA - RECORD #2427 DETAIL</b>
---

**Submission Date :** 4/18/2023

**First Name :** Maureen

**Last Name :** McNally

**Affiliation :** West Linn resident

**Submission Method :** SurveyMonkey

**Q3. Comments :** As a West Linn resident, I am against the proposed tolls as it will trap me into needing to pay a toll to go either north or south on the freeway closest to my home. It will increase traffic on residential streets that surround i205, and diminish my property value. I also take exception to the fact that the tolls have not been voted on by the public. I feel bullied by ODOT, and I am certainly not alone in that sentiment.

**ODOT I-205 Toll EA - RECORD #2428 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Tim

**Last Name :** Tragesser

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I live in the Marylhurst area off HW 43 and it terrifies me to imagine the congestion that will be thrust upon HW 43, my primary road for travel to and from my home. There will be a flood of people attempting to avoid the tolling across the Abernathy Bridge. It will bring traffic to a standstill on an already overloaded HW 43. I am also most concerned about the onerous expense burden tolling will place on my entire family. We've already paid our taxes once to construct HW 205 and now you want to force us to pay a new exorbitant amount of money again & forever more. Your actions continue to drive people to pull up their roots and leave the area to avoid this heavy handed assault on our way of life. Please put a stop to this wrong thinking Tolling Plan!

**ODOT I-205 Toll EA - RECORD #2429 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Yana

**Last Name :** Stone

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I do not believe the I-205 toll project is an effective program. Without a no-toll option, this program will result in significant local traffic diversion, higher local pollution levels, higher traffic noise levels, and an adverse impact to community health. Additionally, this program will have a negative economic and financial impact to the local communities and daily drivers who already pay significant taxes for a smooth and efficient transportation system. Without no toll alternatives on I-205 lanes, ODOT has not shown how any of these negative outcomes will be addressed or fully mitigated so that they do not cause undue environmental and financial harm to local communities. A no-toll option should be mandated as part of any new program, or else this toll system should be fully scrapped altogether.

<b>ODOT I-205 Toll EA - RECORD #2430 DETAIL</b>
---

**Submission Date :** 4/18/2023

**First Name :** Zeke

**Last Name :** Guenther

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I don't believe the money will actually go to any road benefit. Oregon is horrible in their money management. This is a money grab.

**ODOT I-205 Toll EA - RECORD #2431 DETAIL**

**Submission Date :** 4/18/2023  
**First Name :** Derek  
**Last Name :** Lawton  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2432 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Madelaine

**Last Name :** Olbricht

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls of \$15 each way will harm all but the wealthiest families. It will be a tax that most families can't afford. Additionally, tolling doesn't eliminate traffic congestion, it merely changes where it occurs. It will cause tens of thousands of vehicles to divert side roads to avoid the tolls, making neighborhoods and other side streets less safe. Tolls are hugely inefficient, with the "cost of collection" running 30-60%. This tax affects also Washington workers with Oregon jobs, who already pay over \$300 million a year in Oregon Income Taxes. We're already paying more than our "fair share."

**ODOT I-205 Toll EA - RECORD #2433 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Marie

**Last Name :** Jensen

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** My husband and I are retired and living in Oregon City. Because of the tolls we will have to pay to go to the Dr, church and see family. I have lived all my life in Oregon and don't feel now in retirement I should be penalized like this.

<b>ODOT I-205 Toll EA - RECORD #2434 DETAIL</b>
---

**Submission Date :** 4/18/2023  
**First Name :** Dennis  
**Last Name :** Belkot  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**



<b>ODOT I-205 Toll EA - RECORD #2435 DETAIL</b>
---

**Submission Date :** 4/18/2023

**First Name :** Steven

**Last Name :** Svehaug

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Why toll bridges? Place the tolls at the start of I205 beginning and ending on the Oregon side. Not just a small section. Everyone using I205 should have to pay too!

**ODOT I-205 Toll EA - RECORD #2436 DETAIL****Submission Date :** 4/18/2023**First Name :** David**Last Name :** Robison**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** EIS 1.4.1 states projects need construction funding. Is that still true? Does Building Better America now provide funding that could be applied? Impact of traffic diversion to local streets appears to be assessed for the year 2045. What about the impact after tolls, say in year 2025? Impact analysis seems to conclude that the No Build option will have such poor traffic that the Build impacts will not be much worse. What is the comparison for local diversion to Hwy 43 in West Linn peak hours in year 2025? The traffic analysis seems to focus on major intersections eg. McVey Avenue. what about local feeder streets along Hwy 43? If there is bumper-to-bumper traffic, will that interfere with drivers entering or crossing Hwy 43 during peak? Will that affect emergency vehicle access during such times? How are costs for decreased emergency services included in the cost/benefit model? Benefits for local residents appear to be primarily reduced drive times on I-205. According to the model, how many trips are local only (no I-205) and what is the impact to those trips due to diverted traffic? Please provide the assumptions behind computing the cost of bill enforcement and collection. Exactly how will bills be collected from out-of-state drivers? What portion of revenue will be noncollectable due to out-of-state drivers? what portion of revenue will be noncollectable due to poverty allowances? Will bill payment be enforced through vehicle registration? If so, will that encourage failure to register and provide insurance and how are these safety costs included in the analysis? Mention is made of mitigation but there is no feasible mitigation suggested for the immediate local area: Hwy 43 in West Linn, Arch bridge and downtown Oregon City. Since the few river bridges are a bottleneck, the local community bears a disproportionate impact for trips that are purely local, eg. medical, government trips that require crossing the river. Have you considered as a mitigation strategy providing a number of free trips to local Clackamas country residents?

**ODOT I-205 Toll EA - RECORD #2437 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Christine

**Last Name :** Lawton

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling should not be permitted on highways and roads that have already been built and paid for. Tolling just this section may have some justifiable reasons behind it but will ultimately lead to tolling of nearly the entire freeway system in Portland. This will ultimately cripple traffic, separate families (especially when there are only 2 routes across the Columbia River, both of which are expected to be tolled) and increase financial strain on households. Not everyone can live near where they work, especially if there are two incomes in the household, so this will effectively reduce their income. Further, for those Washington residents who also work in Oregon, we are already paying more than our fair share into Oregon's tax system without any representation and very little return. Looking at Washington's financially-strained tolling system, it's also not a very efficient way of collecting revenue. On Seattle's I-405/SR-167 tolling system, the "cost of collection" was 68 percent of money collected, according to the most recent report to WSDOT. That's outrageously inefficient, as the gas tax has a 1 percent cost of collection. Please do not go down this path. There are other ways to reduce congestion and raise revenue for projects.

<b>ODOT I-205 Toll EA - RECORD #2438 DETAIL</b>
---

**Submission Date :** 4/18/2023

**First Name :** William

**Last Name :** McGinnis

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am opposed to the tolling of the bridges between Washington and Oregon in the Portland Metro area due to hardship and cost on families that need to make this trip daily.

**ODOT I-205 Toll EA - RECORD #2439 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** David

**Last Name :** Robison

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Local diversion impact appears to be based on year 2045 - with the conclusion that No Build local traffic would be so poor that the Build alternatives could no be much worse. What about in the immediate aftermath of the new toll, say in year 2025? What would be comparative traffic on Hwy 43 in West Linn during peak hours? Traffic impact is only assessed at major intersections, eg. McVey Avenue. What about small local feeder streets? If traffic is bumper-to-bumper during peak on Hwy 43, will it be difficult for traffic to enter or cross the highway? What is the resultant cost in the local neighborhood if emergency vehicles are constrained? There are no practical mitigation measures for the local area: Hwy 43 in West Linn, Arch Bridge and downtown Oregon City. Benefits to residents are primarily reduced drive times on I-205. There is no mention of the costs of increased drive times on local streets. According to the model, how many drives are local-only (no use of I-205) and how will they be affected by diverted traffic? Is this impact included in cost/benefit estimates? There is an estimate of the cost of toll enforcement, however the assumptions are not clear. Please provide more details on expected cost of compliance. How will bill collection be enforced? Exactly how will bills be collected from out-of-state drivers? How much of the revenue will be noncollectable due to drivers being out-of-state? If bill enforcement relies on vehicle registration, will that result in drivers avoiding registration and insurance requirements? If so, how is the cost and safety impact of such avoidance included in benefit/cost ratios? If some revenue for low income drivers cannot be collected (equity proposal), how do the noncollectable debts affect revenue? The local community will bear a disproportionate impact since local trips rely on the few river bridges.  
W

<b>ODOT I-205 Toll EA - RECORD #2440 DETAIL</b>
---

**Submission Date :** 4/18/2023  
**First Name :** Jessica  
**Last Name :** Blaumer  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

<b>ODOT I-205 Toll EA - RECORD #2441 DETAIL</b>
---

<b>Submission Date :</b>	4/18/2023
<b>First Name :</b>	KLF
<b>Last Name :</b>	fiero
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey

**Q3. Comments :**

To Whom it may concern, Tolling on 205 not fair to Oregon city residents at all. Streets are already bogged down clogged up and there are a few thousand Apartments and low income apartments being built on those bogged down roads. It takes 5 consecutive traffic lights to get through the one light at 213 to get across it during traffic hours. There have been NO road improvements already and more apartments and homes being built other places also. Now you want to add all the traffic getting off highway to avoid toll area. Also it will cause problems with Police, Fire, ambulance, first responders, County and state workers, PGE will have problems getting to places and doing their work with so much more traffic and traffic problems. So you will be risking lives and needed services in all of our area and if you think that's OK you need to think again. There are 2 rivers we can't get across to go anywhere you have us boxed in we don't have shopping other than Fred Meyers and groceries but other shopping none that we will be able to get to Oregon City is NOT equipped to handle this at all, and we won't be able to get to even Clackamas in a timely manner. It already takes 30-45 minutes one way, and you want us to pay the toll also if we get on Highway which is one of 2 options to cross rivers and both would be tolled. The only way across the river except the bridge downtown Oregon City that gets hugely all blocked up already and is just 2 lanes it blocks up downtown and parts of West Linn but you want to add to that. The road to avoid 205 S. is also very backed up. This could cost us hours. The area you picked is not appropriate with the rivers there and such small roads in Oregon City. It will cause bottlenecks, accidents, road rage, hassles for Police, Fire and all needed services and first responders. It will also cause increased prices for everything as trucks will charge more to stores and we will get that expense also and so much frustration you will be trapping those of us who live in Oregon City. I have lived here over 30 years. You also are not considering all the apartments going in that are going to cause a huge amount of more traffic already and the fact that Oregon City has no real shopping or a motel we are not as a town equipped to handle this our roads are already filled some don't have hours to spend to go elsewhere to shop and some can't sit that long due to disabilities. Just so very wrong Toll roads don't work anywhere else why do you think they will work here you are wasting more money on doing this using our tax dollars for something we don't want at all, nobody does in this area, especially in Oregon City.. Let us vote on it and let those it affects the most as we live near by have the say. You also did not make necessary road enhancements and you did not take our livability into consideration. I would move if I could but I'm disabled and can not physically do what it takes to move nor can I afford to hire people to do it for me. and just going to doctor will cost me \$8 to go one exit and back really 1/2 to 3/4 mile and about 1 hour of time this would double that time I have no way to avoid the toll as I have to cross both rivers and I can't sit for over 45 minutes or it damages my spine So what am I to do let you cause me harm. That is just so very wrong. I don't even leave Oregon City but would have to pay a toll twice to Doctor or to get my prescriptions. The small bridge is always backed up already. It will cause people their jobs and livelihoods by being late due to huge traffic issues in our town and being unable to get to work besides the cost of tolls So Many do not have an extra \$180 a month and more due to trucks and services having to pay tolls and economy that's already to high going up more. The added costs and problems will cause more homelessness, More crime when we have little police or law and order, and cause more anger outrage and frustration. The State is causing more problems to their people than good. It's just greed by our Government and leaders that does not use tax money efficiently as it is and does not care about the people who pay the taxes. You will be causing harm to the people of this area. I am so against 205 being a toll road and really believe you did not take the residents of Oregon City being trapped and highly burdened into consideration. at least give us free tolls, but would prefer this whole idea being stopped it's a waste of time money and causes more problems than it's worth as your toll road will cause us so many problems and heartache just with the traffic coming in our town to avoid the toll, as well as added time loss in our schedules less services and problems for buses first responders and more. You Will be ruining lives already having to work 2 jobs to make it and cutting out any real family time by just adding even more travel time. Just so very wrong. Obviously the People in this area do not matter to Our Leaders or Our Government The Oregon City Government officials are all



against this but you wont listen to reason.Cause a worse economy cause delays in first responders and needed care Cost people their homes Jobs and just ruin lives that is not right. So very wrong to Use a trap to get more tolls and Harm the residents that live near by. Just so very WRONG and would harm many of The people who pay taxes that pay your salary. We are your boss not the other way around. ITS A Total abuse of power to be doing this tolling Nobody wants it except greedy Government what you have already spent on this would have made some of the modifications there is so much Gov. waste the top leaders of City, County, and State Reps dont want this to happen Nor do the People of this State quit wating OUr money on something we dont want could hurt us and cause huge problems for us. Stop this stupid WRONG expensive project now and quit wasting our Money Remember we are your boss We elected you to do right by us and you are NOT. Why would you think this is OK at all WE THE PEOPLE do not want this at all Stop The toll on 205 Please.....

**ODOT I-205 Toll EA - RECORD #2442 DETAIL**

**Submission Date :** 4/18/2023  
**First Name :** Kerri  
**Last Name :** Fiero  
**Affiliation :** Oregon City Resident that this will hurt  
**Submission Method :** SurveyMonkey

**Q3. Comments :**

To Whom it may concern, Tolling on 205 not fair to Oregon city residents at all. Streets are already bogged down clogged up and there are a few thousand Apartments and low income apartments being built on those bogged down roads. It takes 5 consecutive traffic lights to get through the one light at 213 to get across it during traffic hours. There have been NO no road improvements already and more apartments and homes being built other places also. Now you want to add all the traffic getting off highway to avoid toll area. Also it will cause problems with Police, Fire, ambulance, first responders, County and state workers, PGE will have problems getting to places and doing their work with so much more traffic and traffic problems. So you will be risking lives and needed services in all of our area and if you think that's OK you need to think again. There are 2 rivers we can't get across to go anywhere you have us boxed in we don't have shopping other than Fred Meyers and groceries but other shopping none that we will be able to get to Oregon city is NOT equipped to handle this at all, and we won't be able to get to even Clackamas in timely manner. It already takes 30-45 Min's one way, and you want us to pay the toll also if we get on Highway which is one of 2 options to cross rivers and Both would be tolled. The only ways across the river except the bridge down town Oregon city that gets hugely all blocked up already and is just 2 lanes it blocks up down town and parts of West Linn but you want to add to that. The road to avoid 205 S. is also very backed up This could cost us hours. The area you picked is not appropriate with the rivers there and such small roads in Oregon city. It will cause a bottleneck, accidents, road rage, hassles for Police fire and all needed services and first responders, It will also cause increased prices for everything as trucks will charge more to stores and we will get that expense also and so much frustration you will be trapping those of us who live in Oregon city. I have lived here over 30 years. You also are not considering all the apartments going in that are going to cause a huge amount of more traffic already and the fact that Oregon City has no real shopping or a motel we are not as a town equipped to handle this our roads are already filled some don't have hours to spend to go elsewhere to shop and some can't sit that long due to disabilities. Just so very wrong Toll roads don't work anywhere else why do you think they will work here you are wasting more money on doing this using our tax dollars for something we don't want at all, nobody does in this area, especially in Oregon city.. Lets us vote on it and let those it affects the most as we live near by have the say. You also did not make necessary road enhancements and you did not take our livability into consideration. I would move if I could but I'm disabled and Can not physically do what it takes to move nor can I afford to hire people to do it for me. and just going to doctor will cost me \$8 to go one exit and back really 1/2 to 3/4 mile and about 1 hour of time this would double that time I have no way to avoid the toll as I have to cross both rivers and I can't sit for over 45 mins or it damages my spine So what am I to do let you cause me harm. That is just so very wrong. I don't even leave Oregon city but would have to pay a toll twice to Doctor or to get my prescriptions. The small bridge is always backed up already. It will cause people their jobs and livelihoods by being late due to huge traffic issues in our town and being unable to get to work besides the cost of tolls So Many do not have an extra \$180 a month and more due to trucks and services having to pay tolls and economy that's already to high going up more. The added costs and problems will cause more homelessness, More crime when we have little police or law and order, and cause more anger outrage and frustration. The State is causing more problems to their people than good. It's just greed by our Government and leaders that does not use tax money efficiently as it is and does not care about the people who pay the taxes. You will be causing harm to the people of this area. I am so against 205 being a toll road and really believe you did not take the residents Of Oregon City being trapped and highly burdened into consideration. at least give us free tolls, but would prefer this whole idea being stopped it's a waste of time money and causes more problems than it's worth as your toll road will cause us so many problems and heartache just with the traffic coming in our town to avoid the toll, as well as added time loss in our schedules less services and problems for buses first responders and more. You Will be ruining lives already having to work 2 jobs to make it and cutting out any real family time by just adding even more travel time. Just so very wrong. Obviously the People in this area do not matter to Our Leaders or Our Government The Oregon city Government officials are all

against this but you wont listen to reason.Cause a worse economy cause delays in first responders and needed care Cost people their homes Jobs and just ruin lives that is not right. So very wrong to Use a trap to get more tolls and Harm the residents that live near by. Just so very WRONG and would harm many of The people who pay taxes that pay your salary. We are your boss not the other way around. ITS A Total abuse of power to be doing this tolling Nobody wants it except greedy Government what you have already spent on this would have made some of the modifications there is so much Gov. waste the top leaders of City, County, and State Reps dont want this to happen Nor do the People of this State quit wating OUR money on something we dont want could hurt us and cause huge problems for us. Stop this stupid WRONG expensive project now and quit wasting our Money Remember we are your boss We elected you to do right by us and you are NOT. Why would you think this is OK at all WE THE PEOPLE do not want this at all Stop The toll on 205 Please.....

**ODOT I-205 Toll EA - RECORD #2443 DETAIL**

**Submission Date :** 4/18/2023  
**First Name :** Tim  
**Last Name :** Cook  
**Affiliation :** Clackamas Community College  
**Submission Method :** SurveyMonkey

**Q3. Comments :** Thank you for the opportunity to comment on the I-205 Toll Project Draft Environmental Analysis (EA) published by the Oregon Department of Transportation (ODOT) in February 2023. Clackamas Community College is proud to have three campuses in Clackamas County - Oregon City, Wilsonville, and Milwaukie. Last year, we served nearly 20,000 students at the college, and we employ nearly 1,000 people. Community colleges serve students at all education and skill levels, educating students with the greatest barriers to attaining post-secondary education and training. Many of our students experience low income and financial challenges. In our 2022 fall student survey, 50% or more students reported these barriers: Work outside of college (73%) Difficulty paying for tuition and fees (64%) Household finances [rent, bills, groceries] (61%) Mental health issues (59%) Difficulty paying for books and supplies (57%) Family responsibilities/childcare (54%) As you can see, our students are already struggling to pay for living expenses as well as the cost of higher education. Adding a toll on I-205 will add another barrier that may prevent students from starting, continuing, or completing their education. We often say our students are one flat tire away from having to leave college. We might add: Our students may be one toll away from having to quit their dreams of a better future for themselves and their families. If the I-205 toll continues to be implemented, I implore you to include community college students in your toll program "to help lessen burdens and negative impacts." Clackamas Community College strives to remove barriers for our students, and I ask that ODOT do the same. Thank you for your consideration.

**ODOT I-205 Toll EA - RECORD #2444 DETAIL****Submission Date :** 4/20/2023**First Name :** Colleen**Last Name :** Suzanne**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** There is already not enough parking in my NE Portland neighborhood. Vehicles crowd the main east-west & north-south roads. When you charge for people to drive on roads that are already paid for, it will cause huge traffic diversion, including into my neighborhood. ODOT has already predicted 130,000 vehicles will divert on to side roads and into neighborhoods, once tolls are put on all Portland area freeways. Understand the I-205 project is merely the "camels nose getting into the tent". The tolls are hugely regressive, harming hard-working low and middle families the most. It will reduce the number of times I can afford to visit my children and grandchildren. And when I do, I will be forced to use side roads to save money, adding to traffic congestion in those neighborhoods. The amount of vehicles diverting on to side roads will ADD to greenhouse gases and carbon emissions, the opposite of what ODOT says will happen with their tolling proposal. Shame on them for lying! Generally, federal law prohibits tolling on freeways. Oregon has obtained an exception to that law. I strongly urge the Federal Highway Administration to REJECT the Oregon request for tolling on any area freeway.

<b>ODOT I-205 Toll EA - RECORD #2445 DETAIL</b>
---

**Submission Date :** 4/18/2023

**First Name :** Cody

**Last Name :** Kitterman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** If the toll program went into effect, I personally would avoid the area at all costs. Either diverting to i-5 or backroads for that portion. I regularly travel from my home in Battle Ground, WA to Lebanon, OR. Generally back and forth on I-205 when possible as it is a less congested route. That said, if this goes into place, this will no longer be the case, and not something I am willing to pay for.

**ODOT I-205 Toll EA - RECORD #2446 DETAIL****Submission Date :** 4/18/2023**First Name :** Donald**Last Name :** Pollard**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** My wife and I are retired on a fixed income. We will be forced to pay tolls for traveling short distances when visiting doctors etc. Also this will lead to more traffic in Oregon City which is already bad at certain times of the day.



**ODOT I-205 Toll EA - RECORD #2447 DETAIL**

**Submission Date :** 4/18/2023

**First Name :** Patricia

**Last Name :** Jermov

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I fear this is just another dollar harvest with no real value to the public, like the seemingly endless Columbia River Crossing studies with no real resolution.

**ODOT I-205 Toll EA - RECORD #2448 DETAIL****Submission Date :** 4/18/2023**First Name :** Mark**Last Name :** Russell**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I am totally opposed to the toll on 205 as a local resident that already pays some of the highest total state taxes in the US and a frequent traveler on I 205 for both business and personal this is an unreasonable burden for us local people. Suggest all Clackamas county residents receive a waiver from the tolls. Let the travelers through pay to fees.

<b>ODOT I-205 Toll EA - RECORD #2449 DETAIL</b>
---

<b>Submission Date :</b>	4/18/2023
<b>First Name :</b>	Brett
<b>Last Name :</b>	Maurer
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Cost prohibitive for commuters

**ODOT I-205 Toll EA - RECORD #2450 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Gina

**Last Name :** Kinman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The roundabouts on Stafford Road and traffic traveling in front on stafford primary and Athey creek middle school will be greatly effected by additional traffic and stafford road from Childs to I205 will need additional lanes, stoplights, crosswalks etc to accommodate more vehicles. There will be cars backed up for miles idling along stafford road causing more pollution than cars traveling at highway speeds on 205 and I5 I will have to pay \$8.80 everyday just to pick up my mail at the post office just 4 miles from my house. I had to use a PO Box when moving here because I was almost ran over 2 different times while trying to cross stafford road to get my mail out of my mailbox and this was 15 years ago when the traffic wasn't near as bad as now. With tolling this traffic will be unbearable and unsafe! The families of Westlinn, Oregon city, and Tualatin will bear the brunt of these tolls and cause many to have to quit their jobs and/or be unable to afford their monthly house or rent payments. What happened to all the other taxes Oregonians have had to pay for infrastructure/road improvements over the years? Misappropriated to pay for what? Abortions? Police that can't do their jobs because they can't put criminals behind bars or chase them when they are caught red handed? How many more families will become homeless due to this? The average middle income family can not afford this toll! Contractors/distributors will have to pass this extra cost onto their customers or be forced to shut their doors. I honestly can not think of one good outcome if these tolls.

**ODOT I-205 Toll EA - RECORD #2451 DETAIL****Submission Date :** 4/17/2023**First Name :** James**Last Name :** McCormack**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Our community will be stressed with drivers trying to get around the tollway. This will do damage to our local economy. Just poorly conceived further take of our already tight budgets people have. Please reconsider tolling this bridge.

<b>ODOT I-205 Toll EA - RECORD #2452 DETAIL</b>
---

**Submission Date :** 4/17/2023

**First Name :** Thomas

**Last Name :** Cooney

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Transportation system: I strongly support the introduction of tolling in this project and ultimately for the entirety of the I-5 and I-205 corridors from the Washington border to the junction of I-205 and I-5. This not only helps finance the new infrastructure but also existing, which will be an increasing challenge going forward as gas tax revenue continues to decline. It also will help reduce congestion and its adverse economic and environmental impact and improve safety. 2. Mitigation: the proposed mitigation for the OR 43 Lake Oswego segment is inadequate for cycling safety. There are no separated bike lanes, making it extremely dangerous to reach the multi-use path at Tryon Creek when traveling north. Many cyclists reach Lake Oswego northbound via River Rd, a low speed low traffic road, only to be confronted with transiting the high speed, high volume traffic on a state highway, with no other options to continue northbound.

**ODOT I-205 Toll EA - RECORD #2453 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Hans

**Last Name :** RAUB

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Please no Tolls in Oregon. It seems like we are already Overtaxed ! Thanks,  
Hans

**ODOT I-205 Toll EA - RECORD #2454 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Jeremy

**Last Name :** Boldt

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This project will greatly effect side street traffic and congestion and will put even more strain on family finances, especially when so many are already struggling do to inflation and low wages. I also worry about the precedence this sets for more ways ODOT will find to tax and toll Oregon citizens.



**ODOT I-205 Toll EA - RECORD #2455 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** De

**Last Name :** Boldt

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** As a longtime Clackamas county citizen and tax payer, I'm concerned about the addition of tolls on i205. Financially, it will greatly impact my family who uses that route almost daily and will be forced to find alternate routes to travel. Other drivers will inevitably be doing the same thing, causing unnecessary travel on side streets, neighborhoods, etc. I'm also concerned that this sets a precedence of tolling in a county and metro area where we've never had them before. What's to stop ODOT or metro from putting more and more toll booths on all major freeways? Please keep Oregon toll-free!

**ODOT I-205 Toll EA - RECORD #2456 DETAIL****Submission Date :** 4/17/2023**First Name :** Donna**Last Name :** Ayers**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** The tolls will be unjust, hurting those that can least afford it. Inflation has already decimated disposable income. There is nothing left for tolls. Travel to and from work is not an option. Food and housing are not optional. Tolls are regressive.

<b>ODOT I-205 Toll EA - RECORD #2457 DETAIL</b>
---

**Submission Date :** 4/17/2023

**First Name :** Livia

**Last Name :** McCaffrey

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** No Toll! Don't need another tax, find a different way to pay for the new bridge and stop wasting money on analysis that proves to be faulty. Get money from the Federal Government for the new bridge

**ODOT I-205 Toll EA - RECORD #2458 DETAIL****Submission Date :** 4/17/2023**First Name :** Leticia**Last Name :** Davies**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am a resident of oregon city. I believe that ODOT has not provided adequate solutions to avoiding tolls for residents of our community. There are minimal and poor ways currently to access resources in west Linn and Lake Oswego. The one bridge that connects oregon city to West Linn is already always congested with horrible traffic causing break down of that structure. Diverting traffic avoiding tolls (oregon city residents) will increase the burden on this bridge. This will also negatively impact commutes to the community for school, lessons, shopping, banking and more. The middle class will bear the brunt of this endeavor, we are being taxed unfairly by these proposed tolls and had no voice in the decision to roll an already publicly funded road. Please cease progress on tolling I 205. No resident in the vicinity wants this. We do not see any hood that will come from this other than to fill ODOT's coffers and strip the middle class of money that could be better served to feed, cloths and shelter their families. Please stop this tolling. It is headless extortion of hard working people. As voting citizens contributing top tax dollars, the middle class deserves to be listened to on this. Do not break our backs for your own gain. Please! Stop! No tolls on 205

<b>ODOT I-205 Toll EA - RECORD #2459 DETAIL</b>
---

**Submission Date :** 4/17/2023

**First Name :** JJ

**Last Name :** Jutila

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls will put an undue burden on families who rely on have to commute over tolls locations. It will also reduce economic activity for businesses as people are less likely to shop, spend as a result of the tolls.

**ODOT I-205 Toll EA - RECORD #2460 DETAIL****Submission Date :** 4/17/2023**First Name :** Linda**Last Name :** Herman**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I'm greatly concerned about the costs locally to access healthcare with tolls in place. My family has a genetic disease and we have many specialists at the major medical institutions throughout Portland. We live in Camas, WA, in addition I care for an elderly parent in McMinnville. I'm not using the roadways for fun, and we are already heavily taxed and dealing with inflation, the extra costs of tolls is excessive. When casinos were built we were told they would pay for infrastructure, but as always costs are transferred directly to local citizens. The population increase over the past 20 years should sustain roadway improvements, which have been minimal in comparison to the population increase. I know you will move ahead and gouge all of us once again with more burdening costs, but it's not equitable to charge those of us who's lives depend upon accessing healthcare services with these toll fees.

<b>ODOT I-205 Toll EA - RECORD #2461 DETAIL</b>
---

**Submission Date :** 4/17/2023

**First Name :** Mary Jane

**Last Name :** Mathews

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** We have a way now to collect road taxes. We do not need another expensive way to get more money for our roads. This totally not right to burden people already suffering from the government shutdown ir COVID-19.

**ODOT I-205 Toll EA - RECORD #2462 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Patrick

**Last Name :** Wright

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is a money grab. It will not only put a severe burden on the working public but force people to drive on residential and or side roads. If you have an unfounded obligation say so don't be sneezed. You wasted \$300 million on the last attempt to build a new interstate bridge knowing full well the public didn't want to pay for special buss and light rail lanes as well as bicycle lanes of little or no value.



<b>ODOT I-205 Toll EA - RECORD #2463 DETAIL</b>
---

**Submission Date :** 4/17/2023

**First Name :** Joey

**Last Name :** Lawton

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am very concerned how tolling will affect local communities. I have attended meetings and responded to surveys and the transportation analysis does nothing to address the diversion problem. The diversion traffic will make areas of West Linn a parking lot and endanger bikers and pedestrians. ODOT has not listened to the local communities and is continuing with tolling even though the majority of Oregonians do not support tolling existing roads. Inflation has been hard on everyone and adding more taxes is irresponsible and an offense to the people of Oregon you are supposed to be serving.

**ODOT I-205 Toll EA - RECORD #2464 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Mike

**Last Name :** Perham

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Hell yeah I want to see tolls. Free highways are government socialism. If I have to pay for a bus ride or a bike share, why do I get to use a highway for free?

**ODOT I-205 Toll EA - RECORD #2465 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Sabrina

**Last Name :** Rokovitz

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I do believe there is a need for the third lanes on 205 both directions. However, I am concerned that the tolling begins before lanes are added. This will create extensive rerouting based upon the current toll starts and stops. Why not start the tolling northbound at the 5/205 junction? Starting the toll AFTER Stafford road will create extreme congestion above and beyond what it currently is. The transportation analysis needs to consider how cars volume will impact roads such as Borland, Ek, Stafford and Johnson roads. The intersection of Childs and Stafford is ALREADY in process of traffic mitigation with the addition of the traffic circle. Again, to start to toll prior to adding the third lane is backwards. Why not get a bond to pay for the added lanes and THEN start the tolling?

**ODOT I-205 Toll EA - RECORD #2466 DETAIL****Submission Date :** 4/17/2023**First Name :** Carl**Last Name :** Shaw**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** It is painfully apparent that first off the tolls are going to happen no matter what people say or do. Second once you toll 26 people might think believe these are not punitive against people who live in Washington Or low income or right leaning communities like Clackamas. You can't toll Intel or Nike. You would loose too many votes.

**ODOT I-205 Toll EA - RECORD #2467 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** S

**Last Name :** Cangelosi

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** 1. These are public roads. We own them. We have already paid for them. We pay one of the highest gas taxes in the nation for you to maintain them. For you to take away our access unless we pay an exorbitant fee is theft. 2. Instead of investing millions of dollars on infrastructure to implement tolling, you can use the money to fix the damn bridges and roads instead. 3. There is no compelling reason for this project. Every time I read an article or read through documentation, the entire project lacks a compelling reason for its existence. 4. This will create a nightmare in local communities that already have traffic issues when there is an accident on these highways. You will not reduce traffic because the majority of people using these roads during busy times are doing so because they are commuting to and from work. They lack flexibility as to their times of travel so if they cannot afford the highways, they will be on the side streets which increases risks to pedestrians, children near schools, bicyclists. You are basically diverting traffic from roads built to accommodate high traffic volumes to local streets which were not. This is ludicrous and you have NO PLAN TO ADDRESS the issues. Local communities have been raising issues with your plans and yet you continue on without any regard to the will of the people. This is unacceptable.

**ODOT I-205 Toll EA - RECORD #2468 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Paxton

**Last Name :** Rothwell

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I would like to see tolls priced so that vehicle miles travelled is reduced along the affected I-205 corridor. This will improve air quality in the Metro region, help shift trips to transit and active transit, and reduce GHG emissions.

**ODOT I-205 Toll EA - RECORD #2469 DETAIL****Submission Date :** 4/17/2023**First Name :** Jordyn**Last Name :** Hubbard**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** This state fucking sucks. The amount of money taken from Oregonians to fund the state's administrative bullshit is nothing other than wrong. How are we going from giving free handouts to now charging the local people commuting to work, that are also paying an income tax, registering their vehicles and paying a tax at the gas pump. Figure your corrupt spending out and quit charging the Oregonians for your bullshit.

**ODOT I-205 Toll EA - RECORD #2470 DETAIL**

**Submission Date :** 4/17/2023  
**First Name :** Kimberly  
**Last Name :** Smith  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :** We don't need any tolls



**ODOT I-205 Toll EA - RECORD #2471 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** GLENN

**Last Name :** JONES

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling I 205 would cause many drivers to use side streets, thereby causing mass congestion in other areas. The economic impact on lower and middle income families would be detrimental.

**ODOT I-205 Toll EA - RECORD #2472 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Delaney

**Last Name :** Kenney

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Proposed tolls along this section of I 205 will dramatically increase traffic in downtown Oregon City, West Linn and Willamette. Bus routes, pedestrian and bike traffic in addition to longer commute times for individuals that already use Hwy 99E, 43 and Willamette Dr will all be adversely impacted.

**ODOT I-205 Toll EA - RECORD #2473 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Brandon

**Last Name :** Tate

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The analysis does not adequately discuss the impacts to local surface street traffic. It also does not adequately illustrate the disproportional impact to the citizens of Clackamas county and southern washington county. We would like to see Oregon personal vehicle plates exempt from tolls. Obtain your desired taxation/revenue from interstate commerce traffic (e.g. out of state license vehicles). Lastly, to suggest that the tolls are to "alleviate traffic congestion during high traffic times" is ridiculous. How many of us do you think DESIRE to be on the freeway between 7-9am? Don't you think, that if we had a different time option we would likely use it? You will not obtain the effect you desire by tolling this freeway. The drivers of this route will gladly reroute, amidst a longer drive time, to avoid the toll. You're gravely mistaken on the likely outcome of tolling the freeways most of us have been paying for, for decades. Yours Disgusted, [ ]

**ODOT I-205 Toll EA - RECORD #2474 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Ken

**Last Name :** Crouch

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Please do not institute tolls on Oregon roads, which seems like an inefficient way to raise money. It's a form of taxation without representation. After 40 years in the Portland area we are considering relocating to another state. Don't give us another reason to leave. [ ] and [ ]

**ODOT I-205 Toll EA - RECORD #2475 DETAIL**

**Submission Date :** 4/17/2023  
**First Name :** Chris  
**Last Name :** Atkison  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2476 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Mary

**Last Name :** Lunsford

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The Multnomah County area is currently not collecting over 25% of it's tag fees as well as not collecting over 20 years of traffic ticket fees. I propose that ODOT redirect it's collection for it's \$500,000 deficit to Multnomah County and clean up the deficit from the expired tags and past due traffic tickets rather than trying to suck the life out of it's commuting citizens!!! These people will just clog the already conjested roadways of Oregon city and other I-205 communities!

**ODOT I-205 Toll EA - RECORD #2477 DETAIL**

**Submission Date :** 4/17/2023  
**First Name :** Richard  
**Last Name :** Burke  
**Affiliation :** Metro Policy Advisory Committee (Former member)  
**Submission Method :** SurveyMonkey

**Q3. Comments :** To Whom It May Concern, I write this message in opposition to your current plan for tolling on I-205. I am a former member of MPAC (I represented special districts) and worked in the Oregon senate for a state legislator who chaired the Senate Transportation Committee. So while I cannot claim to be expert on this specific program, I know something about the problems your current tolling plan purports to solve and some of the unintended consequences it will create. First, the tolling scheme being used is out of balance in that it poorly balanced revenue creation with traffic volume management. Tolls are high and not assessed in a way that is consistent with true congestion pricing which makes pricing worth not taking the trip at times of maximum congestion while minimizing costs during times of less congestion. As is currently configured, traffic congestion will be impacted in a non-optimal way while incurring unnecessarily high costs at times when doing so is not necessary. This defeats the entire purpose of congestion pricing. Second, costs incurred on working class and poor families will be excessive under this scheme. Average families will see an over \$500 per year cost resulting from tolls in addition to the gas taxes and other taxes they pay. In some cases, this will make travelling to and from jobs prohibitively expensive, reduce the field of economically viable jobs workers may apply for, and generally hurt average families already struggling with inflation. Third, an objection that seem inherent to modern versions of tolling, is that of privacy. Modern tolling, which tracks license plates, is inherently invasive as it creates a record of individual travel that is owned by government or accessible to government depending on the status of laws that can be changed at any time. While one can argue that people should not object to being "tracked" if they are not doing anything wrong, technologies such as the ones used for modern tolling cumulatively contribute to "surveillance culture" that most people do not want. Please, go back to the drawing board and reject the current plan. Thank you. I'm sure that many others have raised the points I have raised more articulately and expertly than I. Nevertheless, I and virtually everyone I know agrees with what I have written above and opposed this plan.

**ODOT I-205 Toll EA - RECORD #2478 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Mark

**Last Name :** Anderson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This seems a sham to pretend to be listening. You say, "After the comment period, ODOT and FHWA will review the comments, determine how to incorporate them into the project, and prepare a Revised Environmental Assessment to address comments received." Nothing in that indicates that if there is opposition, even overwhelming opposition, will you cancel tolling. I expect better of Oregon. But it's become nothing more than a tyrant dressed up as a democracy.



<b>ODOT I-205 Toll EA - RECORD #2479 DETAIL</b>
---

**Submission Date :** 4/17/2023

**First Name :** Brad

**Last Name :** Johnson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Please don't toll the roads. We don't have a choice but to use 205 in west linn.

**ODOT I-205 Toll EA - RECORD #2480 DETAIL**

**Submission Date :** 4/17/2023  
**First Name :** Traci  
**Last Name :** Kelly  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2481 DETAIL****Submission Date :** 4/16/2023**First Name :** Melinda**Last Name :** Snodgrass**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** So many cars will re-route to avoid the ridiculous tolls, and this will overwhelm communities like West Linn and Oregon City. Most everywhere else, tolls are done to help pay for a bridge that was built. Except here, there's nothing NEW to pay for! This is absolutely insane!

<b>ODOT I-205 Toll EA - RECORD #2483 DETAIL</b>
---

**Submission Date :** 4/16/2023  
**First Name :** David  
**Last Name :** Baldwin  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2484 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** Alina

**Last Name :** Lomanova

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This will cause a lot of problems. Overcrowding side streets and making them unsafe and making the freeways only available to the rich. Especially put an extra strain on people having to travel to/ from Oregon and Washington for work. Do not put tolls on our highways.

**ODOT I-205 Toll EA - RECORD #2485 DETAIL****Submission Date :** 4/17/2023**First Name :** GARY**Last Name :** LEWIS**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Bad Idea. Toll collection will make a new level of bureaucracy in Oregon's government. This new bureaucracy will chew up major portions of the revenue sought to improve this section of I-205 with the third lane. A simple raise in gas tax would provide much more usable revenue. Also, the financial burden this new tax will place on working families is exorbitant. When will Oregon leave the common man's money alone? Like we need another expense in our already stretched budgets. Has any consideration been given to the additional traffic pressure put on the communities with the side roads? Traffic will undoubtedly increase significantly. This means more noise, more exhaust, more local road congestion and more local road wear and tear. Additionally, this plan to put a "more" burden on local communities will also impact businesses. Many people will avoid the businesses on the altered commute locations because the time to get to and from the store will increase. Tolls are not the way to go. Use existing methods of raising revenue to meet the demands of freeway improvement. Thank you.

**ODOT I-205 Toll EA - RECORD #2486 DETAIL**

**Submission Date :** 4/16/2023  
**First Name :** Sarah  
**Last Name :** Forsythe-Insley  
**Affiliation :**  
**Submission Method :** SurveyMonkey

**Q3. Comments :** I'm very concerned about the traffic being diverted in local communities and the impact on travel on 99e through Oregon City/Gladstone and across the (very narrow and already extremely busy Oregon City/west Linn bridge). The reason traffic will decrease on 205 is because drivers will simply take other routes, making those of us who live in/around the toll area have longer drives when we're trying to get around, especially during rush hour (peak pricing time). One of the reasons many will take alternate routes is due to the overall cost of tolls. The impact on many struggling families who already cannot afford housing and often have long commutes (because they can only afford outside the central city) is also a huge concern. I agree that work needs to be done on 205, but would rather see it paid for some other way (property taxes, gas tax, etc) that won't create extra congestion in my community as people try to avoid the tolls and clog our streets.

**ODOT I-205 Toll EA - RECORD #2487 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** Amanda

**Last Name :** Mercer

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Why do the tolls have to be an all or none project? In many other states there are certain "fast" lanes that are tolled but leaves a true "free" way option for those who cannot afford it. The economic impact on those traveling on the proposed toll route will be very significant for a considerable portion of travelers. To not have a viable option to allow those who cannot afford these tolls to be able to travel for work/school/etc is just short sighted and is an entirely privileged outlook. If this were to go ahead, then those who cannot afford the tolls will go onto the surrounding surface streets leading to further congestion, environmental and safety issues which are supposedly the core issues this tolled expansion is seeking to address. Under the current plan, the issues will just be moved to surrounding communities and insufficient infrastructure (I.e. 99, Stafford rd area). This does not make sense and hopefully the planning committee can figure out a better solution for all our community members.



**ODOT I-205 Toll EA - RECORD #2488 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** Patricia

**Last Name :** Farrell

**Affiliation :** Citizen of Tualatin who works in Milwaukie

**Submission Method :** SurveyMonkey

**Q3. Comments :** I don't believe there could have been adequate research on the environmental impacts of the extra traffic that will be flowing throughout this area due to people avoiding the tolls, which we were not allowed to vote on. I would not have chosen to work on the east side for anything, but the company I worked for in Tualatin moved to Milwaukie. Now I am forced to drive there daily, and often I choose NOT to use the 205, but to travel locally. I can imagine the horrendous increase in traffic to my route due to this toll, and I am not alone. I would like to see this toll put to the vote of the people who it will directly affect, and not a decision made by powers that be elsewhere who have no way to know it's ill effects on the people of my town and those nearby. We are already paying taxes for our roads, and these should be enough to do the work that seems necessary to someone. This is not an eastern city, where tolls are expected. The people of Oregon have always travelled where we want unhindered by such things. I don't see how this will be a good thing for anybody. I don't see any answer to this in the studies.

**ODOT I-205 Toll EA - RECORD #2489 DETAIL****Submission Date :** 4/16/2023**First Name :** Therese**Last Name :** Berg**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I pay Oregon taxes because I work there. I can barely make it financially. I live paycheck to paycheck.

<b>ODOT I-205 Toll EA - RECORD #2490 DETAIL</b>
---

**Submission Date :** 4/16/2023

**First Name :** Robert

**Last Name :** Yonker

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Data from other states that use electronic tolling shows minimal impact on reducing traffic jams e.g. Illinois tollways. An innovative method that requires speed limits to be maintained such that traffic moves effectively without tolls is required.

<b>ODOT I-205 Toll EA - RECORD #2491 DETAIL</b>
---

**Submission Date :** 4/16/2023

**First Name :** Steve

**Last Name :** Gatrell

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This should be voted on by the people that this effects. Not rammed down our throats by Salem. I vote NO tolls!

<b>ODOT I-205 Toll EA - RECORD #2492 DETAIL</b>
---

**Submission Date :** 4/16/2023

**First Name :** Evelina

**Last Name :** Kuznetsov

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** \$15 each way TOLLS will harm all but the wealthiest families. It will be a regressive tax that most hard working families can't afford. ODOT will truly be creating "roads for the rich". Tolling doesn't eliminate traffic congestion, it merely changes where it occurs. It will cause tens of thousands of vehicles to DIVERT on to side roads to avoid the tolls. ODOT estimates at total of 130,000 vehicle diversions when all Portland area freeways are tolled. That is equivalent to every vehicle that crosses the Interstate Bridge on an average day, suddenly using side roads and making the neighborhood roads more congested and less safe.

**ODOT I-205 Toll EA - RECORD #2493 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** Joanne

**Last Name :** Fraser

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Any tolls that are put in place will severely impact people like me that have to commute to Portland for work!

**ODOT I-205 Toll EA - RECORD #2494 DETAIL****Submission Date :** 4/16/2023**First Name :** Charlie**Last Name :** Arata**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Tolling is a bad idea. It's not right that Oregon City residents be tolled to see their doctor in West Linn or shop at Whole Foods in Lake Oswego, among the many activities of just living life. The state was shortsighted when the bridge was built, and citizens should not have to pay the price - literally.

<b>ODOT I-205 Toll EA - RECORD #2495 DETAIL</b>
---

**Submission Date :** 4/16/2023

**First Name :** Aimee

**Last Name :** Martin

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I would like to see the current taxes paid to improve roads. With the current inflation, and a recession that will follow, families will be put in even more financial hardship if tolls are placed on the interstate. Side roads and neighborhoods will be congested if drivers have to avoid the interstate, which will affect all people going to their work places and children, staff, and bus drivers within the school districts.



<b>ODOT I-205 Toll EA - RECORD #2496 DETAIL</b>
---

**Submission Date :** 4/16/2023

**First Name :** Brian

**Last Name :** Ruder

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling affects working families, making it more difficult to justify going through portland. Does not affect upper and lower class.

<b>ODOT I-205 Toll EA - RECORD #2497 DETAIL</b>
---

**Submission Date :** 4/16/2023

**First Name :** Jennifer

**Last Name :** Reed

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The transportation needs haven't considered everything and how these tolls would adversely affect everything!! All proposed tolls are not to go through!

**ODOT I-205 Toll EA - RECORD #2498 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** Sandra

**Last Name :** Rust

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** In light of the current economic climate, I am concerned about the impact of these additional costs on the trucking and transportation industry. Everything has become more expensive for all of us, and the timing of this is poor at best. Also, for people who are making low wages, but who have to commute on this section of highway, it could be a factor that sends them into homelessness.

**ODOT I-205 Toll EA - RECORD #2499 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** Shelly

**Last Name :** kirgiss

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls will put a burden on all but the wealthiest households and will not decrease traffic, it will simply be diverted to side road and other areas, thus causing traffic jams in other areas. I also don't believe that Portland, which has become an absolute mess, can really afford to lose more traffic coming it's way. I, for one, will choose not to go to Portland any longer, thereby spending my money elsewhere. Portland has become a joke across the country for how poorly the city is being run, I would think they would not want to alienate their neighbors just across the river.

<b>ODOT I-205 Toll EA - RECORD #2500 DETAIL</b>
---

**Submission Date :** 4/16/2023

**First Name :** Michelle

**Last Name :** Skundrick

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling hard-working families on federal highways should be unacceptable. Tolling does not eliminate traffic congestion, but changes where it occurs. It will cause thousands of vehicles to divert to other side roads to avoid the tolls. This makes neighborhood roads less safe and more congested, and considering how badly maintained the roads are already, the local cost impact would rise considerably.

<b>ODOT I-205 Toll EA - RECORD #2501 DETAIL</b>
---

**Submission Date :** 4/16/2023

**First Name :** Michele

**Last Name :** ReMillard

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I-205 tolls project will harm all but the wealthy. It is a regressive tax that working families can't afford. Congestion of other ways to avoid to pay toll is unsave on routes and roads.

**ODOT I-205 Toll EA - RECORD #2502 DETAIL****Submission Date :** 4/16/2023**First Name :** Laurie**Last Name :** Winton**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Tolls have been consistently voted down. I would like to see a study of why tolls will improve traffic flow vs introduce even more congestion. And I would like to see studies showing the change in traffic volume from 2019 through 2022 as a large portion of the population shifted to working remotely.

**ODOT I-205 Toll EA - RECORD #2503 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** William

**Last Name :** Kennedy

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Avoiding the toll gates will become a major game and adversely impact the residential streets. Some other way to finance the upgrades needs to be considered rather than a toll that will never go away.



<b>ODOT I-205 Toll EA - RECORD #2504 DETAIL</b>
---

**Submission Date :** 4/16/2023

**First Name :** Mark

**Last Name :** Brasch

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Punishing drivers for picking a specific route, often the most efficient in time, miles, and fuel, will alter their behavior. A toll is a force, or coercion, and all such force by government will harm. Extra fuel burned. Extra time used. Wasted energy. Extra heat generated. More wear on vehicles. Time lost, resulting in lower income, less tax revenue, and higher costs of goods and services. Finally, lost sales by businesses not visited. Please do not punish prosperity.

<b>ODOT I-205 Toll EA - RECORD #2505 DETAIL</b>
---

**Submission Date :** 4/16/2023

**First Name :** Jill

**Last Name :** Trasatti

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This will cause significant financial hardship to families who live near the OR/WA border and need to routinely commute back and forth.

<b>ODOT I-205 Toll EA - RECORD #2506 DETAIL</b>
---

**Submission Date :** 4/16/2023

**First Name :** David

**Last Name :** Ball

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls will discourage people from traveling to local businesses, which will cause a downturn in economic activity. People speeding through local neighborhoods to avoid tolls will cause pollution and possibly endanger children playing in the streets.

**ODOT I-205 Toll EA - RECORD #2508 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** Thomas

**Last Name :** Schenk

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The original plan was for four bridges across the Columbia River. The proposal here would do nothing to ease any congestion on the I-205 or the I-5, including replacement of the I-5 bridge, which engineers have stated would be good for another forty years. The worry many of us have is a never-ending toll situation, because state Governments never met a taxpayer dollar they didn't want to spend. Any work done to ease congestion, should it require a toll...would only be acceptable with a firm date that the tolls would cease...or, as with the Glenn Jackson Bridge, the tolls would end sooner than the end-date when the cost of the bridge was realized. It is past time, when elected officials in both Washington and Oregon should finally listen to the will of the people and not to the lobbyists who will make money off of the wrong construction projects for our States. No one in their right mind would give the current elected officials a "blank check" to continue to soak the taxpayers of our States. A Glenn Jackson-type bridge from 192nd on the Washington side of the Columbia River to the Northeast Airport Way on the Oregon side...with no light rail...is the most economical method to relieve congestion on our two Interstates...Clark County residents have voted five times on light rail from Oregon to Vancouver...they have voted it down all five times...anyone listening????

**ODOT I-205 Toll EA - RECORD #2509 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** Ty

**Last Name :** Whitcomb

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** What percentage of people using the roads at peak congestion times have an alternative option not to be on the road at that time? Seems peak congestion is related to people going to and coming from work. Do you really want to punish those people disproportionately if they don't have an alternative option? Let's say they all stop driving, then how will ODOT collect any money? You know that won't happen, so your not really trying to disinsentivize driving or getting people to change their driving habits in a meaningful way. Your really just trying to take money from a captive group who has no other alternatives.

**ODOT I-205 Toll EA - RECORD #2510 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** Kerri

**Last Name :** Deegan

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** In every article I've read I see the words "Less Congestion on the freeway" that is a false statement. ODOT is only adding an extra lane for 7 miles and making the people pay for something we didn't get to have a vote on. Nobody wants this toll who lives in these areas. Having commuters taking side roads is going to be a cluster "F" and it will put an additional cost on the city of West Linn to maintain their roads which are horrible and they don't do even now. I've lived in this area for over 40 years and this freeway was paid for when it was built, and it's up to the state to pay for maintenance. If the state is so eager to generate money, instead of tolling all the lanes, do like California does and come up with a FastPass lane (new 3rd lane) let the people who can afford to be tolled on a daily bases going to and from home/work pay for this privilege. With the economy being as horrible as it is people can barely afford to keep a roof over their heads and food on the table, now you expect us to give the state our money that we are working very hard to make to survive?! Tolling 205 is an extremely bad idea, and it is not necessary. If you absolutely have to toll us let it only be a \$1.00 all day both ways, with the amount of vehicles the freeway a dollar is more than enough to steal from us.

**ODOT I-205 Toll EA - RECORD #2511 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** Mike

**Last Name :** Stark

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** My wife and I will suffer a financial burden if the freeway tolls go into effect. She works in Wilsonville and passes through both toll areas twice a day and I am a mobile installer and also pass through the area multiple times daily. Also, these freeways have already been paid for by our tax dollars. Also this isn't going to stop congestion in these areas. People are still going to drive because they need to get to and from work. Put this to a vote like it should be and you'll see exactly how many people want this.

<b>ODOT I-205 Toll EA - RECORD #2512 DETAIL</b>
---

**Submission Date :** 4/16/2023  
**First Name :** Karen  
**Last Name :** Kirk  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**



**ODOT I-205 Toll EA - RECORD #2513 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** ADAM

**Last Name :** RONDEAU

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I write in opposition to the tolling of the proposed road. The tolling of roads will fracture the community and make local residents less likely to interact with the nearby communities. I personally travel to/from west Linn multiple times a month and I would be much less likely to drive and spend in west Linn and the surrounding cities if my travel was taxed further.

**ODOT I-205 Toll EA - RECORD #2514 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** Shae

**Last Name :** Rondeau

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I am concerned about the long term financial impacts and implications of the tolls. We live in Vancouver but have worked in Oregon. We already pay Oregon state tax for the use of roads, I believe extra tolls and costs just to go to work is harmful. on My family lives in westlinn and these tolls would effectively cut our ability to see each other regularly. This is not beneficial on so many levels. Freedom of motion is a human right and I oppose the tolling of the roads. Pick tolling or taxes don't try to get both.

<b>ODOT I-205 Toll EA - RECORD #2515 DETAIL</b>
---

**Submission Date :** 4/16/2023

**First Name :** Katie

**Last Name :** Bauer

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Many of our goods are brought to suppliers via trucks that will now be tolled. The costs will be passed to the consumer. Tolling has no place on our highways. There is no need for impact studies of any kind.

**ODOT I-205 Toll EA - RECORD #2516 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** Algirdas

**Last Name :** Zalpys

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** As a business owner on both sides of the Columbia, the cumulative tolls would greatly impact my businesses' and family's bottom line. As an employer and business owner any change to my bottom line will affect those of my employees and my customers

<b>ODOT I-205 Toll EA - RECORD #2517 DETAIL</b>
---

<b>Submission Date :</b>	4/16/2023
<b>First Name :</b>	Glenn
<b>Last Name :</b>	Kincaid
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Build a third bridge before anything else takes place!

**ODOT I-205 Toll EA - RECORD #2518 DETAIL****Submission Date :** 4/16/2023**First Name :** Athena**Last Name :** Contreras**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** It is wrong to cut an existing path to basic amenities such as drugstores like Walgreens. My kids are sick and we shouldn't be forced to pay a toll to go pick up cold medicine. Cutting off access to basic amenities and services without passing a toll bridge is wrong. If you want to toll people, build something new.

**ODOT I-205 Toll EA - RECORD #2519 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** Steve

**Last Name :** Van Hoomissen

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Applying tolls to I205 infringes on the free movement of folks specifically living in or visiting West Linn or Lake Oswego. Tolls would add a significant financial burden on families already paying high costs for transportation. This roadway was originally federally funded. Have federal dollars pay for the upgrades proposed and do not add another tax burden on low and middle income citizens.

**ODOT I-205 Toll EA - RECORD #2520 DETAIL****Submission Date :** 4/16/2023**First Name :** Alexander**Last Name :** Olbricht**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling doesn't eliminate traffic congestion, it just moves it to other roads, clogging them up instead and making local neighborhoods less safe. Additionally, many citizens of Washington state work in Oregon, we already pay our share in Oregon income tax. Finally, freeways are supposed to be a quick and efficient means of travel, easily accessible to all. Tolling them would effectively penalize people for leaving their houses, costing money to use the interstate, or time to avoid it. This is a lose-lose situation.



<b>ODOT I-205 Toll EA - RECORD #2521 DETAIL</b>
---

**Submission Date :** 4/15/2023

**First Name :** Mike

**Last Name :** Stupak

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls as proposed are just a bad idea. They are regressive and inefficient. It's aggravating to people I talk to that this is being considered as a traffic reduction mechanism. Let's come up with better ideas.

<b>ODOT I-205 Toll EA - RECORD #2522 DETAIL</b>
---

**Submission Date :** 4/15/2023

**First Name :** Lorene

**Last Name :** Henderson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Don't put tolls on the bridges. Commuters who work in Oregon already pay income taxes to Oregon and is financially unjust to have to pay tolls just to get to work! Please don't do this, we cannot afford it!

<b>ODOT I-205 Toll EA - RECORD #2523 DETAIL</b>
---

<b>Submission Date :</b>	4/15/2023
<b>First Name :</b>	Elizabeth
<b>Last Name :</b>	Zalpys
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	This will negatively effect our household fonances

**ODOT I-205 Toll EA - RECORD #2524 DETAIL****Submission Date :** 4/15/2023**First Name :** Jeff**Last Name :** Kauzlaric**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Implementing tolls will have a negative effect on many households as it will increase their monthly expenses. In this already rising inflation environment, this is absolutely the last thing we need.

**ODOT I-205 Toll EA - RECORD #2525 DETAIL****Submission Date :** 4/15/2023**First Name :** Megan**Last Name :** Colerick**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Stop wasting money on pursuing tolls. Tolls will force traffic to use neighborhoods and increase risk to families of being injured. Tolls will UNFAIRLY hurt the bottom financial of all families and will HURT the least financially secure families the hardest. The toll costs will be added to the costs of all good and services and will cause extreme hardship to all. This is the worst form of wealth redistribution possible. Focus energy on creating a third bridge from WA 14 around 192nd to Troutdale. Properly managed and using transparency on the funding this bridge could be a toll and would pay for itself by citizens who would not be stopping in Portland and supporting local businesses.

<b>ODOT I-205 Toll EA - RECORD #2526 DETAIL</b>
---

**Submission Date :** 4/15/2023  
**First Name :** Angelica  
**Last Name :** M Keene  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2527 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Irene

**Last Name :** Yoshimori

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** West Linn's population has been growing and roads have already been more crowded, and when the toll starts, non-residents will start to drive on our local roads/streets to avoid paying tolls and make traffic worse. Have you considered who will pay for roads and streets maintenance that is required due to higher usage? West Linn roads/streets around I-205 have curves here and there and people unfamiliar with our roads might have a higher tendency to cause car accidents, especially when it's dark, rainy and icy.

<b>ODOT I-205 Toll EA - RECORD #2528 DETAIL</b>
---

**Submission Date :** 4/15/2023

**First Name :** Judy

**Last Name :** Croxford

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I live in oregon and am concerned that I won't be able to afford the tolls on the two bridges.



<b>ODOT I-205 Toll EA - RECORD #2529 DETAIL</b>
---

**Submission Date :** 4/15/2023

**First Name :** Ellen

**Last Name :** Newman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Washington drivers already pay high Oregon income tax without any benefits. Adding a high tolling tax will be financially difficult for many people. Please keep the toll low for those of us who cross the bridge daily.

**ODOT I-205 Toll EA - RECORD #2530 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Tom

**Last Name :** Hazel

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The I-205 Toll Project Environmental Assessment is in fact a tax that has not been voted upon by the folks in Clackamas County. Allow the population most impacted by this toll to vote on whether to implement or not. This should not be something mandated by Salem.

<b>ODOT I-205 Toll EA - RECORD #2531 DETAIL</b>
---

**Submission Date :** 4/15/2023

**First Name :** Gregg

**Last Name :** Havemann

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The the tolls will increase the traffic on the surface streets. Especially Willamette Falls. Which will also be impacted by the new middle school being built in West Linn. Plus the financial hardships it will cause on commuters. I am not excited about sitting in traffic on the surface streets or paying \$4.00(?) to visit my daughter in Oregon City. There has to be a better way!

<b>ODOT I-205 Toll EA - RECORD #2532 DETAIL</b>
---

**Submission Date :** 4/15/2023  
**First Name :** Tiffany  
**Last Name :** Van Domelen  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

<b>ODOT I-205 Toll EA - RECORD #2533 DETAIL</b>
---

**Submission Date :** 4/15/2023

**First Name :** Michael

**Last Name :** Cushman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling costs would be cost prohibitive to long distance commuters who must use the freeways to drive to work daily.

**ODOT I-205 Toll EA - RECORD #2534 DETAIL****Submission Date :** 4/15/2023**First Name :** Anita**Last Name :** Havemann**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Based on how we have been lied to by the WLWV School District about the new middle school construction, I don't have a lot of hope that my concerns will be acknowledged or addressed, but here goes... The diverted traffic onto Borland and Willamette Falls Drive to avoid the toll and further through an already impossibly congested area just west of the Oregon City bridge that connects to West Linn will be insane. I cannot even think of a word to describe how bad it will be. It seems incredibly unfair to punish the residents of West Linn not only with a toll to go ANYWHERE - North or South - of our homes, but to also hold us hostage with overwhelming our local roads with toll-evaders. If ODOT needs money (despite having some of the highest gas taxes in the NATION), please consider two alternatives: 1. Tax electric vehicles that are not paying gas taxes but ARE using the highways; also, please either ban or tax people that use studded tires that severely damage the roads. 2. Collect a toll crossing the Columbia river. WA residents come to OR to save on sales tax, so why not have them chip in? That is the most logical place to implement a toll. One last request since we've learned to not trust lawmakers, can you at least recommend a place to move to so we don't have to deal with all of this (expletive) craziness? (Which makes me sad because I thought West Linn was going to be my "forever home".)

**ODOT I-205 Toll EA - RECORD #2535 DETAIL****Submission Date :** 4/15/2023**First Name :** Linda**Last Name :** Goodman**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I find the EA lacking in specificity when it comes to mitigation to local communities and I felt the options that the EA considered should have had another option - tolling the third lane only where people who are in a hurry can use the toll lane. I have seen that option in other states and was surprised to find the EA didn't even consider it. Now for the mitigations. Highway 43 is already overburdened and no matter what ODOT says about people using the freeway more when it isn't so busy, I don't believe that is true. With two toll areas within a few miles of each other, they will take willamette and highway 43. I am sure how they analyzed that but I don't think it is accurate and at least there should be improvements like a middle turn lane and bike lanes. The road is already full of patches and no improvements and no proposals! Disappointing throughout and I hope the federal government requires an EIS to consider moving forward.

**ODOT I-205 Toll EA - RECORD #2536 DETAIL****Submission Date :** 4/15/2023**First Name :** Kristin**Last Name :** Koski**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I was hoping Oregon would wake up and realize they need to find a way to attract tourists to their state.. Clearly, I shouldn't hope Oregon cares about businesses struggling to stay afloat. I do not shop in Oregon because of horrible crime, filthy freeways littered with garbage everywhere. Homeless people laying on the streets. What a terrible idea adding toll bridges..another blow to the Oregon small businesses. The economy is suffering. Adding a toll bridge is icing on the cake. I will not shop in Portland. My money will remain in Washington state.



**ODOT I-205 Toll EA - RECORD #2537 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Corey

**Last Name :** Boehler

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is nothing more than a tax on the middle class, and should be left to voters who live in the affected communities. Not only will that have adversely negative impacts along hwy99, but it will have a financial implications as well against small business that incorporate deliveries, locals side roads and the surrounding communities they serve, and ultimately claim what amounts to punitive damages towards people that do not want this. I strongly urge the state lawmakers to reevaluate their budget and realize that the decisions being made mirror a welfare state which is not sustainable, nor is it representative to the majority of Oregonians.

**ODOT I-205 Toll EA - RECORD #2538 DETAIL****Submission Date :** 4/15/2023**First Name :** William**Last Name :** Vojak**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** \$15 each way TOLLS will harm all but the wealthiest families. It will be a regressive tax that most hard working families can't afford. ODOT will truly be creating "roads for the rich". Tolling doesn't eliminate traffic congestion, it merely changes where it occurs. It will cause tens of thousands of vehicles to DIVERT on to side roads to avoid the tolls. ODOT estimates at total of 130,000 vehicle diversions when all Portland area freeways are tolled.

<b>ODOT I-205 Toll EA - RECORD #2539 DETAIL</b>
---

<b>Submission Date :</b>	4/15/2023
<b>First Name :</b>	David
<b>Last Name :</b>	Franke
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	No new bridge should be installed

**ODOT I-205 Toll EA - RECORD #2540 DETAIL**

**Submission Date :** 4/15/2023  
**First Name :** A  
**Last Name :** D  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :** This should NOT be tolled.

<b>ODOT I-205 Toll EA - RECORD #2541 DETAIL</b>
---

**Submission Date :** 4/15/2023

**First Name :** Roberta

**Last Name :** Arbuckle

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** As a wa resident we already pay or taxes and now will be paying tolls. This is insane.

**ODOT I-205 Toll EA - RECORD #2542 DETAIL****Submission Date :** 4/15/2023**First Name :** Curtis**Last Name :** Charles**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Tolling I-205 will hurt the poor the most. Different tolls based on weath is unfair to those \$1 over the line. Better to place a fee based on total miles driven in a year and mass of the vehicle.

**ODOT I-205 Toll EA - RECORD #2543 DETAIL****Submission Date :** 4/15/2023**First Name :** Rick**Last Name :** McDaniel**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I live in the Jennings Lodge area, and work at locations in Hillsboro, Beaverton, Tigard and Lake Oswego. I travel the 205 tolling area daily. Totally against tolling. I'm 64, and saw the Abernathy Bridge be built in the 70s yet the bridge and the south bound section has not been improved or expanded in 40 plus years. It's absurd to even think that we have to pay yet again for Oregon's short sided or stick the head in the sand approach to infrastructure improvement. Diversion off 205 will be a huge problem. As I already used the back roads and surface streets between Southern Lake Oswego area and Oregon City. They are already congested just trying to get around the dangerous stop and go of Stafford road to the Abernathy Bridge. To go to Hillsboro and Beaverton I already divert to the Ross Island Bridge to Hwy 10 or 26 just adding to that congestion as well. The proposed toll tax is obsessive, I'm middle income and the tolls will greatly impact my financial situation. There are many people already looking for those routes off the toll way. And to use higher tolls during times when the majority of the people using 205 are try to get to and from work is also absurd and insulting to the residents of this and state who already pay too much in taxes. Yes, the communities around this area, Oregon City, the old OC Bridge, West Linn, Willamette, Lake Oswego will be greatly negatively impacted by a huge rise in surface street and back road traffic. A huge safety and environmental effect will be felt. Areas like Milwaukie, Sellwood and SE and SW Portland will be felt as well as people try to avoid the tolls. I can't understand why penalize people with higher rates when they are just trying to get to work. The tolling pricing at the least such higher in off peak times. It's a shame that Oregon has done nothing for 4 decades and now because they recognized the lack of future planning, we the people have bear the brunt of that poor planning. It's no wonder people are fleeing Oregon for smarter and less costly states of Washington and Idaho.

**ODOT I-205 Toll EA - RECORD #2544 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Cheyonne

**Last Name :** Abadi

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The toll on 205 near Oregon City will increase traffic on small single lane roads in West Linn and Oregon City. These areas are walkable and bike accessible now but will quickly become dangerous and congested, which will take away the local spending in Downtown Oregon City and elsewhere. My family and I moved to Oregon City for the walkability especially in the downtown area and we will lose that if the 205 toll near Oregon City is implemented. I would rather pay higher taxes to Clackamas county or the State of Oregon if it goes to improve bridges and road infrastructure. Base tax increase on the population is a better alternative to a toll.



<b>ODOT I-205 Toll EA - RECORD #2545 DETAIL</b>
---

**Submission Date :** 4/15/2023

**First Name :** Colleen

**Last Name :** Bonin

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** 205 and I-5 tolls. Tolls will adversely impact low-wage earners' commute costs and limited-income seniors (driving to medical appts).

<b>ODOT I-205 Toll EA - RECORD #2546 DETAIL</b>
---

**Submission Date :** 4/15/2023

**First Name :** Kris

**Last Name :** Webb

**Affiliation :** City of Portland

**Submission Method :** SurveyMonkey

**Q3. Comments :** Adding a toll to bridges already bought and paid for is criminal. There is incredible amounts of governmental waste, to charge tax payers to use roads that are barely maintained is asinine.

<b>ODOT I-205 Toll EA - RECORD #2547 DETAIL</b>
---

**Submission Date :** 4/15/2023  
**First Name :** Mark  
**Last Name :** Miller  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2548 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Frankie

**Last Name :** Edmonds

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This toll/ tolls are a foolish way to use an exemption. Sounds like people will be forced to use a bus system that will be introduced and create a worse economy than is. Why not charge \$2.50 a day for crossing per bridge.

**ODOT I-205 Toll EA - RECORD #2549 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Trisha

**Last Name :** Thompson

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I believe this project will cause way too much traffic through local communities that already have a heavy traffic load. The small streets in these areas already are in need of improvement from west and tear. Financially this will impact a lot of hard working people who are already struggling to make it day by day. This project is double taxing the people. We pay many other taxes for roads. Many people will not be able to sustain this financial impact which could further impact the already large homeless population. I don't agree with any of this project or it's potential effects on the people who live here.

**ODOT I-205 Toll EA - RECORD #2550 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Daniel

**Last Name :** Vattiat

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I don't believe that I205 should be tolled. We already pay an exuberant amount of taxes. The state needs to find a better way to use money and fund its projects with the money it has. Charging hourly wage workers to travel to and from work is not the answer! Not to mention all of the toll skipping traffic this is going to add to surface streets.

<b>ODOT I-205 Toll EA - RECORD #2551 DETAIL</b>
---

<b>Submission Date :</b>	4/15/2023
<b>First Name :</b>	Justine
<b>Last Name :</b>	Stimmel
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Waste of money.

**ODOT I-205 Toll EA - RECORD #2552 DETAIL****Submission Date :** 4/15/2023**First Name :** Philip**Last Name :** Ridgeway**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I and thousands of other SW WA residents use I-205 to travel to OR on a regular basis. As a federal interstate, I-205 should not be tolled. Doing so would affect most hard working families as they would not be able to afford it. The I-205 bridge should remain free for all to travel across, not just a luxury for the rich who can pay the toll "tax".



**ODOT I-205 Toll EA - RECORD #2553 DETAIL**

**Submission Date :** 4/15/2023  
**First Name :** Kim  
**Last Name :** Pham  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2554 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Wendy

**Last Name :** Schlichting

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** As a local to Oregon City I am concerned the placement of tolls could have a disproportionate financial impact on the citizens of our town. If there are tolls 24/7 our daily living costs could increase as our access to I-205 Spth 205 would require a "toll" every time. The "Old Bridge" and Road between West Linn and Oregon City (Main Street and Willamette Drive) already has terrible congestion, which would increase with this project. Unfortunately, there isn't a cost effective way to widen that bridge or the impacted roads, so It is unclear how ODOT would mitigate this. This project speaks in too many generalities and not enough specifics and planned mitigation efforts are not until 3 years after the tolls have been implemented. I worry this could increase congestion on the side roads 24/7 as locals seek to avoid tolls, which could increase neighborhood accidents and pedestrian injuries, essentially just relocating the "accidents" the proposal says it will decrease.

**ODOT I-205 Toll EA - RECORD #2555 DETAIL**

**Submission Date :** 4/15/2023

**First Name :** Dan

**Last Name :** Ewert

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This project, as many others that ODOT has attempted to engage in, is a effort to shift the financial mismanagement of the ODOT system to the individuals using it. It is also a flagrant exercise in crowd sourcing by ODOT in ignoring the requests of the people. - As a long time local resident this will be a unnecessary financial burden placed on the residents of a very local geographical area that the system was intended to serve. - As a resident and planning commissioner of a local jurisdiction we are already at failing levels at most all of our road system and this will exacerbate the problem with NO relief built into the project. - There are no financial relief monetarily or planning for radius road systems in the outlaying areas to accept the increased avoidance traffic levels that this will create. - From a live ability stand point you are damaging not only our local area but Oregon as a whole as a less desirable place to live. This is an overall VERY BAD PLAN. This is not how we expect you to spend our tax dollars.

**ODOT I-205 Toll EA - RECORD #2556 DETAIL**

**Submission Date :** 4/15/2023  
**First Name :** Brian  
**Last Name :** Wilson  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :** I do not want tolls

<b>ODOT I-205 Toll EA - RECORD #2557 DETAIL</b>
---

**Submission Date :** 4/15/2023

**First Name :** Holli 98642

**Last Name :** Kelley

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Please consider how cars avoiding tolls make alternative route much more dangerous, congested and unsafe.

<b>ODOT I-205 Toll EA - RECORD #2558 DETAIL</b>
---

**Submission Date :** 4/15/2023

**First Name :** Bradley

**Last Name :** Borlin

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Vehicles avoiding tolls will negatively effect those who live and work in the toll zone. Fees or surface street congestion will become a daily occurrence. This project should have been only initiated with voter approval. Special consideration should be given to those unable to avoid the local hassles. Other funding should be sought for widening projects.

**ODOT I-205 Toll EA - RECORD #2559 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** L.A

**Last Name :** PIERSON

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** \$15 ONE WAY per day Makes it almost impossible for struggling families to be able to afford to drive to work. A minimum wage worker has to work 2 hrs to pay tolls. Are the roads to be only for the wealthy now? I vehemently oppose tolling - it never ends!

<b>ODOT I-205 Toll EA - RECORD #2561 DETAIL</b>
---

**Submission Date :** 4/14/2023

**First Name :** Eric

**Last Name :** Olbricht

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling roads will hurt those that need the most help. It will create a financial burden on all people at all levels which will directly and indirect hurt jobs and the ability for people to live in the area.



<b>ODOT I-205 Toll EA - RECORD #2562 DETAIL</b>
---

**Submission Date :** 4/14/2023

**First Name :** Clars

**Last Name :** Raney

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The traffic would be terrible down Oregon City. Old bridge can't handle all the of cars. Now. traffic. Traffick is bad now and will get much wor

**ODOT I-205 Toll EA - RECORD #2563 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Tiffany

**Last Name :** Markel

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** How will traffic be mitigated on Main street in Oregon city? The back-up currently goes all the way up to Warner Parrot, through several historic and new neighborhoods, with people waiting to go across the old bridge. Can the old bridge handle any more traffic than it does now?

**ODOT I-205 Toll EA - RECORD #2565 DETAIL****Submission Date :** 4/14/2023**First Name :** Nolan**Last Name :** Knox**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The tolling will not help with congestion along I-205. I live right off the highway and use it to do daily errands. This would disproportionately affect others like myself that use it for those same purposes. We would be tolled at a much higher rate than 'commuters'. I also try to avoid using the highway during high traffic times, as do many others, yet there is still significant traffic. So tolling would not reduce traffic, it would just put an undue burden on the residents living around that area, both financially and by not mitigating the traffic in any way.

**ODOT I-205 Toll EA - RECORD #2566 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** jesse

**Last Name :** murray

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** People can't afford these tolls . it's gonna kill us low income people.

<b>ODOT I-205 Toll EA - RECORD #2567 DETAIL</b>
---

**Submission Date :** 4/14/2023  
**First Name :** Phil R  
**Last Name :** Kooistra  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2568 DETAIL****Submission Date :** 4/14/2023**First Name :** Laird**Last Name :** Blanchard**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** The toll on 205 at Stafford rd will make people change and use Borland rd. Boarland rd is a 2 lane rd no shoulders and be a safety problem for bicyclists,walkers ect. Do not toll 205 and create safety issues for cyclists, pedestrians,and people who live on that road getting mail, children walking to school,church, willamette or the parks for fun. Get your funding from other sources please!!!

**ODOT I-205 Toll EA - RECORD #2569 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Lisa

**Last Name :** Brown

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Politicians always pander to the middle and lower class, but here they are again making policy that will cause significant financial burden to the working class. Setting congestion-timed tolls sounds like a great idea—except that only higher paid salaried employees typically have flexible work schedules to be able to alter their driving times. Good going Oregon, making the state even less affordable for the people that make the state work. Secondly, with the insanely high tolls planned, traffic will necessarily be diverted off of highways to neighborhoods. I'm sure there are plans to alter traffic controls to address this, but the extra traffic and controls will burden those who actually live and drive in those neighborhoods. Ivory tower ideas out of touch with reality, or elitism that doesn't care—which is it? My input—if you have to toll, use flat rate tolls, lower than proposed; otherwise it'll be highways only for the rich.

**ODOT I-205 Toll EA - RECORD #2570 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Yahanna

**Last Name :** Masimer

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I will avoid a toll road at all costs. Doing so will cause more traffic on side roads. This will upset residents. It may even lead to injuries. Ex. Children playing, pets or locals just out for a walk. We all pay our fair share in taxes, insurance, gas, registration fees....when will it ever be enough? It's basically a punishment for anyone who has no other option but to drive to work.



<b>ODOT I-205 Toll EA - RECORD #2571 DETAIL</b>
---

**Submission Date :** 4/14/2023

**First Name :** Rachel

**Last Name :** Powell

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The Oregon-Washington economy mutually benefits with free-flowing, and no toll traffic on Interstate-205. Residents of Clark County Washington will enter less into the Oregon economy (and vice versa) if tolls are enacted, as well as less community engagement between states.

**ODOT I-205 Toll EA - RECORD #2572 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Thomasa

**Last Name :** Silva

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** There is no question that Oregon's population is growing by the large numbers. But everything is already so expensive with the inflation - and you want to charge the tax payers more money to drive on the road that was built with their tax dollars! How the freak does that make sense???!!!! Tons of people won't pay the toll, therefore the inner city streets will be flooded and that will definitely put pedestrians that are walking and on bikes at serious risk.

**ODOT I-205 Toll EA - RECORD #2573 DETAIL****Submission Date :** 4/14/2023**First Name :** Zoe**Last Name :** Murillo**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I am adamantly against tolls on I-205 or I-5. As my husband and I approach retirement age we are trying to save and prepare for a cut to our full time jobs to hopefully go to part time work. Having to pay tolls to run errands across the River would be a huge blow to our monthly budget. Please consider how a toll would affect middle class aging adults as ourselves. Thank you for your time and consideration.

**ODOT I-205 Toll EA - RECORD #2574 DETAIL**

**Submission Date :** 4/14/2023  
**First Name :** David  
**Last Name :** yuill  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2575 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Cary

**Last Name :** moro

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** this is Oregon you keep your tolls the fuck out you greedy extortionist pieces of shit. you want to put tolls somewhere put them on the borders. everything about your project is complete nonsense both on 205 and 5. who's ever bringing up these ideas need to be fired ..out of a cannon into the sea.

**ODOT I-205 Toll EA - RECORD #2576 DETAIL**

**Submission Date :** 4/14/2023  
**First Name :** Kim  
**Last Name :** Hansen  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2577 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Emily

**Last Name :** Van horn

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This wasn't even put up for vote. You guys knew everyone would think it was a shit idea and throw it out. All you guys want is money. You don't actually give a shit about any of that other stuff. All you are going to do is divert traffic into other parts. And congest shit further all because you are greedy pigs.

**ODOT I-205 Toll EA - RECORD #2578 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Erin

**Last Name :** Wright

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This analysis needs to consider how tolls will impact jobs, the ability to visit friends and family, the deterrence to visit businesses, the increased congestion on side streets and through neighborhoods, and the increased amount of animals that will be hit and die due to the increased traffic on side streets. Tolling is not necessary when taxes are already so high in the area. It is time for the state to figure out how to better use the money they have.



<b>ODOT I-205 Toll EA - RECORD #2579 DETAIL</b>
---

**Submission Date :** 4/14/2023

**First Name :** Aleta Gardner

**Last Name :** Angrish

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls on I205 would be a hardship for local kids in both Oregon and Washington. Kids and families that participate in sports, school field trips (such as to OMSI), and/or arts performances would be negatively impacted by tolling on I205. Kids and families travel to events and performances in the larger local area, and are already struggling for money.

**ODOT I-205 Toll EA - RECORD #2580 DETAIL****Submission Date :** 4/14/2023**First Name :** Katie**Last Name :** Mersinger**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I would like to see public transportation expanded to wilsonville and Oregon city before strating tolling, including more frequent service (Wes doesn't operate on weekends or non peak weekday hours), direct train service to downtown/greater Portland area, service to Oregon city. We need more train service to avoid slowing down buses.

<b>ODOT I-205 Toll EA - RECORD #2581 DETAIL</b>
---

**Submission Date :** 4/14/2023

**First Name :** Brian

**Last Name :** Helsing

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I cannot imagine having to pay up to an additional \$5 per day to get to work and back. This is more compulsory taxation. Future projects will endlessly affect traffic.

**ODOT I-205 Toll EA - RECORD #2582 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Jennifer

**Last Name :** Helsing

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I'm concerned about being able to afford getting to and from work with already strained finances. I'm extremely concerned for the increased traffic in our town. I'm most concerned that the project is moving forward despite the majority being against it.

**ODOT I-205 Toll EA - RECORD #2583 DETAIL****Submission Date :** 4/14/2023**First Name :** Emily**Last Name :** Baker**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Tolls over the Oregon city bridge will affect the traffic, foot traffic and local businesses negatively. The traffic is already too over crowded. The little downtown section of Oregon City should not suffer in order to fund huge metro-wide freeway traffic.

**ODOT I-205 Toll EA - RECORD #2584 DETAIL**

**Submission Date :** 4/14/2023  
**First Name :** Cambria  
**Last Name :** Hubel  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2585 DETAIL****Submission Date :** 4/14/2023**First Name :** Lori**Last Name :** Pengra**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Combined with the traffic changes the city of Portland has made. I believe that, adding tolls to the freeways is going to be nothing but a hot mess. Those who cannot pay the tolls will take the side roads, which have all been made smaller in order to put in bike lanes, which are never used. the mass transit system in Portland is totally ineffective because of the lawlessness that has been allowed to happen within the city on the streets in the buses, the max system. My husband and I both work at a nonprofit in Portland and we commute from Vancouver. It will be nearly impossible for us to continue to drive into town to do our job. Since much of our job can be done from home the state will lose tax dollars from us as non-residents in order to gain our tolls. We would no longer come to Oregon to shop because why pay the tolls instead of sales tax? it would be much more convenient to stay in our local community and shop. I don't know why this bothers me so much since I hate driving into Portland with all of its lawlessness, homelessness, drug addiction, alcoholism and crime. It will be one more reason for me to stay home in Vancouver.

<b>ODOT I-205 Toll EA - RECORD #2586 DETAIL</b>
---

**Submission Date :** 4/14/2023  
**First Name :** Lori  
**Last Name :** Pengra  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**



**ODOT I-205 Toll EA - RECORD #2587 DETAIL****Submission Date :** 4/14/2023**First Name :** Jeffrey**Last Name :** Langan**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** ODOT estimates the average household will pay \$575 a year just for its first phase of tolls. That's \$575 that Oregonians won't be able to spend on other things, with restaurants and retail establishments the hardest hit. ODOT estimates that its tolls will cause more than 750 people to lose their jobs and reduce wages by about \$3 million a year. This is devastating to a already struggling economy. And I was told that low income people will get some sort of discount, but it's the middle class that will have to pay the full price. It seems like every government expenditure uses the money of the middle class and gives breaks for those that are low income and also the rich. I already struggle paycheck to paycheck and use i-205 regularly for work, and also to take my daughter to her violin lessons. This cost will make it not worth taking my child to her instructor anymore because of this increase in cost. I not talk to one single person who thinks this is a good idea. Improve the roads with the money that we already give you. Every year I pay taxes that is to be used for road improvements, not only that I pay gas tax, DMV fees (which also has gone up). Please consider metal income earners and the ramifications of tolling.

**ODOT I-205 Toll EA - RECORD #2588 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Jesse

**Last Name :** Langer

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Why was this not included in the Biden administration infrastructure bill "Build back America" in 2021?

**ODOT I-205 Toll EA - RECORD #2589 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Dominique

**Last Name :** Lyles-Brush

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The tolling of the I 205 would have a tremendous financial impact to those in this community. There is no reason the average person should pay out more for access to roads they already pay for. No one should have to pay an upwards of \$4 a day just to travel to work. I can also guarantee there aren't many people who would benefit from the rebate program nor the low income which I bet not many people would qualify for anyway.

**ODOT I-205 Toll EA - RECORD #2590 DETAIL**

**Submission Date :** 4/14/2023  
**First Name :** Adam  
**Last Name :** Fiss  
**Affiliation :** SW Washington Regional Transportation Council  
**Submission Method :** SurveyMonkey

**Q3. Comments :** Environmental Justice Technical Report: The Area of Potential Impact (API) outlined in the Environmental Justice Technical Report, page 12, adopts the APIs of air quality and economic analysis, which are the EA's largest. The API includes census tracts in Multnomah, Clackamas, Washington, and Marion Counties. As acknowledged by the report, toll projects can have effects on users of the tolled facility that are not geographically constrained to the API. The cost of the toll – especially on low-income users – and the potential language or technology barriers to accessing the electronic toll payment system extends beyond these boundaries. We believe the following items would further support the EA and the success of the program:

- ODOT/OTC policy and rules for Low Income Toll Program benefits/credits shall be accessible and available to all Washington state stakeholders, who are affected by the Toll Program costs. The Area of Potential Impacts (API) must include SW Washington, which historically and currently includes lower-income community members. The benefits that are derived from this program must flow across state lines.
- ODOT/OTC policy and programs for toll enforcement shall be equitably available/applied to SW Washington stakeholders.
- ODOT/OTC policy and programs shall be implemented in WA state, and/or partnerships be established with third party vendors, whereby Customer Service center(s) shall be located in WA state to provide for in-person cash services related to the OR Toll Program.

Congestion Management: An express goal of the program, as noted in each Appendix, is to use variable-rate tolls on I-205 to manage congestion. Regional corridor outcomes and performance metrics should be defined prior to beginning a value pricing pilot project. Through monitoring, propose corridor specific project mitigations and programs to ameliorate social/economic impacts created by a value pricing project. Corridor monitoring and mitigation towards the outcomes should be continuous for the duration of a pilot project. Please consider the following question:

- What are the congestion performance targets associated with the I-205 Toll Project? How are metrics like speed, volume to capacity, emissions, hours of congestion, and VMT prioritized?
- How will these standards be set and will they periodically be reset or recalibrated? How will these targets be defined?
- What are the target traffic diversion metrics being used to measure success or failure?
- What is the target mode shift being used to measure success or failure?

Miscellaneous:

- ODOT should utilize general media outlets based in SW-WA communities; partnerships should be established with service providers and community groups and private businesses, and, distribution of materials in non-English languages shall be produced specific to SW-WA cohorts.
- How can toll revenues be spent in Washington State as part of a mitigation program? ODOT/OTC policy and programs shall identify the legislative steps to be taken to ensure equal opportunity to mitigation efforts that guarantee resources located in Washington.
- What are the direct and indirect impacts created by value pricing?

**ODOT I-205 Toll EA - RECORD #2591 DETAIL****Submission Date :** 4/14/2023**First Name :** Laura**Last Name :** Davis**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Drivers of (non-electric) motor vehicles already pay gas tax, which supposedly goes to road maintenance. Having to pay a toll to go from Clackamas, south on I-205 to connect with I-5 going to Tigard, will be a financial burden that many simply cannot afford on a regular basis. This will shift some traffic onto many local roads, causing worse traffic there. Also many cars will try to avoid the toll by driving farther than necessary, increasing air pollution. This is not a well-thought-out plan.

<b>ODOT I-205 Toll EA - RECORD #2592 DETAIL</b>
---

**Submission Date :** 4/14/2023

**First Name :** Nancy

**Last Name :** Holbrook

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Washington State residents will be financially harmed by these tolls in addition to Oregon's employee taxes.

**ODOT I-205 Toll EA - RECORD #2593 DETAIL**

**Submission Date :** 4/14/2023  
**First Name :** Becky  
**Last Name :** Dewey  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :** I strongly oppose this toll!

**ODOT I-205 Toll EA - RECORD #2594 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Jeff

**Last Name :** Ley

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The traffic diversion will be horrible, making neighborhoods and communities less safe. Tens of thousands of vehicles will divert off the freeway and onto side roads to avoid paying the tolls. This is a nightmare. The financial impact will be hugely negative for hard working low and middle income families. Especially those who have no other options. This is a regressive tax that will benefit the toll collection companies the most. I don't want the traffic diversion that will occur near my home when tolls are put on all of I-205. Furthermore, I can't afford to pay the daily "per mile" tolls that ODOT wants to ultimately charge to drive on roads we've already paid for.



**ODOT I-205 Toll EA - RECORD #2595 DETAIL****Submission Date :** 4/14/2023**First Name :** Jay**Last Name :** Parshall**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** These proposed tolls will undoubtedly cause commuters to choose different routes on side/neighborhood streets - the results will be more congestion on these streets that weren't meant to handle that much traffic. This proposal will hurt lower and middle income earners who rely on these already tax funded roads to get to places of employment and recreation. This will put many commuters in a financial bind causing many to make tough decisions about places of employment and have second thoughts about leisurely activities impacting local spending. I'm Washingtonian who commutes five days a week to Oregon. If these tolls go in to affect it would have a negative impact on my families finances. While I understand there are pros and cons to every idea but this seems like a punishment rather than a solution.

**ODOT I-205 Toll EA - RECORD #2596 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** Tyler

**Last Name :** Stone

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling in our region is inequitable, unfair, and not desired by local Oregonians. Tolling was never put to a vote in our region and we have had zero say in the decision-making process. Tolling would be extremely harmful to ALL residents as it would raise the cost of transportation and the transport of goods, divert significant traffic to local roads leading to higher pollution/noise levels in communities, harm business and household budgets, and lead to less business/economic activity and demand in our region. Our significant state taxes, high DMV fees, gas taxes, and community road fund taxes should all be going to maintenance and durability of our roadways - forcing tolls onto residents indicates complete mismanagement of numerous revenue sources for roads. Go back to the drawing board ODOT - tolls are a NO GO for Oregonians!

**ODOT I-205 Toll EA - RECORD #2597 DETAIL****Submission Date :** 4/14/2023**First Name :** Aspen**Last Name :** Breuer**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** I live in Washington and commute into the Portland area, 2 to 3 times a week for work. The main travel routes are already terribly congested at peak hours, making travel difficult. These toll ways will only exacerbate the issue. As well, I do not know how the average worker will be able to financially sustain additional costs. fuel increases every day, while our wages do not. I pay Oregon income tax on wages, earned in Oregon, but I live in Washington and pay sales tax. This will be yet another local tax that I'll have to bear. I already do my part by paying the high income tax required by the state of Oregon. these suggested tolls are an awful idea that will crush those on the tightest budgets already. The state of Oregon spends money in ways that arguably make it challenging to leave funds available for infrastructure improvements. This irresponsibility to manage should not be shifted onto the shoulders of the hardest working families.

**ODOT I-205 Toll EA - RECORD #2598 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Matt

**Last Name :** Cabral

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** As there is no mitigation option for surface roads that will be negatively impacted. How can the board claim that this will improve traffic? With so many of the communities that are impacted by this. Why are they being ignored when they have openly stated that they are opposed to this project? The board and ODOT had claimed that people could use alternative transit to travel the tolled areas. As there is a clear lack of alternative transit is the areas to be tolled, how can the board and ODOT make this claim?

**ODOT I-205 Toll EA - RECORD #2599 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** L

**Last Name :** B

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The assessment needs to address increased traffic congestion within a 10-mile radius of the bridge, specifically Oregon City, Gladstone, West Linn, and Lake Oswego.

**ODOT I-205 Toll EA - RECORD #2600 DETAIL****Submission Date :** 4/14/2023**First Name :** Carolyn**Last Name :** Doll**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** Cars will use other local roads in Oregon City, West Linn, and Lake Oswego to avoid paying tolls. This will congest other local roads which weren't built for such heavy traffic. And, you won't collect the tolls amounts you anticipate. A better option is to toll 205 and I 5 both so people can't avoid the tolls. Also you should toll both bridges over the Columbia at both sides.

<b>ODOT I-205 Toll EA - RECORD #2601 DETAIL</b>
---

**Submission Date :** 4/14/2023

**First Name :** Douglas

**Last Name :** Perednia

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The proposed tolling of infrastructure that our tax dollars already bought and paid for is unconscionable. Public transport in the metro area is unsafe and impractical for a huge variety of applications, from medical visits to shopping to pass-through traffic. In addition, it is unreasonable to remove free passage - especially over the river - on federally funded interstate highways. If cars are all going electric the pollution benefits will be negligible. Time and money would be far better spent on improving the existing facilities and making the flow of traffic more efficient rather than trying to make travel so expensive and miserable that no one has the time and money to do it.

**ODOT I-205 Toll EA - RECORD #2602 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Peter

**Last Name :** Waskiewicz

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The transportation analysis appears to have collected feedback, but gone forward with tolling regardless of the massive amount of input and pushback against it. I am very concerned that the rural residents in these affected areas have little options to avoid the tolls, especially for households that don't have additional headroom in the household budgets to pay an additional cost. And this is almost an imposed tax on them, because many need to drive to work in these toll areas. I've seen tolls back east when growing up, and they can be effective. But there were always other very viable options for motorists to choose to avoid a toll. We do not have viable options, and only have residential street options to avoid a toll. Overall, I feel this proposed toll is not a good idea, and needs to be abandoned.



**ODOT I-205 Toll EA - RECORD #2603 DETAIL****Submission Date :** 4/14/2023**First Name :** Ryan**Last Name :** Payne**Affiliation :** working class citizen**Submission Method :** SurveyMonkey**Q3. Comments :** Tolling this corridor does not benefit the local community in any way shape or form. Furthermore it is yet another way to extort money from hard working commuters who must use the affected corridor on a regular basis. The federal government can fund projects on the interstate and the state can hold off on building parks and shopping centers to pay for the needed improvements.

**ODOT I-205 Toll EA - RECORD #2604 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Michelle

**Last Name :** Smith

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls are just another tax and will negatively impact our lower income citizens that have to travel on these highways. Stop taxing us! Put this on the ballot. You have no right to create a new tax without citizen input.

**ODOT I-205 Toll EA - RECORD #2605 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Chuck

**Last Name :** Coleman

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I will stop shopping in West Linn and Oregon City. If I need to drive south I will use 43 or 99 to avoid the tolls just on principle. Oregon can't manage money and I will go out of my way to avoid anyway I can to pay a dime to the state.

**ODOT I-205 Toll EA - RECORD #2606 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Chester

**Last Name :** Ng

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** My main concern is costs. I'm retired and on fixed income and I travel I-205 and I-5 together regularly. A round trip of \$8+ is significant and simply not available in my budget, especially with the inflation rate the way it is. The cost of the tolls is an incentive for me to bypass the highways by using local roads and will simply add to the neighborhood congestion and travel time to get to my destinations. West Linn and neighboring cities should be exempt from paying these expensive tolls. There should be exemptions for senior citizens as well.

**ODOT I-205 Toll EA - RECORD #2607 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** M

**Last Name :** R

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Odot has completed other projects without placing undue fines/costs on a select community. Examples include work on Sellwood bridge and current 217 projects. We pay money/taxes to pay for infrastructure projects already. Odot can't say it's going to "help" the communities when there are creating more problems with those communities. This feels like an unending money grab and Odot needs to brainstorm and work within financial means or constraints. Like we all do as tax payers and responsible citizens.

**ODOT I-205 Toll EA - RECORD #2608 DETAIL****Submission Date :** 4/14/2023**First Name :** Gene**Last Name :** Shrock**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This is a horrible idea for many reasons. The bridge is already a bottle neck and this will only make it worse. The traffic studies odot did during the height of the covid 19 pandemic is flawed. This bridge was already paid for by tax payers and there was Federal money available for earthquake proofing...why wasn't that used. Why did we hire an out of state contractor? There has already been several accidents since construction started making this unsafe for citizens. This is an unlawful way around to punish and collect taxes because we see the waist in Salem and our tax money is waisted. If this goes into effect, this will be the last straw and I will move my family out of this state. The people who ruined Portland are now trying to destroy the suburbs...this is horrible and I feel sorry for Aurora, Canby and downtown Oregon city because traffic will be non stop. Working people who are already struggling can't afford tolls!

<b>ODOT I-205 Toll EA - RECORD #2609 DETAIL</b>
---

**Submission Date :** 4/14/2023

**First Name :** Lisa

**Last Name :** Rawdin

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This toll would negatively impact our families' financial situation. It's already hard to navigate buying necessities such as food with the record high inflation rate. This will not stop vehicles from driving, it will just cause people to struggle more in the trying time.

**ODOT I-205 Toll EA - RECORD #2610 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Matt

**Last Name :** Jordan

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This was not voted by the people who live here. Traffic within the surrounding neighborhoods will be a nightmare and create problems related to heavy traffic congestion, e.g., cars running red lights because of the added drive time, frustrated people creating road rage incidents, bumper to bumper traffic which expedites damage to roadways, higher likelihood of car vs pedestrian/bicyclist crashes, idling vehicles creating more emissions. Property values decrease (?) Overall this is bad for our communities. Please no



<b>ODOT I-205 Toll EA - RECORD #2611 DETAIL</b>
---

**Submission Date :** 4/14/2023  
**First Name :** DON  
**Last Name :** BENTON  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2612 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Hj

**Last Name :** Vanmeter

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I regularly travel on 205 for work and personal, 205 flows fine generally and congestion is not a major problem, unless there is a car crash. A toll is not needed, will be an administrative nightmare (I've used them in Calif/NJ/NY), will illegally disrupt the use of a free highway system, and will cause many or most drivers to use I-5 or 99 which are already congested. The impact on low-income families will be severe, as the proposed costs are very high. The environmental and neighborhood impact on 99, 43, and other alternate routes will also be extreme. Again this affects lower-income families and businesses residing/operating on these routes. Gas taxes, federal funding, and other funding sources should be used.

<b>ODOT I-205 Toll EA - RECORD #2613 DETAIL</b>
---

**Submission Date :** 4/14/2023

**First Name :** Hans

**Last Name :** Boehm

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This is a federal highway for which taxes are already paid (see infrastructurebill). A toll will constitute a second taxation. If the toll is only to satisfy the additional expenses for including mass transportation, this is to be seen as ill conceived. Such mass transportation must be able to pay for itself!

**ODOT I-205 Toll EA - RECORD #2614 DETAIL****Submission Date :** 4/14/2023**First Name :** Richard**Last Name :** Murray**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** I would like to see the idea of tolling abandoned. Portland has been my home for 40+ years and we used to be a city that had innovative ideas. We did not say lazy things like "it works in other cities. We are better than other cities and should not abuse our citizens by installing tolls. I have not been able to find someone that is not a government employee that supports tolling. Try to do better.

**ODOT I-205 Toll EA - RECORD #2615 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Elise

**Last Name :** Tauscher

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The economic impact of these tolls on families traveling to Oregon regularly and individuals who work in Oregon but live in Washington is drastic and devastating. My husband has worked repairing and remodeling homes in Oregon and has paid his taxes faithfully for his entire working life even though we live in Washington. His job cannot be made remote, and it cannot change hours as working in individual homes cannot be done overnight or outside of peak working hours. These tolls would be taken directly out of his paycheck leaving our family paying thousands of dollars per year we need for food, housing, and utilities. Additionally we have four small children and we regularly visit family, friends, and conduct business through that tolled area. These tolls would be prohibitive to our continuing to support Oregon parks and educational facilities in Oregon and devastating to our desire to be with family and friends. This would cause isolation and FURTHER expense taking money out of our family's pockets and educational resources out of reach for our children. We are not a unique case. By enacting these tolls many families will be hurt and those who must continue to travel the tolled areas will bear substantial financial burdens they will not be able to sustain.

**ODOT I-205 Toll EA - RECORD #2616 DETAIL****Submission Date :** 4/14/2023**First Name :** Carol**Last Name :** Wesely**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** The toll station is right at Oregon City, which means that people are going to try and bypass the toll booth by going down 99, 213 or down Willamette Drive through West Linn. This is going to further clog those smaller city streets. AND many of those smaller city streets are ones that aren't 'due for repair' until 10 years hence - and it will just make it worse! Additionally, having it right at Oregon City means that those of us who work in downtown Portland are going to be hit with tolls going and coming - just to get to work! Why not put the toll station at the Oregon End of the 205 bridge between Washington and Oregon? That would be more equitable - ensuring that those who work in Oregon but live in Washington are the ones paying the tolls for using our Oregon freeways!! This isn't going to help the Oregon economy at all - other than the transportation administration - but everyone else is going to be paying with no benefit!!

**ODOT I-205 Toll EA - RECORD #2617 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Norene

**Last Name :** Kuhn

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** It's a functional bridge, fully paid for....there's no reason to toll it. PERIOD. It will cause more congestion and would cause financial hardship on the majority of common folks.

**ODOT I-205 Toll EA - RECORD #2618 DETAIL**

**Submission Date :** 4/14/2023  
**First Name :** John  
**Last Name :** Howorth  
**Affiliation :** 3J Consulting  
**Submission Method :** SurveyMonkey

**Q3. Comments :** 1. The EA analysis should not just look at the impact area around I-205 in terms of the diversions to avoid tolls. The entire metro region should be analyzed an adequate distance from all of the tolling proposed on I-5 and I-205. The concern is that the impacts from the I-205 EA (say Canby) would also likely be impacted by the I-5 tolling project/EA but not be cumulatively seen with individual smaller areas. This is a regional tolling project and it should be reviewed accordingly. Toll impacts on the revenue side of the equation may also be negatively impacted as well. A trip through the I-205 tolling area might be impacted by the I-5 tolling area. 2. Variable toll rate tables. From my understanding only one rate table (H, M, L) was used to determine the impacts of surrounding roadways, etc. from toll avoiding behaviors. I believe that at least three rate tables should be analyzed in order to determine if the impacts to surrounding roadways thus providing either a straight line correlation, or a curvilinear correlation. This could then help adjust/determine the actual toll rates. This might also assist with determining mitigation strategies for roadways impacted by the tolls (could a mitigation for the adjacent roadways be a lowering of the tolls to better balance traffic on the tolled facilities and the adjacent roadways?).



<b>ODOT I-205 Toll EA - RECORD #2619 DETAIL</b>
---

**Submission Date :** 4/14/2023

**First Name :** Dennis

**Last Name :** Walsh

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Dramatic increase of auto emissions on local streets as commuters avoid tolls. Specifically, Stafford Rd, Hwy 205 exit 10, Hwy 43, Borland Rd and Willamette Dr. In effect delivering emissions into residential neighborhoods via thousands of additional autos on local streets daily. There is no solution to this 100 percent negative impact.

<b>ODOT I-205 Toll EA - RECORD #2620 DETAIL</b>
---

**Submission Date :** 4/14/2023  
**First Name :** Yana  
**Last Name :** Teper  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

<b>ODOT I-205 Toll EA - RECORD #2621 DETAIL</b>
---

**Submission Date :** 4/14/2023

**First Name :** Melanie

**Last Name :** Bryant

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** With the rising cost of everything, this would very negatively impact all who need these roads to get to and from work. The financial impact would be severe on most if not all people.

<b>ODOT I-205 Toll EA - RECORD #2622 DETAIL</b>
---

**Submission Date :** 4/14/2023

**First Name :** Justin

**Last Name :** Hornbaker

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I stand firmly against any toll upon the I-5 and I-205 roads, you will be effectively making it a road for the rich only. If you want to help the community and environment don't fill your own pockets, organize some community efforts to pickup trash along the highways.

**ODOT I-205 Toll EA - RECORD #2623 DETAIL****Submission Date :** 4/14/2023**First Name :** Shirley**Last Name :** Mozena**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** We don't need tolls between two neighboring states! This will have detrimental affects on the workers from Clark County, WA who cross the bridge every day! Oregonians won't like it either. Do not add tolls, please!

**ODOT I-205 Toll EA - RECORD #2624 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Keith

**Last Name :** Winsell

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Another tax / toll on both Oregon and Washington workers is ridiculous especially at the same time as the cost overruns (failure's like i90) on i5 bridge lightrail inflate the costs and that are only used by 7% rider capacity -- and these 7% are just a import of Portland crime to Vancouver - So there are no ridership, economic or crime reduction reasons for the current bloated replacement plan and subsequent tolling. Regards --

**ODOT I-205 Toll EA - RECORD #2625 DETAIL**

**Submission Date :** 4/14/2023  
**First Name :** Dina  
**Last Name :** Sinyayev  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

<b>ODOT I-205 Toll EA - RECORD #2626 DETAIL</b>
---

**Submission Date :** 4/14/2023  
**First Name :** Shania  
**Last Name :** Fleming  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**



**ODOT I-205 Toll EA - RECORD #2627 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Klaus

**Last Name :** Heyne

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** What is your analysis of major reduction of congestion through tolling based on? Few will mind paying if indeed the results you promise ("50% reduction in afternoon commute times and 26% fewer crashes...") are achieved. But if you do not publish hard facts from similar projects on the West Coast that support these claims, you will not get buy-in from the public at large, with disastrous political consequences.

<b>ODOT I-205 Toll EA - RECORD #2628 DETAIL</b>
---

**Submission Date :** 4/14/2023  
**First Name :** Teresa  
**Last Name :** Waite  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

<b>ODOT I-205 Toll EA - RECORD #2629 DETAIL</b>
---

**Submission Date :** 4/14/2023

**First Name :** Pat

**Last Name :** Ewert

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I would like to see ODOT listens to the citizens, rather than believe they (ODOT) knows what is best. To completely disregard the large percentage of citizens who have communicated the negative impact on their lives due to tolling, yet the project moves forward is disrespectful and dismissive of the The People. I have heard nothing regarding "discounts" for senior citizens, daily commuters, nor people who are simply middle class but must drive the designated freeways marked for tolling. There also does not seem to be any attempt on the part of ODOT to address the local communities and the already packed local roads, that will be further hit with traffic attempting to avoid the tolls. Please do what your citizens want! Thank you!

<b>ODOT I-205 Toll EA - RECORD #2630 DETAIL</b>
---

**Submission Date :** 4/14/2023

**First Name :** Michelle

**Last Name :** Garifalakis

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The bridge is functional we don't need to toll it. The cost will have an impact on on families that have to commute everyday for work. The extra traffic on the side streets while you work on the bridges will cause more congestion and possibly more accidents as people may not slow down going through neighborhoods. The commute time for work will increase greatly.

<b>ODOT I-205 Toll EA - RECORD #2631 DETAIL</b>
---

<b>Submission Date :</b>	4/14/2023
<b>First Name :</b>	Desiree
<b>Last Name :</b>	Hamilton
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Do not toll

**ODOT I-205 Toll EA - RECORD #2632 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Justin

**Last Name :** Beer

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This project is a terrible idea and should be abandoned. No tolls in Oregon!

**ODOT I-205 Toll EA - RECORD #2633 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Jason

**Last Name :** Hamilton

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** This would have negative impact. Do not toll. I repeat do not toll

**ODOT I-205 Toll EA - RECORD #2634 DETAIL****Submission Date :** 4/14/2023**First Name :** Liana**Last Name :** Kovtun**Affiliation :****Submission Method :** SurveyMonkey**Q3. Comments :** People work in Portland that live in Vancouver, it is absolutely ridiculous to charge people to get to work. At this point you might as well take away our entire paycheck because it seems like the government just want to tax us and take all of our money. You raise the rent and cost of living and the wage earning is still the same and then you want to add more charges for us. Think about it.



<b>ODOT I-205 Toll EA - RECORD #2635 DETAIL</b>
---

**Submission Date :** 4/14/2023  
**First Name :** Kristina  
**Last Name :** Esperanza  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :**

**ODOT I-205 Toll EA - RECORD #2637 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Nick

**Last Name :** Taylor

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Need to consider the financial impact this will have on the middle class. This will only help the wealthy...

**ODOT I-205 Toll EA - RECORD #2638 DETAIL****Submission Date :** 4/14/2023**First Name :** Connie**Last Name :** M Snyder**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** This will change the way our companies do business and cost our employees money they dont even have in an expensive world we are trying to survive in. It is ludacris that you are wanting to impose this on travelers. This will cost our SW Washington employees thousands of dollars in their regular commutes; it will also add costs to every job that goes out our door.

<b>ODOT I-205 Toll EA - RECORD #2639 DETAIL</b>
---

**Submission Date :** 4/14/2023

**First Name :** Mark

**Last Name :** Grusing

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Way too much money per toll. It will cost me a minimum of 60.00 dollars per WEEK. Figure something else out please.

**ODOT I-205 Toll EA - RECORD #2641 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Eva

**Last Name :** Huang

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** ODOT's round trip fee during rush hours is projected to cost apx.: — \$30 daily — \$150 per week — \$600 per month — \$7,000 per year No one can afford that and especially the low-income who need to travel through the area to get to their worksites.

<b>ODOT I-205 Toll EA - RECORD #2643 DETAIL</b>
---

<b>Submission Date :</b>	4/14/2023
<b>First Name :</b>	Ed
<b>Last Name :</b>	Blatter
<b>Affiliation :</b>	
<b>Submission Method :</b>	SurveyMonkey
<b>Q3. Comments :</b>	Portland

**ODOT I-205 Toll EA - RECORD #2644 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Dustin

**Last Name :** Long

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** The economical impact will be severe, especially for those living outside the Portland metro area. I would need to pay to go from the airport to Albany where I live both ways every day. I cannot move closer as the parenting time with my children is dependent upon my residence staying where I'm at. Even \$5/day in tolls would completely shatter my budget.

**ODOT I-205 Toll EA - RECORD #2645 DETAIL****Submission Date :** 4/14/2023**First Name :** larry**Last Name :** summerton**Affiliation :****Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls proportionally negatively impact lower economic households while a limited impact on affluent families. This is a punitive tax that effects those least able to pay. All pay taxes that should be used to upgrade roads to service the overall community and tolls are just another tax. Transportation by car is essential and minimal environmental impact is far out weighted by economic benefits. Those that do not rely upon private car use should not penalize those that do - it is not equitable. it is the responsibility of public agencies to represent all the community rather than the few vocal minorities.



**ODOT I-205 Toll EA - RECORD #2646 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Rose

**Last Name :** Ellis

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** I cannot afford plumbing in my home. I cannot do laundry, wash my hair, or shower. I can barely afford gas to drive to work. I must cross the river to work! If I have to pay to drive across the river, it will no longer be affordable and I will be forced to leave my job. Oregon and Washington BOTH created gambling and lottery revenue sources to prevent tolling of roads. USE the funds as they were intended instead of punishing the poor and creating roads for only the rich to use!

**ODOT I-205 Toll EA - RECORD #2647 DETAIL**

**Submission Date :** 4/14/2023  
**First Name :** Tandy  
**Last Name :** Broughton  
**Affiliation :**  
**Submission Method :** SurveyMonkey  
**Q3. Comments :** this will up our regular commute costs

**ODOT I-205 Toll EA - RECORD #2648 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Alex

**Last Name :** Peru

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolls implemented on I-205 will be the most impactful on local hard working families that cannot afford these tolls and continue to provide for their families. An exemption departing for Federal Law to toll projects which were already fully funded is an egregious option to gain funding by burdening local hard working families. tolling is highly inefficient as the cost of collection is well into the high double digit percentile to recoup any monies and this will not eliminate any traffic issues but rather add traffic issues in different places and cause mass frustration to drivers who are already taxed with trying to gain more time with families and find time to get off of the road and back to their families and friends. projects like this are why the mass amount of public mistrust the direction of local state and federal entities. You should not allow this project to move forward without thinking of the families it will impact the most on a daily basis.

**ODOT I-205 Toll EA - RECORD #2649 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** Brandon

**Last Name :** Gonzalez

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Tolling on the bridges and freeways - should not happen. This will kill business , add costs to jobs and take money out of my pockets as well as my employees. 205 bridge and I 5 are main roadways used by many and would not only be expensive for regular commuters, it's just plain wrong. There are no ways to avoid the tolls for those who can't afford them . Seattle has alternatives , that aren't too far out of the way and they also don't require the entire roadway to be tolled, just a lane . This is wrong on so many counts and an insane amount .

**ODOT I-205 Toll EA - RECORD #2650 DETAIL**

**Submission Date :** 4/14/2023

**First Name :** David

**Last Name :** Shafer

**Affiliation :**

**Submission Method :** SurveyMonkey

**Q3. Comments :** Very simple- I am against tolling as a method to control our behavior and punish us from driving to and from work, school, etc.. Especially if it isn't state wide. You indicated gas taxes are lower and electric cards don't pay it- fix this and make them pay their fair share. Tolling has nothing to do with funding, it is a choice, no other projects have this- i.e. you aren't tolling citizens for building an overpass or re-surfacing the roads...increase the vehicle registration fees or add a mileage tax to electric cars. Done fixed it. I won't vote for any representatives who support this locally and will let them know my stance. I wonder if you like tolling in our area because you think we have extra money, as opposed to tolling a poor neighborhood for street improvements.....just another tax- we are second highest tax in the nation already. It is never enough, is it?

**ODOT I-205 Toll EA - RECORD #2651 DETAIL**

**Submission Date :** 4/4/2023  
**First Name :** Paul  
**Last Name :** Savas  
**Affiliation :** Clackamas Board of County Commissioners  
**Submission Method :** Public hearing

**Q3. Comments :** Thank you for the opportunity to comment. We wish there were more public hearings and that this hearing was better publicized. We are concerned that ODOT's public outreach is not as robust as we had expected. Clackamas County has joined other jurisdictions in requesting a longer comment period, 30 additional days, for a total of 90. We believe the fact that this will -- we believe that this will have a significant impact to our communities, that this was the first tolling program of its kind in the region, and the fact that there are over 2,000 pages of policy and technical data to review, we believe warrants 30 additional days of comment and study. In 2010, ODOT and Clackamas County agreed the bottleneck on I-205 was causing significant diversion on the local roadways, yet the study is predicated on 2019 traffic counts when the diversion was at its worst. Furthermore, because of this flawed approach, ODOT is essentially normalizing the highest diversion levels as a basis, burdening the local system, essentially, with local safety issues that are there today. And furthermore, worsening local congestion and the local road impacts because ODOT's failing interstate and/or the tolling. Shifting this burden of ODOT's facility is wrong, on to local roadways. In fact, tolling will increase the local diversion beyond rush hour to 24/7 as motorists avoid tolls. It is not safe or responsible to increase traffic through neighborhoods and on narrow, winding rural roads, and not offer any viable alternatives. The EA does not reveal any solutions or any alternative and no choices for motorists and residents. We are disappointed in the absence analysis of the economic impacts to local businesses. The EA is incomplete and is flawed. Significant impacts still exist. Our -- and will still exist. Our communities will be less safe and prosperous than they are today. We believe that there are significant concerns that cannot be mitigated, and further analysis required through environmental impact statement in coordination with a reasonable mobility pricing program.

**ODOT I-205 Toll EA - RECORD #2652 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** John

**Last Name :** Russell

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I am worried about mostly on the toll bridge and the toll lane charges that would put people with disabilities in old methods of discounted programs like SNAP. Because of (inaudible) being illegal nowadays, you cannot take someone with disabilities who is now at minimum wage who can barely make money to be out and be socially inclusive with the programs that are available by ODDS and other departments. In a way, I'm hoping to make my opinion and that you guys consider a discounted program for those with disabilities in a way that it be socially included, not just by tolling bridges and tolling roads, but having a steadfast future plan in ways of considering those with disabilities going out to the community and being included, rather than being dis-included because of the charges that the PSW, DSP, and other entities, like myself, who can't be free and self-determined, but have these types of worries that are not being communicated. I'm not saying that I am for or against this bill or what's happening, but do hope that you guys can consider - - consider those with disabilities, and the workers, and the community at hand in the community decision, the State decision in how you guys are approaching this problem, where you guys do need more money for roads, and to make people safe, but also it might hurt and not hurt others. I'm done with my statement. And I hope this conversation can go later on until all of you on a call, or mutual on a bill, or whatever is good. But I do hope that we can consider those types of conversations later on. Thank you.

**ODOT I-205 Toll EA - RECORD #2654 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Ross

**Last Name :** MacKae

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I strongly concur with the first speaker, and predominantly agree with the second one. However, I am strongly opposed to the tolling. I believe that it is an adverse effect on the underprivileged and those at risk in our society. It, basically, is going to restrict people who are not of upper castes in our society from utilizing a federal highway. I think that the unequal application to us as a whole is wrong. Additionally, I have lived on the East Coast and I've seen exactly what tolling has done. And it's done exactly what everybody is fearing. The affluent and the commercial are able to utilize it. Everybody else is shoved off on to the city streets. And the burden is carried by the working class and the poor because they pay more in fuel. And the local communities have to repair and maintain the roads that the turnpikes have shoved off on to the local streets. And we're proposing to bring a bad thing from the East Coast to Oregon, and I strongly oppose it.



**ODOT I-205 Toll EA - RECORD #2655 DETAIL****Submission Date :** 4/4/2023**First Name :** Cory**Last Name :** Poole**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** Hey, I just wanted to testify in favor of tolling. I commute daily between Portland and Salem. And as everyone knows, the traffic is pretty horrible. And I mean, I hate to tell everyone one who is against tolling, tolling is one of the few things that actually works. You know, adding lanes does not reduce congestion. It's been proven. Induced demand is a very real thing. And, you know, tolling will actually reduce congestion. It actually works. In addition, we do need to have funding sources for the infrastructure that people want. So I think it's very important that we find ways to equitably pay for the infrastructure. If we want to make tolling progressive, someone can prove that they have a hard time making the means to pay for tolling, I could see being progressive on the tolling schedule, maybe a refund system. But most of the signs I see against tolling in people's yards are, like, million-dollar homes. I'm pretty sure they can cover it. So I understand everyone's concerned. Nobody likes traffic. Nobody likes congestion on their local streets. Believe me, I have it. But tolling is the one way that might get our freeways functional again in this area and pay for the infrastructure that they need. I would also like to see any tolling funding, some of it go to methods to get people way from driving their cars, because that's what's really going to help in the long run. That's all.

**ODOT I-205 Toll EA - RECORD #2656 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Josh

**Last Name :** Carter

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** Throughout this process, it's been clear that ODOT is very interested in hearing the public comment, but really is not interested in doing anything about the comment. And if you could just look at this event today, which was not publicized at all. It's not on the calendar of the ODOT website. The only reason I found out was because KOIN News posted about it on their website. So it's clear that they are just simply checking a box so that they can say that they did a lot of public outreach. But they're really not doing anything about it which is really, really frustrating. I'm not against tolling. I think it does serve a purpose, as Cory has just outlined. I think the way this has gone about throughout the process has been not very concerted, not very thoughtful, not very pragmatic, and certainly not taking into account our most vulnerable communities, including folks that are still working minimum wage jobs. You know, you have maybe a single mother of two that has to decide whether or not to take a toll road because it's going to eat away at their, you know, their budget. So I think more has to be done to, hopefully, take into consideration those that are most vulnerable. And I hope that more is done within this public hearing process to make sure that more people know that it's happening. You're scheduling this to 6:00, and it's 3:15 and you have nobody else commenting. It's really frustrating, and it just goes to show that there's just very little being done to make people aware and get people involved in the process. So hopefully you do more. I think there's ways to do the tolling where it's equitable and fair, and that everybody has a say in this. Whether it's one-lane tolling, or tolling at a specific time, or even what other communities do where you can select the lane. I think there's all ways to do this and there could be a better way. So that's it. Hopefully, these comments are taken into consideration, and there's more -- a more thoughtful way to do this. Otherwise, you know, I don't see myself staying in our community more much longer if this is going to be the way that things just get pushed through. Thank you for your time.

**ODOT I-205 Toll EA - RECORD #2657 DETAIL**

**Submission Date :** 4/4/2023  
**First Name :** Chris  
**Last Name :** Smith  
**Affiliation :** No More Freeways  
**Submission Method :** Public hearing

**Q3. Comments :** I'm [] with the No More Freeways Campaign. We believe, similar to [ ]'s statements, that congestion pricing, which, I think, is a better phrase than "tolling," is the appropriate tool for management performance of facilities. But we think that coupling that with freeway expansion is both counterproductive and also is the most expensive way to serve the needs of community. The path that ODOT is on to build seven miles of freeway expansions, and then price it to pay for it has both the highest public cost and the highest private cost to manage this corridor. A congestion pricing scheme that charged a much more modest toll to manage congestion, and then applied that to creating transportation choices, like better transit service, would be both more effective for community and significantly less expensive for both the public sector and the private folks using the facility. I'd further like to contrast the disparate treatment between the commuters in Clackamas County and those coming over the interstate bridge from Clark County. In this project, ODOT is proposing to put about 80 percent of the project costs as a burden in tolling for the community. In contrast, on the interstate bridge project, tolling is going to represent more like 20 percent of the costs. And, in fact, the chair of the transportation committee has proposed borrowing a billion dollars to be repaid by future generations to help finance that. So why ODOT is proposing much less expensive commutes for Clark County commuters than for Clackamas County commuters kind of astounds me.

**ODOT I-205 Toll EA - RECORD #2658 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Kate

**Last Name :**

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I just wanted to let you know, and everyone that's listening, that I feel like people should be voting on any new taxes. And I think we should be moving out IP-4 for everyone to sign this petition so we can get it on the ballot. And the reason for this is I don't believe in tolling. And the second reason is how much money does the State need to improve our roads? They have gotten over \$5 million over the last two years to help move and improve our roads. All they're looking at is providing a congestion tax, which is moving people off the roads. But yet, I'm a retiree, and I live out toward Mulino, and there is no commuting. There is no MAX. There is no bus line. There isn't anything like that. So how are they going to prove to us Oregonians that they can take care of us Oregonians if we do not have a voice? Thank you.

**ODOT I-205 Toll EA - RECORD #2659 DETAIL**

**Submission Date :** 4/4/2023  
**First Name :** Sarah  
**Last Name :** Iannarone  
**Affiliation :** Street Trust  
**Submission Method :** Public hearing

**Q3. Comments :**

I am the [ ] of the Street Trust and a member of the Regional Tolling Advisory Committee, which is working with stakeholders across the region to set a policy for tolling, I-5 tolling, and the Regional Mobility Pricing Project. I'm here today on behalf the Street Trust, which does support congestion pricing, and would be very good, as many of the commenters on this call, whether they support or oppose tolling agree that we have to be clear about what we are pricing and how the money will be used. So one primary concern in the EA that the Street Trust has about the I-205 toll project is the competing purposes stated by the project. They're in direct opposition to each other in large part. On the one hand, to generate revenue to pay for roadway, and on the other to maintain a minimal level of free-flowing conditions, which is to manage traffic demand or to alleviate congestion on the roadway. It's the Street Trust's opinion the I-205 toll project should be designed to reduce congestion on the road. But as many people said, this isn't going to work unless we have adequate alternatives in place for people who could otherwise be able to get around without having to drive. This means that revenue generated from tolling must be allocated to improve public transit and active transportation options, especially for people who need them most. This means expanding bus and light rail services and providing new transit options to areas that are not currently well served by transit. We also think that there are many people who are close to where they need to go, who instead of driving on the highway could walk or even ride an E-bike as opposed to getting on the highway. And the more that we can make these options affordable to people, the more equitable this program can be administered. We also want to make sure that the I-205 toll program is rolled out in accordance with recommendations made by ODOT's E-equitable Mobility Advisory Committee. Their shaping and equitable toll program report was adopted by Oregon Transportation Commission, and we need to follow the priorities that they set in there, which meanings mitigating the potential negative impacts of the project on low income and vulnerable populations. We need to invest in all sorts of things adjacent to the highway that people need so that we can reduce the amount of vehicle miles they need to travel overall. And we must make sure that this toll program is designed so that we don't actually induce demand, which means as we free up space on the roadway, more people decide it's time to drive because the congestion is gone. We have to make sure that as we alleviate congestion by pricing the roadway that we actually get people moving around by other modes. Finally, we need to make sure that measures are in place over the course of the project, not just in standing up the project to ensure that tolling is not disproportionately effect minority or low income populations. This means ongoing equity analysis and tracking demographic data to ensure that tolling is not creating unintended disparities.

**ODOT I-205 Toll EA - RECORD #2660 DETAIL****Submission Date :** 4/4/2023**First Name :** Cynthianna**Last Name :****Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** I'm a local business owner that provides services where I go to clients. So I just wanted to make that be a -- something that's made aware is that tolling also affects businesses, whether it's services provided to residences or businesses within the area, but that to travel back and forth. And for small businesses, they may not have that budgeting for tolling. The other aspect that I wanted to bring in was the local infrastructure. Like, this tolling, I'm opposed to it, obviously, but the infrastructure around isn't set up for the additional traffic that's going to go through the neighborhoods, whether it's residential or business, to be able to accommodate all the additional high traffic for those trying to avoid the tolling. And that's the end of my statement. Thank you.

**ODOT I-205 Toll EA - RECORD #2661 DETAIL****Submission Date :** 4/4/2023**First Name :** Jordan**Last Name :** Lewis**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** I'm testifying in favor of congestion pricing on the I-205 corridor. When we talk about the pricing, we fixate on the costs while minimizing benefits. Congestion pricing provides a reliable price signal to drivers about the congestion they add by joining a road system. I find this superior to the status quo where no one has any idea how much cost they are adding on to the system by driving. Everyone gets on the system and you have this exponential issue of traffic getting bigger and bigger and just, you know, congestion. If you're concerned about the impacts on a single mother commuting, imagine the costs that the freeway imposes on the communities around it. Not everyone chooses to -- not everyone signed on to deal with the negative externalities of living next to a massive road system. If you're really concerned about that, you can make them whole through progressive policy and allocating the funds, the revenue from the program equitably. My large concern here is the purpose of the tolling revenue. I believe that the I-205 toll project's purpose should primarily focus on reducing traffic flow and not funding further road projects. What revenue does come from the program should go towards transit and active transportation. I also want to second what Chris Smith said earlier about the I-5 bridge replacement and what seems like competing of purposes of a toll -- of tolling in these two projects. That's all I have to say.

**ODOT I-205 Toll EA - RECORD #2662 DETAIL****Submission Date :** 4/4/2023**First Name :** Laureen**Last Name :** Felton**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** I'm totally opposed to putting tolls on the roads. Other people earlier, much earlier said I lived in New Jersey where there's the turnpike, and then have been in Florida on toll roads, and it does not do anything to decrease traffic. And I also feel that with the two spots picked to be the first in line, where I am and I live, the people around me are being unfairly -- going to be unfairly taxed with -- burdened with these tolls. I go either of these roads on these bridges almost every single day to get to where I need to go. And then also, too, being senior and 68 years old, I already pay a lot of money in taxes and property taxes. And I just feel that, you know, the roads are crowded because so many people move here. So, you know, what are going to do? People are going to be driving on the highways and -- or they're going to be crowding the side streets which are already very crowded, and no other alternatives are present that could help me. Thank you.



**ODOT I-205 Toll EA - RECORD #2663 DETAIL****Submission Date :** 4/4/2023**First Name :** Linda**Last Name :** Wyland**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** I am not in favor of the tolling the way I hear it is set up right now. I have a job. I'm going to be crossing this bridge four times a day to get to and from work. I don't have the ability to pick my hours. I have to work when the hospital says to come into work. I live in Tualatin and I work at Providence. I don't have the choice to not take my car, because there is no mass transit that does any back-and-forth in those two areas. I'm going to be hit every day, every day, every day. My wage is not going to go up to accommodate this. I don't have the ability to pick non-peak hours because I have a job. And I really think this is unfair for people who do work that we're getting penalized to have to use a road and pay for the benefit to use that road when I don't have an option to pick a non-peak time to come to work. How are you guys going to take this into any consideration? I make enough money to support my household, but in the same breath, every time I turn around, it's more money coming out of my pocket. The road is still congested. It is still full. Trying to do rideshare or carpool with other people is not feasible. I work 12-hour shifts. There's nothing I can do to make this work for me in any way, shape or form, and I don't have a say. And you're going to pick this road to be the first one to try out the tolls to see how you can make it work. Side streets, as you hear are busy. The road is going to be busy. And I'm being penalized for having a job. It almost makes me want to quit and go on government welfare so I can cross the roads and not be charged. I wish this would be looked at a little bit differently. If you're going to give people breaks on some of this stuff, people who make an income who have to use this road should also get some kind of a handout so we can use this road and not go into debt by having a car trying to get to and from work. That's all I gotta say. Thank you.

**ODOT I-205 Toll EA - RECORD #2664 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Jacob

**Last Name :** Apenes

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I'm a resident in Portland. When ODOT determined that tolls could be used to raise revenue for congestion relief projects, it should be made clear that freeway widening is not a congestion relief project. Freeway widening instead contributes to congestion via induced demand. Active and public transportation infrastructure are viable and necessary developments to reduce congestion. As the Portland metro population grows by 2.5 million residents by 2040, and as affordable housing projects allows lower-income families packs into cities in West Linn and Oregon City, we must be prepared to supply equitable and affective transportation alternatives. Without buses, park, biking and pedestrian infrastructure, our tolling system becomes nothing more than a progressive tax that will not help with traffic. I hope that you ensure that revenue from tolling is used for mobility option separate from the personal vehicle and not more freeway widening. Without this, we will only see more traffic. Thank you.

**ODOT I-205 Toll EA - RECORD #2665 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Jennifer

**Last Name :** Cook-Buman

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I have a question about how the -- the points of tolling were established. Is there someone that could -- could elaborate on how those decisions were made? And then I also have -- and the reason behind my question is I am a resident of West Linn. I'm not in the upper five percent of income. And frankly, it shouldn't matter. I'm all for a flat tax across the board. So I'm not in favor of tolling for a variety of reasons. I feel like our gas taxes are user-based taxed enough. But the positioning of the tolls appear to be a targeted space. Targeting a particular user-base group. And to the point of many of the others that have already testified here, we don't have good options for mass transit or for any kind of metro services, yet we all pay taxes for that. And we also -- West Linn specifically is full of micro businesses. A large percentage of our population are micro businesses, meaning we work for our homes and we are consultants, and we are in and out, using the roads very frequently. So -- and that's all. Thank you.

**ODOT I-205 Toll EA - RECORD #2666 DETAIL****Submission Date :** 4/4/2023**First Name :** Florence**Last Name :** Tagaban**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** I'm currently a resident of Happy Valley. I used to be a resident of Portland. I moved to Happy Valley during the pandemic because of the situation downtown. Now, since moving to Happy Valley, I have seen it grown quite a bit. And we've also have allocated some parcels of land for lower-income residents to help the housing situation here in Oregon. Now, looking at the tolling map that you folks had put out, I do agree that of the residents here on the eastside have been unfairly disappropriated as far as where you are placing the toll bridges. I am for tolling, and to help with the congestion of our roadways, but I also am in favor of helping out the communities where a lot of these side streets are going to be used. Now, I don't know if people realize that some of the side streets -- well, some of the older side -- older roads here in Oregon themselves, because this is on old city. Has anyone looked at how the use of these roads are going to be, you know, environmentally impacted to the streams, to the land, and not only that, the community? And I do agree that it is not fair that how ODOT rolled out this process. There has not been any wide community outreach for this side of Portland. And it really -- I feel, again, like you folks -- it kind of feels like a racial-motivated thing on this side of the Portland metro area. So please, could ODOT extend this period and also educate or inform the people who live in this community and look at that impact. Because I really think ODOT really kind of just slided right in there without even asking the community that it's going to impact heavily. Thank you.

**ODOT I-205 Toll EA - RECORD #2667 DETAIL**

**Submission Date :** 4/4/2023  
**First Name :** Mary  
**Last Name :** Baumgardner  
**Affiliation :** West Linn City Council  
**Submission Method :** Public hearing

**Q3. Comments :** I have been following this issue for over a year. Many in our community aren't aware, and that's the first thing I would like to address, is that under the Oregon goal one for citizen involvement is about public access to the planning process. And the responsibility is on the government body who is doing planning in this case, tolling congestion pricing, and the fact that as of last night, when we had our council meeting, and I would welcome anyone to go into the City's website and look at the section that the city council addressed, the presentation given by the representatives from ODOT and the questions we were asking. I won't go into them now, but if you look up the April 3rd meeting, you can watch that. But my concern is that as of last night, there were no engagement planning meetings, opportunities for citizens of West Linn to speak. They were being planned in Oregon City, which is important, of course. We need to hear from the citizens of Oregon City, but this is going through West Linn specifically. And West Linn residents are at the epicenter of the impact. So -- and since I represent West Linn, I'm not going to talk about the impacts of other communities, but I'm concerned about them too. But, specifically, West Linn has been burdened with I-205 since -- it was decided in 1963, approximately, to locate I-205 through West Linn rather than Lake Oswego, which didn't want it and was better organized to defend its placement apparently, citing that it would cause disruption to their schools, having children have -- be cutoff from their schools that they were going to and other impacts that, obviously, a freeway in the middle of a community will have. So instead, West Linn has been burdened with I-205. The third-lane factor of diversion traffic that already gridlock's West Linn residents for several hours -- So I would ask you to lengthen the public comment period, and also subject this plan to an EIS, rather than just the EA, for the impacts that it's going to have on the citizens. Thank you.

**ODOT I-205 Toll EA - RECORD #2668 DETAIL****Submission Date :** 4/4/2023**First Name :** Greg**Last Name :** Lehman**Affiliation :****Submission Method :** Public hearing**Q3. Comments :**

I am currently a stay-at-home father, and I have a son that experiences Down's Syndrome, so I have to drive into appointments all over the place, you know. And I have a daughter who is three years old, and I have to drive her all over the place as well. So, like, with this toll, it's going to have to change up everything. The whole reason we moved to the Willamette area is because that school district is inclusive. My son can go to the classrooms and be with his peers. And if we're doing -- if we're going to bring this toll, it's going to make it just even harder on my family where it's already difficult. And I'm just -- I'm just really disappointed in this toll. I think it's just an absolute failure. And I left a public -- I left a message that I might not be proud of, but I did leave it for you guys to view. But I am just really upset. It is -- my family is -- we just -- we just can't pay for this. This is just too much. It's too much hardship on my family that already has enough stuff going on. I have to cut this off before I start to break out in tears. So I'm just really upset. I'm also -- I just pulled over. I was driving along Stafford Road just trying to get back home. That is completely blocked up already. So, I mean, if you're going to add a toll, it's already blocked up. I had to turn around. I had to go down Petes Mountain to get home to take -- to replace the caretaker that's watching my son right now. And I have to be home by 4:00, and I don't know if I even can get home. So you're just -- it's just going to be a lot of difficulty on my family, and just trying to get to places on time where we have to be on time for all these appointments. And that's all I have. I'm just really sad that this is something you guys came up with. And it just -- it just -- for families that experience anything that's different than typical or anything that's, you know, less than, like, financially secure, it is -- this is just really hard to hear, and I'm very disappointed. That's all I have today.

**ODOT I-205 Toll EA - RECORD #2669 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Doug

**Last Name :** Buman

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I have two things that I'd like to share. One of the biggest concerns -- first of all, I applaud the project. It's a long time overdue and things like that. The biggest concern I have with the way this project has come about was legislature's way of funding it. Because tolling -- essentially, we're going to end up spending 1.5 or two times the original cost of the project to include all of the tolling by the time we're done paying for all the tolling. Tolling is a lazy way of the legislature to come up with the funding. So again, why are we spending one and a half time or two times the cost of the project by the time we're finished paying for the tolling? And the other one is reimbursement of the gas tax. Would ODOT ever consider as part of this a reimbursement of a gas tax? I know you don't capture electrical vehicles and things like that on the gas tax, but what about those -- it's almost double taxation that we're paying for a gas tax, and then we're going to pay for a toll to use the same roads. So those are my two concerns right there. Thank you.

**ODOT I-205 Toll EA - RECORD #2670 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Sidney

**Last Name :** Chase

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I guess my concern -- there's a couple of concerns I have about this. First and foremost is that I just heard about this yesterday. And so getting word out, I think, has just been terribly handled. And I sort of consider myself reasonably plugged in. And the fact that this is the first I'm hearing about it is, I find it deeply troubling. The second thing that really troubles me about this is that this tolling initiative, it disproportionately affects the lower wage earners of our group here. So the white collar people that can work from home, you know, they don't have to worry about this toll. But for those people that have to drive to our plant every day and have to use the freeways to get here, they're going to be the ones that are going to be impacted by this every single day. If they don't go through toll, then they're going to have to find alternate routes that are going to be slower, which is going to impact their families and, you know, getting to work on time. So I just really feel like it's disproportionately impacting those frontline workers, and I just don't think that's fair. That's all I had have to say. Thank you.



**ODOT I-205 Toll EA - RECORD #2671 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Steve

**Last Name :** Lathram

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** We just got notice of this as well. It doesn't seem to be that the effort to let us know exactly what's going on has been -- there's been a lot of time spent on that. There's no transparency. The effort seems to be shrouded in ambiguity. There's a lot of rumor going on, but nothing really transparent as to exactly what's going to happen. Who is going to be affected; what the cost is going to be; all the design and engineering concepts, the time frames. And most importantly, it doesn't seem that public is being allowed to have an opportunity to input and respond to the real issues. So if there could be an opportunity to really put out exactly what's going to happen, and then allow for the public to respond, that would be -- that would be wonderful. Because it seems like right now, it's just shrouded in ambiguity. There's no transparency and no opportunity for us to respond. We just found out about this today. So if you could please continue this opportunity to address your issues and let us know exactly what they are, that would be helpful. Thank you.

**ODOT I-205 Toll EA - RECORD #2672 DETAIL****Submission Date :** 4/4/2023**First Name :** Jay**Last Name :** Jewess**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** I feel the outreach engagement communication by ODOT has been less than adequate. The location of tolling seems to be me to be unfair to West Linn and Oregon City residents. I-205 tolling will increase congestion on the local city streets even more so than they are today. And there's been no talk about mitigation in this area, what can be done to mitigate this local congestion, should the tolling go through. I think more effort should be made to improve mass transit and the transportation system than trying to reduce congestion with this project. I'm in favor of additional studies. And environmental impact study would be warranted in this situation to better understand the impacts. And just finally, I'm a retiree and I have a lot of medical appointments and therapy that I need to drive to because there is no mass transportation system in place. And so, I'm very concerned of the impacts on myself financially and other families in the area that have similar situations. That's all.

**ODOT I-205 Toll EA - RECORD #2673 DETAIL****Submission Date :** 4/4/2023**First Name :** Tera**Last Name :** Taylor**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** I am one hundred percent, adamantly against tolling. As many have stated already, it is very specific to kind of the area. And it's very unfair for the residents who kind of -- everyone is kind of trapped where they are in one way or another. In addition, we've already paid for this existing infrastructure with our taxes, our DMV registration fees. We've already paid for this. If ODOT wants to add infrastructure and toll new infrastructure to pay for it, fine. But there has got to be a different way to go about doing this rather than on the backs of residents who have already paid for what is existing. And if ODOT can't manage their money or find a better way to manage this without people paying for it and in unfortunate circumstances, then it sounds like there is massive mismanagement elsewhere, and it's not up to us to fix it. That's all I have.

<b>ODOT I-205 Toll EA - RECORD #2674 DETAIL</b>
---

**Submission Date :** 4/4/2023

**First Name :** Doug

**Last Name :** Buman

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** Just a quick note, kind of in defense of ODOT, I think it's important to remember that ODOT was directed by the legislature to do this, so I think our battle would be with the legislature. The public hearing process, I appreciate ODOT holding this and people can get comments and their thoughts out there. But again, I think we should be focusing on the legislature. ODOT was directed to do it and they're doing a good job of what they were directed to do.

**ODOT I-205 Toll EA - RECORD #2675 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Keith

**Last Name :**

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I, like many of the people in dissent here, understand the financial impact. One of the concerns that I have goes beyond that to more of a cultural impact and a segregation between the east and west side. My concerns are that where the tolling is being presented is one of the major and most significant ways to cross from the east side to the west side of town. And I think where, you know, the financial impact comes in greater here is segregating people that normally visit, whether for work or for social reasons, you know, it breaks the city in two at the river. So I would just be really interested to, you know, see more -- further studies on what that impact would be, concerns that the city -- you know, that downtown Portland might have with toll limiting the availability of people to travel there, to participate economically in what is supposed to be the vibrance in down -- you know, the vibrancy in the downtown Portland area.

**ODOT I-205 Toll EA - RECORD #2676 DETAIL****Submission Date :** 4/4/2023**First Name :** Bill**Last Name :** Merchant**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** I think it should tell ODOT something that in less than an hour of a three-hour listening session, you've run out of people commenting. This means it was not well publicized. People didn't know about it. People are very anxious and concerned about the prospects of tolling and what it means for us. And the fact that nobody shows up, tells you something about your outreach. The second off, I'd like to say, I live in rural Clackamas County, on the east or south side of 205. And I don't have many choices to get to the other side of the river, close to me. Closest way, I guess, is the old bridge in Oregon City, if I don't want to pay a toll on the 205 bridge. But I know that if I'm thinking that way, lots of other people would be thinking that way too. And downtown Oregon city is going to be become a parking lot. And the old bridge, which is clearly the old bridge and not designed for the kind of traffic that will want to go over it, is going to have a real burden on trying to have any kind of traffic move through Oregon City. Same thing applies for West Linn. West Linn, if you're coming down 43 from the Portland area, you're going to get down 43 here and just stop because it's going to be a parking lot along trying to get here. The location of the tolling spots that's been proposed seems completely wrong. If you're trying to raise money to get through-trips on the expansion of 205, you're tolling at the wrong place, if you're tolling at the bridge. Yes, the bridge will have three lanes in both directions, but the traffic -- the tolling traffic is going to be between the bridge and I-5. So the tolling spots are in the wrong place. And lastly, this is just really an imposition on Clackamas County. It doesn't hurt much of Portland. It doesn't hurt much of West Linn, but it really hurts Clackamas County to have the first tolling right here without enough outreach that people even know about this public hearing. Thank you for your time.

**ODOT I-205 Toll EA - RECORD #2677 DETAIL****Submission Date :** 4/4/2023**First Name :** Lacy**Last Name :** Nichole**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** I wanted to call in to talk about the unfair burden this places on the employers in Clackamas County. It's going to make it incredibly difficult for us to recruit with the added burden of people having to pay tolls to get to work. That's not fair on our businesses. In addition, it's really unfair for businesses who rely on vehicles, specifically trucks or deliveries and the increased burden that's going to place on them. So outside of how this effects individuals, I'm very concerned. And I do not believe the business community has an adequate input in how it's going to impact them in recruiting efforts, especially in this difficult labor market. Thank you.

**ODOT I-205 Toll EA - RECORD #2678 DETAIL****Submission Date :** 4/4/2023**First Name :** Dave**Last Name :** Farmer**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** I think the tolling program that's being set up now is very unfair, and it's not good for Oregon. My big complaints are the toll program is terribly ineffective as far as raising money because so much money is spent building the system and collecting the tolls. So much money of our tolls is just wasted and it doesn't do anybody any good. Now, the I-5 and I-205 system is considered one corridor. So whatever happens on one freeway affects the other one. It's one system. That's in the December 2018 application. So if two tolls go up on 205, that affects all of the I-5, from the Columbia River down to the start of 205. So the environmental assessment has to consider the whole corridor. That's from the Columbia River down to Charbonneau, and it's not being done. The whole thing has to be looked at. And the diversion traffic, the through traffic, when 205 has two tolls an I-5 has none, a lot of through traffic, which is going to be a lot of trucks, a lot of big trucks, is going to divert to I-5. I-5 is at capacity often. So if you put much more big trucks on I-5, I-5 is going to be very negatively impacted with congestion. And I live right in the middle of first two tolls, so I can't go anywhere on the freeway without paying tolls. And there's a lot of talk about equity for minorities. I haven't heard anything about the Native Americans getting something back for all their lands that were stolen to build the freeways. I think that all the Native Americans should get a free pass. And we didn't get to vote on this. And thank you so much for your time. Thank you.



**ODOT I-205 Toll EA - RECORD #2679 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Wendy

**Last Name :** Marshall

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I am not opposed to tolling. I think it is a tool to fund our highways. However, I do agree that the impact -- the financial impacts to the local residents is a concern of mine. And we should have significantly reduced or waived fees in you live in the vicinity. Also the congestion that will flow onto the local roads is a concern. And I want to add to that by saying the extra maintenance for our older roads will then fall upon the cities, West Linn, Oregon City mostly, to maintain the roads. And it should not fall on us unless it is fully funded to take -- to make up for that. But even if ODOT did pay the cities for the extra maintenance that will result, we still have to deal with the construction traffic and the extra traffic accident. Thank you so much for your time.

**ODOT I-205 Toll EA - RECORD #2680 DETAIL****Submission Date :** 4/4/2023**First Name :** Robert**Last Name :** Bayly**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** I would like to speak now on behalf of my father who has Parkinson's and speaking is difficult. He'll be 90 on May 18th. He's a veteran and uses the services at the West Linn VA Clinic, located on Blankenship Road. And he and I have both been discussing with concern some of the impacts of veterans, like himself, and other people -- elderly people on fixed incomes of the tolling. And he has suggested that it would be more fair that the tolling gantries be located at the interstate I-5 bridge and I-205 bridge, the Glenn Jackson bridge over the Columbia River. Because that would impact the people from -- who are driving on the road already, but they wouldn't be invited to divert onto the surface streets of those communities, so that the impact of tolling would be spread more widely and throughout interstate travel. And that West Linn, he thinks, having lived here all his life, is not set up to accommodate the added traffic burden that we noticed in the EA as listed potentially for on Borland Road to Willamette Falls Drive, specifically, an increase of potentially a hundred percent of traffic. And we live right off of Willamette Falls Drive. And he sees, on his walk, the back-up of traffic at the already failing intersections, and how much that will impact people trying to get to and from their homes, to their doctors appointments, to and from school. And those are concerns that he wanted to share. Thank you.

<b>ODOT I-205 Toll EA - RECORD #2681 DETAIL</b>
---

**Submission Date :** 4/4/2023

**First Name :** Bill

**Last Name :** Avison

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I apologize. I'm probably late -- an hour late into this meeting, but I'm wanting to know in EIS documents show the diversion impacts and how that impacts climate with traffic that is stalled on these side roads, particularly in West Linn, Rosemont, and all these neighboring communities? And I could not determine, looking at the data, if there was any direct study determining if there was any impact from those -- from this diversion, which will happen when you toll on 205. And thank you. I appreciate it. I'm sorry. This may have been answered earlier. I'm an hour late getting into the meeting, but I appreciate any information. Thank you.

**ODOT I-205 Toll EA - RECORD #2682 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Joshua

**Last Name :** Coxwell

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** My primary concern with the tolling is, as has been mentioned by other callers, is the diversion onto Willamette Falls Drive, because we already see pretty intense diversion during rush hour traffic between roughly 4:00 and 6:00. And it can take -- the high school is also right there by where the Oregon City bridge and the 205 bridge and Willamette Fall Drive and 43 all kind of come together there. And that intersection already can take 20 minutes to get from my house to the school if I'm taking my daughter to extracurricular activities after school. And like I said, we just already see a lot of diversion when there's traffic backed up on the freeway onto Willamette Falls Drive. And it just reduces the quality of life for the businesses there along Willamette Falls, and then just trying to get to other parts of West Linn. And that's all I have to say.

**ODOT I-205 Toll EA - RECORD #2683 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Bella

**Last Name :** Johnson

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I want to state an opposing viewpoint for tolling. As a resident of Oregon who frequently works across the border with our friends over in Washington, the tolls would be a substantial risk and a cost to my household and many of my friends and coworkers. It would impact our state. ODOT, when questioned about this, had stated that to avoid peak hours, rush hours and pricing to change your work schedule, which, unfortunately, is not an option or will no longer be an option in the foreseeable future, or to have public transportation. In my area and multiple other neighboring areas, there is no adequate public transportation that would allow me to get to my workplace in those hours, which would result in me having to be in a peak hour pricing. This would cause great cost to my household and be detrimental. So appreciate you taking the time to listen to my comment.

**ODOT I-205 Toll EA - RECORD #2684 DETAIL****Submission Date :** 4/4/2023**First Name :** Sarah**Last Name :** Risser**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** Thank you very much for letting me speak today. I'm a new resident to Oregon. I've recently relocated here. I've lived in many different places. I have had the great privilege, one of which was Singapore of all places, and it may or may not be relevant to draw on that example. Road pricing was a big part of managing traffic in Singapore, and it worked. It worked on many levels. It worked to decrease demand. And it worked to incentivize people to take other modes of transportation. So that sets the context for my perspective on this issue. I believe in this age of great traffic congestion, very serious road safety issues, and undeniable climate crisis, traffic should -- driving should be expensive. And I know that may sound callous and uncaring, but we definitely need to have systems that reflect the damage to human health and the environment inflicted by driving. So I am very much in support of tolling. I think it's really important that this project be designed to reduce the amount of people who are actually driving, and reduce the amount of vehicle miles. It should be designed to eliminate the potential for induced demand, or people driving more, because the congestion is relieved. In addition to all of this, I think it is imperative that revenue generated from this project, once the basic costs have been covered, be allocated to improving public transportation and active transportation options to get as many cars off the road as possible. You know, and this could be expanding the bus and light rail services, providing new transit options to areas that are not currently well served by public transit. So thank you very much for considering my comment and letting me speak today.

**ODOT I-205 Toll EA - RECORD #2685 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Helen

**Last Name :** L

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I appreciate you letting me comment. I live in the historic Willamette District. And while I appreciate many aspects of tolling, there -- there have been so many issues flagged around safety and equity. And, essentially, what's going to happen is people are going to come through our neighborhood. And there's a series of four-way stops in what already comprises pretty much the third lane of 205. And so a lot of the issues with, you know, looking to have things be safer and have less traffic, it's just going to route it from a freeway through a historic neighborhood and it is absolutely going to destroy the small businesses, families. There's multiple schools along the route. I can appreciate some of the concepts of tolling, but I just -- it doesn't seem terribly well thought through in terms of, like, there's very little public transit here, and there are very few opportunities for people who have lower incomes or need to travel. For example, I have a child who experiences a disability, and we don't have all the services we need within our small neighborhood and we have to travel much more than other families to access those services. And I've just -- I've read a lot of the documentation that's been put out, and it doesn't seem that it has been thought through how, you know, neighborhoods are going to be safe. Safety is going to be preserved. I mean, if you're looking to reduce numbers on the freeway and just move them into the neighborhoods, that exponentially increases safety issues. And this has a seriously disproportionate impact on lower-income households and people with disabilities. And I'm concerned that these -- it's being rushed. And I just think that there are models in other countries and other places that have very much more fine-tuned thinking put into place. And while I may agree with some of those principals -- like, this is going to destroy our neighborhood. It's going to be really hard on our family. And -- and I just firmly urge anybody who is listening who has some power to take this out of the budget and to raise taxes to, like, pay for this in a different way. It's going to disproportionately impact a small percentage of Oregonians. And I just -- it doesn't seem right. And I've reached out to multiple public officials on this, and it feels there's just this strong desire to push it through and to not hear people. So I'm saying this in the hopes that somebody will actually hear it and hear -- against this but I'm not sure because I'm just hearing a lot of this is going to happen anyways, and there we are. So hopefully, people's voices will be heard on this. Thank you.

**ODOT I-205 Toll EA - RECORD #2686 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Joe

**Last Name :** Chambers

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** Okay. So one of my main issues when I'm looking at this is quality of life. Oregon -- and people come here for quality of life. And when I look at adding tolling, it just totally adds a stress level over and above. Sure, we have traffic. It has mentioned other countries that are literally stacked on top of one another, but here, you literally have the ability to do as you please, drive where you want without added extra cost. Families that would literally be -- probably having less food to deal with the funding and passing or having to drive through the tolls. To me, when I look at this, it's actually another -- just another notch taken away from the quality of life. You sit there and people, now they're trying to go -- I'm going to take this road. I'm going to take Willamette Drive. I'm going to go Borland, and this is just the start. This has brought to us -- when I look at this -- I mean, I try to -- I paid attention to this, because I look who is bringing this and it's ODOT. ODOT is famously known for spending, what was it, a decade trying to pass Columbia River crossing, the new bridge going across the Columbia. Now, I'm only using this as an example. Now, you think that should be no problem. But the reason it was a problem and they lost -- they spent \$200 million just trying to come up with it, design it is because they were really trying to get light rail. And so, that is what I see them doing. They try to push the narrative, and they're going to push it and change it and spend whatever they have to until they get that narrative. So now we have tolling here and they want to do that. They haven't -- if you truly believe in tolling, you literally give it to a vote of the people. Now I get it, we have bureaucrats that say no, we're going to do it our way. That's what they're doing -- they have done it with light rail. And it has -- there used to be the light rail from the west side crossing that went from Hillsboro to Wilsonville, and you will see nobody on it. There was one point the Oregonian had an article about how much they were losing every month, and it was astronomical, and the whole thing is. But then TriMet comes back and says that well, but we got \$50 million from the federal government. If we stop it, we'd have to pay it back. So you're literally losing 100,000 it was a month, 50,000 -- it was just a huge amount every month. Now, I'm sorry if I sound a little anxious. I've never done this before, but I just see that if you want to have it -- if ODOT wants to have it, give it to a vote of the people. And if people vote it in -- and I may be against it -- I want to thank the Commission for allowing us to have this opportunity. Thank you.



**ODOT I-205 Toll EA - RECORD #2687 DETAIL****Submission Date :** 4/4/2023**First Name :** Lisa**Last Name :** Herman**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** I'm a resident of Oregon City. I have family members living in Damascus and West Linn who will also be impacted by these tolls. I'm against the tolling project for a variety of reasons. It unfairly punishes residents in the Oregon City and West Linn areas. I am dumbfounded at the fact that there will be two toll gateways that I must travel through to reach my medical and dental providers, as well as complete routine shopping trips. I previously worked for a farm property in a rural area of Beaverton that could not even be reached by public transportation. What do you expect rural farm workers to do? Many of them have no option to get to work besides driving. These tolls will unfairly punish the working class as they will likely receive no help from the State to alleviate the financial burden tolls will place on that their families, and oftentimes, are living paycheck to paycheck. For example, what about families who must pass through the tolls to get to work each day, to drive kids to school, daycare, or extracurricular activities, and then back home. Now, we are talking about the potential for families who live in Clackamas County to pay multiple tolls each day just to get where they need to go. As far as congestion pricing goes, commuting to work school and extracurricular activities happen at planned times, and families do not have the ability to change these times. People who cannot afford to or just don't want to pay these tolls but still must get to their appointments and school and work commitments, will instead divert their route through our neighborhoods in Oregon City and West Linn and only create a different type of traffic problem. It will not reduce congestion, but instead divert it through our residential neighborhoods. Thank you, and that is the end of my comment.

**ODOT I-205 Toll EA - RECORD #2688 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Shannon

**Last Name :** Knight

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** So I will preface this and also say that I do sit on the STRAC, so I'm coming at this from a little bit different perspective, but I am not a hundred percent against tolling. You know, I grew up in Los Angeles where we did have tolling. But the difference, and I've said this before, is all lanes were not tolled. From what I understand, the study ODOT did on tolling, they didn't look at tolling two lanes. They only looked at tolling one lane or all of them. And so, I don't feel like the decision to toll all lanes was properly vetted. I'm also a small business owner in the Willamette area, and my employees will have to pay a toll to get to work. So I do feel like there's a way for businesses to be able to purchase discounted vouchers to allow employees to come to work. I know the restaurants here already have trouble finding employees because they're low-wage jobs, and those people don't often live within the city of West Linn. So they are going to have to pay a toll, and my guess is they have a hard time finding employees that have to pay a toll to come to work. And that's why I feel like this toll should be put off until you can toll other areas, because it's unfair that West Linn businesses are going to, you know, not be able to find employees just because the toll only went in in their area. If the toll was in every -- in all the other areas at the same time, then everyone would be struggling with the same thing and they would have to say yeah, I can't get a job anywhere without a toll, so I'll pay it wherever I can get a job. But right now, we're going to lose employees because we can't, you know, have them come to work without paying a toll. I'm also concerned about the 24/7 tolling. We have narrow roads that are completely residential on that diversion route. And they're dark, and I just see all this -- you know, trucks coming off the freeway in the middle of the night making additional noise and causing safety issues with how dark those roads are. I don't understand if this is congestion -- for congestion, why, you know, at 2:00 a.m. we have to have tolling -- a price on the tolling in there. And then the toll would be a lot easier to sell if the infrastructure was already built out because we would have options for transit or bike lanes or anything like that, but right now we don't. I had a customer that flew in from Australia. She did a three-hour layover here just to come to see my business, thinking that would be long enough. She took the bus here. It took her an hour to get here on the bus. It took her 15 minutes for the appointment, but the bus only runs every hour, so she had to sit around for 45 minutes waiting for another bus, and she missed her connecting flight. So the transit is not -- there's no good transit here. Maybe if we had, like, a local shuttle that would go around parts of towns and take us to Oregon City -- then it would be, again, a lot easier to sell. But all that stuff should be built out before the tolling ends, and I think you would be more successful in selling this to public.

**ODOT I-205 Toll EA - RECORD #2689 DETAIL****Submission Date :** 4/4/2023**First Name :** Stephanie**Last Name :** Gitlin**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** I live in West Linn. Lived here many years. And if you take a glance at the map, you'll see that about half of the perimeter of West Linn is on the Willamette or the Tualatin River. And I am obviously opposed to tolling, like many of the commenters today, but I feel like we're the victim of our geography. To cross the Willamette from West Linn, it's either I-205 or the very narrow arch bridge. To cross the Tualatin, we have four choices; I-205, Stafford Road, Willamette Falls Drive or southwest Petes Mountain Road. We use I-205 a lot just to cross the rivers because our city sits right on a river. And it just doesn't seem fair that we are being penalized because we live in a city that is surrounded by water. And so, I just wanted to bring that to your attention and, you know, make sure you were aware of the fact that we have some obvious geographical constraints. Thank you for giving me the opportunity to voice my concerns.

**ODOT I-205 Toll EA - RECORD #2690 DETAIL****Submission Date :** 4/4/2023**First Name :** Tammy**Last Name :** Ovalle**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** I'm sorry if I get redundant, but I want to express my opinion on these issues. I'm totally against the tolls. I think it's going to be another cash cow for this organization. And the only way that we can express how we feel is by voting. Because otherwise, this particular organization is going to keep raising the prices, and it's going to be, like I said, a total cash cow. And we're never going to see any improvement in the roads. We already see -- we already see what they've done with the money that we pay in taxes for gasoline and it's not going anywhere. Thank you so much for allowing me to speak. I'm sorry I'm not very articulate, but I hope I made my point. I'm against it. Thank you.

**ODOT I-205 Toll EA - RECORD #2691 DETAIL****Submission Date :** 4/4/2023**First Name :** Karissa**Last Name :** Bristol**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** Thank you for allowing me to speak today. I just really do not support these tolls. I understand things need to be paid for, but usually how most of us operate, if we can't afford something, we just don't do the project. And I know that these tolls are meant to fund many projects. And I just think that tolling this section of Oregon just isn't fair for everyone else. And if we -- our State can't afford other things, we need to look at other places. And I just don't think tolling is a solution. It's just not fair with how many people really do use these roads. I'll just leave it at that and thank you so much for your time.

**ODOT I-205 Toll EA - RECORD #2692 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Christopher

**Last Name :** Hale

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** Thank you for giving me the opportunity to express my opinion. As some background, I'm an ER physician here, working in Portland. I'm sure we all recognize -- we all remember the heat dome effects we had last year. We've seen the wild fires that blackened our sky and made them orange for a week. From our perspective in the ER, we were absolutely flooded with people with respiratory illnesses who couldn't breathe. We are in the midst of a climate emergency. And the window for us to do something meaningful is closing rapidly. I have two children. I'm sure many of you do. And we cannot put the burden of solving this problem on them. We need to take bold and decisive action now. So -- and so, that's why I think that tolling is necessary but I think that we need to be very explicit that the -- and it needs to be in writing, an explicit stated goal of this project on I-205 is to reduce vehicle miles traveled and greenhouse gas emissions. It needs to be very explicit that that's the goal, and the project needs to be designed to ensure that happens. And more than that, we also need to make sure that the revenue is used to fund public and active transportation. My wife is -- has a master's in environmental policy, and she has worked closely with transportation and city planners, and it is a hard-and-fast rule of induced demand; if you -- if you increase -- if you increase lanes, if you make it easier for people to drive, they will drive more. And so, we need to make sure that the funds that are raised for -- from this tolling are used to fund alternative transportation, like bus transportation and biking. You know, we are putting our money where our mouth is. We live close to 205. That is the primary highway that we use. We will be subjected to these tolls. And for the sake of our future, for the sake of our children's future, we are willing to do that. And we -- we all need to, like, you know, think about the long-term goal and take decisive action now, for the sake of our community, for the sake of our future, for the sake of our children. Thank you.

**ODOT I-205 Toll EA - RECORD #2693 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Bill

**Last Name :** Merchant

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I'm still opposed to tolling. But I do have a couple of comments if tolling is implemented, which I'm sure ODOT is going to do. The outer two lanes of the 205 bridge, that is the outside lane that would go from Oregon City to West Linn, or from West Linn to Oregon City should not be tolled. That will allow any inter-city traffic between the two cities to pass without tolls. Further, I think that the tolling gantry should be on the west side of the bridge, not on the bridge. That will allow you to pick up the tolls that are going long distance down the rest of 205 to I-5, or from 205, which was also an excellent place to put a gantry, to the 205 bridge. That way you'll pick up the truckers that are going through and who want to have good traffic congestion, but you won't penalize the people who are simply trying to get from one side of the river to the other for local business and shopping. Thank you.

**ODOT I-205 Toll EA - RECORD #2694 DETAIL****Submission Date :** 4/4/2023**First Name :** Melissa**Last Name :** Kostelecky**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** Thank you. I apologize, I missed first part of this meeting. I was in another meeting. So if there is any sort of information that I missed on that, I apologize. But I just wanted to express support for tolling in general, but concern that the funds would be used for freeway expansion. I recently completed a master's degree in environmental policy and management, and have studied extensively some of the problems surrounding not only induced demand, but also when you have just more freeway, more cars, a lot of the air pollution that comes with that, it can be particularly hazardous for people living and working and playing near -- near the freeway. And so, from an environmental perspective, from a public health perspective, freeway expansion, adding more lanes is the wrong way to go. So I would like to see tolling done appropriately. I would like to see it put towards the -- the funds put towards active and public transportation infrastructure. Thank you.



**ODOT I-205 Toll EA - RECORD #2695 DETAIL****Submission Date :** 4/4/2023**First Name :** Laura**Last Name :** Greyerbiehl**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** I live in the Stafford Hamlet area, and I just wanted to put in a note. We have a gentleman farm here and are on well water. And there is no TriMet access by our house, and there's no plan for TriMet access by our house. So we have no option to do public transportation, so we have no choice other than to, you know, deal with the extra traffic that would be in our neighborhoods. We don't have sidewalks. There's no plan to put in sidewalks. So I'm really having a hard time understanding why our area was selected for tolling, when there's so many other areas in the State of Oregon that do have that infrastructure. So that would be my number one concern is the environmental impact and the impact on our community. Thank you.

**ODOT I-205 Toll EA - RECORD #2696 DETAIL****Submission Date :** 4/4/2023**First Name :** Danielle**Last Name :** Weber**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** Hello. I live in the Stafford Hamlet. I travel these roads, take my kids to school almost, you know, twice a day, to pick them up, take them down. And I see the traffic getting, you know -- I'm worried about the traffic and the tolling on the side roads, just like you know, many people have said as well. I'm worried about the businesses in Willamette, you know, the restaurant there, the -- just getting around on Willamette anyway right now, you know, about 4 or 5:00, when all the cars are already getting off the highway to take the side streets. It takes forever to get places. And I'm nervous that it's going to be a lot worse with the tolling. And especially on these side roads, like was previously said as well, the farms on the side all the -- the more the pollution that's going to happen with all the cars coming down, all the traffic and, you know, just -- it makes me a little nervous what's going to happen on all of the side roads. That's about it.

**ODOT I-205 Toll EA - RECORD #2697 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Bill

**Last Name :** Avison

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** Yes, just to kind of follow up, I've heard some comments about climate and the effects of tolling and how it will improve climate and air quality. Again, there's a huge unknown about diversion and being -- a lot of people probably know this that are listening in, but diversion is traffic going to West Linn on all of the side roads and Oregon City. And so those cars idle, and people that are very astute and understand this, when your cars idle, they produce more greenhouse gases versus keeping that traffic flowing. So we created two million more people in the Metro area in the last 15 years, and no new lanes on any freeways. And you can say let's get out of our cars, but you still need lanes and the ability to move around with cars and not pollute neighborhoods, which is going to happen, hugely in West Linn. My wife, sitting next to me, we are on a trip, but I had to log into this. And her mother is 92 and on Rosemont, and she is scared about the traffic and the diversion and, frankly, people idling on her street and creating more pollution. Cars do not -- no matter what they are, they do not do well idling. As long as you keep them moving on the freeway or side streets, it's more efficient. So the tolling will cause diversion. We all know that. That has not been studied. The environmental impact statements need to show that. That has not been shown. And we are going to look at that closely as the Clackamas County community to see where this goes. Thank you for my -- thank you for my time to comment.

**ODOT I-205 Toll EA - RECORD #2698 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Dave

**Last Name :** Farmer

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I live in Willamette. Like everybody else said, there is almost no mass transit around here. I recently rode the train. The train absolutely is not safe. I'm 69 years old. I can't ride a bike because I have some balance and I have some knee problems. The way Charbonneau has been picked out is totally unfair to them, because they can't go any place without paying the bridge toll. I West Linn water pipeline is not being paid by ODOT. That's not fair to West Linn. Reminder, toll money cannot buy trains or buses. That's in our constitution, Article 9, Section 3A. The ODOT budget only gets 25.2 percent of their money from the fuel tax. So if the fuel tax goes down a little bit, it's not that big of a deal. People that don't speak English, don't have computer access, don't have bank access will have a very hard time with this system. I'm not sure that the Native America Cultural Center, the new Athey Creek Middle School has been addressed because those are going to be new. Diversion traffic is going to go right through Fields Park and the middle school. Ostman Street is failing now. It will continue to increase in failing with more diversion traffic. And like Oregon City Mayor Denyse McGriff said, I don't want to be a guinea pig for ODOT. The system has never been attempted, and I don't want to be a guinea pig.

**ODOT I-205 Toll EA - RECORD #2699 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Dean

**Last Name :** Suhr

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I live in West Linn. And I am the author and co-petitioner or chief petitioner for the IP-4, the Vote Before Tolls initiative. And those of you that are concerned about tolling, should check us out at [votefortolls.org](http://votefortolls.org). IP-4 will give you the right to vote before this tolling project and all future tolling projects in Oregon. But my comment that you're asking for here is on the environmental assessment report. And that, as you know, is very lengthy document. I have a concern that I don't believe has been addressed in there which is related to diversion. And most of the diversion focuses on the near term, you know, sidewalks, or roads, or new signage, or whatever might be done. But I'm concerned that if we end up with tolling and diversion, that we will have not only more automobiles or just more traffic, but also more heavier vehicles, mid-size trucks that will be using our side streets and parallel pathways, as limited as they are. And the funding for the ongoing maintenance and repair of those roads is not baked in anywhere. The counties can't afford it. The cities can't afford it, and I don't believe ODOT's environmental assessment report has any provisions for that as well. So I'd like to ask that that be a something that you do some analysis on.

**ODOT I-205 Toll EA - RECORD #2700 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** John

**Last Name :** Moss

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I'm calling from West Linn. I was a former City Councilor and former Planning Commissioner. It's very concerning that residents of West Linn and Oregon City, those that will be living closest to the toll, will be unfairly taxed every time they want to leave their region. In the case of West Linn going to Portland, or even just crossing over to Oregon City or Milwaukee is going to be a hardship. I'm wondering if there would be -- I understand that you're going to be having the tokens that go on to the cars that are recognized automatically when they go through toll portion. And I am wondering if those in closer proximity to the toll gates or wherever that will be, would be given some sort of a significant discount based on their close proximity, since they are the most likely users just for day-to-day traffic, not even for commuting. And I think it's very unfair for those to be unfairly burdened. And we might be able to get through this if there is a way to at least economically not punish those that live so close and are lost in this. I also listened to what Dean Suhr had to say, and he's absolutely correct about the traffic that would be coming through West Linn, whether it's on the Oregon City bridge, or whether it's on Willamette Falls, there's going to be a significant pain felt that's going to be disproportionate to other communities and those that are closest to and nearest to the Abernethy Bridge. So that's my comment.

**ODOT I-205 Toll EA - RECORD #2701 DETAIL**

**Submission Date :** 4/4/2023  
**First Name :** Rory  
**Last Name :** Bialostosky  
**Affiliation :** Mayor of West Linn  
**Submission Method :** Public hearing

**Q3. Comments :** On behalf of the city of West Linn and the community at large, I wanted to enter into the record that this I-205 Toll Project Environmental Assessment is wholly inadequate and fails to address and mitigate serious impacts to the human environment from the toll project on West Linn. The city of West Linn will be submitting written comments and fully detail why this is the case, later on this month. My comments are meant to supplement that.

An environmental impact statement should be required by FHWA, pursuant to applicable federal laws. And I urge the FHWA to listen to local communities, businesses, and residents on this issue rather than the spin on the numbers that ODOT is putting forward. The EA states that traffic on West Linn Main Street that contains our historic business district, Willamette Falls Drive, as you've heard about today, will increase up to one hundred percent, compared to current conditions with no tolling, due to drivers rerouting to avoid the tolls. This makes sense given where ODOT decided to propose the gantries on the bridges, allowing easy diversion.

And ODOT's proposed mitigation does nothing to address this serious and substantial increase in cars that will grind traffic in our business district to a halt, and in the surrounding neighborhoods as well, traffic to a halt. It will increase emissions in our city and negatively impact the human environment. ODOT only proposed giving West Linn a crosswalk and solar panel for or a stop sign for pedestrians. The modeling found that the only impact would be pedestrian -- a pedestrian impact near 12th Street not addressing any traffic issues. So the proposed mitigation does not impact -- does not address, excuse me, the significant impact of additional traffic. ODOT's EA claims that, yes, traffic will increase significantly on top of the existing conditions, but local businesses on West Linn's Main Street will see an increase in spending and income due to diversion traffic stopping and potentially using -- frequenting the businesses. But this is an attempt by ODOT to spin the serious negative impacts of gridlock that will happen on our streets that ODOT is not mitigating.

Our two-lane surface streets are not capable of handling more cars. An unmitigated up to one hundred percent increase in cars on our local street system is a significant environmental impact to our city. So I believe an environmental impact statement must be required for this reason, and many others that will come through in our written comments. And we also would like a 90-day comment period. And I just want to comment briefly, nobody knows about this hearing. There was no opportunities for West Linns to comment in our city. No table events, but really just the public process to get to this hearing. Very few people in the community know about it happening today, and it's very concerning that this is the main opportunity to comment.

**ODOT I-205 Toll EA - RECORD #2702 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Bill

**Last Name :** Avison

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I just wanted to underline what Mayor Rory from West Linn was saying. Is that this process really needs to follow the EIS federal rules. We need to see what the impacts are for all these communities that are going to be impacted. I mean, a lot of discussion is let's get people out of their cars and they don't -- you know, let's not drive, and we'll slow them down, and we'll do congestion pricing. The problem is that congestion is going to go into these communities, like West Linn and Oregon City. And we do not -- I'm saying we, people in Clackamas County, do not have any means of other transportation. There's no other alternative mobility transportation. We do not have light rail that mirrors 205. We do not have other areas to -- to get around this impact of saying, okay, tolling will get you out of your car. So anyway, I just -- again, I want to -- I think what Mayor Rory was saying from West Linn is a really strong point. And let's just continue this discussion and keep the information flowing because we're not seeing it, from what the EIS documents, we're not seeing that. And the federal level, you need to show this. Thank you for your -- my time to speak again.



**ODOT I-205 Toll EA - RECORD #2703 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Rory

**Last Name :** Bialostosky

**Affiliation :** Mayor of West Linn

**Submission Method :** Public hearing

**Q3. Comments :** Thanks for providing this forum today. I just wanted to expand a little bit. I heard that I could speak twice, maybe. And my main point that I want to make tonight is that the dead air in this room that -- where people aren't commenting, I just want the record before ODOT to reflect that this does not reflect what I'm hearing from the community. I'm hearing that people care a lot about this issue. They don't want to see tolls on our roads. They want to see -- if they do want to see tolls, they want to see it more equitably impacted -- more equitably distributed across the region, not just in West Linn and Oregon City only. So I just hope that their -- I think that the way in which this was publicized has resulted in not a lot of people showing up, because it wasn't really blasted out to people. And I think if we had a true public hearing process that was adequately noticed, there would be potentially thousands of people showing up to raise their objection. So I didn't want -- I don't want ODOT to take the lack of people here to mean a lack of interest, because there really is a strong interest in participating and sharing concerns. I just think people didn't know about this opportunity today, and it's frustrating. And so I just wanted to make sure that was in the record as well. Thank you for the opportunity to comment.

**ODOT I-205 Toll EA - RECORD #2704 DETAIL****Submission Date :** 4/4/2023**First Name :** Marvis**Last Name :** Militante**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** I got notice yesterday that this was happening, which seems wholly inadequate for a public hearing. I am also concerned because I have family members who are working and are unable to attend this meeting, either on Zoom or in person, who will be severely impacted because of living or working in Oregon City and having to access 205 to get to where they're going. It just seems like there will be no work-around if you work in Oregon City and if you need to go west. Or if you live in West Linn and need to come towards Oregon city. It's -- in my opinion it's an unfair burden. There has not been adequate notice of public hearings. And the environmental impact statements that I have seen do not address reality. The reality is there will be more through traffic on city streets. There will be pedestrians impacted. And should the arch bridge between West Linn and Oregon City be turned into a bicycle only or pedestrian-and-bicycle-only avenue, it will be even worse. And I appreciate having transponders do the work, but what are going to do -- where will the cameras be to catch those who don't have a transponder? I'd like answers to that. And I would like to see an expansion of the environmental impact statements, and another opportunity for people who were not able to attend this because of short notice, or because it was during their working hours, or their commute hours, to have an opportunity to voice their opinions. And you cannot think that just because Internet exists that everybody has access to it. Thank you.

**ODOT I-205 Toll EA - RECORD #2705 DETAIL****Submission Date :** 4/4/2023**First Name :** Jackie**Last Name :****Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** I want to echo a lot of comments that I've heard. I am very against tolling on I-205. Wanted to echo the comment of the environmental impact not being something that is clear at this moment. From a traffic standpoint, the people who would be most impacted are going to work and school, and people are still going to be going to work and school, so that means the traffic on I-205 will be diverted to side roads through West Linn and Oregon City. As a someone who lives in Oregon City, our roads are not set up for that type of traffic. Public transit really is not an acceptable alternative at this point. So really, you're talking about, you know, from what we see as no environmental improvements that will make up for the inconvenience, and also, the impact to local streets. I want to echo the West Linn mayor's concerns on this hearing having very little notice. I found out about it a couple hours ago on -- via Google News. So I think that, you know, being able to include the community and alert them ahead of time of, you know, opportunities like this will be very important moving forward. And I also feel that, you know, the community needs to be fully informed before this goes to a vote. And then, also, you know, the vote needs to be accepted and acted upon accordingly. So I'm against the tolling on I-205, and thank you.

**ODOT I-205 Toll EA - RECORD #2706 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Terry

**Last Name :** Cove

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** One of them is, of course, that I didn't receive notification until 4:07 today in my email that this meeting was going to transact. And so far it sounds like we've talked about financial burden on drivers, and traffic congestion, diversion of traffic, impact on community, the highway tolling for folks would can't necessarily afford it, and the pollution, I think, that, you know, increases throughout the rest of the area. And equity issues for the, you know, disproportionately impacted low income. It just seems like it hasn't been well addressed yet. And so I will add my additional comments. Thank you.

**ODOT I-205 Toll EA - RECORD #2707 DETAIL**

**Submission Date :** 4/4/2023  
**First Name :** Mary  
**Last Name :** Baumgardner  
**Affiliation :**  
**Submission Method :** Public hearing

**Q3. Comments :** Thank you. I appreciate being given a chance to speak again, and I only put my hand up because there is some dead air happening, and I thought I would encourage other people who haven't spoken. I know it can be a little bit off-putting if you've never done it before, but please, just give your comment. It doesn't matter if it's written out or organized. This is an opportunity for the people to speak and ODOT to hear your input. I would like to say that, specifically with regard to the EA, and I have looked not at every single page of this thousand-page document which is a bit of a challenge for just a normal person has also got a full-time job, I would have to say. So the responsibility shouldn't be on the public to memorize this document or fully understand it. I would have to say that the fact that this is being -- this project is being proposed with potential -- well, known impacts being admitted about diversion traffic on surface streets in an area that doesn't have public transit options at all. If you overlay public transit line map onto the Portland -- the greater Portland area, you will see that West Linn specifically has the least amount of public transit options. So to cite this project here, and specifically in an area that's got some really clearly defined alternate routes that are already being used as an alternate to traveling on the freeway, the whole thing just doesn't make sense. So putting this project here does not make sense. And I would really appreciate better outreach to the public, better community engagement, and citing, tabling an outreach -- a direct, in-person outreach in the West Linn community because not everybody is able to access a virtual format. Thank you.

**ODOT I-205 Toll EA - RECORD #2708 DETAIL****Submission Date :** 4/4/2023**First Name :** Dean**Last Name :** Suhr**Affiliation :****Submission Method :** Public hearing

**Q3. Comments :** I understand that this is not a Q and A, so I'm just putting feedback into the process. I, too, was just notified in the last 24, maybe 36 hours about this meeting, and frankly, thought it was a local Clackamas meeting, not an official ODOT townhall. So the communications are not clear at this juncture, and I think that is problem. There's a lot of opinion and a lot of interest in tolling, and I don't think that you're reaching the audience yet. Even as I speak today, now I've spoken twice, so I will show up twice as number of participants and, you know, the hundreds or whatever it's been for today, and so, ODOT will call that a success. With regard to the EA, I've also been alerted but I am not a lawyer and I haven't read -- like Mary, I haven't read all thousands pages of the document. But my understanding is this EA has been crafted in a way that does not require the formal federal review by virtue of where the tolling gantries are being placed. Something to do with whether they're over bridges, or whether they're not over bridges, and so on. And I would like to request that ODOT be transparent about that. And then finally, kind of looping back to what I started in my first comment, I think it's very important that ODOT not just count the number of comments or put them back up on the website for people to read and work their way through, just like the thousand-page report, we really need to have an informative summary of what those comments were. Kind of the topic areas, the number of people weighing in and key points. I think that would be very, very valuable to this process as we go forward. Thank you.

**ODOT I-205 Toll EA - RECORD #2709 DETAIL**

**Submission Date :** 4/4/2023  
**First Name :** Paul  
**Last Name :** Savas  
**Affiliation :** Clackamas Board of County Commissioners  
**Submission Method :** Public hearing

**Q3. Comments :** For those of you who have been online here for the last two and a half hours, I was the first speaker. I've been listening in the entire time. I think it's worth noting that the lack of participation and the dead space is evident, or evidence, that frankly, the notification -- and people are echoing that. The notification has been very poor and certainly hasn't real made the rounds. Otherwise, there would be a lot of people filling in and speaking. I want to echo the comments from the mayor on this topic as well. I started you my public involvement in 1997. I've been to thousands of meetings. I first got elected in 2001, and was I serving in, actually, an employment position in the year 2000. So I have had 20-some-odd years of continuous elected service. And one thing I have learned, if you want people to participate in your meetings, not unlike city councils, not unlike county commissions or other special districts, most of those meetings start at 6:00, 6:30, 7:00, when people are home from work. Each of my family members, my kids, their spouses, my wife, all five of them is currently at work, My neighbors -- I'm looking out my window as I'm speaking to you -- my neighbors aren't even home from work because their car isn't even on the driveway. If you want participation, truly want participation, I think the notification could have been significantly better, and frankly, been made available early on when the EA was released. That way there would have been a good head start on getting the word out. But that's not the case unfortunately. Again, it's self-evident here that participation is very, very, weak. And, you know, it will be -- to echo the other comments, I think having the comments listed and available and the unique comment -- the unique users or participants, again, would help draw out the fact that the attendance here was very, very low, and ought to be reconsidered at a better time where people can attend. And again, far more advance notice in a far more robust way. Thank you.

**ODOT I-205 Toll EA - RECORD #2710 DETAIL**

**Submission Date :** 4/20/2023  
**First Name :** Yolsnda  
**Last Name :** DiPeri  
**Affiliation :**  
**Submission Method :** Web comment form  
**Q3. Comments :** I do not agree to the toll on I205.



**ODOT I-205 Toll EA - RECORD #2711 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Tom

**Last Name :** Borg

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Can't believe that Oregon taxpayers keep paying for overpaid public thieves.  
Hope that everyone wakes up soon!!!

**ODOT I-205 Toll EA - RECORD #2712 DETAIL**

**Submission Date :** 4/20/2023  
**First Name :** Steven  
**Last Name :** Smith  
**Affiliation :**  
**Submission Method :** Web comment form  
**Q3. Comments :** No Tolls Period!!!

**ODOT I-205 Toll EA - RECORD #2713 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Charlene

**Last Name :** Mogle

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I am against putting tolls on our Oregon roads. When we travel to Portland the traffic is horrendous, tolls would make it even worse! We hate driving in the Portland area as it is, why make things worse?

**ODOT I-205 Toll EA - RECORD #2714 DETAIL****Submission Date :** 4/20/2023**First Name :** Bryan**Last Name :** Baumgartner**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** As a lifelong Oregonian I do not support tolls on I-5 or any state highways. As taxpayers and purchasers of fuel these dollars are to be use for critical infrastructure and not low priority projects. It is past time our highway transportation dollars get back on track to what we have originally voted for which are highways! Our limited funds should no longer go for bicycle or other transportation means that have minimal users. In closing, thank you for the committees work and move your recommendation forward not supporting toll options. Thank you

**ODOT I-205 Toll EA - RECORD #2715 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Kourtney

**Last Name :** Seus

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** By rolling our major roads you are adding additional burden to the middle class and negatively impacting our local economy. People who don't want to pay the toll will just find other ways to get across and impact traffic elsewhere and push more traffic to surface streets, endangering local neighborhoods.

**ODOT I-205 Toll EA - RECORD #2716 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Randy

**Last Name :** Stewart

**Affiliation :** WHIPPS INC

**Submission Method :** Web comment form

**Q3. Comments :** No more new taxes and creating another agency. If money is needed us existing taxing agencies. Starting a new one will just be another every growing government agency requiring more and more money to fund.

<b>ODOT I-205 Toll EA - RECORD #2717 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Keith

**Last Name :** Regelin

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I am AGAINST tolls, in any form, due to equity and traffic issues! NO TOLLS!

**ODOT I-205 Toll EA - RECORD #2718 DETAIL****Submission Date :** 4/21/2023**First Name :** Jennifer**Last Name :** Buie**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I vote no on any tolling here in Oregon. My husband commutes to work on our highways every day and this would hurt us dramatically as we are already struggling. Thank you



**ODOT I-205 Toll EA - RECORD #2719 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Ken

**Last Name :** Martin

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolling is a BAD idea. It will create longer commute times, put traffic pressure on surrounding communities and it's just another money grab tax by law makers! We already pay too much in taxes, and this is just one more. There is no light image reason for this tolling of I-205 & I-5 and it needs to stop! NO new taxes & NO tolling!

**ODOT I-205 Toll EA - RECORD #2720 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Cynthia

**Last Name :** Rountree

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** No tolls! No double taxation! I don't mind paying for highway maintenance, just not through tolling. The funding of maintaining our roads and bridges is important, but not through tolls. The legislature should provide enough funding from the taxes we pay already. Increase the state highway tax that I already pay each year. Please don't create the hardship of a toll for me when I'm driving. Thank you,

**ODOT I-205 Toll EA - RECORD #2721 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Lynn

**Last Name :** Miller

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Let's work at other solutions to pay for roads and ODOT expenses before exacting tolls for travelers on Oregon highways. I recently returned from the east coast where it seems toll roads have sprung up everywhere. Toll collection areas are stressful to negotiate, not to mention ugly and I came home thinking this would never happen in Oregon. Please keep Oregon a beautiful place to live and drive. No Tolls! Thank you.

**ODOT I-205 Toll EA - RECORD #2722 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** ROGER

**Last Name :** VANDERHOFF

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** No tolling on Oregon highways! We already pay taxes for those highways. Those highways already belong to us and I am against paying more money for something we already have payed for.

**ODOT I-205 Toll EA - RECORD #2723 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Tim

**Last Name :** Morris

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** We the people pay enough of our hard earned money through taxes special taxes, DMV and we deal with enough congestion on the roadways we do not need NO TOLLING!

**ODOT I-205 Toll EA - RECORD #2724 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Lauren

**Last Name :** Teyema

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I have lived in west linn in the same house for 44 years. My husband and I are retired. Our house happens to be directly across from the freeway. In stating this every time we leave our house we will have to pay a toll. To get groceries, to see our grandkids, to go the the doctor and everything else one can think of. I do not want to think of the financial hardship this will put us under. I don't understand how one can think this is fair to people living around the freeway entrance. So let's talk about traffic in west linn. On any given night we can sit on our front porch and watch "freeway" traffic back up and clog Johnson rd. People know how to manipulate the back road when the freeway is jammed and our street is a particular popular route. Unless u plan on doing something for the people in the area to help with finances brought upon by tolling I am so against this. I already paid for this freeway with my taxes. I 205 wasn't finished when we purchased our home here in west linn and I don't want to pay for it twice. This seems so unfair to me and wrong. I understand people making these decisions don't live in west linn and could care less about how we feel. Shame on you!

**ODOT I-205 Toll EA - RECORD #2725 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Leah

**Last Name :** Klein

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** My 85yo mother attended a senior meeting sponsored by ODOT where a \$5 toll was discussed. We are not unreasonable people. A \$5 toll is OUTRAGEOUS. A dollar, possible even \$2 seems reasonable. Anything above that is excessive and will hurt Oregonians in the area and will no doubt be an absolute hardship for the bridge on the south end of Portland, the neighborhood and bridge in Sellwood. Our children live right over the river just off of 43 in WL. My husband and I are caretakers for our grandchildren and commute there almost 7 days a week to help our daughter's young family. As well, they travel over the river to visit us in Oak Grove. We literally get on at 99 and off on 43. Between 4 generations, we make several trips across that bridge daily. For us, it feels like you are separating our family. Again, we don't mind a toll completely, but it needs to be MUCH LESS.

**ODOT I-205 Toll EA - RECORD #2726 DETAIL****Submission Date :** 4/21/2023**First Name :** Tomas**Last Name :** Pudil**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** Even though I am happy there are some major improvements done on I-205 I believe we shouldn't be paying now for mistakes made when I- 205 was built. The decision to shrink it from 3 lanes to two lanes from exit 3 to exit 8 and also to undersize the bridge over Willamette River was very nearsided. I consider many of the public projects to be that way. The whole Portland Metro are is like that. It never takes in consideration future growth. What was done years ago may be satisfactory for then but not for now. It seems to me every year there are some more additional taxes or fees ( also taxes but named differently) and it is never enough. So I disagree with proposal to pay a toll on our freeways or bridges. We already pay too much. I feel like a partial slave of the system.



**ODOT I-205 Toll EA - RECORD #2727 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Hannah

**Last Name :** Topliff

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** No tolls in Oregon! Our infrastructure cannot handle traffic to be diverted. Our roads were obviously made poorly and this is not a solution. To punish the public is the worst thing you could do.

**ODOT I-205 Toll EA - RECORD #2728 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Charles  
**Last Name :** Hoyle  
**Affiliation :**  
**Submission Method :** Web comment form  
**Q3. Comments :** No toll on any of our roads, Highways , bridges, and freeways!

**ODOT I-205 Toll EA - RECORD #2729 DETAIL****Submission Date :** 4/21/2023**First Name :** Cynthia**Last Name :** Arnich**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** My husband and I do not want to pay the toll tax that will be required or deal with the dangerous alternate route traffic congestion for our surrounding homes. We are against this toll bridge on the Willamette River.

**ODOT I-205 Toll EA - RECORD #2730 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Vicki

**Last Name :** Zeise

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** PLEASE! NO TOLLS! Not only is it not affordable but all the added traffic on the surface streets would be a nightmare.

<b>ODOT I-205 Toll EA - RECORD #2731 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Leanna
<b>Last Name :</b>	Cool
<b>Affiliation :</b>	
<b>Submission Method :</b>	Web comment form
<b>Q3. Comments :</b>	Please vote no tolls.

**ODOT I-205 Toll EA - RECORD #2732 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Robert  
**Last Name :** Hohensee  
**Affiliation :** Oregon City Evangelical Church  
**Submission Method :** Web comment form  
**Q3. Comments :** I believe tolling is a bad idea. If gas tax revenue is down due to electric cars or those with flex options, then require them to pay tax based on the mileage driven. I assume that the Department of Transportation can identify who owns electric cars, etc.

**ODOT I-205 Toll EA - RECORD #2733 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Joanne

**Last Name :** Parker

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :**

I am firmly against tolling for the following reasons.

1. This project has not been thoroughly vetted. The proposed tolled areas are going to cause widespread havoc in all the surrounding areas.
2. Commuters are going to bypass tolled roads by using side streets. Highway 99 is already in horrible shape. The extra traffic will only add to the excessive pot holes.
3. The details of how, where, why the money will be used is very ambiguous.
4. The details of how much we will be charged and for how long is also ambiguous.

I sincerely hope you actually will listen to what the public has to say and rethink this farce of a project.

<b>ODOT I-205 Toll EA - RECORD #2734 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Alan

**Last Name :** Brawner

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** No on Tolls period. If you think this is such a good idea let the public vote on it. You won't because you know it will fail.



**ODOT I-205 Toll EA - RECORD #2735 DETAIL****Submission Date :** 4/21/2023**First Name :** Nicholas**Last Name :** Rivera**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** These toll will do nothing but cause traffic and more damage to side roads.  
These tolls will be a horrible addition. And will make everyone's life worse off.

**ODOT I-205 Toll EA - RECORD #2736 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Savannah

**Last Name :** Vel

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I sincerely believe that adding toll stations on the I-205 and I-5 bridges will negatively impact the local communities, because of the cost of the tolls, the increase in traffic (this will funnel way more traffic into 99E, which is THE main road for a lot of communities), and our general overall quality of life. Please do not setup the tolls on these bridges.

**ODOT I-205 Toll EA - RECORD #2737 DETAIL****Submission Date :** 4/21/2023**First Name :** Terry**Last Name :****Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** Tolling the Free WaY to reduce traffic is insane Folks that use that route to commute will still use it because they have no other choice. But folks that need to visit hospitals in Oregon City or Tualatin will be penalized with higher cost medical care Restaurants will lose business because additional costs. Traffic could better improved by opening and closing lanes based on the day, time, and traffic volume. Like what's done on the Golden Gate Bridge. I also think someone will make a lot of money by supplying the state with a tolling system, its operation and maintenance. Perhaps even kickbacks.

**ODOT I-205 Toll EA - RECORD #2738 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Emily

**Last Name :** Ray

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Oregon does not need tolls. Stop stealing money and wasting it.

**ODOT I-205 Toll EA - RECORD #2739 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Nikki

**Last Name :** Ticen

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolling our roads is only going to hurt seniors and the taxpayers who are trying to make a living.

**ODOT I-205 Toll EA - RECORD #2740 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Pat

**Last Name :** Truhn

**Affiliation :** private citizen

**Submission Method :** Web comment form

**Q3. Comments :** It seems that more and more things are being decided without the people's vote. This is a big deal and will be expensive for many citizens. We are turning into Seattle! I am very unhappy about the tolling. The changes in I-205 started quite a while ago, so I knew it was a done deal after it was started.... asking for comments at this point is a bit late when the decision was made even before the comments were requested. It feels like the agenda is being forced down everyone's throats.

<b>ODOT I-205 Toll EA - RECORD #2741 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Tracy

**Last Name :** Bigonovich

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** We are already taxed to death. Adding tolls will only cause more debt and frustrations and burdons to people already struggling to make it financially in their lives.

**ODOT I-205 Toll EA - RECORD #2743 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Jacqueline

**Last Name :** Bennett

**Affiliation :** WSDOT

**Submission Method :** Letter

**Q3. Comments :** Hello Mandy Putney,

Please see the attached letter for WSDOT's comments about the I-205 Toll Project Environmental Assessment.

Thanks,

**Attachments :** WSDOT\_I205\_Comments.pdf (90 kb)



April 21, 2023

Mandy Putney  
Director of Strategic Initiatives, Urban Mobility Office Oregon  
Department of Transportation  
Transmitted via E-mail: [Oregontolling@odot.oregon.gov](mailto:Oregontolling@odot.oregon.gov)

Dear Ms. Putney

We appreciate the opportunity to comment on the I-205 Toll Project Environmental Assessment. WSDOT understands the challenge of funding infrastructure projects, the impacts congestion poses to our economy and the role that tolling can play in navigating these issues. Especially in the Portland-Vancouver metro area, our transportation systems are interdependent, and we appreciate our involvement to date in this project.

WSDOT has reviewed the Environmental Assessment and does not have any concerns or comments with respect to impacts to Washington roadways or operations. We look forward to the continued engagement of Washington stakeholders, residents and travelers as the process moves forward.

Sincerely,



Carley Francis  
WSDOT Southwest Regional Administrator

Cc:

Scott Langer, WSDOT Assistant Regional Administrator – Operations and Planning  
Laurie Lebowsky-Young, WSDOT SWR Planning Director

**ODOT I-205 Toll EA - RECORD #2744 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Randall  
**Last Name :** Yamada  
**Affiliation :** Stafford-Tualatin Valley Community Planning Organization  
**Submission Method :** Letter  
**Q3. Comments :** Attached are comments from the Stafford-Tualatin Valley Community Planning Organization in opposition to the planned tolling of Interstate 205.  
**Attachments :** StaffordTualatin\_Valley\_CPO\_Env.\_Assessment\_Response.pdf (2 mb)

April 21, 2023

To: Oregon Department of Transportation

[I205TollEA@odot.oregon.gov](mailto:I205TollEA@odot.oregon.gov)

[Oregontolling@odot.oregon.gov](mailto:Oregontolling@odot.oregon.gov)

From: **The Stafford-Tualatin Valley Community Planning Organization**

RE: **The I205 Toll Project Environmental Assessment**

This is in response to the I205 Toll Project Environmental Assessment and prior requests for comment from ODOT. The Stafford-Tualatin Valley CPO stands in opposition to the I205 Toll Project and supports other CPO's, Counties, Cities, Hamlets, communities, and citizens of Oregon standing in opposition to the I205 Toll Project. We have hosted your tolling representatives for presentations and conversations with our community and understand clearly how the Toll Project will affect our community.

The modern interstate freeway system in Oregon and connections to the highways, streets, roads and communities were never initially designed and developed with a system of tolling and pricing in mind.

Retrofitting this tolling only, and pricing system by overlaying it on a freeway built 40 years ago, connected to another freeway built 65 years ago, connected to our existing system of roadways and streets is a complex undertaking. The effort to accommodate diversion traffic, social, and environmental consequences will be one of the largest local planning, engineering, social, and environmental projects of our lives. Initiating the tolling itself is a simple thing but there are deep consequences.

The project funding estimates show revenues will fall short of funding debt and maintenance not to mention cost of diversion. I don't see a tolling system coming up with an amazing new product increasing their profitability to pay for the anticipated and unanticipated costs of an entirely new, landmark transportation system.

As a rural community we see an extremely complex and lengthy Environmental Assessment with goals developed to cope with overlaying tolling and pricing on urbanized communities. This Environmental Assessment does not address overlaying tolling and pricing on our rural transportation system which was never developed to accommodate diversion traffic and other impacts.

At the center of our community is the initiation of eastbound tolling at the Stafford I205 freeway exit. We are a rural community with 1170 acres of land zoned Exclusive Farm Use and 2000 acres zoned Rural Residential Farm Forest. The land is hilly and distances are large enough so urban style pedestrian and bicycle diversion mitigation are not practical for commuting and shopping. Cycling and walking will remain recreational. There is no mention in the Environmental Assessment of toll funding for mass transit in our area as we have no transit system here. Neither ODOT or TRI-Met have offered us a shared ride service. ODOT has never offered non-tolling lanes as a possible concession.

Our roads and streets are rural and were never developed or upgraded for diversion traffic. We have hilly terrain, rivers, streams, and freeways as geographic barriers limiting transportation connectivity where more connectivity is needed. Bridges and overpasses are expensive and none are planned. As an Urban Reserve, future urbanization will be precipitated by tolling and widening of I205 resulting in the need for widespread street and infrastructure improvements in our area.

With no prior tolling system and no testing proposed, initiating this permanent program will result in unfunded problems. Major improvements may be needed on our street system to accommodate diversion traffic.

Since the completion of I5 in 1957 the non-freeway river crossing capacity in our network of bridges has not increased. Our population is using the non-tolled freeway system as an integral part of our network of river crossing roadways. Beyond streets and intersections, a limited number of bridges over our rivers presents a serious problem. The additional freeway bridges have always absorbed the increased transportation demand. During this time our population has increased from 1.7 to 4.2 million.

The purpose of a pricing system where tolls are increased during peak capacity is to encourage people to use other transportation systems during peak hours. Our non-freeway bridge system was developed to support transportation for one car families in 1957. Now we expect it to cope with 2024 diversion traffic? Our off-freeway bridge system will only support current and future traffic if the river crossing freeways are open without tolling.

This is a tolling proposal that has not considered the impact of broad public resistance and organized opposition to tolling. Market studies are needed to evaluate the resistance. Tolling has been turned down multiple times over decades, for it to suddenly become popular would be unique.

All of this while our area will be paying the lions share of the tolling.

The I205 Environmental Assessment submitted exceeds the FHWA ER Toolkit recommended 15 pages by a factor of 13. The description of need should cover traffic congestion and correction of roadway deficiencies. Clearly the problems presented with I205 tolling go way beyond normal circumstances. The primary purpose of the Environmental Assessment is to help the FWHA and HA decide whether an Environmental Impact Statement is needed. Tolling I205 is so complex that the idea of Finding of No Significant Impact is not possible.

The Metro Urban Growth Reports show the need and costs to upgrading current Stafford, including Borland area roadways to arterial standards. These reports do not mention tolling and pricing so the need for improvements precedes tolling. Initiation of tolling prior to diversion traffic improvements and freeway widening should not result in a Finding of No Significant Impact.

Under the I205 Tolling plan, tolling is now. Remember, under our county comprehensive plan tolling will precipitate Stafford area urbanization. Under the Portland Metro Urban Growth Report the initiation of a concept plan process and funding plans for transportation facilities needs to be initiated prior to urbanization. With tolling initiating now, it will be years before roadway planning and funding can bring our streets to the standards needed to meet current urbanization and diversion traffic demands.

Sincerely,

Stafford-Tualatin Valley Community Planning Organization  
Randall Yamada, John McCabe, Mitch Jones, Len Schaber, and Bill Markt

Information for the Community:

Attached are the Environmental Assessment Instructions from the FHWA ER Toolkit.

[https://www.environment.fhwa.dot.gov/legislation/nepa/guidance\\_preparing\\_env\\_documents.aspx#ea](https://www.environment.fhwa.dot.gov/legislation/nepa/guidance_preparing_env_documents.aspx#ea)

Attached are NCHRP Research Document Assessing Highway Tolling and Pricing Options and Impacts with histories of proposed previous tolling for Stafford, Newberg, and Lents.

<https://nap.nationalacademies.org/catalog/22701/assessing-highway-tolling-and-pricing-options-and-impacts-volume-1-decision-making-framework>

Attached are Portland Metro Urban Growth Report for Stafford and Borland.

[https://www.oregonmetro.gov/sites/default/files/2018/07/03/UGR\\_Appendix7zd\\_Stafford.pdf](https://www.oregonmetro.gov/sites/default/files/2018/07/03/UGR_Appendix7zd_Stafford.pdf)

[https://www.oregonmetro.gov/sites/default/files/2018/07/03/UGR\\_Appendix7h\\_Borland.pdf](https://www.oregonmetro.gov/sites/default/files/2018/07/03/UGR_Appendix7h_Borland.pdf)

**Need for new transportation facilities and costs (see attached transportation map)**

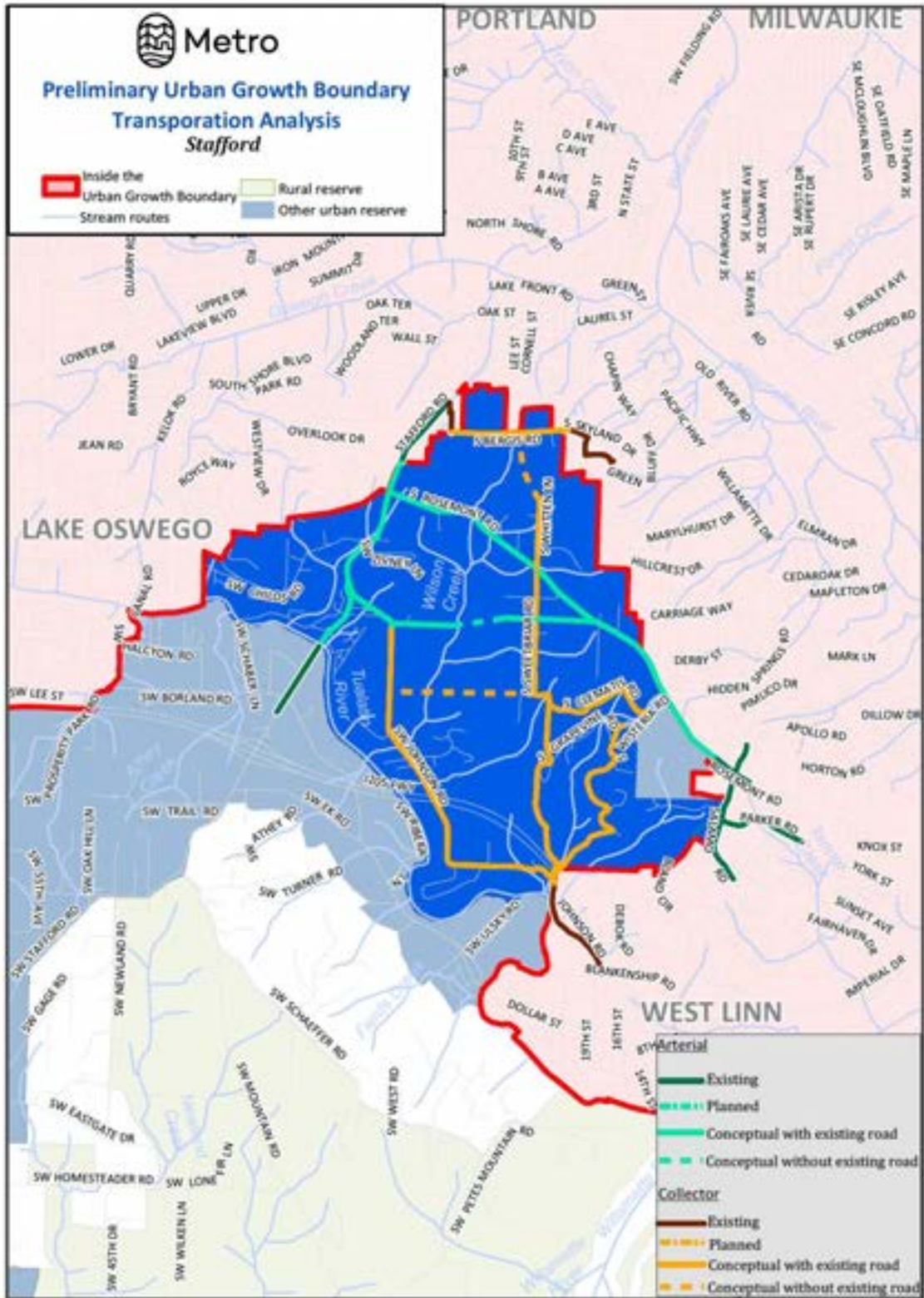
SW Stafford Road, S Rosemont Road, SW Johnson Road (between SW Stafford and SW Long Farm Road), SE Long Farm Road, S Sunshine Lane, S Station Lane will need to be improved to urban arterial standards. A short section of S Rosemont Road is considered a ½ street improvement as the other portion is inside the UGB. One new arterial is needed to connect SW Long Farm Road to S Sunshine Lane. S Bergis Road, S Whitten Road, S Sweetbriar Road, S Clematis Road, S Wisteria Road and SW Johnson Road (remaining section of road) will need to be improved to urban collector standards. Two new collectors are needed, between SW Johnson Road and S Sweetbriar Road and between S Whitten Lane and S Bergis Road.

Facility Class		
<b>Arterials</b>	Type	Cost (in millions)
	Existing/Improved	\$202.65
	Existing/Improved 1/2	\$6.13
	New	\$8.76
<b>Collectors</b>	Type	Cost (in millions)
	Existing/Improved	\$191.61
	New	\$41.63
<b>Total</b>		<b>\$450.78</b>

**Provision of public transit service**

TriMet evaluated the reserve area for providing transit service. TriMet could provide services to the reserve area although there is no guarantee of service. Actual service depends on the level of development in the expansion area and in the corridors leading to the reserve area. Service could be provided at 30 minute headways for all day service, five days a week, with two additional buses at a capital cost of \$800,000 (recurs every 16 years). Annual service cost is \$728,000 and grows 2% per year.

Prior to land being included in the UGB a more detailed concept plan, consistent with the requirements of Metro's Urban Growth Management Functional Plan Title 11, is required. This concept plan process will develop more refined public facility and service needs and cost estimates.



The information on this map was derived from digital databases on Metro's GIS. Care was taken in the creation of this map. Metro cannot accept any responsibility for errors, omissions, or positional accuracy. There are no warranties, expressed or implied, including the warranty of merchantability or fitness for a particular purpose, accompanying this product.

Need for new transportation facilities and costs (see attached transportation map)

SW Stafford Road and SW Borland Road would need to be improved to urban arterial standards. SW Ek Road would need to be improved to urban collector standards. Transportation costs due not reflect a need for new bridge structure on SW Stafford Road or SW Borland Road as the determination of what improvements would be necessary is beyond the scope of this analysis.

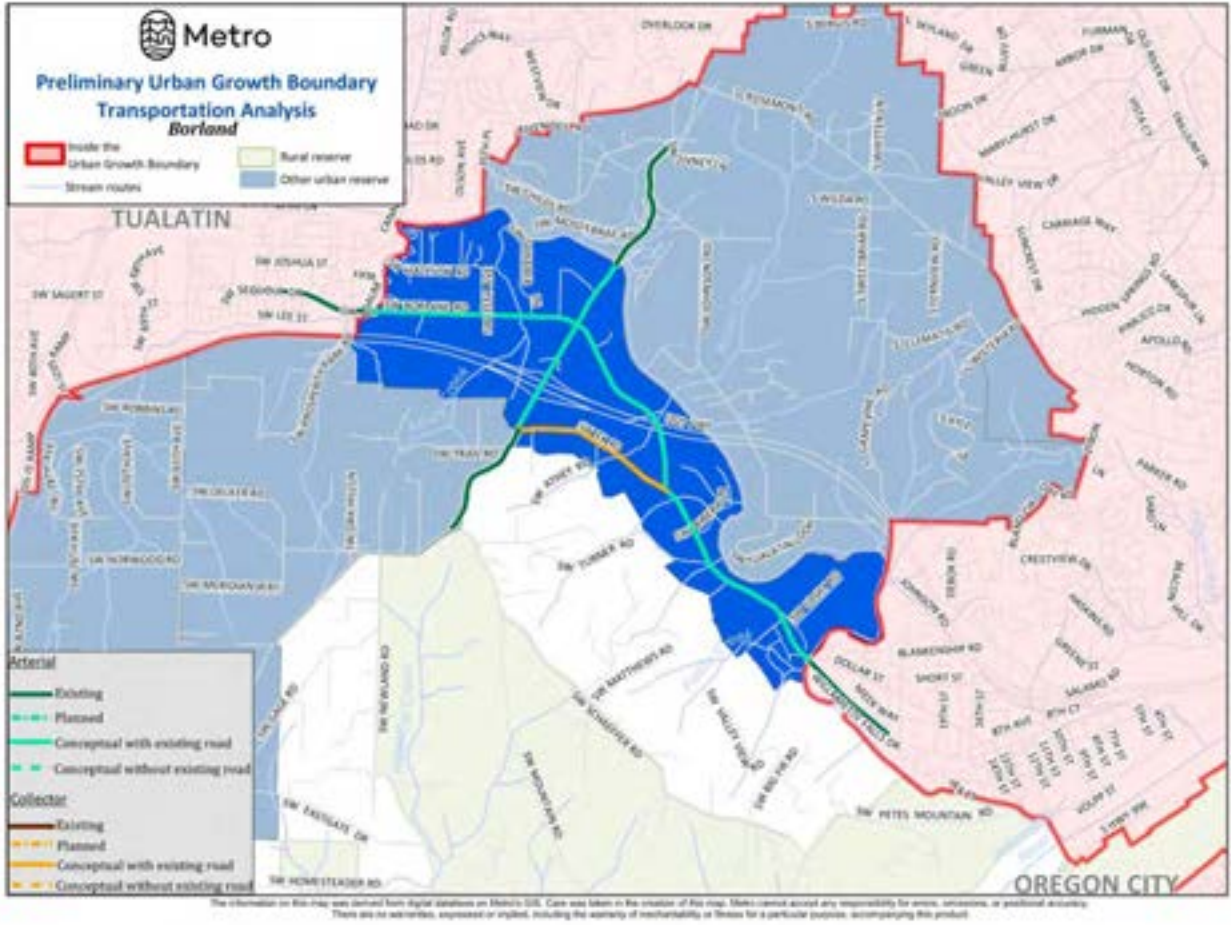
Facility Class		
<b>Arterials</b>	Type	Cost (in millions)
	Existing/Improved	\$141.86
<b>Collectors</b>	Type	Cost (in millions)
	Existing/Improved	\$17.66
<b>Total</b>		<b>\$159.52</b>

#### Provision of public transit service

TriMet evaluated the reserve area for providing transit service. TriMet could provide services to the reserve area although there is no guarantee of service. Actual service depends on the level of development in the expansion area and in the corridors leading to the reserve area. Service could be provided at 30 minute headways for all day service, five days a week, with three additional buses at a capital cost of \$1,200,000 (recurs every 16 years). Annual service cost is \$1,092,000 and grows 2% per year.

Prior to land being included in the UGB a more detailed concept plan, consistent with the requirements of Metro's Urban Growth Management Functional Plan Title 11, will be required. This concept plan process will develop more refined public facility and service needs and cost estimates.





**ODOT I-205 Toll EA - RECORD #2745 DETAIL****Submission Date :** 4/21/2023**First Name :** Sarah**Last Name :** Fawver**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** I strongly oppose the tolling that is proposed for I-205. Tolls are a punishment to those people that have to travel these routes often for work and other necessities. The hours are not often flexible. There are many of us that need our cars because we live in the suburbs but the state seems to forget that mass transit and bicycles do not work for everyone. In fact, bicyclists get charged nothing for the underutilized bike lanes being added many places. Other funds are also wasted on wheelchair crossings etc like the ones between Boring and Damascus on 212 where it would be terribly dangerous to cross at any time! Use this money!! would be factoring in extra time to avoid tolled routes. I realize this would cause other problems but there seems to be no other way to be heard. We are already overburdened with tax money that is misspent. Please do not do this!

**ODOT I-205 Toll EA - RECORD #2746 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** russell  
**Last Name :** helberg  
**Affiliation :** me  
**Submission Method :** Web comment form  
**Q3. Comments :** we have no state tax so whats next on their far left agenda--lol

**ODOT I-205 Toll EA - RECORD #2747 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Craig

**Last Name :** Kunkle

**Affiliation :** Oregonian

**Submission Method :** Web comment form

**Q3. Comments :** NO TOLL! Period... I have a medically challenged child and I take Medical Trips to Portland up I-5 and I-205. I hate driving in Portland, but, for the well being of my CHILD, I make the trip. Our Family Does NOT NEED a TOLL FEE to add to all the other expenses we have to pay. The Cost of everything is up 3 fold...or more? NO TOLL! PERIOD!!

**ODOT I-205 Toll EA - RECORD #2748 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Mike

**Last Name :** Dundon

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** NO TOLLING in Oregon! I want to register that I oppose tolling in Oregon and especially on I-205. Tolling will negatively impact the cities and neighborhoods bordering I 205 as well as I-5 traffic. Oregon City and West Linn will be a mess! Tolling will negatively all traffic flow in the Portland metro area.

**ODOT I-205 Toll EA - RECORD #2749 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Gary

**Last Name :** Frye

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** No! Absolutely NO! You think we have worn out roads in neighborhoods, pedestrians killed and run over along city streets, road rage between drivers, and shootings between drivers NOW? Just push all those hurrying to get somewhere onto the city streets to use as by-passes to I-205 and you will see more and more of this. NO TOLLS!

**ODOT I-205 Toll EA - RECORD #2750 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** N/A

**Last Name :** N/A

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** Regarding these tolls that you guys want to charge on I-205 and I-5 in Wilsonville and West Linn area, all I have to really say on it is you need to figure out a way to get your revenue equitably. The current proposal is entirely unfair. If you were doing this in North Portland, people would call it racism. You are targeting a very specific geographic area that you have ignored for 40 years. The only small improvement is adding some lanes between Stafford and I-205. But, other than that, you really haven't done much of anything in that region for 40 years. I guess, you could call the 217 flyover an improvement in that time span, but that's slightly outside of the area. You know, the improvements are way overdue. The model Oregon has used for many, many decades is that we all help to fund the infrastructure. We need to keep that model. To specifically target a handful of people is entirely wrongheaded.

**ODOT I-205 Toll EA - RECORD #2751 DETAIL****Submission Date :** 4/21/2023**First Name :** N/A**Last Name :** N/A**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** Yeah, I just heard that the public comment period is ending today on this I-205 EA, whatever you call it. I just wanted to say that I think it's completely unfair to people who live in this region of Clackamas County or have to go through this area of Clackamas County both on the I-205 and the I-5 the proposed Wilsonville Boone Bridge change. And I think it's completely unfair to those who cannot afford electric vehicles, as they'll be basically be paying a double taxation. They'll be paying fuel tax, and they'll be paying the toll itself. I do think that it also is disproportionately targeting lower income people who are forced to drive longer distances, because they can't afford to buy a house closer to work, or move to an apartment closer to work, or they can't accept the risk of a job change. I think people who are much more secure financially are well, first of all, many of them have much shorter commutes because they can buy a house where they want or work where they want and they can choose to avoid the tolls. Plus, I think that the argument that it is just charging a toll will improve surface streets around The freeway I think is complete nonsense. People will try to avoid the tolls and I think any thought to the contrary is just wrongheaded. Thanks. Bye.



<b>ODOT I-205 Toll EA - RECORD #2752 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	John
<b>Last Name :</b>	McCabe
<b>Affiliation :</b>	
<b>Submission Method :</b>	Toll program email

**Q3. Comments :**

<https://www.oregon.gov/ODOT/Documents/HB2017-FAQ.pdf>

First I will send additional documentaion on other emails.

In this email the true effect of the additional lane for I205 from and the diversion effects into the Stafford Region. ODOT has used 2015 as the base year. The true divrsion began in 2008 after the 3rd lane implimentation (it only took 6 months to have ODOT to provide me the information of the date that the diversion began to increase). The diversion since the addition of the 3rd lane has been double diget increases (triple diget increase on Ek road) throughout th region.

ODOT will not use 2008 as a base year as there are issues with more than 10 areas that have been listed as a need for mitigation. The realty it is more than 50 areas. This can be reduced if vehicles were to just stay on I 205.. So ODOT used the 2015 base so that the Envirommental Assessment will not show the diversion that has been occurring for more than a decade.

Mandy Putney and Brendan Finn have stated that there will be no further diversion off of I 205 with tolling. There are already facts of diversion that is sizeable that has created local roads being at greater than capacity with no further assistance from ODOT.

In addition the less than 100,000 trips per day on I 205 is below the capacity for I205 capacity as currently designed in the West Linn Area.

Yet Mandy Putney at the January, 2023 OTC meeting stated that the daily congestion causes drivers to be delayed 15 minutes per day. There is no data to support her claim, yet you say it enough it becomes the truth, but it is not true.

I have attached the excel spreadsheet from ODOT that shows there has been no real increases in miles traveled of more than a 1% increase per year since 1995. Essentially more people does not always equal additional miles driven. Citizens have learned that living closer to their work is more economicall. Out here in West Linn, there are low career oppurtunities. So the real growth of population is in Washington County, just ask METRO. It is not here, that is why the Urban Growth Boundry has not really been expanded in thsi region.

HB 2017 ststes that congestion and the necessary tolling will occur when the congested speed is below 45 MPH. In this region there is rarely below 45 MPH, unless there are accidents. To have a safer corridor is of no interst to ODOT. At a public hearing a question was asked of Mandy Putney that the speed limit on I205 from Milepost 0 to Mile Post is listed as 65 MPH. Since ODOT istates this area is closer to being at 55MPH the sped limit will not be lowered for safety.

This would laso reduce the amount of any congestion. Yet the staff has no interst in providing addition safety.

As for the tolling, HB 2017 has raised additional revenue, yet it has 41% of the revenue going to counties and cities. ODOT desires to use the tolling method and use 100% of the revenue for ODOT only (see below in the email of an answer I received from ODOT.)

ODOT has been given the responsibility to upgrade areas such as bridges throughout the State. The spending has been more than \$150 million for bridges per year. Enough to fund the Tualatin River Bridges. Yet ODOT desires to toll rather than using resources that are obtainable from the revenue increases of HB 2017. Yet ODOT always states that Electric Cars are reducing their revenue. This is not true there is an additional yearly fee that Electric Cars have to pay with their registrations that gas powered cars does not pay. But again it is more fraudulent information provided by ODOT.

Tolling is really being used by ODOT as they are unable to address current

responsibilities with the revenue they have been provided, and the debt that must be serviced.

One solution is build as you obtain the revenue. Oregon currently charges more than 10 cents per gallon than the State of Washington. It up to ODOT to inform OTC and the Oregon Legislature that additional fees such as fees for electric cars and gasoline tax are necessary to complete their duties. Yet every time that those fees are increased ODOT only receives 59 cents on the dollar. From the response to me from ODOT, they want it all, and only tolling provides 100% of the revenue to ODOT. Even on roads that were built in the past.

Then there is the economic effect. ODOT has stated that there will be more than \$600 per year increase due to tolling. This is listed as a 9% increase in costs to users of I 205. The reality with the current gas tax of 38 cents per gallon the tolls will be 315% higher than what all other drivers are paying than those paying for roads and no tolls. This is of no concern to ODOT that the equalization of paying taxes on road use has now been burdened for those who use I205.

Economically this will reduce the spending power greater than other areas of the State of Oregon. There are no other roads to use in this area other than local roads. This makes the Environmental Assessment incomplete and inaccurate. This is a penalty to the communities in this area. It is really the responsibility of ODOT that is receiving record revenues to properly forecast what services can be provided with the increased revenue that is currently being received.

At times that will mean that projects will have to be delayed. Using tolling instead of proper budgeting cannot be accepted by FHA and the EA must be rejected.

Mandy Putney has stated that if the EA is rejected then the I 205 project will not occur. It is best to have a correct information rather than threaten the public. With the low level increase of traffic since 1995, this project does not need to be rushed. Other than some staff at ODOT will not be needed.

-----  
[https://www.oregonlegislature.gov/citizen\\_engagement/Reports/2020-ODOT-HB%202017%20Semiannual%20Revenue%20and%20Expenditure%20Report.pdf](https://www.oregonlegislature.gov/citizen_engagement/Reports/2020-ODOT-HB%202017%20Semiannual%20Revenue%20and%20Expenditure%20Report.pdf)

Here is the Financial Activity from the ODOT site showing increases in revenue that is not being spent on critical projects. Or what are said to be critical projects.

-----  
<https://www.oregon.gov/odot/About/Finance/2022AFR.pdf>

Here is the 2022 audit that does show increased revenue from HB 2017. This includes the Electric Cars additional Registration Fee. Yet you wouldn't know this as ODOT always misinforms the public.

**ODOT I-205 Toll EA - RECORD #2753 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Harold

**Last Name :** Hart

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I think I have an idea on how to keep cars off surface roads in WEST LINN and Oregon City. If you put toll booth at exit #3 205 North and a toll booth at exit #11 205 South it would also get you more money from tolls. That would help with future road repairs and construction projects on 205 bypass .

**ODOT I-205 Toll EA - RECORD #2754 DETAIL****Submission Date :** 4/21/2023**First Name :** Linda**Last Name :** Williams**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** Not only are people in Multnomah getting taxed to death for every little issue now you want to toll our bridges. This is just one more reason to move out of Oregon. The toll cost are ridiculous! We paid tolls when I was a kid but it was like 50 and 75 cents. I will do everything possible to avoid a toll bridge! This city collects so much money from us working dogs that they have a surplus that we seem to never see so use it to build the bridge! The new Sellwood bridge was built without tolling! Enough is enough!

**ODOT I-205 Toll EA - RECORD #2755 DETAIL****Submission Date :** 4/21/2023**First Name :** N/A**Last Name :** N/A**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** Over a half a century ago I drove the i-205 freeway which was built and paid for by the taxpayers. Most of those taxpayers are long dead now. They have done nothing to improve the freeway since. And now you want to charge people money to drive that old dilapidated unimproved freeway? This is an outrageous egregious money grab by our infamous Democrat governors. That care nothing for the working people that live here.

**ODOT I-205 Toll EA - RECORD #2756 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Jean  
**Last Name :** Avison  
**Affiliation :**  
**Submission Method :** Toll program email  
**Q3. Comments :** ODOT Representatives,

I am responding to the tolling and am vehemently opposed to this. I was born and raised in West Linn and my mother has lived in her house on Rosemont Road for almost 70 years. Her road has already gotten so busy that she can't get across the road to get to her mailbox. I am already seeing the backroads getting a lot busier than it has been, and it will only get worse once tolling is implemented.

I have heard a lot of people wanting mass transit to play a role in this, but I don't see how well it can work, since Clackamas County is so large and we have actually lost services in the area over the past several years. We have added a great number of people to the metro area and have not added any infrastructure for vehicles traveling around and through the metro area. I don't believe that tolling will solve the problem, but only add to the vehicle congestion on side roads making safety and air quality worse.

As I have stated before, my mother's house on Rosemont road in West Linn has to deal with a lot more dust, dirt and poor air quality just from the increase of traffic over the past several years and will only get worse if tolling is implemented since traffic will divert off I205 onto Rosemont and other residential roads to bypass the freeway tolls.

Please enter my comments into the record.

Thank you.

**ODOT I-205 Toll EA - RECORD #2757 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Julia

**Last Name :** Marie

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** We will end up paying tolls every time we go shopping, church, volunteering at the food pantry, Dr appointments, going to the library, going to community meetings etc. We live on a rural Rd in West Linn that is already over burdened by drivers that bypass the freeway at high traffic times, it will be over the top if people are dodging tolls. Our quality of life as well as making us pay every time we do an errand or drive any where, is totally unfair due to our proximity. There are a lot of particulars that are not being addressed that effect a large portion of the West Linn/Oregon City population.

Think about it like YOU lived here.



**ODOT I-205 Toll EA - RECORD #2758 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** David and Kay

**Last Name :** Pollack

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** We are opposed to tolling the section of I-205 between Stafford Rd. and Oregon City for the following reasons:

Safety and congestion on local residential roads used by those routing around the proposed two toll gantries planned in West Linn.

We have lived at 2120 SW Schaeffer Rd., West Linn, for 50 years. Although much has changed in this area during those decades, it has been within only the past few years that traffic has increased dramatically. We are convinced this is because of mapping apps used by most drivers to find the quickest route. These apps appear to direct drivers off of I-5 N (perhaps at the Elligsen Rd. exit) before it intersects I-205, to take the "back way" (including Schaeffer Road) and avoid congestion on I-205. During rush hours, especially in the afternoon, there is a steady stream of traffic on Schaeffer Rd. that did not previously drive here. There are no additional housing developments in this rural-zoned area, so these vehicles are not driven by people coming home from work. They are just passing through.

Schaeffer Road is designed as a Minor Arterial on Map 5-4A of the Comprehensive Plan. This road classification is not intended to be a major conveyor of through traffic between cities. Schaeffer Road is regularly used by bicyclists. Although Schaeffer Road is designated as a Planned Bikeway on Map 5-2A, it currently has no shoulders, much less bike lanes. Of course, there are no sidewalks, so pedestrians also walk on Schaeffer Road. The additional traffic creates dangerous conflicts with pedestrians and bicyclists, which will get worse as more drivers avoid the tolls. This creates an additional burden on the local residents and businesses.

The current proposal has inadequate mitigation plans to reduce negative impacts of tolling I-205 on adjacent residential areas. No actual traffic or transit solutions are planned for expected diversion traffic volumes on local streets).

Unfairly placing 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.

I agree that I-205 should be improved and the remaining section of I-205 should be widened to three lanes. Such improvements will help ease congestion that currently causes drivers to seek alternative routes. However, the cost for those improvements should not be placed more heavily on adjacent businesses and residents, who will be forced to use the tolled intersections to access or drive the back roads through other rural areas, as described above.

It also places an inequitable burden on people who don't have the option to shift work hours or travel times to avoid peak tolls. That's unfair on its face, but doubly unfair given those same local residents will also be bearing the burden of all the additional traffic that is wishing to avoid the tolls.

This approach would upend decades of precedent that has allocated the cost of major interstate transportation projects to all users.

**ODOT I-205 Toll EA - RECORD #2761 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Kingsley

**Last Name :** Meldrum

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I'm director of operations for a business in Wilsonville. We employ 140 people, many of whom use this corridor to get to and from work and commute. We employ people across three different shifts. We're currently running 24/5, but having past run 24/7. I haven't been able to be on the call for very long. Based on a lot of the comments what I would just reiterate, the timing isn't great for people who work full-time, especially on day shift, to be able to attend the meeting. I personally received notice early today through my HR department. And I was the only one in the executive leadership team that was actually able to attend the meeting. So I wanted to just comment and reiterate what others have said, is that I think the timing and also the communication about the meeting could have been better. I would hope that the comments made in this meeting will be taken and used. And another virtual meeting could be done at a better schedule and give more people time and more notice to attend that meeting. As I said, I know that our executive team has six members of the team, several of those team members would have liked to attend this meeting, and said so, to give their input. The concerns from our side as local business that employ folks that live, you know, in and around the area, would just be the condition of the current, you know, off-street roads, off of the main highways, like the I-205 are already showing signs of needing repair and stress. And so planning to put a system in like this that we know is going to push people out to those outlying local street is only going to make that situation, the environmental impact worse. I have not had time to review the document as many others have said. It's a very large document to look at all the input and everything, but I would imagine most people are not going to have the time to look at the details of that. So as another participant commented, it would be nice to have a lot of these detailed issues that would come up, that questions that people have summarized in a way that's easier for, you know, folks in the community to understand. I know this is a forum for just commenting on, but as a result of having attended this meeting and information that's been presented, and that I was given through email, I have more questions than I do even concerns at this point. I'd like to get my arms around this and understand it better to be able to comment on it, I think, in a way that would be productive. I simply don't have enough information to do that. I do appreciate the invitation to comment and that public forum was scheduled. I just hope that another one would be scheduled as I stated.

**ODOT I-205 Toll EA - RECORD #2762 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Paul

**Last Name :** Edgar

**Affiliation :**

**Submission Method :** Public hearing

**Q3. Comments :** I've been active around transportation issues for 30 years. And we are -- we -  
- you guys have to know that the diversion factor that is going to happen as a  
result of what is being proposed will kill the downtown of Oregon City, and it  
will harm businesses throughout this area in a manner that will maybe result  
in a 15 percent reduction in total economic activity. Diversion will put -- could  
put as many as 20,000 vehicles across the old bridge, right into downtown  
Oregon City. And it freezes up highway 99E to where no one will be able to  
use it. It will also equally affect highway 43 on the west bank of the  
Willamette River. But this diversion factor -- diversion will be happening all  
over. We could potentially have, out of the 107,000 average cars that are  
crossing the Abernethy daily, we could have 40,000 cars diverting  
everywhere. And they would be diverting coming northbound starting at  
Woodburn and in Aurora. And they would be trying to find a way, where do  
they land? On the west side or the right side of the east side of the -- of the  
Willamette River. And coming north, they'll be using the Sellwood Bridge like  
never before and McLoughlin, and it will back into everywhere. But little cities  
like Canby and their industrial area -- they've got -- Columbia Distributing out  
there has got 12 football fields under one roof, and they're running 500 trucks  
in and out of there. And they need to come north, and they can't come north  
because you can't get through Oregon City. And so the economic damage  
that is foreseeable and the disproportionate harm that will result from what is  
being talked about is just unbelievable. Downtown of Oregon City will be put  
on to -- on to the alternate slate like it was without any fear about what the --  
what you're doing. And everyone knows at ODOT this type of diversion. And  
the EA does not do -- does not cover it whatsoever. The only way we can  
have it is with a full EIS, where you get into in-depth study of all diversion,  
and that's the only way it could really happen. Thank you.

**ODOT I-205 Toll EA - RECORD #2764 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Steve  
**Last Name :** Roemer  
**Affiliation :** Cascade Shooting Supply  
**Submission Method :** Web comment form

**Q3. Comments :** I lived in Vancouver for 2 years, and commuted to Albany on many occasions during the States negotiations of the Columbia River Crossing fiasco...The liberal morons screwed that up, wasted millions of the peoples money, and then quit because of some morons who didn't put their 2 cents worth in soon enough...Absolute idiots in charge...Then, years later I move to La Plne where the same idiots screw up the La Plne RR Track bypass, to the tune of 14 million...And there it sits, sinking into the ground cause the same breed of idiots didn't do their homework...I hope all the liberal morons that voted in the useless anti'gun Democrats who are shoving this down our throats have to pay the tolls...It doesn't matter how we vote, these clowns will find a way around it...Screw 'em all

**ODOT I-205 Toll EA - RECORD #2765 DETAIL****Submission Date :** 4/21/2023**First Name :** Rick**Last Name :** Sills**Affiliation :****Submission Method :** Web comment form**Q3. Comments :**

I don't mind tolling a new I-5 interstate bridge across the Columbia River. That's the way the current bridge decades ago was funded. I can remember as a child my Dad paying the toll when he'd drive us across it. Whether walking, bicycling or driving, everyone who crosses a future new I-5 bridge should pay some kind of toll, preferably with walkers paying the least and truckers the most. However, generally, I oppose tolling intrastate highways & freeways. Why? Because such tolls function like a regressive tax; that is, they place a greater burden on low-income people than on those better off. This burden would disproportionately negatively impact the mobility of people with low incomes. Limiting the travel options of low-income workers and people on fixed incomes would have the unAmerican effect of creating a two-tiered system of fundamental rights, with the have-nots being unable to fully exercise their freedom of assembly and freedom of association. In any way linking fundamental rights to income is an extraordinarily bad idea for at least two significant reasons. First, it will only serve to fuel feelings that "the system is rigged" to unjustly favor people of means. Secondly, it will alienate Americans from one another and further divide our country and its people. A less divisive and far more equitable approach than tolling Oregon's public roads would be a graduated, progressive "highway tax" on all Oregon gross income, whether individual or corporate.

**ODOT I-205 Toll EA - RECORD #2766 DETAIL****Submission Date :** 2/26/2023**First Name :** Barbara**Last Name :** Hatch**Affiliation :** Oregon Resident**Submission Method :** Web comment form

**Q3. Comments :** I find it extremely unsettling that toll roads are being added to Oregon's freeways. This will also clog neighborhood streets as cars exit to avoid tolls. There has been lack of foresight for transportation in the Portland and surrounding areas as our population grows. Oregon already has a high tax rate and for the people living in Portland proper the tax rate on on par of New York. Proper management of current resources along with leadership needs to happen first before any more taxes are added. This toll is an extra tax on an already overtaxed population.

Additionally why do we need transponders? Why can't the toll system use a license plate reader and not a transponder. I won't be putting the transponder in my vehicle. I also don't like the idea

**ODOT I-205 Toll EA - RECORD #2767 DETAIL**

**Submission Date :** 2/27/2023  
**First Name :** Michael  
**Last Name :** Coates  
**Affiliation :** PUSH Business Consultants  
**Submission Method :** Toll program email  
**Q3. Comments :** No tolls. None. Oregon and indeed American families are facing incredibly increasing costs at all living expenses and that trend will not stop anytime soon. Increasing government fees and expenses is not the answer. The answer is reducing government spending, focusing on increasing services per tax dollar and reducing government employees and taxpayer commitments. Economics is the science of distributing scarce resources and ALL resources are scarce. Government people do not understand tax dollars CAN dry up, the Oregon consumer CAN be squeezed out of money and a scenario such as that is very possible. Please consider and figure out a way to solve problems economically; a toll is not a solution. Thank you.

**ODOT I-205 Toll EA - RECORD #2768 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Christina  
**Last Name :** Deffebach  
**Affiliation :** Washington County  
**Submission Method :** Letter  
**Q3. Comments :** Please accept this letter from Washington County staff into the public comment period for the I-205 Toll Project Environmental Assessment.  
**Attachments :** 2023\_0421\_I-205\_EA\_Washington\_County\_Staff.pdf (220 kb)





April 21, 2023

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

Dear Ms. Putney:

Washington County appreciates the opportunity to review and comment on the draft I-205 Toll Project Environmental Assessment (EA). Though a small portion of the I-205 Toll Project is included in Washington County, we depend on a functional regional transportation to move goods and people to and from Washington County, the region and the state. We strongly support addressing this critical bottleneck on the I-205 corridor with the addition of the third lane. We also appreciate that tolling and congestion pricing can help manage congestion, fund needed infrastructure and advance other state and regional goals. However, we have some questions and concerns regarding the methodology and model assumptions for the I-205 Toll Project EA and how it fits into the other Oregon Toll Program projects. We appreciate your consideration and response to our comments.

The remainder of our letter documents our questions and concerns.

### Methodology

The biggest methodology questions and issues we identified could be addressed through additional sensitivity analysis, while others are more related to next steps. We recommend that ODOT consider doing sensitivity analysis of 1) different toll rates to refine the needed mitigations and 2) an alternative with construction of the third lane addition without tolling, for the following reasons:

1. The stated purpose of the EA is the “evaluation of the effects of variable rate tolls and the toll-funded I-205 improvements”. The assumptions about toll location and pricing are probably the most elastic variables that will likely affect user behavior the most and thus the conclusions of the EA. Different toll rates, as well as toll exemptions, will result in different levels of use of the tolled facilities and the resulting travel times, different levels of diversion and resulting mitigations which can create different levels of impacts on all other elements of the EA. Assuming that all vehicles will be paying the same rate does not seem realistic considering the social equity and environmental justice goals of the project.
2. Not separating the effects of tolling from the effects of the added third lane effectively clouds the analysis for the public. A sensitivity analysis of the third lane addition without tolling can help agencies and the public better understand the effects of the tolling proposal. This analysis will be especially helpful for understanding diversion and travel times.

The EA process can only estimate future conditions based on many assumptions. For this reason, we strongly support an ongoing monitoring program that is supported by a commitment to mitigate unforeseen impacts due to factors such as changes in toll rates, growth assumptions, road and transit network assumptions and funding for assumed improvement projects.

## Cumulative impacts

We are concerned about the I-205 EA analysis not including the broader Regional Mobility Pricing Project (RMPP). Looking at tolling in an isolated corridor when the region is looking at a broad tolling plan limits the reliability of the conclusions and leads to questions. We know from previous regional analysis that tolls on one facility can cause traffic to shift to other facilities; similar system-wide repercussions can be expected between the I-205 Toll Project and the RMPP. Because we cannot know the impacts and mitigation needs of the larger tolling program at this time, we strongly recommend that ODOT include the I-205 toll project area in future analysis and remain flexible to fund additional mitigation projects as needed in this corridor to address unforeseen cumulative effects.

## Model assumptions

We are concerned about the assumptions for reasonably foreseeable future actions (RFFA) as being constructed and providing mitigation for I-205 Toll Project impacts. The I-205 EA modeling is based on the financially constrained 2018 Regional Transportation Plan, which provides the basis for the RFFA. The RFFA include major transit investments such as Southwest Corridor Light Rail. This project, and others, may no longer be assumed to be fully funded and constructed within the planning horizon. As far as the EA analysis shows these projects help mitigate diversion and climate impacts, funding for the projects should be considered as potential future mitigation to fully implement the conclusions of the EA.

## Transportation concerns

This section details our more specific concerns with the analysis in the Environmental Assessment.

### Arch Bridge

- The daily traffic change identified in downtown Oregon City and across the Arch Bridge under the Build Alternative presents a significant impact. The transportation technical report, figure 5-11, shows a daily traffic increase of 40 to 50 percent on the historic Arch Bridge plus an increase of 30 to 40 percent in downtown Oregon City. These changes indicate the potential for a significant effect on the operation and safety of these roadways, the adjacent properties, and throughout the community. We recommend the EA identify the full range of impacts, particularly those caused by traffic that would otherwise use I-205 (diversion) and weigh the benefits versus the impacts.

In addition, the Arch Bridge is 100 years old (built in 1922) and carries about 12,000 vehicles today (weight limited). The ODOT bridge condition report identifies it as in “fair” condition. The bridge may need improvements to accommodate the 28k vehicles (more than double today’s traffic) forecast for 2045. We recommend consideration of significant improvements needed to increase weight limits, if not replacement, of this historic structure, to enhance its ability to meet new and increased river crossing demands.

### Local and state arterials

- The EA shows an increase of transit travel time on OR 43, Main Street in Oregon City and OR 99E. We recommend that ODOT identify mitigation for impacts to transit travel time for users on these roads. Attractive transit travel times are needed to help shift mode from vehicle trips to transit, reduce diversion and support climate goals.

#### Vehicle miles traveled – climate, economic and air quality impacts

- The EA shows a reduction in Vehicle Miles Traveled (VMT) with the Toll project. Annual VMT going down in the Build vs No Build does not seem realistic since there are limited alternative routes and the area lacks viable modes to reduce vehicle trips. VMT affects all the other outputs of this EA, especially climate and air quality. We recommend documenting the reasons for the VMT reduction. If the reduction is due to diversion to trips taken outside the Area of Potential Impact, the analysis should take these VMT into account. If these are “trips not taken” the documentation needs to account for how this happens and the resulting social or economic impacts.
- Lower VMT due to trips not taken may have economic impacts such as fewer local business patrons. Page 3-57 says local businesses may be impacted, especially smaller businesses. The magnitude of this impact is not documented nor are possible mitigations identified.
- Passing toll costs on trucks onto the consumer is an impact, which could be offset by travel time savings. The value of truck travel time will vary by truck type and level of elasticity.

#### Diversion

- Many of the diversion impacts are hard to measure using the available tools and models. The assessment is also diluted due to existing capacity deficiencies of I-205 and the resulting existing diversion that is baked in into a “do nothing” scenario which mutes percentage changes and thus FHWA definition of “meaningful change.”
- We recommend the EA better define diversion and explain what the baseline conditions are for measuring increased congestion (i.e. diversion caused by tolling only). If congested conditions are the baseline, then it is not surprising that limited mitigation is needed. However, this also leads to questions about how meaningful the proposed mitigation will be if it will not also address existing congestion caused by I-205 capacity deficiencies.
- Limited access facilities like I-205 are typically the “safest” in terms of crash rates. Diversion disproportionately affects safety and level of comfort for the users of the local system. The analysis does not appear to adequately consider how diversion will affect queuing, congestion, and safety on the local system and the proposed countermeasures for mitigation are not robust. These factors, especially increased queuing, will impact other elements in the analysis, including climate and air quality. We recommend that ODOT review and strengthen this analysis.

#### Social resources and communities

- In section 3.4, the costs seem off. The median household transportation costs seem too low and the median household budget seems too high. It is also unclear whether the project team is equating median household income with median household budget, as median household budget is not a typically used or recognized measure. We recommend the project team review terminology and data sources throughout and document reported values.

- Another terminology issue is the use of environmental justice populations and environmental justice households throughout the report. It is unclear what these terms mean and if they differ. We recommend the project team review and update all terminology to be consistent and provide a detailed explanation for uncommon terms.
- The environmental justice section analysis accounts for where people live, not where they work or other destinations. It also assumes that equity populations currently have access to jobs and other destinations. We recommend the project team adds access to jobs, services and other essential destinations to the analysis.

#### Noise

- The level of specificity for the noise wall mitigation should be more flexible. For example, in noise wall #1 Appendix G noise technical report, Table 7-1 on page 30 identifies a \$52,500 wall allowance per receptor. Soundwall #1 has an estimated cost per benefit of \$52,518 and therefore is not recommended. The wall is described as 1,860 foot long, 16-foot-tall sound wall. The description notes that multiple wall heights were evaluated. The most cost-effective wall missed the allowance by \$18 per receptor and exceeds the maximum wall allowance (by 0.035%). We recommend the EA limit level of specificity in measures to be commensurate with the accuracy level of the data.

Thank you for extending the comment period to provide more opportunities for comment. Please contact me and my staff if you would like to discuss any of the comments. As the first of other future Toll Projects, this EA provides a good learning opportunity to work through the evaluation process.

Sincerely,



Stephen Roberts, AICP  
Director of Land Use & Transportation

**ODOT I-205 Toll EA - RECORD #2769 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Robert

**Last Name :** Siegmund

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Just one more reason to not visit Portland or Multnomah County. Keep it up ODOT.

**ODOT I-205 Toll EA - RECORD #2770 DETAIL**

**Submission Date :** 2/26/2023

**First Name :**

**Last Name :** Chandler

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Will there be some sort of education waiver?  
Im not going to pay 5\$ each way to take my kids to school. Id rather move out of Oregon. 20\$ a day if tools are 5\$  
This state is communist.  
Toll on new roads not existing!  
Evil tyrants.

**ODOT I-205 Toll EA - RECORD #2771 DETAIL**

**Submission Date :** 2/27/2023

**First Name :** Bill

**Last Name :** Ethridge

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** I am a resident of Multnomah County interested in stopping the toll roads set to be installed on our highways. I believe tolls are an unnecessary privatization of public roads.  
I would rather pay more tax or have more current tax dollars allocated to highway expansion. What can I do to stop toll roads in Oregon?  
Thank you for your time,

**ODOT I-205 Toll EA - RECORD #2772 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Claudeane  
**Last Name :** Foster

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** This is a bottleneck on a daily basis and tolling would only increase the congestion. I am a senior citizen on a fixed income and don't need another expense. Where are our tax's, the lottery money and pot taxes going? Isn't there a portion that goes to our roadways? With all the Washington plates I see on our roadways why don't you put a toll on the i205 bridge between Oregon and Washington?



**ODOT I-205 Toll EA - RECORD #2773 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Eric  
**Last Name :** Griswold  
**Affiliation :**  
**Submission Method :** Toll program email

**Q3. Comments :** Hello,  
We live on Johnson Road. I wonder if you have ever tried walking along Johnson Road? In some places there is no shoulder, if a car comes and you need to get out of the way you have to walk in the ditch or in the sticks or in the mud. Friday afternoon, there are more cars and walking along the road becomes a bad idea. The toll will likely increase traffic to the point that there will be too much traffic on Johnson Road most of the time and people who want to walk can just forget it or put up with clueless drivers who speed past pedestrians. With increased traffic, aware drivers who give pedestrians space will likely be inhibited by traffic coming from the other direction. Traffic here is noisy enough. I have seen one County Sheriff on Johnson Road in the last ten years. People tend to drive on Johnson Road as fast as they want. Are you aware of that? We do our best to create a space that is friendly to wildlife. We already see too many innocent animals killed on Johnson Road. There is no public transportation on Johnson Road. How are people to use public transportation when it doesn't exist? Your tolls are a bad idea.

**ODOT I-205 Toll EA - RECORD #2774 DETAIL**

**Submission Date :** 4/10/2023

**First Name :** Judith

**Last Name :** Kleinstein

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Greetings-  
I'm concerned about the Toll Project, as it will funnel many cars onto the small Oregon City Bridge, which won't be tolled. The toll will slow people through the project, and those from out of town will not know how to pay the toll.

There is a need to conduct a more extensive Environmental Impact Statement for the tolling project, requiring more community involvement and public outreach. It is disappointing that this public survey was not requested before all the heavy equipment was brought in. Thank you for listening, and for understanding.

Clackamas County Resident

PS- Please add me to the Project Email List.

**ODOT I-205 Toll EA - RECORD #2775 DETAIL**

**Submission Date :** 2/23/2023  
**First Name :** John  
**Last Name :** McCabe  
**Affiliation :**  
**Submission Method :** Toll program email  
**Q3. Comments :** <https://wspgeo.maps.arcgis.com/apps/webappviewer/index.html?id=51e976c480d5425696e56ac95d93749e>

Ms. O'Laughlin;

Is this the one and only meeting that comments can be made as to the "Environmental Report? If so why is this meeting incomplete? The map, also attached( the link), shows many paradoxes that many people might desire to be clarified

One of the great items about in person meetings is the ability to discuss freely with other participants informational items that some persons may know that others may not. Also to get clarification on other parties provided information to other attendees and ODOT Staff.

I have attached the map that the public has been presented with(Again the link). There are issues that need clarification. There are constant statements that all traffic will be faster.

One item that I have attached is a roundabout that is just about to be placed at Willamette Falls Drive @ Fields Bridge. The ODOT Map does not show any such roundabout. I have asked about this for a period of greater than 5 months. Never showed up on any of the presentations. This roundabout might be used to increase diversion, but it still appears that ODOT has not been informed of the roundabout that as of today has not been placed, but the construction for the project has begun.

For one simple question on the map that is linked, what is really going to happen to Borland and Ek Road. There are two icons. One shows that the area will become a three way stop (all lanes). Another Icon shows a roundabout. Which is it going to be.

There are plenty of these paradoxes on the map that shows areas of needed mitigation, or areas where ODOT has listed as no mitigation issue, when it is an issue when the additional lane was added on I 205 when the Prosperity Park Road overpass was completed during the 2000's and a third lane was provided for the construction period. Darlene Hooley requested that the 3rd lane remain after the construction was completed.

Yet Mandy Putney and ODOT has stepped up the fraudulent claim that the 3rd land is missing from the original construction that began in the 1960's. ODOT and Ms. Putney must retract the statement that the 3rd lane is missing unless there can be engineered drawings from 1960's that does show that there was a 3rd lane on tis portion of I 205.

Public record requests have been made to have engineered drawings to show the "missing 3rd lane". It is well known by citizens who have lived in this area prior to the construction of I205 that there was never going to be 3 lanes. So no public record is being provided so that the fraud can continue.

In addition there are several Icons that show areas of problems that will be mitigated much later. Is much later a new way of saying we don't have the money so that it will never be addressed?

So when is the in-person hearing going to occur so there can be discussions rather than continuous fraudulent claims from Mandy Putney and the rest of the ODOT staff.

**ODOT I-205 Toll EA - RECORD #2776 DETAIL**

**Submission Date :** 3/10/2023

**First Name :** John

**Last Name :** McCabe

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** [https://www.westlinntidings.com/news/two-i-205-sound-walls-approved-by-voters/article\\_3973f321-b04c-559e-ba63-f33c96aa5d1f.html](https://www.westlinntidings.com/news/two-i-205-sound-walls-approved-by-voters/article_3973f321-b04c-559e-ba63-f33c96aa5d1f.html)

At the 3/8/23 Clackamas County Commission meeting you made a statement on the Sound Barrier Walls for the I205 section in West Linn.

From the article I have attached from the West Linn Tidings the sound wall issue has already been decided in 2019. The "C" wall was declined by the residents of that area. Will that no longer be honored, based on statements that you made yesterday with Mr. Finn present?

During the meetings on the "Sound Barrier Wall" in 2018 & 2019 there was no discussion that the I205 project would be 100% "congestion" price tolling. Yet that has also changed. But the lack of transparency continues.

There continues to be a process not to provide public records to anybody who resides in the I205 Environmental Assessment area. So, Mr. Finn what will change so that our public records request will be honored? Or must the public hope that certain items were covered by the media to obtain records on the actual events that occurred, not the revised information that is currently being provided, that does not agree with past promises and reality.

<b>ODOT I-205 Toll EA - RECORD #2777 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Daniel
<b>Last Name :</b>	Occhipinti
<b>Affiliation :</b>	
<b>Submission Method :</b>	Toll program email

**Q3. Comments :**

To Whom It May Concern:

Thank you for the opportunity to provide public comments on the proposed I-205 Toll Project ( "Tolling"). As a resident of West Linn who works in Clackamas, I am deeply concerned about Tolling for several reasons, including:

- ODOT's studies indicate that there will be significant diversion of traffic onto my local residential streets, causing dangerous vehicle congestion and speeding from cars and trucks seeking to avoid the highway Tolling. ODOT has provided no credible solution to this.
- ODOT's studies indicate traffic diversion from Tolling will cause increased air pollution in the neighborhood where I live and raise my children. ODOT has provided no credible solution to this.
- ODOT's studies show that after Tolling begins on I-205, several important nearby intersections will fail to meet basic safety standards—including the 10th Street Exit in West Linn, the intersection of Rosemont Road and Stafford Road in West Linn, and the I-5/Nyberg Road Exit. ODOT has provided no credible solution to this.
- Studies indicate record numbers of fatalities and injuries to pedestrians and bicyclists on Portland area streets, and according to ODOT's studies Tolling will result in added vehicle traffic on local side streets frequented by pedestrians and bicyclists. ODOT has provided no credible solution to this.
- ODOT's analysis shows that the majority of people who will be paying these tolls are local residents driving to and from work (not interstate traffic or out of state vehicles). This added cost to get to work is an outrageous financial burden on local residents who already pay high gas taxes to fund public highway construction and maintenance. As ODOT's analysis noted, the burdens created by Tolling will likely disproportionately affect low income and underserved communities. ODOT has provided no credible solution to this.
- ODOT suggests people can use public transportation to avoid Tolling but ignores the fact that safe and reliable public transportation is not available in many cases. Notably, TriMet recently cut service on 10 bus routes in part due to safety concerns from "a sharp rise in aggressive or violent passengers." In the case of West Linn to Clackamas (where I live and work) there are no viable public transportation options at all and therefore drivers will have no choice but to pay the tolls. ODOT has provided no credible solution to this.
- Representatives from Metro and Trimet have indicated that Tolling will overwhelm the existing public transportation system, causing a need for more bus service at the same time diverted traffic will congest and slow down travel, and there is no solution or adequate funding to address this. ODOT has provided no credible solution to this.
- Tolling will cause undue hardship for local businesses (including my employer, a food distribution business in Clackamas) that need to attract employees from throughout the Portland metropolitan region because with Tolling it will be more expensive for them to drive across the metro area to get to work. ODOT has provided no credible solution to this.
- Tolling will put local businesses, especially distribution and transportation companies, at a competitive disadvantage because they will have to pay Tolling for trucks coming to and from the business while competitors do not have this added expense. ODOT has provided no credible solution to this.
- Tolling will not materially advance the goal of reducing carbon emissions because people who want to avoid the tolls will simply choose to drive on surface streets, and the congestion caused by Tolling will reduce vehicle fuel

efficiency and increase carbon emissions, especially in residential areas impacted by traffic diversion. There are less draconian ways to promote carbon reductions, especially given that the proportion of electric vehicles is increasing exponentially, and Oregon has already banned the sales of new gas-powered cars by 2035. Simply put, Tolling is not needed to help the environment.

- ODOT's studies show that after Tolling is in place and the I-205 highway improvements are made, the travel time on I-205 from Tualatin to Gladstone will only improve slightly. Why does ODOT propose we spend hundreds of millions of dollars for such a minor improvement in drive time?
- ODOT's studies also show that after Tolling is in place, multiple travel times will increase significantly. Why does ODOT propose we spend all this money and burden local residents with diversion and fees only to make drive times worse for thousands of people?

In light of these concerns, I respectfully ask ODOT to answer the following questions for the benefit of the public and other local residents like me who will be significantly impacted by Tolling:

#### Traffic Congestion on Residential Streets Caused by Tolling

1. Once Tolling begins on I-205 and the Abernethy Bridge and the Tualatin Bridge, what is the projected increase (or decrease) in traffic on the following streets:

- a. The Oregon City Bridge
- b. The Sellwood Bridge
- c. Salamo Road in West Linn
- d. Blankenship Road in West Linn
- e. Rosemont Road in West Linn
- f. Willamette Falls Drive in West Linn/Tualatin
- g. Borland Road in West Linn/Tualatin
- h. Stafford Road in West Linn/Tualatin
- i. Highway 43 between West Linn, Lake Oswego and Portland
- j. Boones Ferry Road between Tualatin, Lake Oswego and Portland
- k. Kruse Way in Lake Oswego
- l. A Avenue in Lake Oswego
- m. Terwilliger Boulevard between Lake Oswego and Portland
- n. Highway 99W between Oregon City and Portland
- o. SE River Road between Gladstone and Milwaukie
- p. Highway 224 between Milwaukie and Clackamas
- q. SE Tacoma Street
- r. SE Johnson Creek Boulevard
- s. Highway 26 between the Ross Island Bridget and I-205;
- t. The Ross Island Bridge;
- u. The Markham Bridge; and
- v. The I-5 Oregon-Washington Bridge

2. What effect will Tolling have on travel times on the above-listed roadways?

3. What effect will Tolling have on intersections on the above-listed roadways?

4. What effect will Tolling have on infrastructure, repairs, or maintenance needed for the above-listed roadways, and who will bear the associated increased costs?

5. What effect will Tolling have on homes and businesses located along the above-listed roadways?

#### Public Safety and Increased Traffic on Residential Streets

6. The Oregonian recently reported a record number of pedestrian and bicyclist fatalities on Portland streets. Does increased traffic on side streets

have a correlation with increased accidents/fatalities?

7. ODOT's studies forecast significant increases in diversion of traffic from tolled highways onto alternative surface streets. When a significant number of additional cars and trucks, including semi-trucks, long-haul trailers and other industrial vehicles use local streets to avoid Tolling, what effect does ODOT anticipate this will have on pedestrian and bicyclist safety?

8. For each of the following roads and intersections, (a) What public safety measures will be implemented on the roadways to mitigate the effects of added traffic once Tolling begins; (b) What is the additional cost of these public safety measures; and (c) Where is the funding coming from for these public safety measures?

- a. The Oregon City Bridge
- b. The Sellwood Bridge
- c. Salamo Road in West Linn
- d. Blankenship Road in West Linn
- e. Rosemont Road in West Linn
- f. Willamette Falls Drive in West Linn/Tualatin
- g. Borland Road in West Linn/Tualatin
- h. Stafford Road in West Linn/Tualatin
- i. Highway 43 between West Linn, Lake Oswego and Portland
- j. Boones Ferry Road between Tualatin, Lake Oswego and Portland
- k. Kruse Way in Lake Oswego
- l. A Avenue in Lake Oswego
- m. Terwilliger Boulevard between Lake Oswego and Portland
- n. Highway 99W between Oregon City and Portland
- o. SE River Road between Gladstone and Milwaukie
- p. Highway 224 between Milwaukie and Clackamas
- q. SE Tacoma Street
- r. SE Johnson Creek Boulevard
- s. Highway 26 between the Ross Island Bridget and I-205;
- t. The Ross Island Bridge;
- u. The Markham Bridge; and
- v. The I-5 Oregon-Washington Bridge

9. What impact will Tolling I-205 have on I-5? If people can use I-5 to travel free of charge while they would have to pay a toll on I-205, won't I-5 see a big increase in traffic congestion?

#### Increased Pollution in Residential Neighborhoods from Tolling

10. ODOT's analyses indicate diversion traffic will increase air pollution in local neighborhoods. What are the anticipated air quality, noise pollution and other environmental effects caused by diversion traffic from Tolling in the following communities:

- a. West Linn
- b. Tualatin
- c. Lake Oswego
- d. SW Portland
- e. SE Portland
- f. Oregon City
- g. Gladstone
- h. Milwaukie

11. What effects on human health will increased pollution levels have in the above-referenced communities?

12. What other negative environmental effects will be caused by added air pollution in the above-referenced communities?

#### Economic Impact of Tolling

13. What economic effect will Tolling have on local businesses operating in the following communities:

- a. West Linn



- b. Tualatin
- c. Lake Oswego
- d. SW Portland
- e. SE Portland
- f. Oregon City
- g. Gladstone
- h. Milwaukie

15. Is Tolling expected to cause local businesses to relocate to areas that are not subject to Tolling?
16. What impact will Tolling have on the ability of Portland-area businesses to hire employees from around the metropolitan area and would have to travel on tolled highways to get to work?
17. What impact will Tolling have on interstate commerce and the movement of goods on the I-5 and I-205 corridor?
18. What specifically is ODOT going to do for people who cannot afford the Tolling?
19. Will Tolling fees continue even after the highway construction improvements are done and paid for?
20. Will tolling be done by license plate scanning, or transponders in individual cars, or some other method? How does this apply to out of state vehicles? How will this be administered and what is the cost? Who will pay for it?
21. How much income is expected to be collected from Tolling?
22. What government agencies will receive revenue from Tolling? What amount of the money collected from Tolling will go to Metro?
23. Will income from Tolling in Portland be used to pay for roadways in other parts of the state?
24. What is the anticipated cost to administer the Tolling program and collect tolls?
25. Will the Tolling program be administered by the government or by private contractors?
26. Will local residents pay the same tolls as out of state vehicles?
27. Are there any exemptions for local residents or local businesses to avoid paying the tolls?
28. How much is ODOT spending on the public relations campaign to support Tolling?
29. Is ODOT or the State of Oregon going to issue bonds that are required to be repaid with Toll revenues? What happens if Toll revenues are below projections? Will the State of Oregon General Fund be on the hook to pay for the bonds?
30. Would ODOT support an initiative by the people of Oregon, or legislative action, that would allow the citizens who would be paying for Tolling to vote on this before it occurs? Thank you for considering the above comments and questions.

Sincerely,  
[]  
Resident of West Linn, Oregon

**ODOT I-205 Toll EA - RECORD #2778 DETAIL****Submission Date :** 2/26/2023**First Name :** Diane**Last Name :** Schendel**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** Tolling existing roads in the Portland Metro area is a terrible idea. This will just create more traffic cutting through neighborhoods endangering children and pets. Our gas taxes should be more than adequate to repair and maintain our roads. What about the massive Infrastructure Bill that was passed? What about the extra COVID-19 funds that the state received? How were/are those used? Is Oregon squandering these funds and using them for things other than infrastructure? I fear this is nothing more than to add another cost to drivers in an attempt to make us take public transportation. It won't work and our neighborhoods will bear the brunt of these bad decisions. This does nothing to improve the lives of our citizens, in fact, quite the opposite.

**ODOT I-205 Toll EA - RECORD #2779 DETAIL**

**Submission Date :** 2/27/2023

**First Name :** Stan

**Last Name :** Smith

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Why do you even ask for input on the Toll projects? ODOT has already made up its mind on this and it's nothing but a money grab, Just Admit it. There is no way it changes driving habits with the exception of forcing more cars onto city streets to avoid tolls. Perfect example is Willamette Falls drive and travel from Stanford intersection through West Linn across the arch bridge then onto 205 in O. City. Also what is the effect on a minimum wage earner that may travel through tolls to just get to work? What about this Trillion dollar infrastructure bill? Nothing from that helps? As always our government is chasing problems with taxation.

**ODOT I-205 Toll EA - RECORD #2781 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** Sherie

**Last Name :** Albert

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Toll projects on the 205 should not happen. We have been subjected to so many new taxes, STT, OR Corporate Activity, Family Leave, increased gas tax as well as inflation burdens. Wages have not increased to keep up with the new financial burdens. The proposed toll expense is unconscionable and will place additional financial burdens on Oregonians. This also creates a new bureaucracy to manage collection of tolls which reduces the potential monies collected to supposedly pay for the bridge construction. Why isn't the bridge construction paid for with the STT, gas tax and general funds in Oregon's bloated budget allocated to maintaining roads and moving vehicle traffic? THIS IS NOT OKAY AND WILL NOT BENEFIT ALL OREGONIANS! TOLLING DRIVERS WILL HURT INDIVIDUAL OREGONIANS AND BUSINESSES.

**ODOT I-205 Toll EA - RECORD #2782 DETAIL**

**Submission Date :** 4/16/2023

**First Name :** Joanne

**Last Name :** Daniels

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Why weren't we allowed to vote on this issue? CNBC did a middle class test case on those making \$75,000 a year, Orgon ranked #1 in the United States for taxation!!!! I vote NO on more taxes for Oregonians to pay!

**ODOT I-205 Toll EA - RECORD #2783 DETAIL**

**Submission Date :** 4/17/2023

**First Name :** Ted

**Last Name :** Ewoldt

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Will the tolling only be used to improve this section of the road? I'm in favor of that. If the tolling goes to pay for other areas' roadways- go put up a toll plaza there. I've noticed an increasing number of vehicles without plates or stickers lately. I assume these people who already break the law will face no further consequences for running through the toll without paying.

**ODOT I-205 Toll EA - RECORD #2784 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Bethany

**Last Name :** Fielding

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** I support Senate Bill 933! These tolling proposals are wholly unnecessary and will wreak havoc on small businesses, working-class Oregonians and families, and our communities that will be flooded with diverted traffic seeking to avoid these tolls. The only tolls we need is on the Columbia Bridge into Oregon.

**ODOT I-205 Toll EA - RECORD #2785 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Penelope

**Last Name :** French

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolling any of Oregon's highways, especially high traffic I5 and 205, is unfair and I urge you to oppose any tolling. Unfair because working citizens who have to commute to work are already struggling. And although I live in E Ore and rarely travel W Ore roads, I am already paying highway taxes via exorbitant gas tax. As are those who would also be paying the tolls.





**ODOT I-205 Toll EA - RECORD #2787 DETAIL**

**Submission Date :** 4/16/2023  
**First Name :** V  
**Last Name :** Galleguillos

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** The fact that you're having public input means you are going to do what you want anyway. And what about the costs involved? Yes, you can move forward with this project, but don't raise my taxes. Learn how to manage on less like most of us do while still meeting changing needs. Oregon, as well as the whole country needs to start using more of the public transportation available instead of driving cars and making them electric. Why not focus on that? And what happened some months back during that snow storm that had everyone on I-5 gridlocked? Sounds like ODOT was asleep or didn't care to respond in time.

**ODOT I-205 Toll EA - RECORD #2788 DETAIL****Submission Date :** 4/16/2023**First Name :** Luci**Last Name :** Jewess**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** I am truly disappointed that the impact on Oregon City has not been considered in this project. The downtown struggles with traffic/parking issues already and putting a toll on the Abernathy bridge will just cause additional congestion problems in the city and with travel to West Linn. I can't believe that I will have to pay \$4 each way to visit friends in West Linn, go to church and just go anywhere on the 205. You are impacting the people of Oregon City and West Linn unequally and putting the financial burden on the local community. Why not put the toll at the intersection of I-5 and 205, and 84 and 205. This way the financial burden is equally spread out over drivers using the 205, and not just us that happen to live near the bridge. We do not even have any alternate transportation options near us like the Max to use. I don't think you have though the impact on the people of these cities and how we will have to carry the burden of the tolls daily. You will harm the business traffic of Oregon city and its citizens. You talk of equality, well I don't see any equality with this plan,

**ODOT I-205 Toll EA - RECORD #2789 DETAIL**

**Submission Date :** 2/25/2023

**First Name :** Jim

**Last Name :** Johnston

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :**

I am admittedly against tolling on our interstate highways I-5 and I-205.

1. Federal gas taxes built these highways and Oregon gas taxes were meant to maintain them. New tolls would tax users twice...a gas tax and a toll tax.

2. Much of our traffic congestion is the result of poor planning by ODOT (and on the federal level) in constructing I-205 with only 2 lanes in each direction and a bridge over the Willamette River with the same 2 lanes.

3. Given that population is projected to grow by 24% by 2040 how does tolling lessen the impact of increased vehicle traffic on local freeways? A better alternative: increase the number of lanes to improve traffic flow and forget tolling.

4. A recent opinion piece in Oregon Live (Susan McLain & Lee Beyer) stated that "Tolling has been effective in reducing congestion and improving safety around the country." Where has this occurred on an interstate highway? I cannot find any such examples using a Google search.

1. This same article states that "...drivers on Interstate 205 between Stafford Road and OR 213 will see a 50% decrease in afternoon travel time and a 25% decrease in the morning." How were these estimates derived? How can they be realistic?

2. Given the increasing volume of traffic, the decrease in traffic volume can only come with traffic diverted onto secondary and collector roads. This would create more traffic hazards, traffic congestion, and "wear and tear" on our city and county roads.

5. How will this tolling system handle "leakage"...tolls not collected because drivers don't pay and/or cannot be located? A recent news article from WDRB TV in Louisville, KY aired in November 2021 on the RiverLink pay-by-plate tolls accounted for nearly 30% of uncollected tolls (nearly \$18 million) on the I-65 bridge Louisville. Given the lack of Oregon's traffic enforcement for license plate issues, including expired plates for both in state and out-of-state vehicles, this problem will continue to grow in the years ahead. People will find ways to avoid paying tolls.

6. Additionally, in this same news article "...toll leakage [is] one of the main reasons tolls are an inefficient way to fund road construction and maintenance. Add that to the cost of building and operating toll facilities and the amount of money diverted away from actually improving roads quickly adds up."

The bottom line....do not toll.

**ODOT I-205 Toll EA - RECORD #2790 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Coreen

**Last Name :** Jones

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Times are tough and your timing for implementing additional bills and fees on families and small businesses couldn't be worse. This plan isn't fiscally responsible and hurts this community both short and long term. We should be allowed to vote before any tolls are implemented. There is already a housing crisis and tolls will make our community even less affordable.

**ODOT I-205 Toll EA - RECORD #2791 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Marilyn

**Last Name :** Lulay

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** no tolling in oregon! it would ruin our freedom to travel to places that we have to go to ie doctor appointments, health care, jobs, etc by draining our finances. A BAD idea especially during these times of inflation!

**ODOT I-205 Toll EA - RECORD #2792 DETAIL****Submission Date :** 4/15/2023**First Name :** Jeffery**Last Name :** Nighbert**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I am retired on a fixed income. My doctors are at Kaiser Sunnyside Medical Center. It appears I will be paying two tolls each way to get to my medical appointments. How much will the tolls be? Can I get an exemption or a discount? Will I get receipts to claim the tolls on my taxes?

**ODOT I-205 Toll EA - RECORD #2793 DETAIL**

**Submission Date :** 2/26/2023

**First Name :** Aalok

**Last Name :** Shah

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Given that I will live squarely in the middle of this toll. Will ODOT pay for the decrease in value of my home? Who would want to live in the middle of a toll? Also you have not done enough to study the impact this will have on neighborhoods. Very shortsighted and will open yourselves up to litigation!



**ODOT I-205 Toll EA - RECORD #2794 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Denise

**Last Name :** Torj

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** No tolls! As an Oregonian and Clackamas County resident, I do NOT support tolls on any of our highways or freeways!

**ODOT I-205 Toll EA - RECORD #2795 DETAIL**

**Submission Date :** 4/21/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Tolling will be detrimental to the neighborhoods around the tolling area. Tolling should be voted on by Oregon citizens. Once tolling is established the Legislature will never fully fund ODOT and will use that money for pet projects that do not benefit Oregonians.

<b>ODOT I-205 Toll EA - RECORD #2796 DETAIL</b>
---

**Submission Date :** 3/17/2023

**First Name :** The

**Last Name :** Chandlers

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** We are not low income. But we will not be part of oregon if this passes and take our annual 15,000 tax payment to Idaho.

**ODOT I-205 Toll EA - RECORD #2797 DETAIL****Submission Date :** 4/21/2023**First Name :** Richard**Last Name :** Ehlert**Affiliation :****Submission Method :** Toll program email

**Q3. Comments :** I recently read a well written news article about the toll roads which explain how the system would be enacted. The article compared the former Gas Tax funding method with the Toll Tax method, which stated the main reason was current and future transformation from gas powered autos to electric autos. The article exhibits or justifies that if the bridge expansion were to be funded using the former Gas Tax method, then the electric vehicle owners, do not pay a Gas Tax, would consequently not help fund the expansion. If this is the case, then it appears that the electric vehicle owners do not pay for roads also. Perhaps an electric vehicle tax method should be implemented for electric vehicles to help equally fund roads. ??

**ODOT I-205 Toll EA - RECORD #2798 DETAIL**

**Submission Date :** 4/3/2023

**First Name :** Nelle

**Last Name :** Kesterson

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** This email was sent back to me as "follow up" with nothing from staff at ODOT. Hard to follow up on no response from ODOT.

I do have a follow up concern and a positive recommendation for ODOT.

**CONCERNS:** Tolls will cause secondary road damage to highway 99, highway 213 and many side roads that will make driving, walking and biking far LESS safe and MORE of a clogged up mess. Then ODOT will need more money to fix the negative fall out from tolls on I205 and I5. Citizens pay before any proof / completed improvements.

Please reconsider and discontinue ODOT's toll project. It is poorly planned. That is why so many people are against ODOT's Toll Project.

**RECOMMENDATION:** WDOT has used specific tolls to pay for bridge improvements that are already completed and visible to drivers. No tolls until project is completed and citizens reap the benefit. Tolls stop when revenue matches project cost. Toll cost is stable. No squirrely never know till you get the bill expenses. Stable, well planned.

For example WDOT has a toll on the new and completed second Narrows bridge going from Gig Harbor to Tacoma. Citizens see and experience the benefits from WDOT before tolls. No toll on the original Narrows bridge going from Tacoma to Gig Harbor. Toll ends when revenue covers new bridge cost.

**ODOT I-205 Toll EA - RECORD #2799 DETAIL**

**Submission Date :** 2/27/2023

**First Name :** Linda

**Last Name :** M

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** We oppose tolling Oregon freeways, specifically I205 and I5. It was obvious this was happening when our main roads were repainted to reduce the number of traffic lanes, and not fix the potholes! We cannot afford to fund more and more projects. Tolling is your answer to reducing traffic. What a thoughtless solution, since many of us cannot afford a toll tax. What can we do to stop this?

**ODOT I-205 Toll EA - RECORD #2801 DETAIL****Submission Date :** 3/14/2023**First Name :** Fredrick**Last Name :** Sawyer**Affiliation :****Submission Method :** Toll program email**Q3. Comments :** Does the i-205 Project include building sidewalks where pedestrians are forced to walk on the highway shoulder along the east side of OR 99E between Roethe Road and Naef Rd and the west side of OR 99E between Maple St and Courtney Avenue? Does the project include making the sidewalks accessible between Oregon City and Milwaukie?

<b>ODOT I-205 Toll EA - RECORD #2802 DETAIL</b>
---

**Submission Date :** 4/10/2023

**First Name :** Jan

**Last Name :** Tautfest

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Why is ODOT intent on tolling I-5and I-205?The past 4-5 years have been horrific for all Oregonians; what with COVID shutdowns, businesses failing families struggling to make ends meet more than usual, the economy in a downward spiral, and now you want to impose a toll on us? What the devil are you thinking? It's time for ODOT to get your act together and do more with less, just like the rest of us. Cut some corners in your own departments. We the taxpayers have paid enough. NO TOLLING!!!



<b>ODOT I-205 Toll EA - RECORD #2803 DETAIL</b>
---

**Submission Date :** 3/17/2023

**First Name :** Francis

**Last Name :** Vandervelden

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Azuga works really, really well. Real easy to add to the bank when it gets low. Hopefully the with sticker option will be as well. That way it reads the sticker and backup the device reads the vin on the vehicle and if it doesn't match, the device will shut down and send a note the VIN is incorrect and they can track the vehicle to where it was removed from. Also having a link to an available dual OBDB connector would be nice as well for those who also have Insurance trackers as well as Azuga so they will both be in the vehicle like mine.

**ODOT I-205 Toll EA - RECORD #2804 DETAIL**

**Submission Date :** 2/21/2023

**First Name :** Christine

**Last Name :**

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** How much money do you receive for gas tax and vehicle registration and any additional taxes added to property taxes and other misc collections???

**ODOT I-205 Toll EA - RECORD #2805 DETAIL****Submission Date :** 4/20/2023**First Name :** Cheryl**Last Name :****Affiliation :****Submission Method :** Toll program email**Q3. Comments :** I have gone to the Oregon.gov. ODOT toll environmental assessment. I thought there was a survey to be provided. It doesn't appear that there's anything really extensive for my input. Please call me. I have very significant concerns about equity and mobility and regional pricing, as well as the impact on side roads of this project. There is not adequate public transportation in these areas that are impacted by the tolling, so, therefore, people are trapped into paying excessive amounts of tolls. Please give me a call, I'd like to know where we can provide public input that will be heard. Thank you. Goodbye.

**ODOT I-205 Toll EA - RECORD #2806 DETAIL**

**Submission Date :** 4/13/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** Yes, I didn't finish my message, the last one I sent, please forward this to all three advisory committees. This is for the I-205 Tolling. What I wanted to say is that the cost of living, I'm under a vice-grip of pressure right now, the cost of living with my rent doubling in the last 5 years, my car insurance going up, DMV fees going up. Everything is up. The grocery, a 12 ounce coffee I normally buy for \$5 is now \$8, just since the last time I bought it. The cumulative effect of all these things will just run away prices and inflation. And then that's just what we Portlanders need is for you to start tolling the bridge, you know tolling the highways, that's exactly what nobody needs right now. So, I just want to put my input in there, there's some of us, like me, I'm on a fixed-income, so every time something is added, I have to take away something else, and I'm at the point now where I can't take away nothing else.

This needs to be heard. I don't know who these people are, I guess, who are just rolling in the dough, who aren't concerned about the tolls. Those are not the people you should be listening to. You know, a lot of people have left Portland. And I think this is going to be the last straw for them, like it's going to be for me. I just can't keep forking it out, I can't be coughing up money everywhere I go, it's more and more and more and more, when I don't have any coming in. I definitely want to add my no to the tolling, all of it - I205, I5, I85, wherever.

**ODOT I-205 Toll EA - RECORD #2807 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Rebecca

**Last Name :** Wydmark

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** Hi. This is about the toll road on I-205 Bridge. My name is [] I am very, very against this. First off, you got this big bill in Congress that gave a lot to our roads and bridges, so you shouldn't need the money to do this. And not only that, we've been paying a gas tax in order pay for these bridges and everything else we've already paid for this stuff. I have to travel that road to and from work every single day. So that's twice going across those tolls. I do not want it, I cannot afford it. Inflation, it's already gone up enough, and already caused me enough to go to work every day. I do not want it, and I will be making a public announcement myself as far as getting this. I just now found where we could even make a comment, which a lot of people don't even know about. So I will be making sure that people get the notification. Thank you very much. And I would hope somebody would text me. My number is []. if you could text me, and let me know you received this message. Thank you."

**ODOT I-205 Toll EA - RECORD #2808 DETAIL**

**Submission Date :** 3/3/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** I would like to provide some feedback on the tolling project. If the Oregon Department of Transportation is in need of funds from a budgetary standpoint, in order to make these improvements, I would suggest that you toll the entire length of the I-5 Corridor from Washington, all the way to California. As well as the I-84, corridor from the ocean over to the State of Washington or Idaho, where ever that that dumps off. As well as 205 and 405 and Highway 26 around Oregon. If Oregon wants to work within the framework of equity among all citizens. I believe that the most equitable way is to have all Oregonians pay for it. Would love your feedback on why that is not being proposed. Thank you.

**ODOT I-205 Toll EA - RECORD #2809 DETAIL**

**Submission Date :** 3/16/2023

**First Name :** Jay

**Last Name :**

**Affiliation :**

**Submission Method :** Voicemail

**Q3. Comments :** Yeah, good morning, this is [], and I live up Molalla, I'm just trying to find somebody that knows something other than a computer. I understand there's going to be a meeting at noon time today, Friday, or Thursday, the 16th of March. Please give me a call, I find it's ironic that you folks can't answer the phone. My phone number is []. I have a phone, I am a real person, and I will answer the phone. If somebody that is getting paid, can answer and give me a call. Thank you.

[Further comments through phone call:]

I have a big truck that I drive on 213, sometimes I-205. I have opinionated thoughts about the toll program. I pay a lot of money on state/fed taxes, property taxes have gone up. This is a one-family home, 1960s home. My taxes are out of control, I'm 80 years old, I'm really uptight about how the government is spending my money. My opinion is it's a total waste of my tax money.

I don't want to be informed. I don't want this. It's not coming out of your pocket. You just keep spending money. Inflation, taxes.

Suggestions:

1. Get rid of tolls
2. Why do you need sound walls? It's ridiculous. People bought their houses along the highway knowingly. They wouldn't have bought there if they didn't want the noise.

**ODOT I-205 Toll EA - RECORD #2810 DETAIL****Submission Date :** 3/31/2023**First Name :****Last Name :** Bauer**Affiliation :****Submission Method :** Voicemail

**Q3. Comments :** This is [ ]. I'm 69. I've lived in Oregon all my life. I'm completely against the toll on 205. Portland is not a city back east, where there are tolls in New Jersey and New York. Portland is not a large city. We do not need that toll. My phone number is [ ], and I would like a phone call back, please, and I'll explain more. This is [ ]. Phone number [ ]. Thank you.

Further comments during call back: I don't think that's the right thing to do for OR. PBOT or ODOT has spent their money for mass transit options; that's so much money they already spent. That money could have been put into the infrastructure instead of buses that nobody is riding. I don't see a toll should be considered for Abernethy or I-205. We've never had tolling in OR. I don't think that should happen. I say no to that tolling; I don't know how tolling would work. I'm old. We don't need tolls. It will mess up the whole dang system.



**ODOT I-205 Toll EA - RECORD #2811 DETAIL**

**Submission Date :** 4/3/2023

**First Name :** Dawn

**Last Name :** Olsen

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** Do you have a senior citizen rate as my mother's doctors are at meridian Park

**ODOT I-205 Toll EA - RECORD #2812 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** George

**Last Name :** Pitts

**Affiliation :**

**Submission Method :** Web comment form

**Q3. Comments :** If we think that traffic is bad now wait until it is in your neighborhood, because that is where it is going. Salem couldn't care less what we think, they are going to do whatever they want. Like the anti-gun legislation, they will ram it down our throats. The least capable or least knowledgeable insist on making the laws for the rest of us.  
Salem and Portland have destroyed this beautiful state. I guess we are expecting the same ones to fix it. We are doomed to be led by the stupid..

**ODOT I-205 Toll EA - RECORD #2813 DETAIL****Submission Date :** 3/8/2023**First Name :** Stephanie**Last Name :** S**Affiliation :****Submission Method :** Web comment form

**Q3. Comments :** Why are we going to cost Oregonians more money to drive? Why don't we put a toll bridge on I-5 or 205 for crossing from Washington into Oregon. Washington residence live over there, and come across the bridge to shop here tax free and don't help out with the cost of the roads.... wouldn't this make more sense than to tax us Oregon residence even more? We already pay one of the highest state taxes in the US. Bring revenue into our state by taxing others who don't live here and use our roads.

**ODOT I-205 Toll EA - RECORD #2814 DETAIL****Submission Date :** 4/21/2023**First Name :** Granella**Last Name :** Thompson**Affiliation :****Submission Method :** Web comment form**Q3. Comments :** I will not come through Portland on my way to the coast or anywhere else if tolls go on any roads taxpayers have paid for. It is pleasant to drive through Boise with those multi lane freeways keeping you moving. Too bad Portland is such a mess to drive through. Tolls are a horrible way to treat people.

**ODOT I-205 Toll EA - RECORD #2815 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Terry

**Last Name :** Lingman

**Affiliation :**

**Submission Method :** In-person comment opp.

**Q3. Comments :** So I'm concerned that the environmental impact survey does not include a survey of local people and their wishes, whether or not they want a toll road. And also, I don't see where there is an indication of how much the toll fee will be for, say, a passenger car minus -- minus the deductions that will be offered later on. In other words, how much is the normal toll fee? And that would be important to know so that people can evaluate how much of an impact on their personal budget it will have. It seems like a lot of the comments and the literature I've read expresses the view of those who are climate change enthusiasts and support that ideology. Do you have any input from those who are of the opposite ideology? In other words, they believe that global warming is a scam, and in other words, they don't accept the proposals based on that ideology. I also don't see how the -- who the originators are of this proposal. Who are the originators of the toll -- the 205 toll process? And I presume they're at a state level, and so, would it even be possible for the local people and/or the County to oppose this entire project?

**ODOT I-205 Toll EA - RECORD #2816 DETAIL****Submission Date :** 4/4/2023**First Name :** Pat**Last Name :** Regan**Affiliation :****Submission Method :** In-person comment opp.

**Q3. Comments :** I guess most of mine is questioning. And one of the questions is we know that one of them is going to be down here at Abernethy. Where is the other one going to be? How much is it to build these? How much is the toll going to be? How does it stop congestion? What does it do to the working person? They have the expense of driving to work with high gas prices, and now they're throwing a toll on them. Also, this is probably nothing to do with the toll, but I understand they're thinking about changing or converting the old Oregon City bridge into a bicycle, walking thing, pedestrian. How do people get from Oregon City to West Linn? And I personally will be doing whatever I can to keep off the toll. If it happens, I will go on the back streets, and that's just going to be more congestion in the back streets. And then, I think they'll probably be putting up signs on the back streets for local people, whatever, but all of us will find a way to get around it. And I guess I just feel like it's just another way where they're trying to get us out of our cars. That's it.

**ODOT I-205 Toll EA - RECORD #2817 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Mary

**Last Name :** Gault

**Affiliation :**

**Submission Method :** In-person comment opp.

**Q3. Comments :** It's just the concerns on our community. Have they asked people that actually are going to be really impacted by all of this? I haven't met or talked to even one person that is pro. The cost, they're already saying that some people are impacted right now with groceries and et cetera, et cetera. And none of us want it. And it's just -- I guess that's it. What's the impact on our community? No one has asked us. And I think it should be put before a vote. And that's all I have to say right now.

**ODOT I-205 Toll EA - RECORD #2818 DETAIL****Submission Date :** 4/4/2023**First Name :** Pam**Last Name :** Gafner**Affiliation :****Submission Method :** In-person comment opp.

**Q3. Comments :** I think this is ridiculous. The bridge has already been paid for once. I don't think tolling is appropriate, especially in an area where there's a lot of low income. It's absolutely just unheard of to sit here and say that it'll be okay to take mass transit when there is no mass transit available anywhere around here, so it totally screws all of us. I'm on social security. I make \$1200 a month. I have a doctor's office a quarter mile on the other side of the bridge. I've been going there for 10 years. I'll have no way of getting there. I won't be able to pay it. It's ridiculous. I don't like the fact that I've been to two other meetings where I've had questions, where people have said -- they've literally taken my name and said they'd get back to me, and they don't. This is -- there are -- if you want to raise gas tax money, toll a different highway. Toll 26. You can walk faster down 26. You can walk faster down I-5. Toll it. Give us a break. Be up front, you know. I assumed this would be a meeting where we would hear more and be able to ask you personal questions upfront and get an answer. This isn't giving us any answers. This is still kind of deflecting. You're letting us talk, but we won't hear anything back. This doesn't make any sense. This is still another way to shove all of our -- under the -- I'm trying to be polite. And this is still another way to shove everything under the rug. We're still not getting a true face-to-face with any answers. There's been so much money raised in the past, and that bridge was never taken care of then. And now, it's -- it's just -- it's just unbelievable. I don't even know how to go on and be polite. I'm so frustrated over this. Everybody in my family is -- it's -- everybody I know is so frustrated. Oh, my god. I'm sorry. I just -- like I said, I'm trying to be polite, and I don't know how to form any more words to go on. Here in Gladstone, lower Oregon City, it's getting to be older population. We're all on fixed incomes. Property taxes are killing us. And now you can't even be forthright with about how much a toll will be. You keep deflecting everything. Oh, it is just so -- like I said, I can't -- oh. Oh, my god. This is just -- I don't know, it's almost like -- it's just seems to be a whole other thing since the electric car. Now you need another way just to pull in revenue because there's not going to be enough gas tax being picked up out there. You can still put some type of tax on an electric car. Just because some of us can't afford to buy one -- I'll never be able to afford one. It's just so not right. This is -- this side of the river is a very poor side of the river. The other side, the West Linn-Lake Oswego side, is a whole different ballgame. This is just -- you guys need to figure out a way to pull up and figure out some kind of mass transit to go along with this tolling crap that you guys are coming up with, because this isn't right. Just telling us to take it isn't good enough because there isn't any out where I live. I'm sure there's a transit mall that sits over here, but there aren't any buses that cross the river. So in order to get around, you know -- I mean, sure the buses are going to be tolled, and it would be in the fare, but until you guys figure something out -- and that's something you guys really need to put in this plan. Put in some mass transit so that we have a way to get across the darn river, because this is crazy. This is not right, because it's a killer. I can't go on or else I'm going to start spewing out some stuff that you're not going to be wanting to put into that. I'm sure I'm close to my three minutes, aren't I?



**ODOT I-205 Toll EA - RECORD #2819 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Charles

**Last Name :** Johnson

**Affiliation :**

**Submission Method :** In-person comment opp.

**Q3. Comments :** Okay. I think I'll be short and to the point. I think tolling is terrible idea, and that the rest of these details simply amount to putting lipstick on a pig. You know, in this case, the ends don't justify the means as far as the idea of imposing, basically, what's a tax in disguise on the system. I have a real strong concern that this is not where it stops. This is where it begins, so we have to stop it. That I-5 is currently targeted as a potential spot. And, basically, the Department of Transportation is statewide, so it could affect people in other places who can't even imagine that this would be a possibility. Up until recently, I couldn't imagine it either. But as I looked deeper into it and saw that things are moving along, I became more and more concerned. And not just because I live in the area, but the impact on the area is going to be tremendous and bring about terrific negative change. Certainly, in the short term, but more than likely in the long term. So those are my, you know, basic concerns about it. I also think that things being as they are, that the projections, financially, what with cost overruns and so forth, are not going to be nearly close to what the final ticket is going to be on these projects. So I have concerns from those standpoints too. Is there anything else I need to state about myself?

**ODOT I-205 Toll EA - RECORD #2820 DETAIL****Submission Date :** 4/4/2023**First Name :** Kathy**Last Name :** Robertson**Affiliation :****Submission Method :** In-person comment opp.

**Q3. Comments :** Okay. My number one worry would be about the Oregon City bridge being congested with people going there instead of on the freeway. And then I wanted to know what people on fixed incomes are going to do, since they haven't said what price yet fixed incomes might be, if they have it. And then I'm in a volunteer group called Village at the Falls. And we have volunteer drivers that need -- that, right now, are paying for the gas and everything to take people to the airport, Tualatin, Meridian Hospital, OHSU, Sunnyside, and the airport. And the people that are seniors that they're helping may not get help if these drivers don't volunteer. Am I talking too fast for you? If you don't take -- if they don't pay the toll, then they would have to do the side streets, and then it would take a lot longer to get to medical appointments. People in the group also do cleaning and sometimes use the freeway to get to volunteer houses to do cleaning for them. Then I also was kind of worried about service people like plumbing, electricians. They'll pay the tolls, and either it will affect their business, or they'll pass the charge on to customers. And so some of those customers are like myself, who are fixed income. And then, also, truck drivers are going to pass the toll on to their customers. I heard they could even pay, like, \$30 from -- going from Washington down to California, so that's kind of a lot of money in my opinion. I would like more information on the exemptions. Parents with children usually can't take public transportation, and they might have to take the freeway during congestion hours where it costs a lot, and they're already paying a lot for their kids. So even if they're in the higher income, it still would be harder on them. I have a granddaughter that lives in Beaverton, and I would have to figure out ways to go not taking the freeway just to do her laundry for her. I wanted to know if the toll is going to have an end date. And, like, once the bridge is paid for, if they're going to quit tolling. And then, I'm not sure exactly how the gas tax worked, but I thought a percentage of the tax was supposed to go towards the cost of ODOT. And then, if the price of gas went up, the percentage would have gone up, so I don't understand the deficit part of it. I think there was a 20 percent tax fee that went into effect kind of before COVID, and I don't know what happened with that. I've been on vacation in states that have tolls, and I think it's very confusing for tourists, and Oregon seems to be high in tourist dollars. I drive on Willamette Falls instead of the freeway at times, and I never stop to shop there, so I don't think the economic benefits stated in this paper are valid. I also -- what happens with sport teams and school field trips when they're paying tolls? And then, I have also read that tolls aren't working in some states, and they aren't making what was originally estimated. And that was all I could come up with in a short time. All right. Thank you.

**ODOT I-205 Toll EA - RECORD #2821 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Virginia

**Last Name :** Gomez

**Affiliation :**

**Submission Method :** In-person comment opp.

**Q3. Comments :** I'd kind of like to know how it's going to impact people who are on a fixed income, and volunteers who are helping people on a fixed income. And people who need help with things, are they going to have to pay a toll every time they go across the bridge to help somebody, or take somebody to a doctors' appointment, or things like that? So I just kind of want to know how that's going to affect us. What else do you want me to -- that's my big concern is -- I also belong to Village at the Falls, which is -- helps people who stay -- who want to stay in their homes, so they go in and do house cleaning and trips to the doctor. And the volunteers who drive those people, are they going to have to pay the toll? And like I said, I'm on a fixed income myself, so what am going to -- how is that going to impact -- how much do I budget for that? And that's really all I wanted to say.

**ODOT I-205 Toll EA - RECORD #2822 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Ian

**Last Name :** Rose

**Affiliation :**

**Submission Method :** In-person comment opp.

**Q3. Comments :** I come here today, I'm a resident of Oregon City, in this neighborhood, actually. I'm coming today against the toll, mostly due to an increase in traffic in West Linn, Oregon City, and the general impact on commuters. If the toll was implemented conditionally until the project was paid off and then removed, then I could see this potentially being supported by the community. But since this toll is being implemented indefinitely, it would be assumed that it would never be removed, which is why the community is against it. The toll gantry location considerations also do not take into consideration getting off on Stafford Road exit, and rerouting by taking Southwest Ek Road, and then to Borland Road, which changes to Willamette Falls Drive. Background, I commute from here to Oregon State University weekly -- do you need me to slow down at all? Okay. I usually take this route that I described all the way to the Oregon City Arch Bridge on the way home when there's congestion on the I-205. I noticed the environmental assessment notes trying to avoid traffic rerouting from Stafford Road through Gladstone, but I didn't see it noting the rerouting that I described, as there's a lot of rerouting already that occurs through West Linn on the route that I described. Again, if this toll was implemented conditionally, only until the project is paid off and there's potential for support, but if it's an indefinite toll, then I would urge ODOT to reconsider, as this would impact many residents more so than commuters. Final note is I noticed the note on increasing commerce in adjacent areas. Yet, I also wanted to note that it could discourage commerce in farther areas. Being where I live, it would discourage me to travel to Tualatin taking the I-205 for shopping. And I would, instead, be urged to stay in southwest Portland or Oregon City

**ODOT I-205 Toll EA - RECORD #2823 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Ron

**Last Name :** Forrester

**Affiliation :**

**Submission Method :** In-person comment opp.

**Q3. Comments :** I am a retired senior citizen on a fixed income doing volunteer driving for other senior citizens also on fixed income. I'm sure you've heard this, but the organization is Village at the Falls, with the mission of providing services to various -- in various areas to allow seniors to remain in their homes and still meet their basic living needs. Okay. My concern is at least twofold. Additional cost to volunteers or those we assist. I already pay for my own gas and insurance, which I knew going into my volunteer for this organization. I don't think I can take -- I pay for my own gas, so I don't think I can take additional cost. I don't think the seniors that I drive are going to be able to afford that additional cost. Okay. Then secondly, if I try to avoid the traffic and get off on side roads, we're going to have to probably add time to our appointment. Now, as retired and seniors, maybe that's not a big issue to anybody, but time is time. Okay. The last thing I wanted to bring up was appliance repair, plumbing issues, whatever the case may be, any contractor that has to go on that toll is going to pass that cost on to those senior citizens. So -- okay. I'm done.

**ODOT I-205 Toll EA - RECORD #2824 DETAIL****Submission Date :** 4/4/2023**First Name :** Craig**Last Name :** Blair**Affiliation :****Submission Method :** In-person comment opp.

**Q3. Comments :** I live in Milwaukie, Oregon. I was born in Oregon. What would you like me to do here? I'll just read what I put on the Internet at one time. Would that be okay? Tolling roads in Oregon is an assault on the common man. Tolling roads can only fuel inflation. Workers depend -- and dependents would need to be paid more to pay for this tax. With the high cost of registration and gas tax, Oregonians have already paid and been paying for road maintenance and improvements. If current taxes costs are not used totally for road maintenance and improvements, then those funds are being misused. This -- this proposed extortion of the common man is wrong. Those who would want tolls have the option to move to a state that has tolls. Oregonians do not want tolls on the roads. Is that it?

**ODOT I-205 Toll EA - RECORD #2825 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Francisco

**Last Name :** Leon

**Affiliation :**

**Submission Method :** In-person comment opp.

**Q3. Comments :** I'm born and raised here in Oregon City. My father worked for the mill for 30 years here. And there's so much going on in our country, feeling just overwhelmed and -- like we don't have a say and so helpless. And to have say this I-205 toll bridge just kind of -- it feels like it's being, you know, ramrodded onto us. Many of us make multiple trips over the bridges, and there's multiple family members that go to Tigard once a day, or go to Portland once a day. I work in Portland, so I'm going back and forth, you know, twice over the bridge. My wife is going the opposite way twice. You know, if we have -- we go to church over in Abernethy, so that's -- and, you know, that's twice a week. It's just -- at a time when we need to feel like at least small government supports us or is listening to us, and that Oregon City would have a vote on this, whether the toll would be in effect -- we should have a chance to vote on that. And there's so many questions. How much is the budget? How long until the goals are reached? What are they going to do with -- you know, specifically, how long and -- we do care. We want to share improvements, but at what cost? And also the environmental impact didn't have the people's, you know, direct opinion. And we're the ones that make up this community. So I'm grateful for this opportunity, as minute as it may be, to express my concerns. You know, there's so much that we -- it's just expensive. So, I think that's it.

**ODOT I-205 Toll EA - RECORD #2826 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Jason

**Last Name :** Padden

**Affiliation :**

**Submission Method :** In-person comment opp.

**Q3. Comments :** So I have lived in Canby now for several years. Obviously, I'm a resident of Canby. I'm a very active resident of Canby. I'm currently on the City Council, and I have served as the Chair for the Planning Commission in the past. So we have been very cognizant of what's coming up with this I-205 tolling. In many cases, we feel that we are not being heard. We have been expressing concerns regarding diversion and how this is going to impact our community. And, as I said, we don't feel like there's any solutions being given. We're told that there's a plan for the future, but this is going to take effect sooner than later. And we're not getting answers to these problems for the sooner, and then later will be too late. We're already dealing with a huge mess because the 99E repaving project, which was supposed to have happened last year, continues to get delayed and cause problems, not only for travelers, but for us as a city. Because people assume that the damage on 99E that is happening to their cars, and the frustration, is all getting directed towards city staff. When we, as a city -- or I shouldn't say we -- but as the City, they don't have control over 99E. So this sort of project, unless there is some, like, clear way of how the money is going to be used to help these communities, such as Canby, Oregon City, West Linn, and such, we don't know -- we don't know what to do. Even in your packet here, it talks about how this is going to impact local streets. And it talks about how there's a plan being worked on, but I know for a fact that there's no short-term plan to be enacted. It's all things that are going to happen years after this project continues. Another thing is, and I know many people have this sentiment, we don't know why we are being used as the guinea pigs. The congestion is more centered toward the Multnomah County area, up closer towards Portland, yet, it's happening down here. So for many folks here, in Clackamas and some of the more rural counties, we feel like we're being singled out as a guinea pig, and we don't appreciate it. The last point that I will make is just state that I understand what tolling is for. I grew up in New York. I went to college near Albany, New York. And the thruways in many of the interstate highways there are tolled. So I understand that there needs to be funding for maintaining our infrastructure. I have no problem with that. But I think the way this has been -- I think the way this is going about is not taking into consideration the cities, and municipalities, and counties that are going to be inadvertently impacted by this project. And so, that is all I have.



**ODOT I-205 Toll EA - RECORD #2827 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Claire

**Last Name :** Met

**Affiliation :**

**Submission Method :** In-person comment opp.

**Q3. Comments :** Okay. And I'm a resident of Oregon City. I personally feel that tolling is being shoved down our throats here in Oregon City. We're not guinea pigs. I don't know why they picked what they did; why Oregon City? On of the things that you list, and I've heard, is that it will change our habits. And one of the things is mass transit and stuff, there isn't really any buses that I know of that travel on 205. And is the tolling 24 hours? Or is it just because - just during the busy time is one thing, but, like, at night, you know, if you're traveling, is it -- you know, is it 24 hours, basically? And the improvements that are being made now to stabilize the bridge and, you know, all of that, for earthquake stuff, it's already being paid for. And I think the local -- the impact on local communities is going to be horrible. I've been on the Main Street Board -- I'm not on it right now, but I know that parking down there is hellacious anyway, and I think that the tolling will be -- will exacerbate it even worse. And I don't think people -- it says it would help the downtown, people will shop. No. If they're going from point A to point B, I don't see them doing that. And then, they talk about roundabouts to help. I don't -- I hate roundabouts. I know a lot people are -- and then, you know, to me the most equitable way to pay for this and future improvements is a gas tax, which is more equitable to everybody. And that's what I would suggest doing instead of tolling, because I really feel that we've been, quote/unquote, picked on. So that's kind of all I have. Okay.

**ODOT I-205 Toll EA - RECORD #2828 DETAIL**

**Submission Date :** 4/4/2023

**First Name :** Hannah

**Last Name :** Berkowitz

**Affiliation :**

**Submission Method :** In-person comment opp.

**Q3. Comments :** Okay. Well, I live just across the river. Probably 95 percent of the time I leave my driveway, I use the 205 bridge. And I don't make a lot of money, but regardless of that, I just don't think tolling is the right way to go. The surface streets in my neighborhood are horrible because of the -- the way the land lays, the topography and where the river is and everything. And already, they're horribly congested, and there's no other way to go. So the surface streets are going to be worse -- I'm right by the old bridge -- with tolling. And the freeways are there for our convenience. They were built for our convenience. If tolling happens, a lot of people aren't going to be using it, so it's not convenient anymore. So why is it there? I know it needs to get fixed. You know, it's not good the way it is. The seismic upgrade is necessary, and the extra lane is necessary, but there must be a better way to fund it. Yeah. I'm just really concerned about the traffic problems that it will cause. Because all the stuff in the literature, I think, is based on a false presumption of traffic's going to be less because people aren't going to be using it because they're going to be on the surface streets. So, yeah, I guess that's all I have to say.

**ODOT I-205 Toll EA - RECORD #2829 DETAIL****Submission Date :** 4/4/2023**First Name :** John**Last Name :** McCabe**Affiliation :****Submission Method :** In-person comment opp.

**Q3. Comments :** And I live in the Stafford area of West Linn, which will be affected by the diversion. We've obtained the actual diversion -- the actual traffic numbers from 2008 to 2021, and we've already had 110 percent increase in traffic when they added the third lane between I-5 and Stafford. Stafford Road itself has also increased by 140 percent during the same period of time. So we have a substantial diversion problems, which Mandy Putney said it's no big issue, because between 2015 and 2018, it didn't change that much. But it did change significantly between 2008 and 2021. And it will change even higher if tolling does occur. There's no way we can go around it. We know that there will be diversion of substantial amounts. And ODOT does not wish to address this. In addition, there's the talk of the extra \$600 for people in this area to pay for tolls. And they say it's eight percent of what the total transportation cost increase. However, the \$600 tolls is equal to 315 percent of what the normal people in the state of Oregon pay for the gasoline tax. There is no equalization. We are being treated unequal. We are being penalized. The best thing to do if they truly want to build this road -- which is not necessary, because the congestion is only during rush hour and bad weather. And maybe if we had Californians not being able to drive, since they don't know how to drive in the rain -- until they can prove they drive in the rain, that if we kept them off the road, it would reduce the congestion, and there wouldn't be a need for a new freeway. Most of the congestion occurs when accidents occur for people that don't know how to drive in the rain. Thank you for your time. And I hope you consider the no-build option. It's what we need at this time because tolling is a bad thing.

**ODOT I-205 Toll EA - RECORD #2832 DETAIL**

**Submission Date :** 5/5/2023

**First Name :** Virginia

**Last Name :** Wiltshire-Gordon

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
ODOT must conduct an environmental impact statement, including studying congestion pricing before freeway expansion. Traffic is often used a reason for expansion but expanding the freeway simply will not help as new lanes induce demand. As we continue to see events like heat domes and wildfires impacting our state, ODOT must do everything in its power to reduce the impact of climate change - and this means investing in public transit and active transit locking us into car oriented infrastructure.

**ODOT I-205 Toll EA - RECORD #2833 DETAIL**

**Submission Date :** 4/19/2023  
**First Name :** Chris  
**Last Name :** Smith  
**Affiliation :** No More Freeways  
**Submission Method :** Letter  
**Q3. Comments :** Please see the attached comment letter from No More Freeways and Neighbors for Clean Air. Our letter also references a number of footnoted documents and we are attaching many of these in a multi-part zip file spread across 8 emails to stay within email limits.  
The attachments are also available via a Google Drive link that will be maintained for at least 60 days: [https://drive.google.com/drive/folders/1znA-P2LxZ0J4mnVd\\_sss4MlqZ4\\_RUtdL?usp=sharing](https://drive.google.com/drive/folders/1znA-P2LxZ0J4mnVd_sss4MlqZ4_RUtdL?usp=sharing) This is probably a much more convenient way to receive the files.  
**Attachments :** NMF and NCA I-205 EA Comments.pdf (617 kb)



**Date:** 18 April 2023

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

[I205TollEA@odot.oregon.gov](mailto:I205TollEA@odot.oregon.gov)

Keith Lynch  
Division Administrator  
Federal Highway Administration  
530 Center Street NE  
Suite 420  
Salem, OR 97301

[keith.lynch@dot.gov](mailto:keith.lynch@dot.gov)

**From:** Chris Smith, No More Freeways  
Joe Cortright, No More Freeways  
Aaron Brown, No More Freeways  
Mary Peveto, Neighbors for Clean Air

**Subject: Comment on I-205 Tolling and Expansion Environmental Assessment**

*“Some highway engineers have a mentality ... that would run an eight-lane freeway through the Taj Mahal. That is our problem.”*

– Oregon Governor Tom McCall, 1970

No More Freeways (NMF) and Neighbors for Clean Air (NCA) write to comment on the I-205 tolling and freeway expansion Environmental Assessment (EA).

The core philosophy of the No More Freeways campaign is that widening urban freeways has been shown over and over as counterproductive due to induced demand. In a period of obvious climate change, such widenings are also a significant failure to advance our climate goals, especially considering such freeway expansions also siphon resources that should instead be spent on investments in traffic safety and basic road maintenance.

Fossil-fuel based transportation comprises 40% of all GHGs and is the largest source of toxic air pollution. Poor air quality in the Portland region already poses significant risk to human health, additional emissions are untenable, and the transportation sector should be part of reducing harmful pollution in our communities. Ninety percent of Oregonians live in neighborhoods where the air they breathe causes cancer. Oregon’s most populous county, Multnomah, is in the bottom 2% nationally for diesel pollution, with BIPOC neighborhoods subjected to rates of diesel emissions 2-3 times higher than those of white residents. We cannot add to this crisis.



While we believe that congestion pricing can be an effective tool to both manage performance of a facility and to reduce Greenhouse Gas Emissions, investing the proceeds of pricing in the expansion of highways rather than advancing alternatives like transit and active transportation is a policy failure. We detail our concerns with the proposed I-205 tolling and expansion project below.

For the record we also attach our critique of the Categorical Exclusion provided for the Abernethy Bridge (Phase 1a) component of this project.<sup>1</sup>

### **1. Failure to consider sufficient alternatives**

The project proposes to use a combination of pricing, reconstruction and widening to deliver a variety of benefits including congestion management and seismic resilience, but chooses a maximalist approach using widening as the primary answer to congestion and then pricing as a mechanism to pay for the widening. Alternate strategies that rely on pricing as the primary congestion management tool could provide equivalent results at a much lower cost to the community and with fewer environmental impacts. Potential alternative configurations that are not analyzed include:

- Congestion pricing without widening, potentially with only a single tolling gantry at the Abernethy Bridge
- Seismic mitigation or replacement of bridges without widening

The community deserves consideration of a full set of alternatives that could deliver comparable benefits at lower cost.

### **2. Flawed cost-benefit analysis**

Please see the March 21st, 2023 letter<sup>2</sup> from Joe Cortright of NMF to the FHWA demonstrating serious flaws in both the analysis and conclusion of the project cost benefit.

### **3. Failure to sufficiently analyze 4(f) issues**

ODOT/FHWA fail to adequately analyze the impact of bridge replacement and/or widening on rivers and streams. Please see EA comments filed by Tualatin Riverkeepers.

---

<sup>1</sup> August 29, 2022 letter from No More Freeways

<sup>2</sup> March 21, 2023 letter from Joe Cortright to FHWA



#### 4. Inaccurate and insufficient traffic projections

ODOT/FHWA have not prepared accurate traffic projections for the I-205 project.

**A. Travel demand on I-205 has been growing slowly and ODOT inexplicably predicts a three-fold acceleration in traffic growth.** ODOT traffic count data shows that traffic on I-205 in the project area has grown at a rate of about 0.3 percent per year for the past 14 years. Despite that very slow level of growth, the EA asserts that the traffic growth rate on I-205 will more than triple over the next decade to about 1.15 percent per year. No explanation is provided for this enormous increase in expected vehicle traffic on I-205.

This is likely an indication of bias and error in traffic modeling. It overstates the likely amount of congestion and delay in the No Build scenario, and therefore overstates the benefits associated with project construction, and mis-states the social and environmental effects of the project.

ODOT Traffic Counts	2005	2019	AAGR
Stafford Automatic Counter	82,700	87,100	0.37%
Abernethy Bridge	99,600	103,100	0.25%
Average			0.31%

I-205 EA Traffic Projections (No-Build)	2015	2027	AAGR
Tualatin River Bridge	100,000	111,000	0.87%
Abernethy Bridge	112,000	133,000	1.43%
Average			1.15%

**B. ODOT admits that the Kate Travel Demand model over-predicts traffic on I-205.** ODOT relies on the Metro Kate travel demand model. Metro prepared a “validation”





report comparing the outputs of the Kate model to actual traffic counts. This report showed that the Kate travel demand model overestimates traffic on the I-205 Abernethy Bridge by 20 percent (“cutline R-04).

### 6.1.3 Model Validation

Metro’s RTDM was validated to 2015 conditions, using observed data including 2014 Highway Performance Monitoring System and 2015 auto and freight counts. Details about the model validation are documented in *2017 Kate v1.0 Trip-Based Demand Model Validation Report for Base Year 2015*. Model assignment results for average weekday, AM 2-hr (hr), and PM 2-hr peak periods are within FHWA’s acceptable range compared to counts across 16 cutlines, except for AM 2-hr peak period Arterials. The validation also showed the model captures the diurnal traffic pattern across the 16 cutlines well. Figure 6-1 shows the titles and locations of the 16 cutlines.

Among the 16 cutlines, W-14 and R-04 are the most relevant to the I-205 Toll Project. Table 6-3 shows model volume comparison at the two cutlines for average weekday, PM 2-hr (4 to 6 p.m.), and AM 2-hr (7 to 9 a.m.). The validation shows the RTDM tends to over-estimate at both cutlines. Model estimated average weekday volumes at cutline W-14 are close to the counts (5% to 6% higher than the counts). On the other hand, the model overestimates daily volume at cutline R-04 by approximately 20%. To address any variance between modeled and observed volumes, the traffic projections used to develop revenue projections are adjusted to account for calibration error.

**C. Failure to include an analysis of Value Pricing/Regional Mobility Pricing.** The 2017 Oregon Legislature directed ODOT to implement congestion pricing on I-205 and I-5. ODOT’s current project documents indicate that it intends to implement Regional Mobility Pricing on both these roadways as early as 2025.<sup>3</sup> Congestion pricing would charge users of I-205 between 17 and 38 cents per mile traveled, according to ODOT documents.<sup>4</sup> ODOT has failed to incorporate any analysis of how the regional mobility pricing program will affect traffic levels on I-205.

It is highly likely that regional mobility pricing will significantly reduce traffic on I-205 in the base case below the levels estimated in the EA. By overstating the level of traffic in the “No-Build” case, the EA over-estimates the potential benefits associated with the “build” alternative, i.e. traffic levels and congestion will be lower and travel times will be shorter in the No-build than are claimed in the EA.

ODOT has the ability to forecast the effects of congestion pricing on traffic volumes and travel speeds on Portland Area interstate roadways. In fact, ODOT submitted as part of

<sup>3</sup> ODOT, Regional Mobility Pricing Project, Project Schedule, <https://www.oregon.gov/odot/tolling/Pages/I-5-Tolling.aspx> (viewed April 7, 2023).

<sup>4</sup> ODOT, Portland Metro Area Value Pricing Feasibility Analysis, Final, Round 1 Concept Evaluation and Recommendations, Technical Memorandum # 3, 2018.



the I-5 Rose Quarter Supplemental Environmental Assessment a memorandum showing that the implementation of congestion pricing would significantly reduce traffic volumes and shorten travel times on I-5 in the No-Build scenario. ODOT's Rose Quarter "tolling sensitivity analysis memo" (included in the Rose Quarter Traffic Analysis Supplemental Technical Report) indicates that traffic in the No-build scenario would be much lower than indicated in the EA or SEA analyses<sup>5</sup>.

The I-205 Environmental Assessment omits any mention of the regional mobility pricing program (RMPP), which would impose pricing on other sections of I-205 immediately North and South of the project area, and which would also impose pricing on I-5 as well.

## 5. Failure to use appropriate analysis methods

As noted in Section 4 of this comment, the EA acknowledges that the Kate model overestimates traffic on I-205. The EA claims that it has fixed the over-estimates from the Kate model. However, the EA provides no explanation of how model estimates were adjusted.

It appears that the authors of the EA failed to follow ODOT's own procedures for documenting any "post-processing" of model results. ODOT's Analysis Procedures Manual (APM) requires that analysts document any adjustments they make to model outputs, and do so in a way that makes the computations transparent to and replicable by others. The EA omits any explanation of how Kate model outputs were altered.

The Traffic Technical Report also indicates that ODOT altered the results of the Metro Kate Travel Demand model, what they call "post-processing."

Standardized methods described in the APM and the National Cooperative Highway Research Program Report 765 (NCHRP 765) were used to post-process raw model link volumes.

Attachment Y: Modeling Methodology and Assumptions for Environmental Assessment, page 17

ODOT has not only failed to follow its own procedures, but also those prescribed by the NCHRP in preparing and documenting its traffic estimates. Both the NCHRP handbook and ODOT's own "Analysis Procedures Manual" require that traffic volume estimates be documented in a way that reveals any weaknesses and allows third parties to fully understand assumptions, and duplicate. ODOT failed to follow either the practices spelled out in the professional literature for applying such methods or its own Analysis Procedures Manual<sup>6</sup>. Both

---

<sup>5</sup> ODOT, Regional Mobility Pricing Sensitivity Analysis, July 21, 2022.(Supplemental Environmental Assessment, Traffic Technical Report, Appendix D).

<sup>6</sup> ODOT, Analysis Procedures Manual, <https://www.oregon.gov/odot/Planning/Pages/APM.aspx>, attached



of these call for providing spreadsheets or similar written calculations showing input data, describing assumptions, and generally enabling a third party to understand and replicate the calculations. The traffic technical report provides a screenshot of a single “sample” spreadsheet but does not provide the actual spreadsheets showing the computations that were used to produce the “post-processed” results. (Attachment Y: Modeling Methodology and Assumptions for Environmental Assessment, Table 55, page 98)

ODOT's own Analysis Procedures Manual<sup>7</sup> (which spells out how ODOT will analyze traffic data to plan for highway projects like the I-205, states that the details need to be fully displayed:

### 6.2.3 Documentation

It is critical that after every step in the DHV [design hour volume] process that all of the assumptions and factors are carefully documented, preferably on the graphical figures themselves. While the existing year volume development is relatively similar across types of studies, the future year volume development can go in a number of different directions with varying amounts of documentation needed. Growth factors, trip generation, land use changes are some of the items that need to be documented. If all is documented then anyone can easily review the work or pick up on it quickly without questioning what the assumptions were. The documentation figures will eventually end up in the final report or in the technical appendix.

The volume documentation should include:

- Figures/spreadsheets showing starting volumes (30 HV)
- Figures/spreadsheets showing growth factors, cumulative analysis factors, or travel demand model post-processing.
- Figures/spreadsheets showing unbalanced DHV
- Figure(s) showing balanced future year DHV. See Exhibit 6-1
- Notes on how future volumes were developed:
  - If historic trends were used, cite the source.
  - If the cumulative method was used, include a land use map, information that documents trip generation, distribution, assignment, in-process trips, and through movement (or background) growth.
  - If a travel demand model was used, post-processing methods should be specified, model scenario assumptions described, and the base and future year model runs should be attached

---

<sup>7</sup> ODOT Analysis Procedures Manual, Chapter 6, attached



This is also essential to personal integrity in forecasting. The American Association of State Highway and Transportation Officials publishes a manual to guide its member agencies (including ODOT) in the preparation of highway forecasts. It has specific direction on personal integrity in forecasting. National Cooperative Highway Research Project Report, "Analytical Travel Forecasting Approaches for Project-Level Planning and Design," NCHRP Report #765<sup>8</sup> states:

*It is critical that the analyst maintain personal integrity. Integrity can be maintained by working closely with management and colleagues to provide a truthful forecast, including a frank discussion of the forecast's limitations. **Providing transparency in methods, computations, and results is essential.** . . . The analyst should document the key assumptions that underlie a forecast and conduct validation tests, sensitivity tests, and scenario tests—**making sure that the results of those tests are available to anyone** who wants to know more about potential errors in the forecasts.*

ODOT's traffic technical report lacks the spreadsheets and other documentation explaining how ODOT "post--processed" model results. This is a failure to adhere to the agency's own guidelines and undercuts the validity of the modeling results.

## **6. Failure to include tolling for the Abernethy Bridge in the No-Build scenario**

The traffic projections for I-205 in the No-Build scenario assume that there is no tolling to pay for the I-205 Abernethy Bridge. The Oregon Department of Transportation has already started construction on the Abernethy Bridge. The Oregon Legislature has determined as a matter of law, and the Oregon Department of Transportation has testified as a matter of policy, that the cost of the I-205 Abernethy Bridge will ultimately be paid for by tolling the bridge.

In 2017, the Oregon Legislature adopted a budget note to HB 5045 declaring that any revenue from value pricing roadways under HB 2017 would be dedicated to paying for the I-205 project:

### ***Budget Note***

*The Oregon Department of Transportation is directed to ensure an ongoing commitment to fully fund congestion relief on I-205, including but not limited to the Stafford Rd to Abernethy Bridge bottleneck. Pursuant to HB 2017, any value pricing revenue shall be dedicated to I-205. In the event that value pricing revenue is not sufficient, or should value pricing prove not to be a viable funding source, the agency shall report immediately to the Legislative Assembly on the funding issues*

---

<sup>8</sup> NCHRP Report #765, attached.



*along with specifics on funding needs and options available to the Legislative Assembly to quickly remedy such funding gaps. An initial report shall be provided to the Joint Transportation Committee no later than the last legislative days in calendar year 2018.*

At the May 2018 meeting of the Legislature's Joint Transportation Committee, ODOT Deputy Director Travis Brouwer testified that the Department anticipated paying for the Abernethy Bridge project with tolls ("Alternative E") and assured the committee that federal approval of tolling for the reconstruction of the Abernethy Bridge would be straightforward but would be subject to a lengthy NEPA review. (May 23, 2018, at 1:28-1:30).

On December 6, 2018, at a meeting of the Oregon Transportation Commission, ODOT Region 1 Director Rian Windscheimer presented three alternatives for moving forward with the I-205 project, and called Alternative 1--which involved tolling--the "most likely" way of financing the project.

The Department's own [legislatively approved budget](#)<sup>9</sup> for the 2021-2023 biennium, enacted in July, 2021, specifically states:

*"HB 2017 . . . Requires the implementation of value pricing on I-5 and I-205 in the Portland metro area."*

This point was made specifically by the Chair of the Oregon Transportation Commission at the commission's March 2022 meeting, in which he stated that the Abernethy Bridge project could not be built without implementing pricing in the Portland area:

*"I think it comes down kind of to this simple conclusion, which is: we don't have tolling I don't see an alternative funding mechanism to do any of these. I don't think, I don't, we don't have the resources to build the Abernethy Bridge, the Rose Quarter project or the Interstate Bridge, without tolling."*

- Bob Van Brocklin, March 10, 2022, [Oregon Transportation Commission Meeting](#)<sup>10</sup>.

In May 2022, ODOT proceeded with construction of the Abernethy Bridge project, with reliance on a further federal determination that tolling would be adjudged in a separate, later Environmental Assessment project for the widening of I-205. The FHWA wrote:

---

<sup>9</sup> ODOT's 2021-2023 biennium budget is available here <https://www.oregon.gov/odot/About/Budget/ODOT%202021-23%20Legislatively%20Adopted%20Budget.pdf>

<sup>10</sup> Chair Van Brocklin's comments at the March 2022 OTC meeting: <https://youtu.be/XblcgrAprVM?t=16190>



Recently signed into law, Oregon House Bill 3055 provides financing options that allow Phase 1a of the I-205: Stafford Road to OR 213 Improvements Project to be constructed beginning in the spring/summer 2022 without the use of toll revenue. Construction of the remaining phases of the I-205: Stafford Road to OR 213 Improvements Project will require toll revenue. The I-205 Toll Project is a separate project that would toll I-205 near the Abernethy and Tualatin River Bridges to raise revenue for construction of the remaining phases of the I-205: Stafford Road to OR 213 Improvements Project.

As Phase 1a is now advancing as a separate project with independent funding, the 2018 CE decision is being reduced in scope to include only Phase 1a (the "I-205: Phase 1a Project" or "Phase 1a Project").<sup>11</sup>

In June 2022, ODOT Administrator Brendan Finn assured legislators that the escalating cost of the Abernethy Bridge would be paid for, ultimately, with tolls:.

Representative Khanh Pham:

*Thank you. Thank you. So, Brendan, actually could you go back to the I-205 and the contract? I had a question about the budget increases for the Abernethy bridge project. There was a slide about the contract. . . . So my understanding is that in when we passed House Bill 2017, then the \$30 million that we funded that for the I-5 Rose Quarter project was going to start in 2022. And then in 2021, when when we passed HB 3055, that reallocated that \$30 million for the Rose Quarter project to also include the idea of I-205 construction as well as the toll program implementation and the I-5 bridge. So I was wondering if you could talk about the increased costs for the project because I know in 2018 ODOT was estimating it to cost about 250 million and now it looks like it's about 450 million now. So as the Abernethy bridge now absorbs all of that original \$30 million, and if so, for how many years? How is it impacting the other the funding for the Rose Quarter project as well?*

ODOT Administrator Brendan Finn:

*Yeah, Co-Chairs, Representative Pham. Good question. I'll unpack a little bit of that for you. House Bill 3055 did allow some financial flexibility with that \$30 million also*

---

<sup>11</sup> Emily Kline, "Re-Evaluation of the Categorical Exclusion for the I-205: Stafford Road to OR 213 Improvements Project, May 4, 2022, page 3.



*to do some short term borrowing. **This project will be paid for through toll revenues.** The original estimate and what the bids came in we just heard from Mr. Lind, about what we're seeing out in the contracting community and this contract was also a victim to a lot of those same circumstances. So the price of steel, supply chain issues, and then some of the other risks that are associated with the in-water work window. There was an increase in the costs, and we were able to negotiate pieces of that down with Hewitt. You're about right as far as the amount we did program **\$495 million for this project. Again, to be repaid by the tolling program.***

The EA document itself acknowledges Finn's statement that toll revenue would be used to repay the HB 3055 funding.

*If tolling is approved upon completion of environmental review of the I-205 Toll Project, toll revenues could be used to pay back loans for Phase 1A.*

<sup>12</sup>Buried deep in the methodology section of the Traffic Technical report is a claim that asserts that tolling the Abernethy Bridge (Phase 1A) is not included in the "No Build" Scenario because the Abernethy Bridge could be paid for without tolling.

*. . . only Phase 1A of the Improvements Project will be included in the Project's No Build Alternative because ODOT has financing tools that allow this phase to move forward without reliance on toll revenues.<sup>13</sup>*

ODOT and FHWA now apparently intend to assert that it might be possible to pay for the Abernethy Bridge without using tolls. But the fact that the state Legislature and ODOT itself have said they will use tolls to finance the cost of the project means that tolls should be regarded as part of the "No Build" scenario. Also, as noted elsewhere in our comments, the EA fails to consider the impact of Regional Mobility Pricing (which is part of state and regional transportation plans) in its analysis of future traffic levels.

## **7. Improperly Combining Of Tolling and Freeway Widening in the EA**

ODOT and FHWA have illegally combined two different project alternatives with independent utility into a single project. The two project alternatives are (1) tolling of I-205 for congestion

---

<sup>12</sup> Environmental Assessment, page 1-3, footnote 7, [https://www.oregon.gov/odot/tolling/Documents/I-205%20Toll%20Project%20Environmental%20Assessment\\_508.pdf](https://www.oregon.gov/odot/tolling/Documents/I-205%20Toll%20Project%20Environmental%20Assessment_508.pdf)

<sup>13</sup> Oregon Department of Transportation, Memo: Modeling Methodology and Assumptions for Environmental Assessment February 2023 , pages 91-92. [https://www.oregon.gov/odot/tolling/Documents/Appendix%20C\\_Attachment%20Y\\_I-205%20Toll%20Project%20Modeling%20Methods%20Memo\\_508.pdf](https://www.oregon.gov/odot/tolling/Documents/Appendix%20C_Attachment%20Y_I-205%20Toll%20Project%20Modeling%20Methods%20Memo_508.pdf)



management; and (2) adding lanes to I-205. The FHWA should include two separate build alternatives in the EA.

As noted above, the proposed build alternative actually consists of two separate projects, one of which creates induced travel demand (freeway widening) and one which reduces travel demand (tolling). In fact, the project's own benefit-cost analysis concedes that without pricing, freeway widening would induce additional travel. ODOT has combined two distinct projects—road pricing and freeway widening—into a single project. Nearly all of the supposed benefits from the project stem from the congestion reducing aspects of road pricing. In its Benefit Cost Narrative, ODOT notes:

*Demand management through **tolling significantly improves congestion outcomes** .*

*..*

*Value of Travel Time savings, or Vehicle Hours of Driving (VHD) benefits are calculated from traffic studies on pre-pandemic traffic levels and modeled traffic volumes **under the addition of tolling**. These traffic figures are provided by WSP USA and their Transportation Engineering team. Volume growth under the baseline is limited by congestion and lack of additional lanes, while **volume growth under the Build scenario sees slower growth over time due to the ability of tolling to manage demand**.*

*ODOT, Benefit Cost Analysis Narrative, 2022 (Emphasis supplied)*

If ODOT were to separately analyze these two project components, each of which has independent utility, a proper analysis would show that tolling alone has a much more favorable economic, social and environmental impacts than freeway widening. What ODOT has done is to combine tolling (which produces the congestion and pollution reduction benefits) with the freeway widening (which produces negative environmental and social effects). These two options should be examined separately, rather than combined in the EA.

Note: In making this comment, NMF and NCA believe that tolling the Abernethy Bridge should be considered as part of the No-Build alternative in the EA. If however, it is determined that tolling of the Abernethy Bridge is not part of the No-Build, then tolling of the Abernethy and Tualatin River Bridges should be treated as separate "Build" Alternatives in the EA.

## **7. Failure to acknowledge or analyze the impacts of induced demand**





ODOT/FHWA have failed to incorporate best available science on induced travel in its traffic modeling and EA analysis. Extensive published scientific research has demonstrated the concept of induced travel, also known as the "fundamental law of road congestion."<sup>14</sup>

The best available science shows that there is a unit elasticity of vehicle travel with respect to road capacity in urban areas. A one percent increase in road capacity tends to produce a one percent increase in vehicle travel. ODOT's traffic estimates contain no provision for incorporating induced travel into the calculations. ODOT's calculations therefore under-estimate traffic levels in the "build" scenario. As a result, the ODOT analysis overstates the traffic flow benefits of the project, and understates the costs from increased driving, pollution and crashes.

A recent review of transportation models used by state highway departments concluded that these models fail to include provisions for estimating induced travel and this causes them to underestimate the environmental effects of highway expansion projects.

*Despite strong evidence, the "induced travel" effect is often ignored, underestimated, or misestimated in the planning process, particularly in the assessment of the environmental impacts of roadway capacity expansions. Underestimating induced travel will generally lead to overestimation of the traffic congestion relief benefits a highway expansion project might generate, along with underestimation of its environmental impacts. A major reason that induced travel tends to be underplayed in environmental*

---

<sup>14</sup> Goodwin, P.B. Empirical evidence on induced traffic. *Transportation* **23**, 35–54 (1996).  
<https://doi.org/10.1007/BF00166218>

Coombe, D. Induced traffic: what do transportation models tell us?. *Transportation* **23**, 83–101 (1996).  
<https://doi.org/10.1007/BF00166221>

Duranton, Gilles, and Matthew A. Turner. 2011. "The Fundamental Law of Road Congestion: Evidence from US Cities." *American Economic Review*, 101 (6): 2616-52.

Hymel, Kent, 2019. "If you build it, they will drive: Measuring induced demand for vehicle travel in urban areas," *Transport Policy*, Elsevier, vol. 76(C), pages 57-66.  
<https://www.sciencedirect.com/science/article/abs/pii/S0967070X18301720>

Hsu, Wen-Tai & Zhang, Hongliang, 2014. "The fundamental law of highway congestion revisited: Evidence from national expressways in Japan," *Journal of Urban Economics*, Elsevier, vol. 81(C), pages 65-76. <https://www.sciencedirect.com/science/article/abs/pii/S0094119014000126>

Miquel-Àngel Garcia-López, Ilias Pasidis, Elisabet Viladecans-Marsal, Congestion in highways when tolls and railroads matter: evidence from European cities, *Journal of Economic Geography*, Volume 22, Issue 5, September 2022, Pages 931–960, <https://doi.org/10.1093/jeg/lbab025>



*analyses is that travel demand models do not typically include all of the feedback loops necessary to accurately predict the induced travel effect.<sup>15</sup>*

ODOT has officially adopted an “Analysis Procedures Manual,” which, without evidence, dismisses the scientific evidence on induced demand and prohibits consideration of induced travel in Oregon transportation modeling.<sup>16</sup> This “flat earth” approach to transportation modeling violates NEPA’s requirement that agencies use the best available science in reaching their determinations.

Other state transportation departments have adopted explicit provisions for analyzing induced demand, with techniques developed in the scientific literature and with models subjected to independent expert peer review.<sup>17</sup> ODOT’s “head in the sand” approach to induced demand, and ODOT’s failure to include it in its analysis violates NEPA’s requirement that analysis be scientifically rigorous.

CEQ regulations provide:

*Agencies shall ensure the professional integrity, including scientific integrity, of the discussions and analyses in environmental documents. Agencies shall make use of reliable existing data and resources. Agencies may make use of any reliable data sources, such as remotely gathered information or statistical models. They shall identify any methodologies used and **shall make explicit reference to the scientific and other sources relied upon** for conclusions in the statement. Agencies may place discussion of methodology in an appendix. Agencies are not required to undertake new scientific and technical research to inform their analyses. Nothing in this section is intended to prohibit agencies from compliance with the requirements of other statutes pertaining to scientific and technical research.*

40 CFR § 1502.23 (Emphasis added).

The Environmental Assessment’s modeling fails to make reference to the scientific basis for its traffic analysis, and therefore fails to meet the requirements of the National Environmental Policy Act.

---

<sup>15</sup> JMB Volker, AE Lee, S Handy, “Induced vehicle travel in the Environmental Review Process,” Transportation Research Record 2674 (7), 468-479. <https://doi.org/10.1177/0361198120923365> (attached)

<sup>16</sup> ODOT, Analysis Procedures Manual, <https://www.oregon.gov/odot/Planning/Pages/APM.aspx> (attached).

<sup>17</sup> CalTrans. Transportation Analysis Framework First Edition\* © 2020 California Department of Transportation. Evaluating Transportation Impacts of State Highway System Projects



## 8. Failure to significantly improve transit

That notion that we would spend over a billion dollars on an urban transportation project and provide no noticeable improvement for transit is a huge disappointment. Indeed, the fact that some transit connections will actually be slowed confirms that ODOT's only real interest appears to be in moving as many automobiles as quickly as they can.

## 9. Project is controversial

The introduction of tolling into the regional highway network has proven to be very controversial. It is generating opposition from multiple city governments, and others within the corridor. The response has included Bills introduced in the legislature, as well as efforts to gather signatures for a ballot measure. Given this level of controversy, a full Environmental Impact Statement is clearly in order.

## 10. Improper or inadequate traffic model calibration

ODOT has failed to calibrate its traffic modeling as mandated in FHWA NEPA Guidance. Travel models are known to have errors and inaccuracies. In order to minimize such errors, FHWA guidance<sup>18</sup> directs states preparing NEPA documents to validate their traffic modeling.

*In the context of a NEPA study, it is important for the study team to **focus any calibration and validation efforts that they undertake on the study area.** Typically, a regional travel demand model will have been adequately calibrated and validated at least at a regional level prior to adoption. While it is important for the study team to critically review the documentation of this effort, it is suggested that **more emphasis be placed on checks at the study area level.** It is suggested that the study team **scale their calibration and validation effort according to the scale of the analysis, such as its geographic scope.***

**Calibration** A meaningful calibration effort would include: . . .

- *Comparison of modeled traffic volumes with traffic counts both for individual roadway segments and at more aggregate levels such as throughout the study area*

ODOT's failure to undertake this required calibration of Metro's model is material because the Metro Model over-predicts peak hour north-bound travel on this section of I-5. This information

---

<sup>18</sup> Federal Highway Administration, INTERIM GUIDANCE ON THE APPLICATION OF TRAVEL AND LAND USE FORECASTING IN NEPA, MARCH 2010, page 10. (Attached)



is contained in Metro's own model validation result. The traffic screenline corresponding to the I-205 freeway widening project is "Cutline R-04."

According to Metro's validation report<sup>19</sup>, the Metro model overestimates PM peak hour northbound traffic at this cutline by 20 percent (Table 15). This over-estimation of traffic leads the model to predict more congestion than actually occurs, and means that the benefits of the project are exaggerated, and its environmental effects are understated.

## 11. Disclaimer invalidates "Level 2" Traffic Study

The EA includes and relies upon a "Level 2" traffic study performed by WSP to estimate the traffic levels in the Build and No-Build scenarios. The differences in traffic levels between the two scenarios purportedly serve as the basis for estimating the benefits and environmental and social impacts of the two projects.

The WSP report contains a substantial disclaimer. It specifically disallows reliance on this report by anyone other than the Oregon Department of Transportation. This means that the report is not something that can be relied upon by the FHWA. For that reason alone, the WSP report cannot and should not be relied upon as documentation in the EA.

Here are the principle statements in the disclaimer:

*This report and the subject traffic and revenue study analysis was prepared by WSP USA (WSP) for the benefit of the Oregon Department of Transportation, hereafter the Client, pursuant to a Professional Services Agreement with the Client, and this report is subject to the terms and conditions of that agreement and is meant to be read as a whole and in conjunction with this Disclaimer.*

\* \* \*

*This report, information contained herein, and any statements contained within are all **based upon information provided to WSP** and obtained from proprietary data purchased or confidential information **provided by the Client**, from publicly available information or sources, in the course of evaluations of the Project. **WSP provides no assurance as to the accuracy of any such third-party information** and bears no*

---

<sup>19</sup> Metro, Kate Model Validation Report, August, 2017 (attached)



*responsibility for the results of any actions taken on the basis of the third-party information contained in the report.*

\* \* \*

*The data used in the report was current as of the date of the report and may not now represent current conditions. **WSP makes no representations or warranty that the information in the report is sufficient to provide all the information, evaluations and analyses necessary to satisfy the entire due diligence needs of a user of the report.***

***The use of and reliance on this report by any person or entity other than the Client is not authorized without an agreement between the user and WSP. Unless you are the Client, or a party to a fully executed Reliance Letter Agreement with WSP concerning this project (Relying Party), the report is provided for information purposes only and such unauthorized user by its acceptance or use of this document, releases WSP from any liability for direct, indirect, consequential, or special loss or damage whether arising in contract, warranty, express or implied, tort or otherwise.<sup>20</sup> [Emphasis added].***

Moreover, the disclaimer makes it clear that this work is not defensible as the best available science, as required by the National Environmental Policy Act.

## **12. Unsupported Value of Time Estimates Bias Traffic Projections**

The EA traffic modeling performed by WSP builds upon the Metro Kate regional travel demand model, and estimates the impact of tolling on travel behavior by applying a travel time penalty to tolled network links. In essence, the model treats tolled links as requiring longer travel times than otherwise untolled roadways, and models travel behavior accordingly. Estimates from such a model are highly sensitive to the value of travel time used in the model.

This is described in the Methodology Report (Appendix Y) to the Transportation Technical Report, page 29:

---

<sup>20</sup> WSP, I-205 Toll Project, Level 2 Toll Traffic and Revenue Study Report, Revised October 2022, page viii.



### *Value of Travel Time*

*Monetary toll costs are represented as equivalent time penalties in the traffic models, based on estimated values of travel time. These values of time represent willingness to pay and differ depending on the modeled vehicle class. These “toll in minutes” were defined in such a way as to reflect a range of willingness to pay a toll for the different auto and truck vehicle classes. For the DTA model, the perceived time to cross a toll link or segment depended on the simulated travel time plus the value of time and toll cost in minutes for the specific vehicle class.*

We know from earlier work performed by the ODOT that this kind of “Level 2” modeling, which uses excessively high values of travel time, significantly under-estimates the behavioral effects of tolls on travel. Specifically, excessively high values of travel time produce low time penalties in the travel model, which depress the behavioral response to tolling. This leads the level 2 model to overestimate the amount of traffic on the tolled roadway, and under estimate trip suppression and diversion.

In the case of the Columbia River Crossing, the Level 2 toll model prepared for the project using high values of travel time estimated that 178,000 vehicles per day would use a tolled roadway. ODOT commissioned CDM Smith to prepare an investment grade analysis of the same project.

<sup>21</sup>

As part of that analysis, CDM Smith reappraised the appropriate value of time to be used in modeling, based on its experience in predicting observed travel behavior. The CDM Smith analysis came up with **substantially** lower values of travel time.

---

<sup>21</sup> CDM Smith, Columbia River Crossing Investment Grade Analysis, 2013. Page 4-13



Here are the WSP Level 2 estimates of value of time in 2010\$:

**Table 31. Recommended Value-of-Time Assumptions with Rationale (2010\$)**

Vehicle Class	Income Segmentation	Peak VOT (\$/hour)	Off-Peak VOT (\$/hour)	Rationale
Single-Occupancy Vehicle (SOV) Auto	Low Income (<\$25K)	\$8	\$6	<ul style="list-style-type: none"> <li>• Base VOT calculated as 60% of hourly income for top of income bracket (\$25,000) to reflect higher incomes of vehicle owners.</li> <li>• Peak VOT calculated as base VOT times 1.1 and off-peak VOT calculated as base VOT times 0.9 to account for different trip purpose mix.</li> <li>• Additional 1.05 factor applied to peak VOT to account for reliability.</li> </ul>
	Medium Income (\$25K–\$100K)	\$17	\$14	<ul style="list-style-type: none"> <li>• Base VOT calculated as 50% of hourly income for midpoint of bracket (\$62,500).</li> <li>• Peak VOT calculated as base VOT times 1.1 and off-peak VOT calculated as base VOT times 0.9 to account for different trip purpose mix.</li> <li>• Additional 1.05 factor applied to peak VOT to account for reliability.</li> </ul>
	High Income (>\$100K)	\$22	\$17	<ul style="list-style-type: none"> <li>• Base VOT calculated as 30% of hourly income for representative income of \$130,000 for the bracket.</li> <li>• Peak VOT calculated as base VOT times 1.1 and off-peak VOT calculated as base VOT times 0.9 to account for different trip purpose mix.</li> <li>• Additional 1.05 factor applied to peak VOT to account for reliability.</li> </ul>

And here are the CDM Smith Investment Grade Analysis estimates of value of time. These are in 2013\$.



**Table 4-3 Model Weekday Single Occupancy Vehicle Values of Time (in 2013 Dollars)**

Time Period	Income Level	VOT (\$ per hour)
Peak	Low	\$9.62
	Medium	\$12.58
	High	\$14.82
Off-peak	Low	\$8.31
	Medium	\$10.86
	High	\$12.79

X

This table compares the WSP Level 2 estimates to the CDM Smith selected values, with both estimates expressed in 2010\$ (converted according to the the Implicit Price Deflator for Personal Consumption Expenditures (IPD/PCE)).

Values of Travel Time by Income Group (All Values in 2010\$)

	CDM Smith	WSP	Variance
Low Income	9.09	8.00	-12%
Middle Income	11.89	17.00	43%
High Income	14.01	22.00	57%

For example, whereas ODOT’s level 2 analysis used a value of time of \$17.00 per hour (\$2010, middle income traveler), CDM Smith used a value of \$11.89 per hour (\$2010, middle income traveler). WSP chose slightly lower levels of value of time for low income travelers, but much higher values of time for middle and higher income travelers who make up nearly 90 percent of travelers on I-205. WSP overstates the value of time by middle income travelers by 43 percent and high income travelers by 57 percent, compared to CDM Smith’s selected values. Overall, ODOT’s Level 2 Analysis uses values of travel time that are on average 44 percent higher than those used in the CDM Smith analysis. The use of overstated values of time lead the Level 2 Analysis to systematically overstate traffic levels on I-205, and to understate diversion to other routes.





When CDM Smith used these lower travel time values in its version of the same regional travel demand model, it produced significantly lower estimates of traffic levels on the I-5 Columbia River Crossing than the Final Environmental Impact Statement (i.e. less than 100,000 vehicles per day). The CDM Smith study found that tens of thousands of vehicles would divert to a non-tolled I-205 Glenn Jackson Bridge, producing gridlock--something that was not predicted in the project's Final Environmental Impact Statement. The Oregonian wrote:

*Building the \$2.8 billion Columbia River Crossing would dramatically shift metro-area traffic patterns for decades, slashing future traffic on a new Interstate 5 bridge to 1990s-era levels but increasing traffic at the Interstate 205 crossing by more than 40,000 trips each day. Those outcomes can be found from a close read of an investment-grade traffic and revenue analysis released by the Oregon Department of Transportation this week. CRC project officials confirmed The Oregonian's findings on Friday.*

*The new projections differ starkly from a 2011 study that warned of impending traffic doom without a new I-5 span.<sup>22</sup>*

Investment grade analyses routinely produce much more accurate estimates of future travel behavior than the Level 2 analyses. ODOT has planned to prepare an Investment Grade Analysis in the coming year. An Investment Grade Analysis would come much closer to accurately predicting future travel levels on I-205 and other roadways in the project area. Promotional forecasts prepared by sponsoring agencies tend to systematically over-estimate traffic levels on tolled facilities.<sup>23</sup> Credit analysis firm Fitch undertook a systematic analysis of toll road revenue forecasts and found regular and serious over-estimates to traffic and revenue. Fitch warned over-estimating revenue is endemic in the industry and is a key cause of financial problems for toll-financed projects. The Fitch message, summarized in the trade publication, Toll Roads News, is clear and stark:

*They call demand forecasting "a key vulnerability," adding: "The probability of over-estimation remains high despite decades of experience with forecasting demand on transport projects. Many greenfield projects over the years across many jurisdictions have suffered from this... While other risks have been manifested in many cases,*

---

<sup>22</sup> Brad Schmidt, Columbia River Crossing: Building new Interstate 5 bridge would increase future traffic on Interstate 205 by more than 40,000 vehicles daily, The Oregonian, Jan. 11, 2014, page A1.  
[https://www.oregonlive.com/portland/2014/01/columbia\\_river\\_crossing\\_buildi.html](https://www.oregonlive.com/portland/2014/01/columbia_river_crossing_buildi.html)

<sup>23</sup> Robert Bain, Toll Road Traffic and Revenue Forecasts, An Interpreter's Guide, 2009.  
<https://www.amazon.com/dp/0956152716?tag=doctorwhoon0e-20&camp=213381&creative=390973&linkCode=as4&creativeASIN=0956152716&adid=0RF7W93ZSCNECBXQVNCE&>



*defaults on debt have largely been driven by under-performance relative to original projections.*"<sup>24</sup>

An Investment Grade Analysis would constitute best available science, whereas the existing WSP Level 2 analysis does not. In addition, an Investment Grade Analysis would not be subjected to the invalidating caveats contained in the WSP disclaimer. Also, an investment grade analysis is presented to the federal government and prospective investors as an independent and authoritative estimate of future traffic and revenue on which they can rely in making investment decisions.

The EA's selected values of time are not supported by actual practice in predicting traffic levels on tolled roadways. The EA values of time significantly over-state traveler willingness to pay for tolled roads as opposed to non-tolled routes, and therefore overstate traffic levels on a tolled I-5, and over-state likely toll revenue, and understate traffic on non-tolled arterial roads.

### **13. Traffic modeling failed to include an analysis of trip suppression due to tolling.**

The I-205 modeling assumed that residents would continue to take exactly the same number of trips whether I-205 was tolled or not. In reality, both the income effect and the price effect of tolling would be to reduce the number of trips. Households would have less income due to paying tolls, and therefore would have less resources to take trips, and also would face higher prices for trip taking on tolled roads.

Both factors will lead to less trip taking. Both the income effect and the price effect are non-trivial: The income effect of tolling is to reduce average household income in the project area by about \$600 per year, according to the Environmental Assessment, which amounts to about an eight-tenths of one percent reduction in household income.<sup>25</sup> The price effect is to add \$8.80 to a peak hour trip between West Linn and Tualatin, which is likely a 90 percent increase in price for a 15 mile round trip (calculated at 60 cents per mile).

The state of the art or "best available science" in predicting traffic effects of road tolling is to incorporate an analysis of trip suppression. CDM Smith did exactly that for ODOT in the

---

<sup>24</sup> Toll Roads News, <http://www.tollroadsnews.com/node/6769>, (October 7, 2013), emphasis added.

<sup>25</sup> Economics Technical Report, Table 6-11, page 33



Investment Grade Analysis of the Columbia River Crossing. That analysis found trip suppression would cause a 10 percent or greater decline in bridge traffic:

*A trip suppression statistical model was developed as part of the stated preference survey analysis, driven from the passenger car participants' responses. The amount of trip suppression depends on a number of factors including trip type (trip purpose and time of day) trip distance and traveler income. The results showed that trip suppression rates increase sharply for higher tolls, particularly for non-work trip purposes. . . . a Monte Carlo simulation process was used to develop an aggregate trip suppression rate for river crossing traffic, found to be approximately 9.7 percent for FY 2016, 10.1 percent for FY 2020, 14.1 percent for FY 2022 and 13.1 percent for FY 2036.<sup>26</sup>*

The failure to include an analysis of trip suppression due to tolling means that the I-205 modeling over-estimates the demand for additional capacity on I-205 in a tolled environment.

## **Conclusion**

No More Freeways and Neighbors for Clean Air reiterate our insistence that the full impact of this massive proposed freeway expansion can only be understood in the context of a full Environmental Impact Statement, and that such a study must meaningfully consider the possibility that congestion pricing without expansion is a better policy solution for our community. We vigorously agree with the agency's stated goal of making investments in seismically resilient infrastructure that reduces traffic congestion and improves traffic safety. We're troubled by the fact that the agency flat out refuses to conduct any coherent analysis of whether spending hundreds of millions of dollars on additional lanes of freeway (while having no discernable strategy to raise funds for the 700 other seismically vulnerable bridges across the state) is in fact the best way to achieve those desired outcomes.

We wish to once again reiterate that it is regrettable that this proposed freeway expansion has sowed unnecessary rifts between community leaders who truly have more in common than ODOT's deliberately divisive tactics would suggest. As advocates we want to see robust investments in green infrastructure, investments that will generate tens of thousands of green collar jobs. Clackamas County and our state as a whole desperately needs investment in our streets and transportation network.

In light of soaring carbon emissions, skyrocketing traffic fatalities and a growing maintenance backlog, NMF and NCA again point out that costly, ineffective freeway megaprojects steal time,

---

<sup>26</sup> CDM Smith, Columbia River Crossing Investment Grade Analysis, 2013, pages 4-13 to 4-14.



money and political capital that our state instead should be spending on improving transit service, safety investments in ODOT's dangerous urban arterials, and building out a regional intercity rail system. NMF and NCA pledge to continue to champion investments in a green transportation system in line with our values, and with whatever policy reforms ensure Oregon's transportation investments create an optimal number of family-wage jobs and careers.

**The most appropriate course is a full EIS for ODOT's multiple projects for the entire set of the \$15 billion worth of proposed freeway expansions envisioned in ODOT's Urban Mobility Strategy.** Future generations will judge us not just from what we build and create, but on what we retire. NMF and NCA believe that the paradigm in which ODOT bullies community groups and state legislators into accepting their expensive, toxic, polluting, ineffective expansions in their neighborhoods must be retired.

Anything less than a full Environmental Impact Statement that studies alternatives to freeway expansion on the proposed I-205 widening is grossly inappropriate and negligent, especially in a state with Oregon's laudable history of land use leadership and environmental stewardship. We hope the federal government will recognize the obvious shortcomings in this terrible proposal and demand that Oregon's transportation agency reform itself to invest in healthier, climate-smart, cost-efficient infrastructure.

Climate leaders don't widen freeways.

**ODOT I-205 Toll EA - RECORD #2835 DETAIL**

**Submission Date :** 4/20/2023  
**First Name :** Jacque  
**Last Name :** Betz  
**Affiliation :** City of Gladstone  
**Submission Method :** Letter  
**Q3. Comments :** Ms. Putney,  
On behalf of the Gladstone City Council, we respectfully submit the attached letter into the record for the I-205 Toll Project Environmental Analysis comment period.  
**Attachments :** 2023\_0420\_I-205\_EA\_Gladstone.pdf (1 mb)



April 21, 2023

Mandy Putney  
Oregon Department of Transportation  
Via email  
CC: Keith Lynch, FHWA; Kris Strickler, ODOT; Brendan Finn, ODOT

Dear Ms. Putney,

On behalf of the Gladstone City Council, we respectfully submit comments on the I-205 Toll Project Draft Environmental Analysis (EA) published by the Oregon Department of Transportation (ODOT) in February 2023. Our comments represent a unified voice on the letter approved by the Clackamas County Board of Commissioners which is attached to this cover letter as an addendum.

Tolling roads hurt local economies, reduces the quality of life in residential neighborhoods, and negatively affects businesses and families. Gladstone is an older, underprivileged community in Clackamas County, with a population of about 12,170, that falls within the UGB for the Portland Metro area. Gladstone's senior population (19.3%) is higher than the County's or the region's, and residents' poverty rate is 12.1%. According to the State of Oregon Employment Department, 96% of the people living in Gladstone travel outside the city for employment and would be subjected to paying the toll roundtrip.

Traffic diversion is a severe problem. We are concerned with the decreased safety and increased congestion that ODOT cannot adequately mitigate, additional traffic diversion beyond what is already occurring due to the existing freeway bottleneck, and the need to evaluate the difference of impacts between I-205 widening with tolling and widening without tolling. Diverted traffic will also contribute to traffic delays, accidents, and accelerated deterioration of more minor secondary roads not built for such high use. Congestion caused by toll diversion 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 support the recommendation from Clackamas County that the EA does not currently support a Finding of No Significant Impact (FONSI). Instead, we urge the Federal Highway Administration to direct ODOT to proceed with an Environmental Impact Statement (EIS) for this project, combined with the Regional Mobility Pricing Project, to address the deficiencies and issues identified above and in the addendum attached.

Thank you for the consideration,  
  
(signatures follow)



**GLADSTONE**  
Oregon

Michael Milch

Michael Milch, Mayor

Vanessa Huckaby

Vanessa Huckaby, City Council President

Greg Alexander

Greg Alexander, City Councilor

Veronica Reichle

Veronica Reichle, City Councilor

Cierra Cook

Cierra Cook, City Councilor

Luke Roberts

Luke Roberts, City Councilor

Mindy Garlington

Mindy Garlington, City Councilor

## Contents

I.	Introduction .....	1
II.	Overall Issues .....	2
	ODOT and FHWA should proceed with an EIS.....	2
	ODOT should conduct a tiered environmental review of regional congestion projects. ....	5
	The RMPP is a reasonably foreseeable project that needs to be analyzed prior to making a decision regarding tolling on I-205. ....	6
	The Project does not meet the stated Need.....	7
	The Purpose Statement is so narrow that it eliminates the possibility of reasonable alternatives.....	7
	The Project does not meet the stated Goals and Objectives. ....	8
	The Project is a moving target.....	9
	The local community should not be forced to pay for the maintenance of a State facility.....	10
	The Project should be revised to eliminate pre-completion tolling and nighttime tolling. ....	10
	Pre-Completion Tolling .....	10
	Nighttime Tolling .....	11
	The Project EA cannot result in a FONSI because the mitigation measures are unenforceable and unlikely to be performed. ....	12
	The monitoring program is a prime example of unenforceable mitigation.....	12
	The indirect or secondary impacts of mitigation have not been analyzed.....	13
	Agencies and the public did not have sufficient opportunity to review or comment on the Project. ....	13
III.	Detailed Transportation Comments .....	14
	Significant Diversion of Traffic Volumes to County and City Facilities .....	14
	Unmitigated Safety Impacts .....	16
	Borland Road Corridor.....	17
	Stafford Road Corridor.....	18
	Rosemont Road Corridor.....	18
	Canby/I-5 Corridor .....	19
	Unmitigated Congestion Impacts .....	20
	High Levels of Traffic Add Stress for People Walking and Rolling.....	20
	Tolling is Not Shifting Travel Mode.....	21
	Lack of Commitment to the Mitigation Measures .....	22



Truck Traffic on Local Roadways .....	23
Reasonably Foreseeable Future Actions in the Project Corridor Should be Part of Mitigation .....	23
IV. Other Topical Issues.....	24
Air Quality .....	24
MSAT Analysis .....	24
Cumulative MSAT Analysis .....	26
Geographic Boundary of MSAT Emissions Analysis .....	26
Other .....	26
Climate Change.....	27
Noise .....	29
Social Resources and Communities / Environmental Justice .....	30
Land Use .....	34
Historic and Archaeological Resources.....	35
Biological Resources.....	35
Public Involvement / Agency Coordination / Consultation .....	35
V. Conclusion .....	36

# I. Introduction

Clackamas County (County) appreciates the opportunity to offer comments and questions on the *I-205 Toll Project Environmental Assessment (EA)*, as issued by the Oregon Department of Transportation (ODOT) and the Federal Highway Administration (FHWA) in February 2023.

As indicated in the County's requests for extensions, a 15-day extension was insufficient considering the EA relies on thousands of pages of supporting appendices and other documents. While we have identified many serious issues with the EA's analysis within the constrained comment period, the County and partner agencies could have provided a more thorough review with the additional time requested. As such, this letter should not be viewed as outlining every example of the EA's deficiencies, including unmitigated impacts. Rather, we are providing a multitude of examples which support the fact that additional analysis and information is required, particularly surrounding safety, diversion, and mitigation concerns.

**Safety:** The County is concerned with the safety of the entire regional transportation network, including non-highway roadways. While increased safety and decreased congestion are included in the purpose and need, the Project fails to meet this need as the Project will, in fact, *decrease* safety and *increase* congestion on local roadways. Further, the County found several examples in the EA of unmitigated safety impacts for vehicles, cyclists, and pedestrians.

**Diversion Impacts:** Based on our review, the EA does not take a "hard look" at the environmental consequences of diversion from I-205 onto County and city roadways. The EA fails to adequately analyze the impacts to the local community that will bear the burden of increased diversion. While the definition of the study area includes the local roadways and communities that would experience diversion, in many cases there is no meaningful analysis of localized impacts. This is especially true regarding impacts associated with transportation, air quality, and noise.

**Mitigation Measures:** The proposed mitigation measures are problematic on many levels.

- Mitigation measures are vague with respect to timing and other logistical details, rendering them unenforceable.
- The EA does not establish that the mitigation measures offered reduce all of the significant impacts of the Project to a level that would warrant a Finding of No Significant Impact (FONSI).
- The EA fails to disclose the conditions of the roadway network with mitigation. As a result, local agencies have no idea whether the proposed mitigation measures will address the identified significant impacts within their jurisdictions. The burden of analysis of the environmental impacts of the I-205 Toll Project and the Regional Mobility Pricing Project (RMPP) is on ODOT and FHWA, not local agencies.

**Pre-Completion Tolling:** Pre-completion tolling should be removed from the Project or the impacts should be fully analyzed. Due to pre-completion tolling, local communities will be significantly impacted for a number of years before mitigation is implemented. To address the issues of pre-completion tolling the EA states “any mitigation proposed to address near-term impacts that is determined to help alleviate pre-completion tolling impacts could be implemented before tolling begins.” This fails to assess which measures are needed for pre-completion tolling impacts, who will decide which measures to implement and when. The EA should disclose which mitigation measures are needed to address the impacts of pre-completion tolling and when they will be implemented. The EA improperly defers this discussion.

**Cumulative Effects with RMPP:** In addition to the inadequacies in the analysis of the I-205 Tolling Project alone, the EA fails to analyze the cumulative effects with the RMPP. The cumulative or “combined” impacts of I-205 tolling and the RMPP need to be disclosed to allow for informed decision-making and full understanding of the scope of environmental consequences.

The County’s review has identified serious procedural concerns and deficiencies in the EA that can only be fully addressed through the completion of a comprehensive Environmental Impact Statement (EIS) for this Project. Preparation of an EIS will provide for more rigorous analysis of project alternatives, disclosure of cumulative and indirect effects, comprehensive mitigation planning, and public engagement opportunities. The EIS must analyze and disclose the full scope of environmental impacts from the I-205 Toll Project and the RMPP, which are collectively referenced within the current EA as the Portland Metro Area Value Pricing Project, or the first phase of the Oregon Toll Program (see page 1-2 of the EA).

ODOT states in the EA that they plan to issue a Revised EA (page 1-7 of the EA); however, agencies and the public are not guaranteed an opportunity to comment on a Revised EA. It would be unacceptable to release a “Finding of No Significant Impact” until ODOT and FHWA have shown that there will be no residual significant impacts from the Project.

## **II. Overall Issues**

**ODOT and FHWA should proceed with an EIS.**

As outlined in subsequent sections of this comment letter, there are significant, unmitigated environmental consequences associated with the Project. If an EA determines that the environmental impacts of a proposed Federal action will be significant, an EIS must be prepared.

Pursuant to FHWA's NEPA regulations, "[a]ctions that significantly affect the environment require an EIS." 23 C.F.R. 771.115(a). Section 771.115(a) incorporates the definition of "significant" from Section 1508.27 of the pre-2020 CEQ NEPA Regulations. While the CEQ NEPA regulations were amended in 2020 to, in part, remove the definition of "significant," FHWA has not amended its regulations since the 2020 amendments were implemented, and therefore the definition is still relevant to FHWA actions and guides ODOT's analysis of the impacts of the Project. As demonstrated below, the Project significantly affects the environment and should be analyzed in an EIS.

*§1508.27 Significantly. "Significantly" as used in NEPA requires considerations of both context and intensity:*

*(a) Context. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short and long-term effects are relevant.*

- As discussed throughout this comment letter, there will be significant and adverse short-term effects from pre-completion tolling and long-term effects from diversion which have not been sufficiently disclosed or mitigated.

*(b) Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action. The following should be considered in evaluating intensity:*

*(1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect will be beneficial.*

- While on the balance certain effects of the Project may be beneficial on I-205, there will be undeniable significant adverse local effects to communities from diversion to local roadways that have not been properly disclosed.

*(2) The degree to which the proposed action affects public health or safety.*

- As discussed further in this comment letter under the heading *III. Detailed Transportation Comments*, there are major public safety concerns for multiple modes of travel on local roadways. As discussed under the heading *IV. Other Topical Issues*, the localized impacts of air toxics and noise on public health have not been considered.

(3) *Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.*

- The effects of the Project on historic and archaeological resources and biological resources have not been fully evaluated along roadways experiencing significant diversion, nor have the secondary impacts of mitigation been evaluated on these resources. For example, the Project increases traffic volumes across the historic Oregon City Arch Bridge by 40-50%. The Bridge is not included in the Historic Area of Potential Impact or the discussion of 4(f) resources. See further discussion under the Historical and Archaeological Resources and Biological Resources subheadings under *IV. Other Topical Issues*.

(4) *The degree to which the effects on the quality of the human environment are likely to be highly controversial.*

- As noted in the Public Engagement Report for the EA, the Project is highly controversial with 60% of survey respondents disagreeing with the alternatives ODOT proposed for environmental review (Alternative 3/the Project and Alternative 4). Of those that disagreed, 52% strongly disagreed (page 40 of EA Appendix R) “ODOT acknowledges that most commenters who provided input during the comment period opposed the Project and tolling in general” (page 104 of Appendix R).

(5) *The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.*

- The project relies on highly uncertain future mitigation actions to mitigate significant impacts, most notably a long-term monitoring program. See further discussion under the subheading *The monitoring program is a prime example of unenforceable mitigation*.

(6) *The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.*

- This project is essentially the first phase of the Oregon Toll Program and Portland Metro Area Value Pricing Project. Given the interrelated diversion effects and associated mitigation, the I-205 Tolling and RMPP should be analyzed together as one project. See further discussion under the subheading *The RMPP is a reasonably foreseeable project that needs to be analyzed prior to making a decision regarding tolling on I-205*.

(7) *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.*

- The Portland Metro Area Value Pricing Project has been improperly segmented into smaller component parts: I-205 Tolling and the RMPP. By not assessing the effects of tolling I-205 and the RMPP, the cumulative significant impacts of the larger project have not been disclosed.

## ODOT should conduct a tiered environmental review of regional congestion projects.

CEQ's NEPA Implementation Regulations allow agencies to review national or regional plans using a "tiered" analysis wherein the agency (or agencies) first look at the broad impacts of large-scale programs or policies, and then use those studies to guide subsequent analyses for smaller individual projects that make up the larger program or policy. See 40 C.F.R. 1508.1(ff) (defining "tiering" as "coverage of general matters in broader environmental impact statements or environmental assessments ... with subsequent narrower statements or environmental analyses ... incorporating by reference the general discussions and concentrating solely on the issues specific to the statement subsequently prepared."); see also 40 C.F.R. 1501.11.

U.S. Department of Transportation guidance acknowledges the common practice of using a tiered EIS to evaluate the effects of tolling projects on a larger scale.<sup>1</sup> From the U.S. Department of Transportation's (DOT's) *Procedures for Considering Environmental Impacts* (DOT 5610.1C, emphasis added in bold):

*g. Tiering. Tiering of EISs as discussed in CEO 1502.20 is encouraged when it will improve or simplify the environmental processing of proposed DOT actions. Preparation of tiered EISs should be considered **for complex transportation proposals (e.g. major urban transportation investments, airport master plans, aid to navigation systems, etc.) or for a number of discrete but closely related Federal actions.***

In this instance, ODOT should prepare an EIS for the Portland Metro Area Value Pricing Project, or at a minimum evaluate both the I-205 Toll and RMPP projects cumulatively within their respective EISs, for the following reasons:

---

<sup>1</sup> U.S. Department of Transportation, February 2022; NEPA Reviews of Tolling and Road Pricing Projects Case Studies, page 6. Accessed at: [https://www.environment.fhwa.dot.gov/pubs\\_resources\\_tools/publications/case\\_studies/Introduction-NEPA\\_and\\_Tolling\\_Case\\_Studies.pdf](https://www.environment.fhwa.dot.gov/pubs_resources_tools/publications/case_studies/Introduction-NEPA_and_Tolling_Case_Studies.pdf)

- 1) There are significant impacts for which there are no feasible and/or enforceable mitigation measures. The I-205 Toll Project alone will result in significant and unavoidable impacts associated with diverted traffic. See further discussion under the heading *III. Detailed Transportation Comments*.
- 2) Since the Project is a large, complex transportation proposal and is closely related to another major federal action, namely the RMPP, it should be analyzed together with the RMPP under a single NEPA document.
- 3) The Portland Metro Area Value Pricing Project is controversial and affects millions of people in the region. The processing of the projects under separate EAs sets a dangerous precedent for FHWA that is counter to the purposes of NEPA.

**The RMPP is a reasonably foreseeable project that needs to be analyzed prior to making a decision regarding tolling on I-205.**

ODOT should have evaluated the cumulative impacts of the RMPP and the I-205 Tolling Project because the RMPP is a reasonably foreseeable action that will impact the local community.

Under CEQ regulations, an agency must evaluate the cumulative effects of a project, which are defined in the regulations as the “effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions” 40 C.F.R. 1508.1(g)(3). “Reasonably foreseeable” means “sufficiently likely to occur such that a person of ordinary prudence would take it into account in reaching a decision” 40 C.F.R. 1508.1(aa).

ODOT is incorrect to characterize the RMPP’s impacts as not “reliably quantifiable or quantified at this time” when environmental review for the RMPP has already commenced. ODOT/FHWA anticipate completing the environmental review of the RMPP within the year and implementing the RMPP within one year of I-205.<sup>2</sup> This analysis cannot be deferred to the RMPP environmental review process. Our review of initial modeling results from the RMPP indicates that there will be additional impacts to diversion onto local roads, possibly at different levels and in different locations than disclosed in the EA.

Without this cumulative assessment, the public and County have been deprived of the “big picture” in terms of real-world implications, environmental consequences, viable alternatives, and mitigation solutions. The impacts and mitigation associated with the projects are

---

<sup>2</sup> ODOT, 2023. RMPP Project Schedule. Available online at: [https://www.oregon.gov/odot/tolling/PublishingImages/I-5\\_I-205\\_Projects\\_TimelineNarrow\\_01.27.2023.jpg](https://www.oregon.gov/odot/tolling/PublishingImages/I-5_I-205_Projects_TimelineNarrow_01.27.2023.jpg)

interconnected and the full impact of both projects has not been discussed or disclosed in the I-205 Toll Project EA. The analysis of the two projects combined could completely alter the nature and severity of impacts and mitigation analyzed for I-205. As stated in our September 15, 2022 comments on the Draft Transportation Technical Report (TTR): “Traffic diversion will be different for I-205 versus I-205 and I-5. The traffic analysis is inherently flawed without looking at the broader tolling context as impacts may shift to other roads, worsen or make some current improvements unneeded.”

Either the RMPP should be evaluated in the cumulative analysis of the I-205 Toll EA or, ideally, ODOT/FHWA should prepare an EIS that fully evaluates both components of the Portland Metro Area Value Pricing Project. Analysis of both projects together will allow for a more comprehensive review of feasible alternatives, diversion impacts, and mitigation planning.

## The Project does not meet the stated Need.

The EA does not explain how the Project meets the Needs defined in Section 1.4 of the EA. The EA makes the assumption that the Project will improve congestion, resolve unreliable travel issues, increase safety, and reduce climate change impacts. In reality, the created diversion from the highway system onto local roadways will merely displace these issues. Further, the impacts and costs on local roadways and communities are not fully assessed or defined.

One of the fundamental needs for the Project is to improve transportation safety, which is not achieved. Overall, the Project does not increase safety for the region. The Project diverts traffic to local roadways that have greater safety issues than I-205 (see heading *III. Detailed Transportation Comments* discussion below).

“Critical Projects Need Construction Funding” is included within the Project Need statement (page 1-4 of the EA). While critical projects do need infrastructure financing, there are a variety of tools to access funding for this Project that do not involve tolling.

## The Purpose Statement is so narrow that it eliminates the possibility of reasonable alternatives.

The EA includes tolling on I-205 in the Project purpose statement which restricts the range of reasonable alternatives. Since many freeway projects throughout the country are funded without tolling, we do not believe that tolling is the only mechanism to fund these improvements.

The following guidance from *Linking the Transportation Planning and NEPA processes* is located in FHWA’s regulations:

“Consistent with NEPA, the purpose and need statement should be a statement of a transportation problem, not a specific solution. However, the purpose and need



statement should be specific enough to generate alternatives that may potentially yield real solutions to the problem at-hand. A purpose and need statement that yields only one alternative may indicate a purpose and need that is too narrowly defined.” 23 CFR Appendix A to Part 450.

The purpose and need statement for the Project has been designed to yield one solution. The problem is regional congestion on both I-205 and I-5, and thus the I-205 Toll Project must be analyzed with the RMPP project.

Reasonable alternatives that should be analyzed include a tolled/managed third lane only and funding from sources other than tolling. In fact, ODOT must analyze and disclose an alternative with construction of the improvements without tolling in order for agencies and the public to understand the effects of ODOT’s proposal. Alternative methods for pricing I-205 such as ramp tolling should be analyzed as one of the alternatives.

In addition, the elimination of pre-completion and nighttime tolling should be included for any toll alternatives, as discussed further under the subheading *The Project should be revised to eliminate pre-completion tolling and nighttime tolling*.

In a 2015 guidance document, FHWA cautions that even if there is a valid justification for eliminating non-tolled alternatives, it may be advisable to continue examining non-tolled alternatives if there is public opposition to tolls.<sup>3</sup> There is strong public opposition to the Project. As noted in the EA Public Engagement Summary, 60% of survey respondents disagreed with the alternatives ODOT proposed for environmental review (Alternative 3/the Project and Alternative 4). Of those that disagreed, 52% **strongly disagreed** (page 40 of EA Appendix R). In the Public Engagement Summary “ODOT acknowledges that most commenters who provided input during the comment period opposed the Project and tolling in general” (page 104 of Appendix R). The RMPP is similarly controversial. During public engagement on the RMPP, 70% of respondents disagreed (of which 59% **strongly disagreed**) with a minimum toll for any use of the highway (page 23 of the RMPP Spring 2022 Engagement Report).

## The Project does not meet the stated Goals and Objectives.

The EA provides no explanation as to how the Project meets the goals and objectives that were established through input with agencies, the public, and other stakeholders.

### **Goal: Provide benefits for historically and currently excluded and underserved communities.**

- How does the Project support equitable and reliable access to job centers, schools, and health care facilities? The Project is forcing Equity Framework Communities (EFC) and Environmental Justice (EJ) communities on the outskirts of the Area of Potential Impact

---

<sup>3</sup> FHWA, “Public–Private Partnership Oversight: How FHWA Reviews P3s” (Jan. 2015), p. 20.

(API) to either devote needed income to tolling or travel on more congested local routes. Due to the increases in traffic on local roads, these roads will actually be less safe for travel. EFCs and EJ communities do not have the luxury of being able to travel outside of peak hours to reach work, school, health care facilities or social services.

- How has the Project been designed to support travel options for excluded and underserved communities? The Project has been proposed in an area without reliable regional transit and bicycle facilities, and does not provide mitigation to fund development of these facilities.

**Goal: Limit additional traffic diversion from tolls on I-205 to adjacent roads and neighborhoods.** Alternatives 1 and 2 were not advanced in part because they would result in higher traffic volumes near Oregon City due to diversion. It is unclear how the Project lessens or avoids this issue. How has the Project been designed to limit rerouting from tolling and to minimize impacts on quality of life for local communities? Increased traffic and congestion on local roadways will worsen air quality, increase noise, and decrease safety on non-highway facilities as discussed throughout this comment letter.

**Goal: Support safe travel regardless of mode of transportation.** The EA focuses too heavily on I-205 benefits and does not disclose the anticipated increase in crashes on the non-highway system. Any conclusions regarding the perceived safety benefit on I-205 from the Project and local roadways from mitigation must also consider increased traffic/crashes on local roadways.

**Goal: Contribute to regional improvements in air quality and support the State's climate change efforts.** While congestion on I-205 would be improved, traffic and congestion would increase on non-highway facilities throughout the local community, meaning there would be even more motor vehicle emissions near residences, schools, parks, and other sensitive receptors. Such diverted traffic would travel at slower speeds than if it was on I-205 and the diversion routes are longer than I-205. Both of these factors would result in greater air quality impacts.

**Goal: Support regional economic growth.** How does the Project provide reliable and efficient movement of goods and people on local roadways experiencing diversion from tolling? The EA does not provide evidence that increased pass-through trips in the form of congested peak hour traffic on local roadways will benefit local businesses. Heavy traffic on local roadways would be a deterrent to retail customers, particularly during peak hours.

## The Project is a moving target.

The EA states that some of the mitigation “may” be incorporated into the project. “Chapter 3 describes potential mitigation measures that would reduce the effects of rerouting. These measures could become part of the Build Alternative” (page 2-7 of EA).

- How will this selection be made?

- Will these measures no longer be considered “mitigation measures” and instead become “project commitments”?
- Will the EA analysis be revised to incorporate these measures as part of the Project?

This seemingly innocuous statement fundamentally confuses the environmental review process -- the review of the Project itself -- and the comparison among alternatives. The EA should clearly distinguish what the Project is, what significant impacts would result, what feasible mitigation measures would be implemented for each alternative, who would implement/fund the mitigation measures, and the residual impact after mitigation.

## The local community should not be forced to pay for the maintenance of a State facility.

Why would tolls pay for maintenance? It is already an extra burden on users to pay for the improvement; why also make them pay for maintenance? No other area of the State pays extra to maintain the State facility in their neighborhood. ODOT has claimed that this makes the bonding more attractive to investors so they know the highway will be in good condition and people will want to use it. But it would be just as attractive for bonding if ODOT committed Statewide funding to keep it in adequate condition like every other mile of interstate in Oregon. This would be a double hit for the local population.

Also, there is no money being set aside for future mitigation projects. ODOT should pay for more local improvements, including maintenance of local roads that will be overloaded because of diversion.

## The Project should be revised to eliminate pre-completion tolling and nighttime tolling.

### Pre-Completion Tolling

For the I-205 Project, tolling is proposed to begin at the end of 2024/beginning of 2025, before the construction of the third lane is completed. To fully understand the impacts of pre-completion tolling and provide clearer information on which intersections and locations need immediate mitigation, a full modeling analysis needs to be completed of the impacts of applying tolling without the third lane on I-205, both with and without the implementation of the RMPP. ODOT has not addressed these concerns, which were raised in our September 15, 2022 comments on the Draft TTR.

The Project should allow for the completion of Phase 1A in 2025 and other local construction projects -- such as the Stafford Road/Childs Road roundabout scheduled to be under construction by Clackamas County during the pre-completion tolling period -- prior to tolling, so that the supporting local road system does not create additional construction bottlenecks on primary diversion routes.

There is a large temporal delay between when impacts will occur and when mitigation will be implemented. Due to pre-completion tolling, local communities will be significantly impacted for a number of years before mitigation is implemented. Neither the EA nor the Level 2 Toll Traffic and Revenue Study sufficiently address the timing of completion of mitigation. Most mitigation measures cannot be completed prior to construction as scheduled. As noted above, there will be local projects in the areas along critical routes that will not be completed and elements of the I-205 construction project itself (e.g., the required blasting) that will likely cause even greater diversion.

In the near term, pre-completion tolling will cause up to 30% of the trips that would have been on I-205 to divert onto local roadways during the years of construction. The specific roads that will be impacted the most are:

- SW Borland Road/Willamette Falls Drive
- SW Stafford Road
- OR 99E
- OR 213, and
- OR 43

Therefore, it is clear that the impacts to the local system and local communities will be experienced immediately, as soon as the tolls begin to be collected. This will be especially acute for EFCs and EJ communities since, under the pre-completion tolling scenario, none of the benefits of the third lane will be experienced. The types of impacts these communities will be faced with during pre-completion tolling (identified as Long Term Impacts in Table 3-37) include:

- Higher transportation costs for social and emergency service providers;
- The cost of tolls on low-income households, which may include older adults and people experiencing a disability;
- Language and technological barriers to using and understanding the electronic toll system, and
- Delays and longer travel times near intersections, which could affect access to social resources in Canby, Gladstone, Lake Oswego, Oregon City, Tualatin, West Linn, and unincorporated Clackamas County near Stafford Hamlet and Canby.

Pre-completion tolling should be removed from the Project or fully analyzed in the NEPA review. If pre-completion tolling remains in the Project description it is likely that an EIS will be needed to disclose the significant adverse transportation impacts during the construction period which cannot be mitigated. The NEPA document should also identify which of the two pre-completion tolling alternatives is preferred.

## Nighttime Tolling

The County is opposed to nighttime tolling because, while it will raise very little revenue, at the same time it will decrease safety due to diversion of nighttime traffic onto surrounding local roads. Drivers should remain on the well-lit, safe highway after dark rather than divert to unlit,

narrow, winding rural roads. Safety, as always, should be the prime consideration. ODOT has not addressed these concerns, which were raised in our September 15, 2022 comments on the Draft TTR.

## The Project EA cannot result in a FONSI because the mitigation measures are unenforceable and unlikely to be performed.

CEQ guidance approves the use of a “mitigated FONSI” when the NEPA process results in enforceable mitigation measures (76 F.R. 3843, 3848 n.21). Many of the mitigation measures identified by ODOT are unenforceable because they rely on implementation by local municipalities and agencies that are not controlled by ODOT.<sup>4</sup> These mitigation measures will require an intergovernmental agreement or letter of commitment between ODOT and the affected jurisdictions. What if ODOT and the local jurisdictions are unable to reach an agreement? These agreements should be executed prior to making a decision on the Project.

Additionally, CEQ guidance states that an agency should not rely on mitigation measures necessary for a mitigated FONSI if it is not reasonable to foresee the availability of sufficient resources to perform or ensure the performance of the mitigation (76 F.R. 3843, 3848). It is not reasonably foreseeable that local municipalities will have the funding to undertake the necessary mitigation measures set forth in the EA. It is still unclear what percentage of mitigation would be funded by ODOT.

The vagueness of the timing and funding of the mitigation measures render them unenforceable. As discussed previously, neither the EA nor the Level 2 Toll Traffic and Revenue Study sufficiently address the time schedule for completing mitigation.

There are also mitigation measures proposed that would require the acquisition of right-of-way and have significant construction feasibility issues that could result in unfundable projects and/or significant time delays for construction. See further discussion under the heading *III. Detailed Transportation Comments*. How will ODOT address these issues?

## The monitoring program is a prime example of unenforceable mitigation.

There are no specific mitigation measures proposed for implementation after 2027. Instead, the EA relies entirely on a “transportation mitigation monitoring program.” We were unable to find any details on the scope of this program, the length of the monitoring period, the transportation network that will be monitored, how it will be administered and funded, and what standards will apply. It is also unclear what measures could be implemented as a result of monitoring, how mitigation might change in response to monitoring, and how ODOT and the local jurisdictions would reach consensus on the implementation and amendments to the monitoring program.

---

<sup>4</sup> See *Preservation Coalition v. Pierce*, 667 F.2d 851, 860 (9th Cir. 1992)

This reliance on a monitoring program with no specificity, timeline or guarantee of implementation or success represents additional significant unmitigated impacts in the EA.

## The indirect or secondary impacts of mitigation have not been analyzed.

The EA improperly defers the analysis of the indirect/secondary impacts from mitigation to the Revised EA. EA page 3-31 notes “[s]econdary impacts from implementing mitigation measures may require additional avoidance, minimization, or mitigation measures. An assessment of the effects associated with mitigation will be included in the Revised EA.” Mitigation measures would have their own set of environmental impacts that are not disclosed. Impacts from these measures need to be evaluated and disclosed in the EA and be subject to public comment. The reviewing agencies and the public may not have an opportunity to review and comment on the indirect/secondary impacts of mitigation.

## Agencies and the public did not have sufficient opportunity to review or comment on the Project.

The County has not had ample time to review the Project. The EA relies on thousands of pages of supporting appendices and other documents, which are highly technical and require the County and other municipalities to engage expert consultants to review and analyze. It is impossible to conduct a full review in such a short time frame. Moreover, the public has encountered several roadblocks that have thwarted this process.

- The County is aware that the City of West Linn spent two weeks of the comment period trying to obtain proper traffic model inputs from ODOT before they were finally provided on March 29, 2023, which has severely impacted and delayed their analysis and ability to comment.
- Further, the public was not given a sufficient opportunity to comment on the Project at public hearings. These hearings were poorly publicized: other than two overview email notices sent to a handful of public staff when the EA was published and when the 15-day extension was granted, there was no separate notification or announcement from ODOT alerting the public that hearings were being held. Details of the hearing were also difficult to find on ODOT’s website.
- In person events were only noted on the calendar link, meaning that the public had to dig through several layers of the site to find that information. Moreover, the “drop in” events were held during normal business hours and thus were not accessible to anyone who works a standard schedule.

These factors all limited meaningful public participation.

### III. Detailed Transportation Comments

Our primary concern is that the diverted traffic from I-205 onto County roadways and our partner City streets results in unmitigated impacts not disclosed in the EA. The lack of adequate mitigation on our facilities will result in safety impacts to people driving, moving freight, riding bikes, walking, and taking transit on non-highway facilities.

The following discussion summarizes our primary points of concern and offers examples of the unmitigated impacts not disclosed by transportation-related topic area. As discussed in *I. Introduction*, **not all areas of concern nor every example of unmitigated impacts are identified** herein. Rather, we are providing examples to demonstrate how the EA is deficient in its identification and mitigation of impacts.

Our primary points of concern relate to:

- Significant Diversion of Traffic to County and City Facilities
- Unmitigated Safety Impacts
- Unmitigated Congestion Impacts
- High Levels of Traffic Adding Stress for People Walking and Rolling
- Tolling is Not Shifting Travel Mode
- Lack of Commitment to the Mitigation Measures
- Truck Traffic on Local Roadways
- Reasonably Foreseeable Future Actions in the Project Corridor Should be Part of Mitigation

#### Significant Diversion of Traffic Volumes to County and City Facilities

The EA presents detailed analysis for two scenarios: a Short Term of 2027 (i.e., the year when the construction of the additional lanes on I-205 was assumed to be completed) as well as a Long Term scenario identified as 2045. The EA and the TTR (Appendix C of the EA) provide very minimal information about the impacts of “pre-completion tolling” which is defined as the period between when tolling is initiated in 2024 and completion of construction in 2027.

Our review of the EA reveals that it is difficult to separate the benefits and impacts of tolling on the transportation system from the construction of the additional lanes on I-205. This difficulty is exacerbated by the fact that I-205 is currently an inadequate facility, causing trips to reroute off the freeway onto local streets to avoid the congestion. As cited on page 3-1 of the EA, 20–30% of traffic currently using I-205 to travel to Oregon City reroutes in the PM peak period; the EA further acknowledges that this rerouting can increase to as much as 50%. If pre-completion tolling is implemented, it will exacerbate these existing conditions.

The EA needs to be modified to clearly define the differences in impacts between tolling and I-205 widening. This could be accomplished through the introduction of a new alternative that analyzes the proposed widening and seismic improvements on I-205 with an alternative, non-tolling funding source, and then comparing the impacts of that alternative against the current Project. Without this analysis, our communities cannot understand the true impacts of tolling on the local transportation system and our cities and rural areas.

As documented in the EA, but not adequately mitigated, our impacted streets and roadways do not have adequate vehicular capacity, intersection control, or pedestrian or bicycle facilities to address the increases in congestion, the impacts to safety, and the high level of stress that this Project presents to people walking and rolling in either 2027 or 2045.

The EA also documents (as evidenced in Figures 5-8 through 5-12 of the TTR) that our impacted facilities are inadequate to serve 2045 traffic. As discussed in the EA, the 2045 Build scenario results in an increase in traffic volumes by more than 50% at several locations as compared to the No Build. Some examples of unmitigated facilities shown in the comparison of 2045 Build versus No Build include:

- A 40-50% traffic increase on the Arch Bridge, which is a 2-lane historic bridge with a narrow sidewalk and a “sharrow” where cyclists share the lane with the automobiles. Due to the grade and existing traffic, cyclists often choose to use the sidewalk instead of the travel lane. ODOT, in collaboration with Oregon City and West Linn prepared the “Pedestrian-Bicycle Bridge Concept Plan” in 2021 that documents the existing needs of this bridge.
- A 50-60% traffic increase on Borland Road east of Stafford Road. The County has spent substantial resources in planning for future (non-tolled) needs at the Borland Road/Stafford Road intersection, including significant capital and maintenance dollars on constructing a roundabout to increase the capacity and safety of the intersection. Borland Road to the east of this intersection is abutted by rural industrial, commercial, residential, and recreational uses. This roadway is narrow and lacks shoulders of sufficient width for people walking or riding bikes. The significant volume of traffic that will be diverted to this roadway is not sufficiently mitigated. This is also discussed in the safety section below.
- A 50–60% traffic increase on Borland Road between Ek Road and Fields Bridge. This section of Borland Road is also narrow without any usable shoulders. The significant volume of traffic that will be diverted to this roadway is also not sufficiently mitigated.

Table 5.3 of TTR identifies streets that are expected to more than double in traffic volume in 2027 as compared to the 2027 No Build, such as:

- Traffic on Borland Road, east of Stafford, is anticipated to increase by 112%.
- Traffic on Lone Elder east of OR 99E is anticipated to increase by 104%.

Several other roadways will experience a traffic increase of over 25% when tolling is initiated.



For the pre-completion tolling scenario, the EA only includes information about increased volume on selected API arterials and intersections but does not undertake the other analysis that was conducted for year 2027 or year 2045. This lack of information on impacted facilities limits our ability to understand how tolling truly affects our rural and city facilities. The EA needs to be amended to fully document the impacts on our communities.

Further, the impacts to Ek Road are not accounted for in the EA. In fact, during the EA scoping it was Clackamas County staff who identified the need to include Ek Road in the modeling analyses as it parallels I-205 through the corridor. The published EA and TTR does not provide adequate information on the increase in volume along Ek Road, but rather assumes that traffic will use Mountain Road. Since some of the near-term mitigation could be influenced by the usage of Ek Road, it needs to be incorporated into the analyses and appropriately mitigated.

Lastly, it should be noted that with modern navigation apps, many motorists will adjust their routes of travel to “avoid tolls” resulting in instant changes to traffic patterns. The real-time rerouting of traffic onto County and city roadways can result in an abrupt increase in through traffic on our roadways, limiting the ability of people using intersecting streets along these routes, and presenting further difficulties (beyond that documented in the EA) for people to travel within the County. Without proper mitigation, these abrupt traffic volume changes result in the rapid degradation of safety performance and shift the burdens of safety mitigation and crash response to local law enforcement and public works teams to provide traffic control. On the whole, injuries and lost quality of life will increase, and in many cases, in already equity-challenged communities.

## Unmitigated Safety Impacts

As demonstrated in the EA, many of the diversion routes have intersections and roadway segments that exceed ODOT’s critical crash rate today and/or are listed as Top 5% or 10% Safety Priority Index System (SPIS) sites. We are unclear how adding more traffic to these locations is not considered a significant impact.

Any diversion of traffic from a freeway facility results in an overall decrease in safety as shown in ODOT’s crash rate Table V below.<sup>5</sup> Fatal and serious injury rates on freeways are less than 1.5 per million miles of vehicle travel (MMVT), whereas rural arterials have rates in excess of 11 MMVT and collector crash rates can be over 40 MMVT. Diverting traffic to roadways with higher safety risks is contrary to both ODOT’s and Clackamas County’s Transportation Safety Action Plans (TSAPs), both of which have a goal to eliminate fatal and serious injury crashes by 2035.

---

<sup>5</sup> [https://www.oregon.gov/odot/Data/Documents/Crash\\_Rate\\_Tables\\_2020.pdf](https://www.oregon.gov/odot/Data/Documents/Crash_Rate_Tables_2020.pdf)

**TABLE V: 2020 Fatal & Serious Injury Highway Crash Rates and Casualty Rates**

Table V tabulates data for mainline state highway crashes that resulted in death or a suspected serious injury (INJ-A). ODOT's fatality and injury definitions are adopted from the Model Minimum Uniform Crash Criteria (MMUCC), Fourth Edition.

JURISDICTION AND FUNCTIONAL CLASSIFICATION	MILES*	ANNUAL VEHICLE MILES*	FATAL & SERIOUS INJURY (INJ-A) CRASHES*	DEATHS AND SERIOUS INJURIES*	FATAL & INJ-A CRASH RATE**	FATAL & INJ-A CASUALTY RATE**
<b>TOTAL STATE HWY SYSTEM</b>	<b>7,377.44</b>	<b>19,388,425,028</b>	<b>825</b>	<b>967</b>	<b>4.26</b>	<b>4.99</b>
Interstate Freeways	729.57	8,466,908,094	95	107	1.12	1.26
Other Freys/Expressways	66.88	1,289,794,763	16	17	1.24	1.32
Non-Freeways (combined)	6,580.99	9,631,722,171	714	843	7.41	8.75
Other Principal Arterials	3,256.45	7,433,739,009	509	597	6.85	8.03
Minor Arterials	1,968.43	1,843,069,966	148	180	8.03	9.77
Urban Collectors	47.31	55,830,059	7	8	12.54	14.33
Rural Major Collectors	1,272.62	296,635,232	49	57	16.52	19.22
Rural Minor Collectors	34.03	2,348,898	1	1	42.57	42.57
Rural Local	2.15	99,007	0	0	0.00	0.00
<b>URBAN HWY SYSTEM</b>	<b>1,141.30</b>	<b>10,341,826,489</b>	<b>376</b>	<b>418</b>	<b>3.64</b>	<b>4.04</b>

To help further emphasize the EA's deficiency in addressing safety impacts, Clackamas County staff reviewed the effects of the diversion to four primary corridors identified in the EA -- Stafford Road, Borland Road, Rosemont Road, and the Canby/I-5 corridor. These rural corridors serve as vital connections between urban communities. The impacted roadways along these corridors are typically two-lane, carrying between 7,000 and 14,000 vehicles per day under current conditions. These roadways are often characterized by only having 11-foot travel lanes and, in most cases, 0- to 4-foot shoulders. Further details on each corridor are presented below.

### Borland Road Corridor

As documented in the EA, Borland Road between Ek Road and Fields Bridge is expected to have increases of up to 8,000 ADT in 2027, resulting in a total expected 2027 ADT of more than 16,000 vehicles. Under today's conditions, Borland Road carries 5,500 ADT. Our detailed analysis of the current conditions indicates that the crash experience in this corridor is very close to the expected crashes/mile/year for similar facilities, but that the rear-end crashes are overrepresented. This over-representation of rear-end crashes is indicative of the frequency and density of intersections along this corridor and the high percentage of through traffic currently using the facility. With the significant increase in through traffic anticipated in 2027 attributable to the tolling, the total crash rates in this corridor are expected to at least double to 2.7 crashes / mile / year for total crashes and to 1.5 Fatal-Injury C crashes/mile/year in 2027. Without appropriate mitigation to address rear-end crashes, our analysis suggests the crash rates would likely be even higher.

The anticipated volumes and crash patterns identify that Borland Road meets the thresholds for needing mitigation improvements, including a center turn lane at intersections and driveways

along with paved shoulders and rumble strips. These mitigation measures are not included in the EA.

## Stafford Road Corridor

Stafford Road between Ek Road and Mountain Road is predicted to have an increase of 2,800 ADT going from approximately 13,000 ADT to nearly 16,000 ADT on a two-lane road with 11-foot travel lanes with little or no shoulders. People on Trail Road, a local road serving over 50 lots, currently see times of the day when accessing Stafford Road is challenging and residents have expressed concerns regarding access and safety.

Under current conditions, there are 4.6 crashes/mile/year, nearly double the expected rate; and severe crashes are 2.33 crashes/mile/year, again nearly double the expected amount. Adding 2,800 vehicles per day to this route would elevate the crash rates to about 5.5 crashes/mile/year and 2.75 severe crashes/mile/year. In addition, roadway departure and wet condition crashes are overrepresented.

The volumes and crash patterns show that Stafford Road meets the thresholds for needing mitigation impacts, including paved shoulders with rumble strips and either an overlay or high friction surface treatment to increase friction during wet weather. In addition, installing a left turn lane should be considered for Trail Road or connecting Trail Road to the proposed roundabout at the Stafford Road/Mountain Road intersection or traffic signal at Ek Road. These mitigation measures are not included in the EA.

## Rosemont Road Corridor

Rosemont Road provides a critical link to the Salamo area of West Linn and is a route that allows toll avoidance of the Tualatin River bridges for people traveling to and from the west and south. This facility was not analyzed in the EA despite having a predicted ADT increase of 1,500 in 2027 and 500 in 2045. Safety performance is already poor for this facility, with total and severe crash rates more than 22% and 30% higher than the expected values (i.e., 1.92 and 1.06 crashes/mile/year, respectively).

Rear-end and roadway departure crashes are over-represented for this road, reflecting the challenges of a two-lane rural road with no shoulders currently carrying 10,000 vehicles per day. Adding 1,500 more vehicles with no mitigation further degrades the safety performance. The volumes and crash patterns identify that Rosemont Road needs to be improved to include turn lanes and shoulders with rumble strips.

The EA documents that the Stafford Road/Rosemont Road roundabout will be impacted by the traffic volume increases. This roundabout is already over capacity under current volumes and no mitigation for the increase in traffic volumes is proposed.

None of these clearly needed mitigation measures within the Rosemont Road corridor are included in the EA.

## Canby/I-5 Corridor

The EA documents increases in traffic volumes along OR 99E associated with drivers exiting I-5 near Canby at either Miley Road or Ehlen Road to avoid tolling, but does not analyze the impacts to the Arndt Road-Knights Bridge Road intersection nor to Barlow Road between Arndt Road and OR 99E.

Per the EA, tolling is anticipated to increase traffic volumes on Arndt Road between Airport Road and Knights Bridge Road by 3,000 ADT in 2027 and by 2,000 ADT in 2045. The EA makes no mention of the fact that this corridor has daily truck volumes in excess of 20%. These high truck volumes have significant impacts on the capacity and safety of the roadway to handle the increase in tolling-related diversion traffic. This corridor provides access to an active quarry and to freight moving to and from Canby's vibrant and growing industrial area. With this vehicle mix and these unique industrial/quarry uses, the EA needs to document both the operational and safety impacts of tolling on this corridor and of the businesses along it.

Our analysis of Arndt Road suggests that existing safety performance is affected by queue spill-back associated with the signalized Arndt Road/Knights Bridge Road intersection. Rear-end crashes are over-represented; the County is planning to add a queue warning system for eastbound Arndt Road to address this issue. Adding 3,000 more vehicles per day will increase overall volumes from 18,000 ADT to 21,000 in 2027. This added traffic will result in higher levels of congestion, necessitating an additional turning lane at the traffic signal to address queue storage and capacity needs. Based on historical trends on this roadway, the impact of 3,000 vehicles per day in the 2027 tolling scenario would be the equivalent of 10 years' worth of traffic growth in this corridor if tolling did not occur.

Further, safety performance is currently poor on Arndt Road east of Knights Bridge Road with crashes double the expected rate (4.3 crashes/mile/year) and nearly triple the expected rate for severe crashes (3 severe crashes/mile/year). Rear-end crashes are over-represented as are injury crashes and are associated with the existing queue spillbacks on each end of the corridor. A westbound queue warning system for the Arndt Road/Knights Bridge Road intersection would help, and reconfiguration of the Barlow Road/Arndt Road intersection is needed.

As with other parts of this corridor, the Barlow Road/Arndt Road intersection also has poor safety performance with crashes more than double the expected rate at 2.3 crashes/year and 0.97 severe crashes per year versus an expected rate of 0.64. With nearly 11,000 vehicles per day on Barlow Road south of the intersection and less than 700 vehicles per day north of Arndt, the intersection needs to be realigned to reflect existing travel patterns.

The last portion of this corridor includes Barlow Road between Arndt Road and OR 99E, including the portion that is aligned through the City of Barlow. Analysis shows that safety

performance is poor with both total and severe crashes triple the expected rates at 6.6 and 3.3 crashes/mile/year, respectively. Rear-end crashes influenced by Arndt Road and OR 99E are over-represented. Although the County has proposed a speed zone reduction from 35 MPH to 30 MPH in this corridor, including funding for radar feedback signs, the increases in traffic may require additional improvements to maintain adequate safety. With rear-end crashes being overrepresented, mitigation of a center turn lane would address the safety issues.

None of these needed safety mitigation measures are included in the EA.

## Unmitigated Congestion Impacts

We are unclear how ODOT can make the conclusion that “of the 50 study intersections, most would not experience new impacts under the Build condition.” Per Table 5-49 of the TTR, more than 20% of intersections would not meet applicable mobility standards under the Build Condition in both 2027 and 2045.

For the limited number of congestion mitigation measures identified for 2027, the results of the mitigation measures on congestion, i.e., the resultant level of service and volume-to-capacity ratio, was not documented in the EA. (In fact, no congestion mitigation measures are identified for 2045; rather the EA refers to a “monitoring program” for future mitigation.) How can the conclusion be drawn that the mitigation measures are effective in addressing the significant impacts created by the Project?

A primary example of an unmitigated impact and lack of enforceable mitigation is at the Ek Road/Borland Road intersection. Table 6-4 and Figure 6-5 of the TTR identify the need for an all-way stop-control or a roundabout by the year 2045, “pending future analyses.” These two traffic control devices have very different vehicular capacities, right-of-way impacts and significant costs of construction. How and when will the “future analyses” be conducted and what assurance does the community have that the mitigation measures will be in place by the time tolling begins? Also, how can an improvement to this intersection not be needed in 2027?

## High Levels of Traffic Add Stress for People Walking and Rolling

As documented in the EA and the TTR, many of the roadways that will need to shoulder the burden of the diverted traffic do not have any facilities or have only very limited facilities for people walking and rolling. As documented in Table 4-8 of the TTR, the majority of the impacted facilities are rated as having the highest level of traffic stress for cyclists without any diverted traffic. Table 4-9 also documents the lack of pedestrian facilities in the rural area.

The County is very concerned about the safety of cyclists and pedestrians with the significant increase in traffic volume on these roadways that are already rated as having the highest levels

of traffic stress. How can significant increases in traffic not result in definable and mitigatable impacts? It is also unclear whether ODOT's rural Level of Traffic Stress (LTS) methodology was used for these facilities. Per ODOT's Analysis Procedures Manual, there are different methodologies employed for rural contexts versus urban contexts. Many of the impacted County roadways would be considered rural, not urban, facilities. With the implementation of tolling, the rural facilities will be impacted by urban levels of traffic.

Examples of unmitigated impacts on cyclists and pedestrians include volume increases on parallel routes to I-205 and the Oregon City Arch Bridge:

- The EA identifies that parallel routes to I-205 such as SW Borland Road and Willamette Falls Drive could experience 30–100% increases in ADT (page 3-12) under the Build Alternative. Mitigation measures for these increases in daily traffic volumes have not been identified.
- The EA discloses that the daily volumes will increase up to 50% in downtown Oregon City and across the Oregon City Arch Bridge. As was previously noted, this is already a sub-standard facility, and is the only location for pedestrians and bicyclists to cross the Willamette River. The cumulatively significant increase in volume will have negative impacts on the pedestrian and bikeway environment at this location.

Given the lack of clear mitigation measures for these high stress facilities, the County concludes that there are impacts to cyclists and pedestrians that are not sufficiently mitigated in the EA. We also are concerned that the LTS assessment for both pedestrians and cyclists in the future year does not sufficiently acknowledge the near-term impacts to pedestrians and cyclists that will occur due to increases in traffic volume as soon as tolling begins. Many of the pedestrian facilities and bikeway facilities are already substandard. Since the rating scale for LTS is not very granular, it does not recognize the potential impacts, especially on facilities already rated as LTS 4 (the highest LTS). How can there be no significant impacts to facilities already rated as having the highest LTS?

The EA specifically notes on page 1-2, paragraph 1.2: Governor's Transportation Vision Panel that "Community livability" is a key issue. It also recommends bike and pedestrian investments to reduce fatalities and injuries. Tolling impacts are not mitigated, will degrade the safety on local roads, and will reduce community livability by increasing traffic on neighborhood streets.

## Tolling is Not Shifting Travel Mode

There is insufficient investment in the pedestrian, bikeway, and transit systems to affect mode shift. ODOT has not addressed these concerns, which were raised in our September 15, 2022 comments on the Draft TTR. The Project does nothing to contribute to an improved environment for transit riders through the I-205 Corridor. The EA identifies on pages 3-5 through 3-6 that limited transit service exists. While the report claims "slightly higher" transit ridership, the mode share figured in Table 5-5 indicates there would only be 800 additional transit trips throughout

the entire Metro Region, which is a marginal increase at best. “The need for improved transit and other transportation choices” is one of the three priority issues that ODOT was directed to address by the Oregon Transportation Commission (page 1-2 of EA).

A map of the transit in the area should be included in the TTR and the EA. In the EA, ODOT acknowledges (on pages 3-5 and 3-6) that there is limited transit service, insufficient pedestrian systems and a lack of quality bikeways in the area. So how did ODOT determine that there will be a shorter transit travel time through the corridor (as shown on page 3-25 of the EA) when there is currently no transit service on Borland Road, Stafford Road, or I-205? More clarity is needed on how the shorter transit time is achieved.

With insufficient travel mode choice in the region (Table 3-2), it is unclear how the desired greenhouse gas reduction aspirations can be met, especially in light of the fact that the cumulative impacts related to climate change identify a need to shift mode away from single-occupancy vehicles. Investment in non-auto facilities is essential if tolling can truly be expected to provide options for people to shift to a different mode of travel, rather than simply shifting traffic to local streets, as appears to be the case under the current Project. The Project should be modified to incorporate improvements to transit and pedestrian infrastructure as part of the solution to the stated Need to reduce traffic congestion and improve safety or, at the very least, analyze such an alternative.

The EA does not provide adequate mitigation to sufficiently address the lack of travel choices in the corridor. Additional mitigation must be added, including but not limited to, collaborating with transit service providers to support availability and enhancements of transit and other transportation services along I-205, especially for historically and currently excluded and underserved communities traveling through the area.

## Lack of Commitment to the Mitigation Measures

Tables 6-1 through 6-6 of the TTR identify mitigation measures for implementation by 2027, many of which are on County or city facilities. Implementation of the mitigation measures by ODOT will require an intergovernmental agreement between the affected jurisdictions. The EA does not specify whether the County and cities are being asked to help fund the mitigation.

For example, the mitigation for SW Borland Road between SW Stafford Road and the Tualatin River Bridge (Table 3-15 of the EA) states “Contribute to...” The EA does not state what the contribution amount will be or how the other portion of this mitigation measure will be funded.

There will be a long period of time between when impacts will begin to occur (i.e., 2024 when tolling begins) and when identified mitigation measures can be feasibly funded, designed and constructed. As a result, the local communities will experience significant impacts for several years before mitigation measures, if they are even feasible, are fully constructed.

Many of the proposed mitigation measures would require the acquisition of right-of-way, have topographical and/or adjacent land impacts that lead to significant questions of construction feasibility, and could be extremely costly to actually construct. How will ODOT address these issues and assure our communities that the impacts will be sufficiently mitigated?

The EA also proposes mitigation measures that are technically infeasible. A good example of this is the widening and signalization mitigation proposed at the OR 99E/South End Road intersection. OR 99E parallels the rail tracks and the Willamette River, so no widening of this intersection can occur to the west, and there are significant topographic constraints to the east in the form of a solid rock bluff adjacent to OR 99E. To add lanes to the intersection, OR 99E would need to shift eastward well in advance of the intersection. Between the costs of widening and the impacted embankment areas, it would not be feasible to complete this mitigation project prior to 2027, if at all.

Finally, there is a lack of clarity on the mitigation measures proposed, how they will be shaped by local officials and the impacted communities, and a realistic timeline for implementation. The EA states that “any mitigation proposed to address near-term impacts that is determined to also help alleviate pre-completion tolling impacts could be implemented before tolling begins.” This statement defers the analysis of pre-completion tolling impacts. The EA needs to analyze the impacts from pre-completion tolling, identify which mitigation measures will be required to address the significant impacts of pre-completion tolling, and condition tolling to start no sooner than completion of these mitigation measures.

## Truck Traffic on Local Roadways

Traffic and air quality modeling assumes that truck traffic on local roadways will *decrease* with the Project, while passenger car traffic will increase as a result of diversion. This assumption, which is used to justify the lack of local modeling and consideration of air toxics and noise, is not supported by evidence. In particular, the County is concerned that ODOT has not properly accounted for the movement of aggregate materials from the rock quarries near Canby and Vancouver or access to the developing warehouse/industrial district in Canby.

## Reasonably Foreseeable Future Actions in the Project Corridor Should be Part of Mitigation

If a project is identified as a Reasonably Foreseeable Future Action (RFFA) in Section 4.4 of the Cumulative Impact Technical report, and is within the Project corridor, it should be considered eligible for mitigation funding. Examples include 2018 Regional Transportation Plan (RTP) projects 10127, 10128, 11242, and 12089. While these projects are on the 2018 RTP, they are not guaranteed to be funded. In order to achieve the benefits that are described as a part of the Project, the RFFAs need to be constructed.



## IV. Other Topical Issues

In general, the County is concerned that the analysis of other topical areas in the EA focuses on impacts to the highway system while ignoring local impacts in areas that will experience increased traffic from diversion. The geographic boundary associated with the API for the following resources (identified in Table 4-1 of Appendix Q) should be modified to extend onto the roadways that experience diversion and where there are identified mitigation projects: Land Use, Geology and Soils, Hazardous Materials, Vegetation and Wildlife, Wetland and Water Resources, and Historical and Archeological Resources. This is necessary to address the full extent of direct and indirect impacts of the Project. In other areas, including air quality and noise, where the API has been defined to include certain local roadways and communities that would experience diversion, there is no meaningful or quantitative analysis of impacts. Our detailed comments are outlined below.

### Air Quality

#### MSAT Analysis

Under the Build Alternative, the projected addition of diverted traffic to non-highway roadways will increase the generation of mobile source air toxics (MSATs) along those roadways, which will increase the concentration of MSATs at specific locations. However, the EA does not adequately address the potential increase of MSATs at affected locations and the associated potential health hazards. The following factors raise concerns without providing adequate analysis to understand the potential health hazards.

- Table 6-3 of the Air Quality Technical Report identifies an 11% increase of non-highway vehicle miles traveled (VMT) under the Build Alternative.
- Table 6-5 of the Air Quality Technical Report identifies a 12% increase in annual benzene emissions along non-highway roadways under the Build Alternative.
- Figure 3-4 of the EA shows average daily traffic on specific non-highway roadways could increase by up to 31% under the Build Alternative.
- Sensitive receptors (e.g., residences, Willamette Primary School) are in close proximity to affected non-highway roadways and would be exposed to increased MSAT concentrations.
- The quantitative analysis of MSAT provided in the Air Quality Technical Report is limited to aggregate emissions and does not address concentrations at affected non-highway locations.
- As identified in Table 5-2 of the Air Quality Technical Report, concentrations of MSATs at one intersection near the project location exceed Oregon Department of Environmental Quality Benchmarks.<sup>6</sup>

---

<sup>6</sup> The benchmarks “are based on concentration levels that would result in a cancer risk of one-in-a-million additional cancers based on a lifetime of exposure. For non-carcinogens, the benchmarks are levels you

- Section 3.2.2 of the EA states the following: “The localized changes in MSAT concentrations would likely be most pronounced on roadways where traffic volumes would be higher under the Build Alternative relative to the No Build Alternative due to rerouted trips. However, the magnitude and the duration of these potential increases compared to the No Build Alternative cannot be reliably quantified due to incomplete or unavailable information in forecasting project-specific MSAT concentrations and related health impacts.”
- Section 6.2.2 of the Air Quality Technical Report provides approximately two pages of justification for the decision to not characterize the magnitude of the changes in MSAT concentrations at affected locations. The discussion in Section 6.2.2 raises significant human health concerns without resolving them.

The sum of limitations raised within Section 6.2.2 of the Air Quality Technical Analysis does not absolve ODOT from a good-faith effort to characterize the increase in MSAT concentrations along affected non-highway roadways. ODOT should model MSAT concentrations at two or more locations and compare these to established health risk levels, such as the Oregon Air Toxics Benchmarks. Analysis would be limited to two alternatives (No Build, Build) and could be corroborated with existing air quality monitoring data. If the benchmarks are exceeded, then a more detailed health risk assessment should be conducted. While the analysis would entail some level of uncertainty, understanding the magnitude of potential MSAT concentrations is critical for understanding potential health impact on residents. This information is necessary for the decision-makers as well as the affected communities.

Additionally, the assumption that truck traffic and associated MSAT emissions will decrease on local roadways should be revisited. As noted above, the County is concerned that ODOT has not properly accounted for the movement of aggregate materials from the rock quarries near Canby and Vancouver and access to the developing warehouse/industrial district in Canby. Further, Borland Road, which parallels a significant segment of I-205 and is one of the primary roads that would experience an increase in traffic from diversion, currently does not allow truck traffic; therefore, there would effectively be no change in truck traffic on this roadway, but the volume of passenger cars would increase dramatically, along with associated emissions of MSAT. A health risk assessment should be conducted to evaluate impacts from the increase in MSAT along Borland Road and other affected roadways.

Appendix D2, Truck Toll Sensitivity Analysis- Air Quality, only addresses the potential for criteria air pollutant and GHG emissions, stating that even with variable rate tolling for trucks, VMT would be reduced, and therefore “air quality” impacts would be less than significant. But this logic completely ignores MSAT concentrations on local roadways from increased truck diversion from variable rate tolling. The air quality analysis of variable rate truck tolling (Appendix D2) should be revised to consider MSAT health impacts on local streets.

---

could breathe for a lifetime without any non-cancer health effects” (<https://www.oregon.gov/deq/air-toxics/Pages/Benchmarks.aspx>).

## Cumulative MSAT Analysis

The cumulative air quality analysis does not appear to address potential for cumulative projects (including the RMPP) to increase traffic and therefore increase MSAT concentrations along affected non-highway roadways. The cumulative air quality analysis in the EA references FHWA expectations of declining MSAT emissions to conclude that the Build Alternative would not have negative cumulative effects on air quality. While overall emissions are expected to decline, the Build Alternative in conjunction with the cumulative projects has the potential to significantly increase traffic on non-highway roadways. The MSAT analysis of the I-205 Toll Project should take into account the impacts of the RMPP and other cumulative projects on the specific non-highway roadways that will be impacted by the Build Alternative.

The cumulative MSAT analysis should address affected non-highway roadways that will experience increased traffic and intersections where the level of service will decline. ODOT should model cumulative MSAT concentrations at two or more locations and compare these to established health risk levels, such as the Oregon Air Toxics Benchmarks. If the benchmarks are exceeded, then a more detailed health risk assessment should be conducted.

## Geographic Boundary of MSAT Emissions Analysis

The project elements are located entirely within Clackamas County and most of the air quality API is located within Clackamas County; however, the geographic boundary of Multnomah County was used for the MOVES modeling of MSAT emissions. The County is concerned that the geographic boundary used in the analysis does not accurately reflect actual conditions. ODOT should disclose how the geographic boundary was determined and whether emission estimates using Clackamas County as the geographic boundary would differ from those presented.

## Other

The project area is located within an EPA-designated carbon monoxide maintenance area. This should be clarified in the EA.

While air pollutant emissions in the API are projected to be much lower in the future compared to current conditions due to improvements in vehicle technology and implementation of stricter emissions standards, Appendix Q of the EA cites that several of the RFFAs identify “reduced emissions” as a project objective, including the OR 43 Multimodal Improvement (RTP 10127) and Willamette Falls Drive Multimodal Improvements (RTP 10128). These projects should be identified as mitigation and funded through the Project if they are being listed as contributing to improved air quality.

The air toxics monitoring data presented in the Air Quality Technical Report is from a former monitoring station about 7 miles from the Abernethy Bridge. Closer and more recent monitoring data should be used to characterize existing air quality in the region. The Tualatin monitoring station air toxics data is closer to the project area (approximately 3.6 miles from the Tualatin

River Bridges), is more recent and more representative of a near-highway environment. The Tualatin monitoring data shows higher levels of air toxics, which should be taken into account for the analysis of the I-205 Toll Project. This data is available from the Oregon Department of Environmental Quality.

## Climate Change

The TTR (page 65) in Table 5-4 identifies that the Regional VMT will increase on non-highway roads and will decrease on the highway. The people who are choosing to shift their trips off of the highway do not have choices in travel options, and will therefore put additional strain on the local roadway system.

EA Appendix Q, page 25, identifies that “Tolling can encourage shifts away from single occupant-vehicle and a shift in travel time, which can reduce emissions associated with vehicle idling.” While the report notes that the Build Alternative is expected to have a relatively “small effect” on choice on travel mode in the region, it should be more clear that it is a “negligible” impact with only a shift of 800 trips regionally to transit (of the 5,245,000 trips) and an increase of only 200 Active Transportation trips of the total 1,276,800 trips across the region.

One significant reason that trips are not shifting to another mode is because other modes of transportation are not available in this area. To take a trip using transit would require two to four times as much time for most travelers.

In addition, there are insufficient bikeway facilities in the area.

- As the analysis of the bikeway facilities demonstrates, the majority have a Bicycle Level of Traffic Stress (BLTS) rating of R3 and R4, and are not expected to improve.
- As noted on page 47 of the TTR, “Most study corridors are already at the highest or worst level (BLTS 4) when considering the overall corridor as a whole.”
- The report goes on to say, “In rural areas (denoted with an “R”), shoulders are more important to the BLTS results because safety concerns tend to be higher (ODOT 2020a). All of Stafford Road, most of SW Borland and parts of 99E are considered rural.”
- Even though a significant additional volume of traffic is anticipated in these corridors with the Build Alternative, the granularity of the BLTS rating system does not demonstrate any difference with the score, with the corridor going from a BLTS 4 to a BLTS 4, which means that no mitigation for the impacts to bikeway travel were proposed through the corridor.

If tolling is expected to be a tool to reduce GHG emissions, there must be reasonable mode choices. To achieve congestion management, as identified in the Project purpose, investments in bikeway and transit infrastructure are necessary as a part of the mitigation so that people have reasonable travel alternatives. For example:

- Investments need to be made in a complete protected bikeway path throughout the corridor, including along Stafford Road, SW Borland, and parts of OR 99E.
- Bikeway improvements as well as the RFFA OR 43 Multimodal Improvement (RTP 10127) and RFFA Willamette Falls Drive Multimodal Improvements (RTP 10128) are needed to help achieve the proposed GHG emissions reductions.
- There needs to be regular, reliable transit service throughout the corridor, addressing both through and local trips, to provide a viable mode option.

The pedestrian and bicycle level of stress analysis presented in the EA does not recognize the rural nature of many of the County roadways where diversion would occur. ODOT's Analysis Procedures Manual outlines procedures for assessing rural roadways and identifying potential risks and mitigation measures.

Emissions may be reduced on I-205, but due to diversion air quality will become worse within the communities when congestion shifts. This puts more families at greater risk and may create additional hardships due to healthcare costs, missed work and permanent illness.

As with other analyses in the EA, the benefits and impacts are focused on I-205 and ignore impacts to local communities.

Additional information is needed on the economic impact to downtown Oregon City and Canby. The EA states that businesses in Oregon City and Canby would benefit from pass-through traffic, but no documentation is provided beyond that statement. What other considerations were there when making the assumption that the increase in volume would improve business? Parking is limited in some areas and thus would not support someone trying to stop on a pass-through trip. There should be a mitigation program for the businesses that may be negatively impacted in Oregon City, Canby and West Linn. More traffic volume may not be better if it is in the form of congested traffic.

On page 3-60, Table 3-30: Under the Build Alternative, the EA claims there would be higher levels of opportunity (traffic exposure-oriented) consumer spending in three commercial districts because of the projected higher traffic volumes compared to the No Build Alternative. This is questionable at best considering conditions will be gridlocked. It seems more likely that people will avoid the area due to congested conditions. Logic would imply that individuals who elect to travel longer distances to avoid the costs of tolling are less likely to be the "opportunity shoppers" referred to in Appendix F, Economic Technical Report.

Estimated toll rates are expensive; with no real rates it is impossible to say what the true economic impact will be to individuals and families. Our rough estimate given the financial data provided is that it would cost a household at least \$2,000 to \$2,400 per year (\$166 to \$200 per month).

It is not clear whether commercial use will be tolled at a higher rate. Will these costs be passed through to consumers and further exacerbate the economic hardships families and businesses experience?

On page 3-77 of the EA it states that the Project would result in the “same or improved access to jobs.” However, if a person has problems traveling to a new job now, how will tolling improve access? This is not a positive impact as stated as it is based on representative scenarios which have many technical errors (see comments under the subheading of *Social Resources and Communities/Environmental Justice*). Additionally, some representative scenarios show that EJs and EJ communities will be forced to choose between paying a toll or traveling on a non-toll path which is more congested as a direct result of the Project (increased non-toll path travel times under the Build Alternative in comparison to the No Build Alternative). The Project creates an even larger divide between socioeconomic households at different levels and creates more disadvantages for those who already have trouble accessing jobs.

On pages 19 & 23 of the Economics Technical Report (EA Appendix F) there are contradictions: on page 19 it states that “detailed household spending is not available at the state, regional, and API levels, household income is assumed”; yet on page 23 it states “based on analysis of spending by households in the API, the existing spending by cost category can be estimated”. This contradiction needs to be explained and resolved.

## Noise

Some noise level increases on local roadways are disclosed, in some places up to 6 dBA, but there is no discussion of sensitive receptors located along these segments, and whether impacts would be significant. There is also no discussion of noise thresholds for significance or local policies related to noise. Mitigation is identified for I-205 segments only. The increases in local roadway noise appear to be a significant, unmitigated impact.

While EA Appendix Q states that the Build Alternative would not have negative cumulative effects related to noise, the EA states on pages 3-66 and 3-67:

“Along non-highway roads in the API, changes in traffic noise levels under the Build Alternative would range from 6 dBA lower to 6 dBA higher than existing noise levels because of changes in traffic volumes. The largest reduction in noise levels would occur along the segment of Willamette Falls Drive east of 19th Street, where traffic volumes would be lower than under the No Build Alternative, and the largest increase would occur along the segment of SW Borland Road east of SW Stafford Road, where traffic volumes would be higher than under the No Build Alternative. Figure 3-14 shows the estimated increases in traffic noise levels on non-highway roads under the Build Alternative as compared to existing conditions. Most locations would experience 0 to 3 dB higher noise levels under the Build Alternative compared to the No Build Alternative, which would be barely perceptible to the human ear.”

The analysis does not appear to address the potential for cumulative projects (including the RMPP) to increase traffic and therefore increase noise levels along affected non-highway roadways. The noise analysis of the Project should take into account the impacts of the RMPP

and other cumulative projects on the specific non-highway roadways that will be impacted by the Build Alternative. Mitigation needs to be identified for significant cumulative impacts.

Figure 3-13 of the EA, which depicts the noise API, does not include all of the non-highway roads that will have significantly increased traffic. This figure should be revised to address all non-highway roads that will experience notable diversion as a result of the Project. For instance, Figure 3-4 of the EA shows an 11% increase in traffic on OR 99E near Canby, which is not shown in Figure 3-13.

Some noise walls were not included as mitigation as they were not feasible from a cost perspective; because there is no feasible mitigation, the EA should disclose that a residual significant noise impact will occur which is not mitigated, thereby triggering the need for an EIS.

## Social Resources and Communities / Environmental Justice

Overall, the EA does not adequately address impacts to EFCs and EJ communities. This should be a prime focus as “Impacts of tolling on communities experiencing low income” is one of the three priority issues that ODOT was directed to address by the Oregon Transportation Commission (page 1-2 of EA).

The EFCs and the EJ communities will experience the impact of diversion during pre-completion tolling, and this is not addressed in the EA. There are high concentrations of these communities in several of the areas where impacts to the transportation system have been clearly identified in the EA, especially near OR 99E, from Jennings Avenue south through Oregon City, as well as in Canby and the surrounding areas. The EA must document how these areas will be impacted in the pre-completion tolling scenario.

The base map used in almost all of the figures inaccurately displays the “urban area” in this section, and throughout the document. For example, the industrial areas east of I-205 along OR 212 and the Clackamas Town Center area north of OR 224 and west of I-205 are both fully developed and highly urbanized. The EA maps appear to be displaying incorporated areas and census designated places, but this does not properly identify what is “urban” according to US Census data. The maps should be revised to utilize the 2010 or 2020 Urban Area as defined by the US Census Bureau. This revision would accurately show additional urban areas within Canby, Oregon City, West Linn, and other jurisdictions.<sup>7</sup>

While it is noted on page 35 of EA Appendix Q that, “In the short-term it is possible that the construction of the Build Alternative and the RFFAs could overlap leading to detours and travel time delay for people accessing social resources,” it is much more likely that the implementation of pre-completion tolling will create delay for people to access social resources, and that some

---

<sup>7</sup> For reference, the US Census 2010 Urban Areas map for this area is available online at: [https://www2.census.gov/geo/maps/dc10map/UAUC\\_RefMap/ua/ua71317\\_portland\\_or--wa/DC10UA71317.pdf](https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua71317_portland_or--wa/DC10UA71317.pdf)

of the critical active transportation RFFAs will not be constructed due to lack of funding, further negatively impacting EFCs and EJ communities.

There is a need for active transportation investments throughout the corridor -- not just spot improvements at very minimal locations -- so that persons with low income and other EFC/EJ communities have choices of different modes. Page 27 of EA Appendix Q identifies that a “historic lack of transportation improvements and investment in these communities has led to increased safety risks, including risk of traffic fatality and limited access to transit and active transportation networks (Oregon Walks 2021; Cohen and Hoffman 2019)”. As a part of this Project, this needs to change. Unfortunately, the proposed mitigation does not sufficiently address these issues faced by EFCs or EJ populations.

Page 28 of EA Appendix Q states that the “Build Alternative would have beneficial or neutral effects on environmental justice populations related to access to social resources and travel times, air quality, roadway safety, and travel mode shift” and goes on to say “with the implementation of mitigation measures, no disproportionately high or adverse effect on environmental justice populations would occur under the Build Alternative. **The RFFAs would also be required to mitigate any disproportionately high and adverse effects on environmental justice populations** (emphasis added in bold).”

Overall, it appears that the RFFAs are needed to address the impacts to EFCs/EJ communities and should be included in the mitigation measures that are constructed with the Project.

The analysis of both Social Resources and Communities and EJ (Appendices I and J) relies on Representative Scenarios, which included trips that started in areas with higher concentrations of EFCs and ended in areas with social resources. Representative Scenarios 1 and 8 describe people who will now be forced to choose between paying a toll or taking a non-toll route that is now longer and less safe due to the Project (the Build Alternative increases volumes and travel time in comparison to the No Build Alternative). This is a significant and unmitigated impact created by the Project that disproportionately affects EFC/EJ communities on the outskirts of the proposed tolling location. Further, all Representative Scenarios could be affected by the RMPP and thus do not accurately assess cumulative conditions.

Other technical issues with the representative scenarios that were used are listed below. In addition to the issues noted, all of these scenarios assume bus routes that are undefined and do not correspond to claims of travel time estimations. In giving alternative travel options (public transport, bus, etc.), far more specificity is needed as to which specific routes will yield equivalent or less travel times.

#### **Scenario Description 2**

- The map is inaccurate and shows a trip from Rivergrove to Oregon City, not Tualatin to Oak Grove.
- There is direct transit that should be added, and it would require 1 hour and 52 minutes to make the trip.



**Scenario Description 3**

- The scenario describes going to a farm outside of Oregon City, but the map shows traveling to the hilltop/central Oregon City.

**Scenario Description 4**

- This scenario does not travel through the toll corridor.
- The scenario indicates that there would be no difference in travel time between Wilsonville and Portland between Existing Conditions and the year 2045. Also, this would indicate that the tolling on I-205 has no impact to travel time on I-5. Are these conclusions accurate?
- The assumed toll-free travel route does not align with plausible navigation decisions.

**Scenario Description 5**

- This scenario does not travel through the toll corridor.
- The scenario describes a student living in SE Portland, but the map has the person traveling from Clackamas Town Center, which is in unincorporated Clackamas County (likely with a Happy Valley zip code).
- The travel time range of 1-2 hours is extremely large in comparison to the “minute” of travel time savings for automobiles using the freeway.
- The trip cannot be done as described. The assumed toll-free travel route does not align with plausible navigation decisions.

**Scenario Description 6**

- The map does not display a trip from Rivergrove to Oregon City; it shows a trip from Tualatin to Oregon City.

**Scenario Description 7**

- How would the No Build Alternative increase travel time by 10 minutes at 11 PM?

**Scenario Description 12**

- The map is incorrect and does not match the scenario description.
- McLoughlin Promenade is located in Oregon City, not Gladstone.

**Scenario Description 16**

- The toll path under this scenario does not provide an improved travel time.

**Scenarios 9, 10, 11 and 15**

- The assumed toll-free travel routes do not align with plausible navigation decisions.

The Social Resources and Communities Technical Report (EA Appendix I), Section 7 discusses short-term and long-term impacts.

- The impacts of tolling and congestion pricing happen immediately and in the near term. All of the items listed in Section 7.2 need to be incorporated into Section 7.1 Short Term Impacts.
- When describing long-term impacts in Avoidance, Minimization, and/or Mitigation Commitments in both the Social Resources and Communities Technical Report

(Appendix I of the EA, pages 57-58) and Environmental Justice Technical Report (Appendix J of the EA, pages 50-51), three different options are summarized for how the Oregon Transportation Commission (OTC) will develop the Low-Income Toll Program.

Those options range from:

- (1) toll discounts and exemptions;
- (2) providing focused discounts for more specified demographics based on specific income levels, and
- (3) using a verification process that leverages existing low-income service programs or exploring self-certification to qualify for enrollment.

These options need to be exercised as early as possible in the pre-completion tolling period to allow efficient and measured pre-implementation and implementation of one or more of the OTC's Low-Income Tolling options. The report does not provide a realistic timeline of preparing for option three, in particular. We strongly recommend that the OTC give as much time and resources to existing low-income service programs to help implement a feasible verification process.

There was no discussion about the disproportionate impact on populations relying upon transit, and the lack of transit resources within and through the corridor. Also, the lack of other complete bikeways through the corridor limits the fare-free options for people who do not drive. While the low-income toll program addresses the disproportionate burden on low-income populations, the Project is not making any significant improvements to transit or bikeways which could be alternative modes for people taking trips through the corridor. In the Cumulative Impacts Technical Report (Appendix Q of the EA), there is a continued reliance upon the RFFAs to provide the benefits for cyclists and pedestrians.

Social services are offered during business hours, which are during peak travel times. The cost to get to appointments will not lessen if people receiving the services have to pay the tolls or take alternative routes. Instead the time to get to appointments and cost will increase, adversely impacting those individuals even more.

How will penalties impact those who can least afford tolling and how might those create further financial hardships?

While the EA states that "ODOT is prioritizing equity throughout the Project development process" (EA page 1-6), the Project fails to achieve equity-related goals for historically underserved and disproportionately affected communities.

- The Project does not increase access to job centers or other important community centers. In fact, it would represent a new financial burden through use of a toll path, or reduced access through a longer, more congested, and less safe non-toll path.
- The Project shifts air quality effects from I-205 to surrounding communities.
- The Project may negatively impact local businesses in underserved communities.
- The Project does not enhance or expand multimodal transportation choices.

## Land Use

The Land Use API needs to be expanded to include areas of significant diversion and mitigation. For example, Willamette Park and Fields Bridge Park should be considered as they will be impacted by diversion.

We are concerned with the compliance/consistency analysis for following items:

- Oregon Highway Plan (OHP) Policy 1F and Policy 1G Action 1G 1
- Oregon City Transportation System Plan
- West Linn Comprehensive Plan Goal 12, Chapter 2 *Goal 4: Maintain, protect and improve the existing transportation system*
- Stafford Hamlet Community Vision – Goal to Minimize additional traffic and infrastructure impacts

There is no discussion of compliance or consistency with OHP Tolling and Congestion Pricing Policy Amendment, which was adopted by the OTC on January 12, 2023. Goal 6 supports investments in multimodal access and addressing impacts to neighborhood health, safety and congestion.

The Land Use review only takes into account areas within 100 feet of I-205. The land use impact of the diversion on to the local roads is not taken into account. Land use review should be conducted along all of the primary diversion routes that will have an increase in daily traffic volume due to the implementation of tolling.

Land use for the Stafford area is guided by a 3-party agreement which allows for the cities to begin concept planning the area for urban uses upon completion of the improvements along I-205. The land use discussion should analyze the indirect growth-inducing impact of urbanization of the Stafford area which will be caused by the Project.

The Oregon City Arch Bridge should also be evaluated as a 4(f) resource in the land use section. Before approving a project that uses Section 4(f) property, FHWA must determine that there is no feasible and prudent alternative that avoids the Section 4(f) properties and that the project includes all possible planning to minimize harm to the Section 4(f) properties. The Project will result in the increased use of the Arch Bridge (a 40-50% increase in daily volumes), and feasible and prudent alternatives must be further evaluated. A managed toll lane or alternative non-toll funding sources are feasible and prudent alternatives.

The EA should disclose if any County planning permits are required as a part of the Project or mitigation. County right-of-way (ROW) permits will be required for mitigation projects in County ROW.

## Historic and Archaeological Resources

The historic and archaeological API should be expanded to include areas of significant traffic diversion, as well as transportation mitigation measures that would involve visual changes or ground disturbing activities. Due to the narrow nature of the API for the Historic and Archeological Resources section, the report does not address the impact to the extremely important resource of the historic Highway 43 Arch Bridge which connects Oregon City and West Linn. It will be the only toll-free crossing option between Oregon City and West Linn with the implementation of tolls and congestion management. The County requested a discussion of the issues related to the Arch Bridge and the condition of the bridge in our September 15, 2022 comment letter on the Draft TTR.

The Oregon City-West Linn Pedestrian Bridge Concept Plan report outlines the historic significance of the bridge, as well as the need for improvements to the pedestrian and bikeway access in this area.

Figure 5-11 in the TTR specifically identifies an expected increase of 40-50% in daily volume of traffic across the Arch Bridge. There needs to be greater detail provided on impacts of the increased daily volume on this resource, as well as the impact of this increased volume on the local circulation in downtown Oregon City. While there may be existing or cumulative capacity issues with the Arch Bridge, an increase of 40-50% would mean the Project contributes significantly to a cumulative impact. If there is no feasible mitigation to bring conditions to an acceptable level of service, an EIS should be prepared rather than a FONSI.

## Biological Resources

The EA does not disclose the potential secondary impacts from mitigation on vegetation, wildlife, wetlands, and water resources. The EA should describe which mitigation measures would require work outside of the developed right-of-way and whether these measures would impact biological resources. Proposed mitigation includes roundabouts which could impact undeveloped areas next to the right-of-way.

## Public Involvement / Agency Coordination / Consultation

The 60-day public comment period provided by ODOT was woefully insufficient for the public to review and evaluate 3,000 pages of text and several very complicated models. While shorter public comment periods may be the standard practice in other states where tolling is normalized, this will be Oregon's first toll program in the Portland metropolitan area and the first toll program in the State applied to roadways, not just bridges. It is imperative that it is done correctly. Indeed, the public engagement report only details a 10-week period from August 3rd to October 15, 2021 and no other public engagement before and after that period. Instead, ODOT is rushing to implement a project that is based on inadequate and deficient data and analysis, significantly increasing the likelihood ODOT will make mistakes that will negatively affect the communities we are elected to represent for years to come. Thus, it would be

appropriate and prudent for ODOT to extend the public comment period, as is allowable under the NEPA regulations.

Further, governmental agencies and the public experienced several roadblocks that inhibited their ability to review and comment on the EA. For example, the EA, appendices and associated materials were initially published only in English and translated materials were not available for several days. The public engagement report notes that outreach included “[d]istributing flyers containing information about the Project and the comment period in English and Spanish to the Borland Road Free Clinic and Tualatin School House Food Pantry along I-205.” ODOT should have distributed flyers to sites in West Linn, Oregon City, or other portions of Clackamas County.

The public hearings and public in-person information sessions were poorly publicized and held during typical working hours. Particularly underserved communities cannot take time off of work and risk lost income to attend these informational sessions. Additional informational sessions on the EA should be held outside of normal office hours, particularly in areas of environmental justice concern.

## V. Conclusion

The full extent of environmental impacts from the Portland Metro Area Value Pricing Project (or the first phase of the Oregon Toll Program) needs to be evaluated. We must understand the combined impacts of tolling on I-205 and the RMPP to enable the development of appropriate mitigation and informed decision making. The County cannot afford to invest in mitigation projects only to find out that the RMPP makes them stranded investments, or simply the wrong investments. The County has raised this and other key issues throughout the process, yet these concerns remain ignored.

At this time, it is essential that a FONSI is NOT issued, and that ODOT/FHWA be required to complete an EIS. The EIS should include the information that has been identified as missing or needed to supplement the current analysis. Substantial new technical information and analysis is needed to truly understand the impacts of the Project and required mitigation – this includes, but is not limited to:

- Modeling the impacts of implementing the RMPP at the same time as I-205 tolling
- Modeling the impacts of pre-completion tolling (with and without the RMPP)
- Fully evaluating and modeling an alternative with a completed six-lane facility and no tolling

We look forward to receiving your response to our comments and would welcome an opportunity to discuss our concerns further with key ODOT representatives. Our goal is to partner with ODOT to provide for the safe travel of all of our residents, businesses, visitors, and the movement of freight, regardless of the facility that people use to move within and to/from the County and our local cities.

<b>ODOT I-205 Toll EA - RECORD #2836 DETAIL</b>
---

<b>Submission Date :</b>	4/20/2023
<b>First Name :</b>	Jaimie
<b>Last Name :</b>	Lorenzini
<b>Affiliation :</b>	City of Happy Valley
<b>Submission Method :</b>	Letter
<b>Q3. Comments :</b>	Good morning Mandy, Please find attached a letter of comment from the City of Happy Valley regarding the I-205 Toll Project Environmental Assessment. Thank you,
<b>Attachments :</b>	2023_0420_I-205_EA_Happy_Valley.pdf (322 kb)

Mayor  
Honorable Tom Ellis



City Manager  
Jason A. Tuck, ICMA-CM

April 19, 2023

Mandy Putney  
Oregon Department of Transportation  
Urban Mobility Office  
355 Capitol Street NE, MS 11  
Salem, OR 97301

**Re: I-205 Toll Project Environmental Assessment**

Dear Ms. Putney,

On behalf of the Happy Valley City Council, thank you for assisting in community conversations around the I-205 Toll Project. We recognize that the I-205 Toll Project comes in response to legislative direction, and the development of this new pricing tool is complex. While City Council members have a variety of opinions on tolling, if tolling is implemented, the City of Happy Valley has several concerns that should be addressed. In general, the City supports comments made by other jurisdictions in Clackamas County regarding the I-205 Toll Project Environmental Assessment and offers the following additional concerns:

**There is a continued lack of financial transparency from ODOT. The absence of financial information makes it difficult to interpret the EA.**

Local jurisdictions have asked ODOT repeatedly for comprehensive, transparent financial information. It was only after a community group submitted a public records request that ODOT shared the Level 2 Traffic and Revenue Study with impacted jurisdictions. The Level 2 Traffic and Revenue Study shows that projected tolling revenues would finance \$500-800 million in construction funding. That amount is insufficient to complete the capital project and construct NEPA-required and locally preferred mitigations.

We cannot accurately evaluate the adequacy of mitigation proposals, and therefore potential diversionary impacts to the Happy Valley community, without a complete revenue picture, including toll rates and an understanding of how ODOT plans to pay for the complete project and share revenue with local jurisdictions to address costs associated with diversion including future mitigations, local capacity projects, and increased maintenance.

**Pre-Completion Tolling should be eliminated from the Environmental Assessment.**

The I-205 Toll Project proposed to initiate tolls at the end of 2024/beginning of 2025, before the construction of the third lane on I-205 is completed. To fully understand the impacts of pre-completion tolling and provide clearer information on which intersections and locations need immediate mitigation, a full modeling analysis needs to be completed of the impacts of applying tolling without the third lane on

16000 SE Misty Drive, Happy Valley, Oregon 97086-4288  
Telephone: (503) 783-3800 Fax: (503) 658-5174  
happyvalleyor.gov

I-205, both with and without the implementation of the RMPP. Moreover, the EA must clearly articulate which mitigations will alleviate pre-completion tolling impacts and when mitigations will be provided. This information will help us better plan for our local transportation system.

**The EA does not adequately demonstrate how the Build Alternative will reduce diversion from the highway onto local streets, thereby improving traffic safety both on and off the tolled system.**

The City of Happy Valley is deeply concerned that the I-205 Toll Project will cause harm to vulnerable communities, the environment, and quality of life in Clackamas County by redistributing traffic and emissions in areas unprepared for it. Currently, traffic diverts off I-205 onto the local system due to the bottleneck created by the last remaining two-lane section of I-205 in Oregon; tolling would induce additional diversion as drivers make an economic choice to avoid the toll.

The Draft EA presents multiple goals relating to diversion and safety, including “limit additional traffic diversion from tolls on I-205 to adjacent roads and neighborhoods.” However, ODOT’s analysis shows alarming traffic changes at multiple arterial locations, including increases of 86.5-114.5 percent along routes that are popular for diversion today.

As a newer community of nearly 26,700 neighbors, the City lacks the regional transportation infrastructure that was invested in more established parts of the Metro Area decades ago. With few larger capacity transportation facilities and limited transit options, our residents must travel on already congested roads and local streets. Happy Valley also has one of the lowest permanent tax rates in the Metro region (\$0.67 per \$1,000 of assessed value), which limits our ability to fund transportation connections or transition rural roads to urban multi-modal standards.

Prior to implementing the I-205 Toll Project, the Oregon Transportation Commission must fortify the local system to prevent serious injuries and deaths, as well as abrupt changes in traffic flow that may contribute to these losses.

**Pursuant to Section 3.1 Transportation, the EA should be amended to expand the Area of Potential Impact to include Clackamas River Bridge and the OR 212/224 interchange and conduct additional analysis.**

According to ODOT’s I-205 User Analysis, a meaningful number of Abernathy trips travel to and from the area north of the Clackamas River and east of I-205. The Area of Potential Impact, however, does not account for plausible diversion routes to or from this geography, leaving us only to speculate about how our community could be impacted.

Whereas our area lacks a north/south travel alternative in proximity to the interstate, there may be a viable diversion route on the east side of Happy Valley via the OR 212/224 interchange to Clackamas River Drive via the Clackamas River Bridge. There are several manufactured home communities in proximity to this route, and the route lacks basic amenities, like sidewalks and shoulders. Notably:

- In a 2018 analysis, the OR 212/224 intersection exceeded the ODOT volume to capacity ratio mobility standard. In the same analysis, the OR 224/Springwater Road intersection exceeded both the ODOT volume to capacity ratio mobility standard and the Clackamas County level of service mobility standard.
- The OR 224/Springwater Road intersection has been the site of 19 crashes in recent years, of which seven have included evident or possible injuries (2012-2016).
- In a recent scan of the ATNI, the bicyclist Level of Traffic Stress between the OR 212/224 interchange and the OR 224/Springwater Rd intersection appeared to range between 3-4. The urban bike crash risk appeared to range from 4.17 – 6.65, and the urban pedestrian crash risk factor largely appeared to range from 6.32 – 9.72, with a small segment measuring 5.13.



For these reasons, the City respectfully requests ODOT to expand the Area of Potential Impact to evaluate diversion in this area.

**Pursuant to Section 3.15 Cumulative Impacts (Pg. 3-119), the Regional Mobility Pricing Project (RMPP) should be re-categorized and analyzed as a Reasonably Foreseeable Future Action (RFFA).**

Within the EA, ODOT declines to name the Regional Mobility Pricing Project (RMPP) as a Reasonably Foreseeable Future Action (RFFA), which carries important analysis requirements, because the RMPP is not currently included in Metro's 2018 Regional Transportation Plan, and key details about the RMPP are purportedly unknown (e.g., starting and ending points for tolling, potential toll rates) (Pg. 3-120). Provided rationales are insufficient to exclude the RMPP as a Reasonably Foreseeable Future Action in consideration of the following factors:

- ODOT has [initiated](#) NEPA activities for the Regional Mobility Pricing Project. The activities undertaken through NEPA, however, are only permissible if completed under a programmed preliminary engineering phase in the Metropolitan Transportation Improvement Program, and by implication, a corresponding project in the 2018 RTP, as was the case for the I-205 Toll Project NEPA analysis.
- The Regional Mobility Pricing Project is *referenced* in Metro's 2018 Regional Transportation Plan, and it is specifically referenced in relation to the I-205 Toll Project preliminary engineering phase ([RTP ID 12099](#)). Pursuant to the project description, "The Project will enhance the connection between tolling on I-205 and the Regional Mobility Pricing Project."
- In 2022, ODOT entered into a written Letter of Agreement with Metro regarding the I-205 Toll Project, through which ODOT made several commitments that effectively link the I-205 Toll Project to the Regional Mobility Pricing Project. These linkages are such that the I-205 Toll Project must consider RMPP impacts. For example, ODOT committed to designing the project to align with the RMPP, not to start collection of tolls on I-205 until after the RMPP application has been submitted to FHWA/USDOT under the VPPP, and to terminate the collection of tolls upon retirement of bonds associated with the initial tolling of I-205 and costs associated with construction of the I-205 South Corridor Widening and Seismic Improvements Project, if the Regional Mobility Pricing Project, or other regional tolling project, is not implemented.

Not only should the I-205 Toll Project analyze the cumulative impacts of the RMPP, but the Environmental Assessment should be amended to codify ODOT's written agreements as a necessary project component.

**Pursuant to Section 3.7 Social Resources and Communities (Pg. 3-70), the EA should be amended to assess project impacts and benefits for women.**

The EA currently observes the presence of and impacts to several demographics, including adults (age 65+), children (age 18 and under), people experiencing a disability, people with limited English proficiency, and households with no vehicle access. Additional data focuses on people experiencing low incomes and racial and ethnic minority populations. Conspicuously absent, however, is any analysis or consideration unique to women. Readily-available census data suggests that women in Clackamas County have different transportation and employment patterns than men. Accordingly, ODOT should analyze how tolls, and project impacts such as diversion, may disproportionately impact women. Consider, for example, readily accessible census data about women in Clackamas County:

- Women in Clackamas County are more likely to experience poverty ([S1701](#), 2021)
- Women in Clackamas County have, on average, shorter commute times than men ([S0801](#), 2021)
- Women in Clackamas County may be overrepresented during morning and evening peak hours ([B08011](#), 2021)

Expanding the demographic analysis of tolling by gender will help our community understand potential impacts.

**The I-205 Toll Project should be elevated into a full Environmental Impact Statement**

Given the abundance of concerns, unmitigated and unmitigable impacts, the City requests that FHWA elevate the I-205 Toll Project to an Environmental Impact Statement, allowing our community to better understand project impacts. Further, we request FHWA direction to coordinate the I-205 Toll Project alongside the Regional Mobility Pricing Project for the purposes of comprehensive environmental analysis.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tom Ellis".

Tom Ellis  
MAYOR

**ODOT I-205 Toll EA - RECORD #2837 DETAIL**

**Submission Date :** 4/20/2023  
**First Name :** John  
**Last Name :** Lewis  
**Affiliation :** City of Oregon City  
**Submission Method :** Letter  
**Q3. Comments :** See attached documents in response to the I 205 Tolling Environmental Assessment. Thank you.  
**Attachments :** 2023\_0420\_I-205\_EA\_Oregon\_City.pdf (3 mb)



April 20, 2023

*Sent Via Electronic Mail*

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

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

Dear Ms. Putney:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



**Conclusion**

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

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

Sincerely,



Denyse C. McGriff  
Mayor

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

## I-205 Toll Project Environmental Assessment

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

Updated: April 11, 2023

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

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

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

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

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

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

# MEMORANDUM

DATE: April 3rd, 2023

TO: Dayna Webb, City of Oregon City

FROM: Carl Springer and Kevin Chewuk | DKS Associates

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

---

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

## INTERSECTIONS ANALYZED IN OREGON CITY

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

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

---

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



### Findings for Oregon City:

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

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



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

## TRAFFIC DIVERSION WITH I-205 TOLLING

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

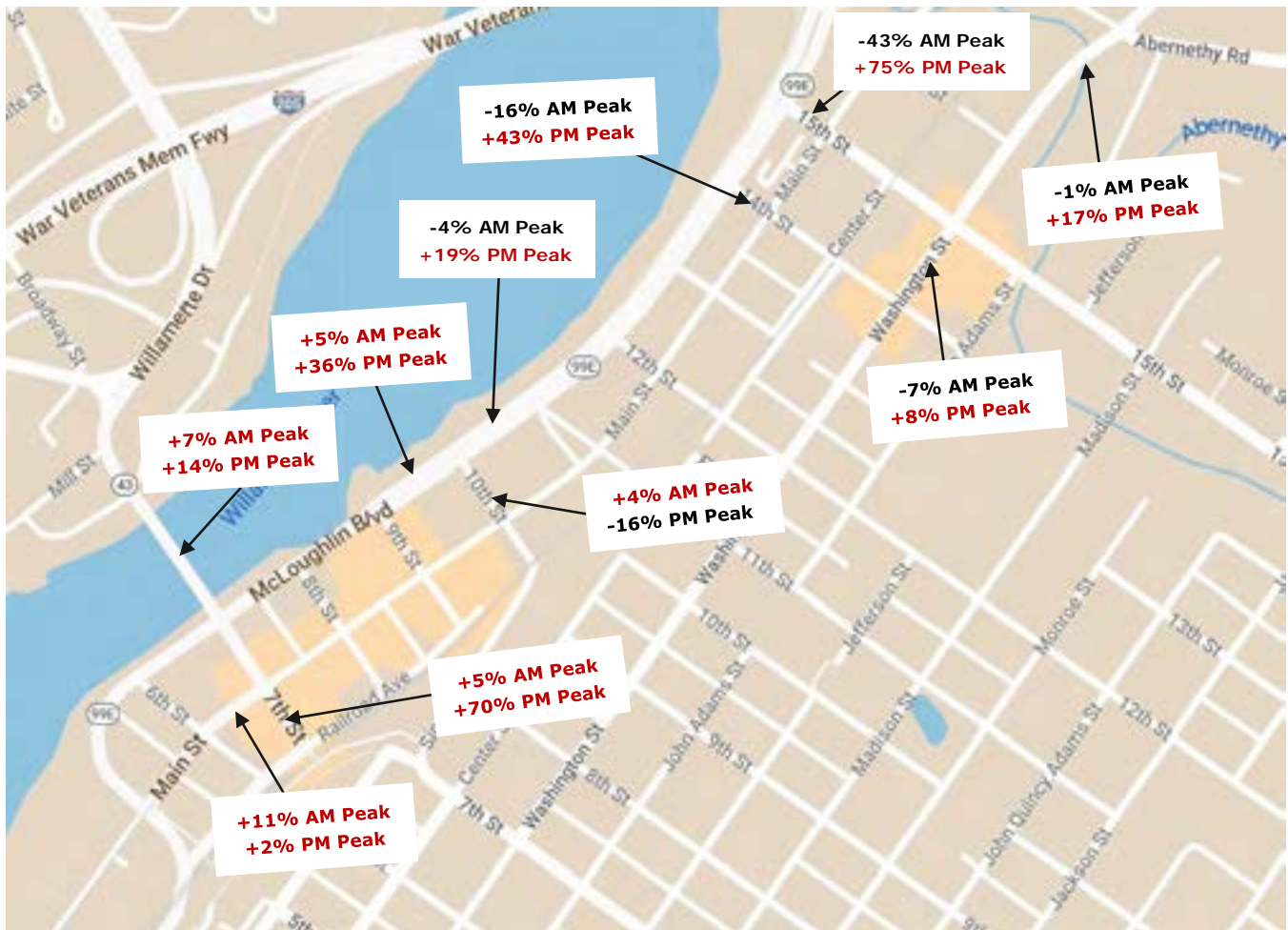
The range and scale of the expected traffic diversion onto Oregon City streets and highways was presented in the I-205 Tolling EA Transportation Technical Report. Significant diversion impacts are expected along OR 99E, across the Arch Bridge (OR 43), along Main Street and its connecting streets to OR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

## 2027 TRAFFIC DIVERSION WITH I-205 TOLLING

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

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

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



## 2045 TRAFFIC DIVERSION WITH I-205 TOLLING

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

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

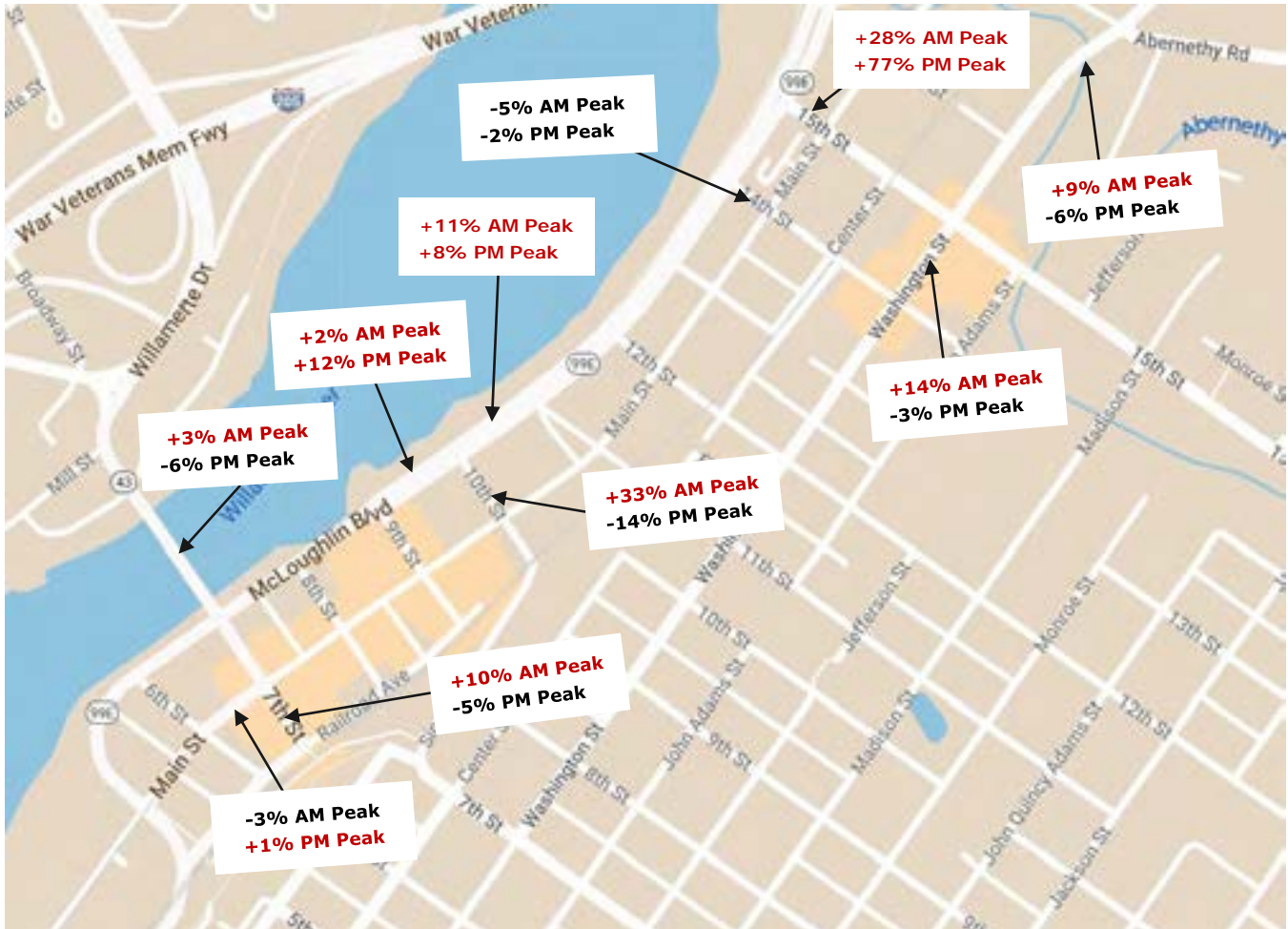


Figure 4 shows the projected 2045 peak hour volume changes with I-205 tolling. The 15<sup>th</sup> street connection between OR 99E and Main Street shows major increases in both peak hours, while five blocks south at 10<sup>th</sup> Street, the same connection serves 33 percent higher in the a.m. peak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

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

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

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



### Findings for Oregon City:

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

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

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

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

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

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

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

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

### Findings for Oregon City:

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

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

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

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



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

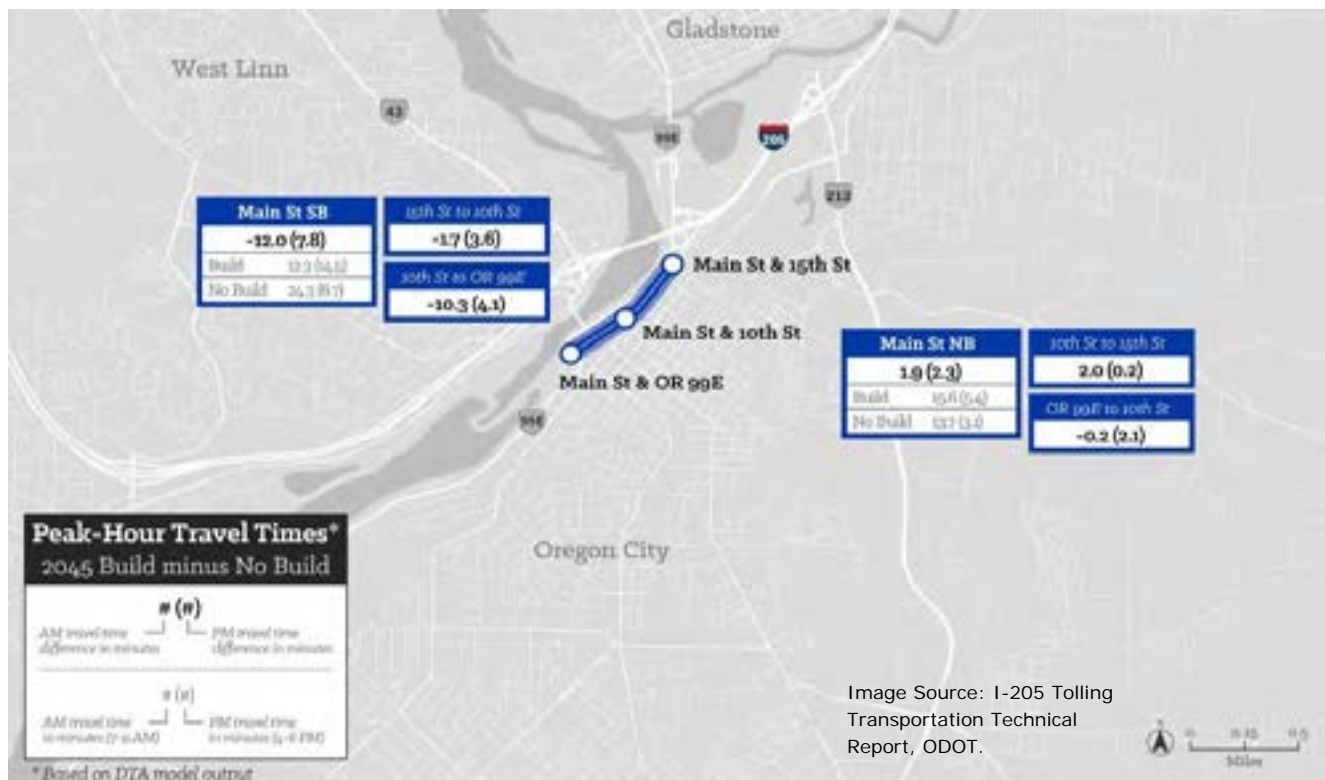
INTERSECTION (ID #)	MOBILITY STANDARD	2045 NO BUILD (AM PEAK)			2045 BUILD (AM PEAK)		
		V/C	DELAY	LOS	V/C	DELAY	LOS
7TH ST AND MAIN ST (ID #18)	v/c 1.1	0.54	11	B	0.56	12	B
OR 99E AND I-205 NB RAMPS (ID #19)	v/c 0.85 (0.75)	<b>0.89</b>	<b>60</b>	<b>E</b>	<b>0.99</b>	<b>85</b>	<b>F</b>
OR 99E AND I-205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

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

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

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

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



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

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



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

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

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

### Findings for Oregon City:

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

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

TABLE 3: 2045 NO BUILD AND BUILD TRANSIT TRAVEL TIMES

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

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

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

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

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

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

### Findings for Oregon City:

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

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

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

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

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

### Findings for Oregon City:

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

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

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

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

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

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

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

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

### Findings for Oregon City:

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

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

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

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


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


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





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

### OR 99E OREGON CITY

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


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

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


 **Safety Improvements**

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

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

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

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

 **Intersection Improvements**

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

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

**OR 99E/14th St**

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

**OR 99E/10th St**

- Extend SB left-turn lane to 12th St

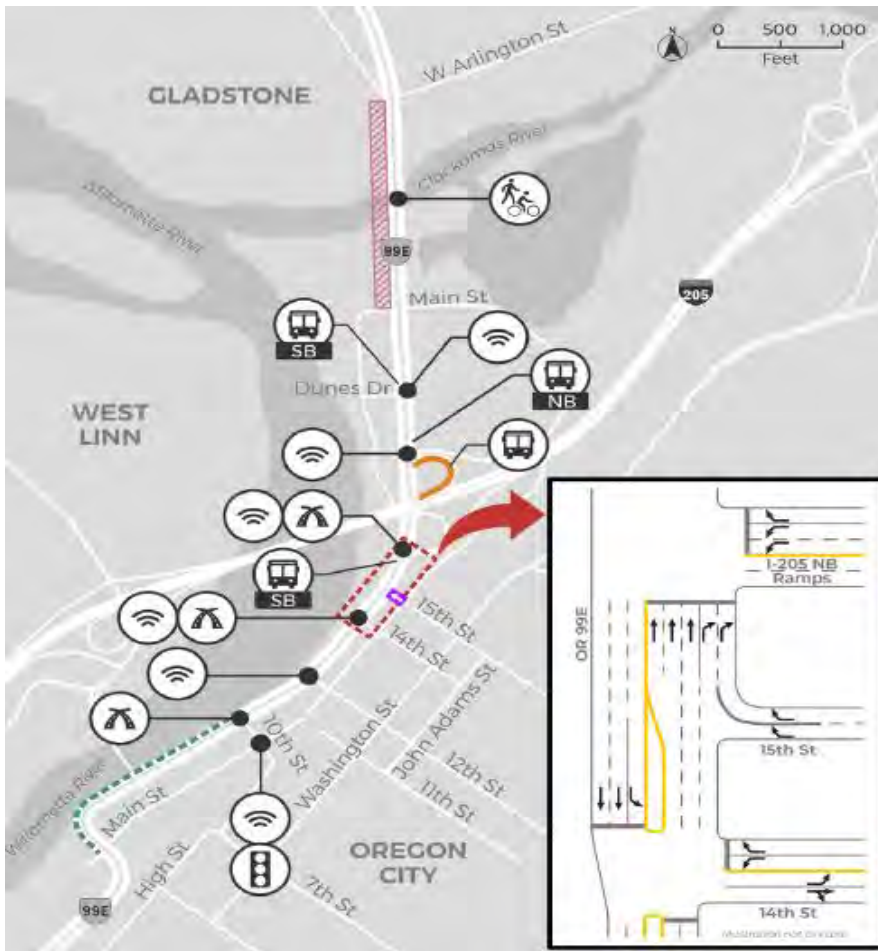


Image Source: I-205 Tolling Transportation Technical Report, ODOT.

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

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

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

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

### Findings for Oregon City:

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

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

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

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

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

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

**Findings for Oregon City:**

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

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

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

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

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

**Findings for Oregon City:**

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

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

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

### Findings for Oregon City:

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

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

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

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

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

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

### Findings for Oregon City:

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

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

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

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

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

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

### Findings for Oregon City:

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

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

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

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

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

# CLACKAMAS COUNTY BOARD OF COUNTY COMMISSIONERS

## Policy Session Worksheet

**Presentation Date:** April 19, 2023    **Approx. Start Time:** 1:15 p.m.    **Approx. Length:** 30 Mins

**Presentation Title:** I-205 Toll Project Environmental Assessment Findings Technical Letter

**Department:** Transportation and Development

**Presenters:** DTD – Dan Johnson (Director), Mike Bezner (Assistant Director), Jamie Stasny (Transportation and Land Use Policy Coordinator)

**Other Invitees:** Karen Buehrig – Long Range Planning Manager, Chris Lyons – Government Affairs Manager, PGA

### WHAT ACTION ARE YOU REQUESTING FROM THE BOARD?

Approval of technical comment letter for ODOT's I-205 Toll Project Environmental Assessment.

### EXECUTIVE SUMMARY:

ODOT is in the midst of the public comment period for the I-205 Toll Project Environmental Assessment. Our team has reviewed over 2,000 pages of information and has developed a technical letter containing all of the technical issues with the assessment. (See Attachment A)

### Next Steps:

Upon approval the technical letter will be appended to the previously approved board comment letter and submitted to ODOT and FHWA as formal public comment prior to the end of the public comment period.

After the public comment period closes on April 21<sup>st</sup>, ODOT will analyze the comments submitted and will prepare responses to all comments specific to the EA. ODOT and FHWA will determine if additional analysis is needed. ODOT could be asked to prepare a revised EA or could be directed to elevate the process to an Environmental Impact Statement.

### FINANCIAL IMPLICATIONS (current year and ongoing):

Is this item in your current budget?     YES     NO

What is the cost? \$ N/A

What is the funding source? N/A

### STRATEGIC PLAN ALIGNMENT:

- This item relates to all five of the county's Performance Clackamas goals:
  - Build public trust through good government;
  - Grow a vibrant economy;
  - Build a strong infrastructure;
  - Ensure safe, healthy, and secure communities; and
  - Honor, utilize, promote, and invest in our natural resources.



**LEGAL/POLICY REQUIREMENTS:**

N/A

**PUBLIC/GOVERNMENTAL PARTICIPATION:**

Involves several departments and external partner agencies.  
Clackamas County has submitted comments on the record throughout the EA process.

**OPTIONS:**

- A. The Board approves the technical letter.
- B. The Board directs staff to incorporate minor edits and approves the technical letter.



**RECOMMENDATION:**

Option A. The Board approves the technical letter.

**ATTACHMENTS:**

Attachment A – Clackamas County I-205 EA Technical Letter

**SUBMITTED BY:**

Division Director/Head Approval   
Department Director/Head Approval   
County Administrator Approval \_\_\_\_\_

For information on this issue or copies of attachments, please contact Dan Johnson @ 503-742-4325

# **Comments on the I-205 Toll Project Environmental Assessment**

Prepared by Clackamas County Department of Transportation and Development

April 12, 2023

# Contents

I.	Introduction .....	1
II.	Overall Issues .....	2
	ODOT and FHWA should proceed with an EIS.....	2
	ODOT should conduct a tiered environmental review of regional congestion projects. ....	5
	The RMPP is a reasonably foreseeable project that needs to be analyzed prior to making a decision regarding tolling on I-205. ....	6
	The Project does not meet the stated Need.....	7
	The Purpose Statement is so narrow that it eliminates the possibility of reasonable alternatives.....	7
	The Project does not meet the stated Goals and Objectives. ....	8
	The Project is a moving target.....	9
	The local community should not be forced to pay for the maintenance of a State facility. ....	10
	The Project should be revised to eliminate pre-completion tolling and nighttime tolling. ....	10
	Pre-Completion Tolling .....	10
	Nighttime Tolling .....	11
	The Project EA cannot result in a FONSI because the mitigation measures are unenforceable and unlikely to be performed. ....	12
	The monitoring program is a prime example of unenforceable mitigation.....	12
	The indirect or secondary impacts of mitigation have not been analyzed.....	13
	Agencies and the public did not have sufficient opportunity to review or comment on the Project. ....	13
III.	Detailed Transportation Comments .....	14
	Significant Diversion of Traffic Volumes to County and City Facilities .....	14
	Unmitigated Safety Impacts .....	16
	Borland Road Corridor.....	17
	Stafford Road Corridor.....	18
	Rosemont Road Corridor.....	18
	Canby/I-5 Corridor .....	19
	Unmitigated Congestion Impacts .....	20
	High Levels of Traffic Add Stress for People Walking and Rolling .....	20
	Tolling is Not Shifting Travel Mode.....	21
	Lack of Commitment to the Mitigation Measures .....	22

Truck Traffic on Local Roadways .....	23
Reasonably Foreseeable Future Actions in the Project Corridor Should be Part of Mitigation .....	23
IV. Other Topical Issues .....	24
Air Quality .....	24
MSAT Analysis .....	24
Cumulative MSAT Analysis .....	26
Geographic Boundary of MSAT Emissions Analysis .....	26
Other .....	26
Climate Change .....	27
Noise .....	29
Social Resources and Communities / Environmental Justice .....	30
Land Use .....	34
Historic and Archaeological Resources .....	35
Biological Resources .....	35
Public Involvement / Agency Coordination / Consultation .....	35
V. Conclusion .....	36

# I. Introduction

Clackamas County (County) appreciates the opportunity to offer comments and questions on the *I-205 Toll Project Environmental Assessment (EA)*, as issued by the Oregon Department of Transportation (ODOT) and the Federal Highway Administration (FHWA) in February 2023.

As indicated in the County's requests for extensions, a 15-day extension was insufficient considering the EA relies on thousands of pages of supporting appendices and other documents. While we have identified many serious issues with the EA's analysis within the constrained comment period, the County and partner agencies could have provided a more thorough review with the additional time requested. As such, this letter should not be viewed as outlining every example of the EA's deficiencies, including unmitigated impacts. Rather, we are providing a multitude of examples which support the fact that additional analysis and information is required, particularly surrounding safety, diversion, and mitigation concerns.

**Safety:** The County is concerned with the safety of the entire regional transportation network, including non-highway roadways. While increased safety and decreased congestion are included in the purpose and need, the Project fails to meet this need as the Project will, in fact, *decrease* safety and *increase* congestion on local roadways. Further, the County found several examples in the EA of unmitigated safety impacts for vehicles, cyclists, and pedestrians.

**Diversion Impacts:** Based on our review, the EA does not take a "hard look" at the environmental consequences of diversion from I-205 onto County and city roadways. The EA fails to adequately analyze the impacts to the local community that will bear the burden of increased diversion. While the definition of the study area includes the local roadways and communities that would experience diversion, in many cases there is no meaningful analysis of localized impacts. This is especially true regarding impacts associated with transportation, air quality, and noise.

**Mitigation Measures:** The proposed mitigation measures are problematic on many levels.

- Mitigation measures are vague with respect to timing and other logistical details, rendering them unenforceable.
- The EA does not establish that the mitigation measures offered reduce all of the significant impacts of the Project to a level that would warrant a Finding of No Significant Impact (FONSI).
- The EA fails to disclose the conditions of the roadway network with mitigation. As a result, local agencies have no idea whether the proposed mitigation measures will address the identified significant impacts within their jurisdictions. The burden of analysis of the environmental impacts of the I-205 Toll Project and the Regional Mobility Pricing Project (RMPP) is on ODOT and FHWA, not local agencies.

**Pre-Completion Tolling:** Pre-completion tolling should be removed from the Project or the impacts should be fully analyzed. Due to pre-completion tolling, local communities will be significantly impacted for a number of years before mitigation is implemented. To address the issues of pre-completion tolling the EA states “any mitigation proposed to address near-term impacts that is determined to help alleviate pre-completion tolling impacts could be implemented before tolling begins.” This fails to assess which measures are needed for pre-completion tolling impacts, who will decide which measures to implement and when. The EA should disclose which mitigation measures are needed to address the impacts of pre-completion tolling and when they will be implemented. The EA improperly defers this discussion.

**Cumulative Effects with RMPP:** In addition to the inadequacies in the analysis of the I-205 Tolling Project alone, the EA fails to analyze the cumulative effects with the RMPP. The cumulative or “combined” impacts of I-205 tolling and the RMPP need to be disclosed to allow for informed decision-making and full understanding of the scope of environmental consequences.

The County’s review has identified serious procedural concerns and deficiencies in the EA that can only be fully addressed through the completion of a comprehensive Environmental Impact Statement (EIS) for this Project. Preparation of an EIS will provide for more rigorous analysis of project alternatives, disclosure of cumulative and indirect effects, comprehensive mitigation planning, and public engagement opportunities. The EIS must analyze and disclose the full scope of environmental impacts from the I-205 Toll Project and the RMPP, which are collectively referenced within the current EA as the Portland Metro Area Value Pricing Project, or the first phase of the Oregon Toll Program (see page 1-2 of the EA).

ODOT states in the EA that they plan to issue a Revised EA (page 1-7 of the EA); however, agencies and the public are not guaranteed an opportunity to comment on a Revised EA. It would be unacceptable to release a “Finding of No Significant Impact” until ODOT and FHWA have shown that there will be no residual significant impacts from the Project.

## II. Overall Issues

ODOT and FHWA should proceed with an EIS.

As outlined in subsequent sections of this comment letter, there are significant, unmitigated environmental consequences associated with the Project. If an EA determines that the environmental impacts of a proposed Federal action will be significant, an EIS must be prepared.

Pursuant to FHWA's NEPA regulations, "[a]ctions that significantly affect the environment require an EIS." 23 C.F.R. 771.115(a). Section 771.115(a) incorporates the definition of "significant" from Section 1508.27 of the pre-2020 CEQ NEPA Regulations. While the CEQ NEPA regulations were amended in 2020 to, in part, remove the definition of "significant," FHWA has not amended its regulations since the 2020 amendments were implemented, and therefore the definition is still relevant to FHWA actions and guides ODOT's analysis of the impacts of the Project. As demonstrated below, the Project significantly affects the environment and should be analyzed in an EIS.

*§1508.27 Significantly. "Significantly" as used in NEPA requires considerations of both context and intensity:*

*(a) Context. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short and long-term effects are relevant.*

- As discussed throughout this comment letter, there will be significant and adverse short-term effects from pre-completion tolling and long-term effects from diversion which have not been sufficiently disclosed or mitigated.

*(b) Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action. The following should be considered in evaluating intensity:*

*(1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect will be beneficial.*

- While on the balance certain effects of the Project may be beneficial on I-205, there will be undeniable significant adverse local effects to communities from diversion to local roadways that have not been properly disclosed.

*(2) The degree to which the proposed action affects public health or safety.*

- As discussed further in this comment letter under the heading *III. Detailed Transportation Comments*, there are major public safety concerns for multiple modes of travel on local roadways. As discussed under the heading *IV. Other Topical Issues*, the localized impacts of air toxics and noise on public health have not been considered.

(3) *Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.*

- The effects of the Project on historic and archaeological resources and biological resources have not been fully evaluated along roadways experiencing significant diversion, nor have the secondary impacts of mitigation been evaluated on these resources. For example, the Project increases traffic volumes across the historic Oregon City Arch Bridge by 40-50%. The Bridge is not included in the Historic Area of Potential Impact or the discussion of 4(f) resources. See further discussion under the Historical and Archaeological Resources and Biological Resources subheadings under *IV. Other Topical Issues*.

(4) *The degree to which the effects on the quality of the human environment are likely to be highly controversial.*

- As noted in the Public Engagement Report for the EA, the Project is highly controversial with 60% of survey respondents disagreeing with the alternatives ODOT proposed for environmental review (Alternative 3/the Project and Alternative 4). Of those that disagreed, 52% strongly disagreed (page 40 of EA Appendix R) “ODOT acknowledges that most commenters who provided input during the comment period opposed the Project and tolling in general” (page 104 of Appendix R).

(5) *The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.*

- The project relies on highly uncertain future mitigation actions to mitigate significant impacts, most notably a long-term monitoring program. See further discussion under the subheading *The monitoring program is a prime example of unenforceable mitigation*.

(6) *The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.*

- This project is essentially the first phase of the Oregon Toll Program and Portland Metro Area Value Pricing Project. Given the interrelated diversion effects and associated mitigation, the I-205 Tolling and RMPP should be analyzed together as one project. See further discussion under the subheading *The RMPP is a reasonably foreseeable project that needs to be analyzed prior to making a decision regarding tolling on I-205*.



(7) *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.*

- The Portland Metro Area Value Pricing Project has been improperly segmented into smaller component parts: I-205 Tolling and the RMPP. By not assessing the effects of tolling I-205 and the RMPP, the cumulative significant impacts of the larger project have not been disclosed.

## ODOT should conduct a tiered environmental review of regional congestion projects.

CEQ's NEPA Implementation Regulations allow agencies to review national or regional plans using a "tiered" analysis wherein the agency (or agencies) first look at the broad impacts of large-scale programs or policies, and then use those studies to guide subsequent analyses for smaller individual projects that make up the larger program or policy. See 40 C.F.R. 1508.1(ff) (defining "tiering" as "coverage of general matters in broader environmental impact statements or environmental assessments ... with subsequent narrower statements or environmental analyses ... incorporating by reference the general discussions and concentrating solely on the issues specific to the statement subsequently prepared."); see also 40 C.F.R. 1501.11.

U.S. Department of Transportation guidance acknowledges the common practice of using a tiered EIS to evaluate the effects of tolling projects on a larger scale.<sup>1</sup> From the U.S. Department of Transportation's (DOT's) *Procedures for Considering Environmental Impacts* (DOT 5610.1C, emphasis added in bold):

*g. Tiering. Tiering of EISs as discussed in CEO 1502.20 is encouraged when it will improve or simplify the environmental processing of proposed DOT actions. Preparation of tiered EISs should be considered **for complex transportation proposals (e.g. major urban transportation investments, airport master plans, aid to navigation systems, etc.) or for a number of discrete but closely related Federal actions.***

In this instance, ODOT should prepare an EIS for the Portland Metro Area Value Pricing Project, or at a minimum evaluate both the I-205 Toll and RMPP projects cumulatively within their respective EISs, for the following reasons:

---

<sup>1</sup> U.S. Department of Transportation, February 2022; NEPA Reviews of Tolling and Road Pricing Projects Case Studies, page 6. Accessed at: [https://www.environment.fhwa.dot.gov/pubs\\_resources\\_tools/publications/case\\_studies/Introduction-NEPA\\_and\\_Tolling\\_Case\\_Studies.pdf](https://www.environment.fhwa.dot.gov/pubs_resources_tools/publications/case_studies/Introduction-NEPA_and_Tolling_Case_Studies.pdf)

- 1) There are significant impacts for which there are no feasible and/or enforceable mitigation measures. The I-205 Toll Project alone will result in significant and unavoidable impacts associated with diverted traffic. See further discussion under the heading *III. Detailed Transportation Comments*.
- 2) Since the Project is a large, complex transportation proposal and is closely related to another major federal action, namely the RMPP, it should be analyzed together with the RMPP under a single NEPA document.
- 3) The Portland Metro Area Value Pricing Project is controversial and affects millions of people in the region. The processing of the projects under separate EAs sets a dangerous precedent for FHWA that is counter to the purposes of NEPA.

**The RMPP is a reasonably foreseeable project that needs to be analyzed prior to making a decision regarding tolling on I-205.**

ODOT should have evaluated the cumulative impacts of the RMPP and the I-205 Tolling Project because the RMPP is a reasonably foreseeable action that will impact the local community.

Under CEQ regulations, an agency must evaluate the cumulative effects of a project, which are defined in the regulations as the “effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions” 40 C.F.R. 1508.1(g)(3). “Reasonably foreseeable” means “sufficiently likely to occur such that a person of ordinary prudence would take it into account in reaching a decision” 40 C.F.R. 1508.1(aa).

ODOT is incorrect to characterize the RMPP’s impacts as not “reliably quantifiable or quantified at this time” when environmental review for the RMPP has already commenced. ODOT/FHWA anticipate completing the environmental review of the RMPP within the year and implementing the RMPP within one year of I-205.<sup>2</sup> This analysis cannot be deferred to the RMPP environmental review process. Our review of initial modeling results from the RMPP indicates that there will be additional impacts to diversion onto local roads, possibly at different levels and in different locations than disclosed in the EA.

Without this cumulative assessment, the public and County have been deprived of the “big picture” in terms of real-world implications, environmental consequences, viable alternatives, and mitigation solutions. The impacts and mitigation associated with the projects are

---

<sup>2</sup> ODOT, 2023. RMPP Project Schedule. Available online at: [https://www.oregon.gov/odot/tolling/PublishingImages/I-5\\_I-205\\_Projects\\_TimelineNarrow\\_01.27.2023.jpg](https://www.oregon.gov/odot/tolling/PublishingImages/I-5_I-205_Projects_TimelineNarrow_01.27.2023.jpg)

interconnected and the full impact of both projects has not been discussed or disclosed in the I-205 Toll Project EA. The analysis of the two projects combined could completely alter the nature and severity of impacts and mitigation analyzed for I-205. As stated in our September 15, 2022 comments on the Draft Transportation Technical Report (TTR): “Traffic diversion will be different for I-205 versus I-205 and I-5. The traffic analysis is inherently flawed without looking at the broader tolling context as impacts may shift to other roads, worsen or make some current improvements unneeded.”

Either the RMPP should be evaluated in the cumulative analysis of the I-205 Toll EA or, ideally, ODOT/FHWA should prepare an EIS that fully evaluates both components of the Portland Metro Area Value Pricing Project. Analysis of both projects together will allow for a more comprehensive review of feasible alternatives, diversion impacts, and mitigation planning.

## The Project does not meet the stated Need.

The EA does not explain how the Project meets the Needs defined in Section 1.4 of the EA. The EA makes the assumption that the Project will improve congestion, resolve unreliable travel issues, increase safety, and reduce climate change impacts. In reality, the created diversion from the highway system onto local roadways will merely displace these issues. Further, the impacts and costs on local roadways and communities are not fully assessed or defined.

One of the fundamental needs for the Project is to improve transportation safety, which is not achieved. Overall, the Project does not increase safety for the region. The Project diverts traffic to local roadways that have greater safety issues than I-205 (see heading *III. Detailed Transportation Comments* discussion below).

“Critical Projects Need Construction Funding” is included within the Project Need statement (page 1-4 of the EA). While critical projects do need infrastructure financing, there are a variety of tools to access funding for this Project that do not involve tolling.

## The Purpose Statement is so narrow that it eliminates the possibility of reasonable alternatives.

The EA includes tolling on I-205 in the Project purpose statement which restricts the range of reasonable alternatives. Since many freeway projects throughout the country are funded without tolling, we do not believe that tolling is the only mechanism to fund these improvements.

The following guidance from *Linking the Transportation Planning and NEPA processes* is located in FHWA’s regulations:

“Consistent with NEPA, the purpose and need statement should be a statement of a transportation problem, not a specific solution. However, the purpose and need

statement should be specific enough to generate alternatives that may potentially yield real solutions to the problem at-hand. A purpose and need statement that yields only one alternative may indicate a purpose and need that is too narrowly defined.” 23 CFR Appendix A to Part 450.

The purpose and need statement for the Project has been designed to yield one solution. The problem is regional congestion on both I-205 and I-5, and thus the I-205 Toll Project must be analyzed with the RMPP project.

Reasonable alternatives that should be analyzed include a tolled/managed third lane only and funding from sources other than tolling. In fact, ODOT must analyze and disclose an alternative with construction of the improvements without tolling in order for agencies and the public to understand the effects of ODOT’s proposal. Alternative methods for pricing I-205 such as ramp tolling should be analyzed as one of the alternatives.

In addition, the elimination of pre-completion and nighttime tolling should be included for any toll alternatives, as discussed further under the subheading *The Project should be revised to eliminate pre-completion tolling and nighttime tolling*.

In a 2015 guidance document, FHWA cautions that even if there is a valid justification for eliminating non-tolled alternatives, it may be advisable to continue examining non-tolled alternatives if there is public opposition to tolls.<sup>3</sup> There is strong public opposition to the Project. As noted in the EA Public Engagement Summary, 60% of survey respondents disagreed with the alternatives ODOT proposed for environmental review (Alternative 3/the Project and Alternative 4). Of those that disagreed, 52% **strongly disagreed** (page 40 of EA Appendix R). In the Public Engagement Summary “ODOT acknowledges that most commenters who provided input during the comment period opposed the Project and tolling in general” (page 104 of Appendix R). The RMPP is similarly controversial. During public engagement on the RMPP, 70% of respondents disagreed (of which 59% **strongly disagreed**) with a minimum toll for any use of the highway (page 23 of the RMPP Spring 2022 Engagement Report).

## The Project does not meet the stated Goals and Objectives.

The EA provides no explanation as to how the Project meets the goals and objectives that were established through input with agencies, the public, and other stakeholders.

### **Goal: Provide benefits for historically and currently excluded and underserved communities.**

- How does the Project support equitable and reliable access to job centers, schools, and health care facilities? The Project is forcing Equity Framework Communities (EFC) and Environmental Justice (EJ) communities on the outskirts of the Area of Potential Impact

---

<sup>3</sup> FHWA, “Public–Private Partnership Oversight: How FHWA Reviews P3s” (Jan. 2015), p. 20.

(API) to either devote needed income to tolling or travel on more congested local routes. Due to the increases in traffic on local roads, these roads will actually be less safe for travel. EFCs and EJ communities do not have the luxury of being able to travel outside of peak hours to reach work, school, health care facilities or social services.

- How has the Project been designed to support travel options for excluded and underserved communities? The Project has been proposed in an area without reliable regional transit and bicycle facilities, and does not provide mitigation to fund development of these facilities.

**Goal: Limit additional traffic diversion from tolls on I-205 to adjacent roads and neighborhoods.** Alternatives 1 and 2 were not advanced in part because they would result in higher traffic volumes near Oregon City due to diversion. It is unclear how the Project lessens or avoids this issue. How has the Project been designed to limit rerouting from tolling and to minimize impacts on quality of life for local communities? Increased traffic and congestion on local roadways will worsen air quality, increase noise, and decrease safety on non-highway facilities as discussed throughout this comment letter.

**Goal: Support safe travel regardless of mode of transportation.** The EA focuses too heavily on I-205 benefits and does not disclose the anticipated increase in crashes on the non-highway system. Any conclusions regarding the perceived safety benefit on I-205 from the Project and local roadways from mitigation must also consider increased traffic/crashes on local roadways.

**Goal: Contribute to regional improvements in air quality and support the State's climate change efforts.** While congestion on I-205 would be improved, traffic and congestion would increase on non-highway facilities throughout the local community, meaning there would be even more motor vehicle emissions near residences, schools, parks, and other sensitive receptors. Such diverted traffic would travel at slower speeds than if it was on I-205 and the diversion routes are longer than I-205. Both of these factors would result in greater air quality impacts.

**Goal: Support regional economic growth.** How does the Project provide reliable and efficient movement of goods and people on local roadways experiencing diversion from tolling? The EA does not provide evidence that increased pass-through trips in the form of congested peak hour traffic on local roadways will benefit local businesses. Heavy traffic on local roadways would be a deterrent to retail customers, particularly during peak hours.

## The Project is a moving target.

The EA states that some of the mitigation “may” be incorporated into the project. “Chapter 3 describes potential mitigation measures that would reduce the effects of rerouting. These measures could become part of the Build Alternative” (page 2-7 of EA).

- How will this selection be made?

- Will these measures no longer be considered “mitigation measures” and instead become “project commitments”?
- Will the EA analysis be revised to incorporate these measures as part of the Project?

This seemingly innocuous statement fundamentally confuses the environmental review process -- the review of the Project itself -- and the comparison among alternatives. The EA should clearly distinguish what the Project is, what significant impacts would result, what feasible mitigation measures would be implemented for each alternative, who would implement/fund the mitigation measures, and the residual impact after mitigation.

## The local community should not be forced to pay for the maintenance of a State facility.

Why would tolls pay for maintenance? It is already an extra burden on users to pay for the improvement; why also make them pay for maintenance? No other area of the State pays extra to maintain the State facility in their neighborhood. ODOT has claimed that this makes the bonding more attractive to investors so they know the highway will be in good condition and people will want to use it. But it would be just as attractive for bonding if ODOT committed Statewide funding to keep it in adequate condition like every other mile of interstate in Oregon. This would be a double hit for the local population.

Also, there is no money being set aside for future mitigation projects. ODOT should pay for more local improvements, including maintenance of local roads that will be overloaded because of diversion.

## The Project should be revised to eliminate pre-completion tolling and nighttime tolling.

### Pre-Completion Tolling

For the I-205 Project, tolling is proposed to begin at the end of 2024/beginning of 2025, before the construction of the third lane is completed. To fully understand the impacts of pre-completion tolling and provide clearer information on which intersections and locations need immediate mitigation, a full modeling analysis needs to be completed of the impacts of applying tolling without the third lane on I-205, both with and without the implementation of the RMPP. ODOT has not addressed these concerns, which were raised in our September 15, 2022 comments on the Draft TTR.

The Project should allow for the completion of Phase 1A in 2025 and other local construction projects -- such as the Stafford Road/Childs Road roundabout scheduled to be under construction by Clackamas County during the pre-completion tolling period -- prior to tolling, so that the supporting local road system does not create additional construction bottlenecks on primary diversion routes.

There is a large temporal delay between when impacts will occur and when mitigation will be implemented. Due to pre-completion tolling, local communities will be significantly impacted for a number of years before mitigation is implemented. Neither the EA nor the Level 2 Toll Traffic and Revenue Study sufficiently address the timing of completion of mitigation. Most mitigation measures cannot be completed prior to construction as scheduled. As noted above, there will be local projects in the areas along critical routes that will not be completed and elements of the I-205 construction project itself (e.g., the required blasting) that will likely cause even greater diversion.

In the near term, pre-completion tolling will cause up to 30% of the trips that would have been on I-205 to divert onto local roadways during the years of construction. The specific roads that will be impacted the most are:

- SW Borland Road/Willamette Falls Drive
- SW Stafford Road
- OR 99E
- OR 213, and
- OR 43

Therefore, it is clear that the impacts to the local system and local communities will be experienced immediately, as soon as the tolls begin to be collected. This will be especially acute for EFCs and EJ communities since, under the pre-completion tolling scenario, none of the benefits of the third lane will be experienced. The types of impacts these communities will be faced with during pre-completion tolling (identified as Long Term Impacts in Table 3-37) include:

- Higher transportation costs for social and emergency service providers;
- The cost of tolls on low-income households, which may include older adults and people experiencing a disability;
- Language and technological barriers to using and understanding the electronic toll system, and
- Delays and longer travel times near intersections, which could affect access to social resources in Canby, Gladstone, Lake Oswego, Oregon City, Tualatin, West Linn, and unincorporated Clackamas County near Stafford Hamlet and Canby.

Pre-completion tolling should be removed from the Project or fully analyzed in the NEPA review. If pre-completion tolling remains in the Project description it is likely that an EIS will be needed to disclose the significant adverse transportation impacts during the construction period which cannot be mitigated. The NEPA document should also identify which of the two pre-completion tolling alternatives is preferred.

## Nighttime Tolling

The County is opposed to nighttime tolling because, while it will raise very little revenue, at the same time it will decrease safety due to diversion of nighttime traffic onto surrounding local roads. Drivers should remain on the well-lit, safe highway after dark rather than divert to unlit,

narrow, winding rural roads. Safety, as always, should be the prime consideration. ODOT has not addressed these concerns, which were raised in our September 15, 2022 comments on the Draft TTR.

## The Project EA cannot result in a FONSI because the mitigation measures are unenforceable and unlikely to be performed.

CEQ guidance approves the use of a “mitigated FONSI” when the NEPA process results in enforceable mitigation measures (76 F.R. 3843, 3848 n.21). Many of the mitigation measures identified by ODOT are unenforceable because they rely on implementation by local municipalities and agencies that are not controlled by ODOT.<sup>4</sup> These mitigation measures will require an intergovernmental agreement or letter of commitment between ODOT and the affected jurisdictions. What if ODOT and the local jurisdictions are unable to reach an agreement? These agreements should be executed prior to making a decision on the Project.

Additionally, CEQ guidance states that an agency should not rely on mitigation measures necessary for a mitigated FONSI if it is not reasonable to foresee the availability of sufficient resources to perform or ensure the performance of the mitigation (76 F.R. 3843, 3848). It is not reasonably foreseeable that local municipalities will have the funding to undertake the necessary mitigation measures set forth in the EA. It is still unclear what percentage of mitigation would be funded by ODOT.

The vagueness of the timing and funding of the mitigation measures render them unenforceable. As discussed previously, neither the EA nor the Level 2 Toll Traffic and Revenue Study sufficiently address the time schedule for completing mitigation.

There are also mitigation measures proposed that would require the acquisition of right-of-way and have significant construction feasibility issues that could result in unfundable projects and/or significant time delays for construction. See further discussion under the heading *III. Detailed Transportation Comments*. How will ODOT address these issues?

## The monitoring program is a prime example of unenforceable mitigation.

There are no specific mitigation measures proposed for implementation after 2027. Instead, the EA relies entirely on a “transportation mitigation monitoring program.” We were unable to find any details on the scope of this program, the length of the monitoring period, the transportation network that will be monitored, how it will be administered and funded, and what standards will apply. It is also unclear what measures could be implemented as a result of monitoring, how mitigation might change in response to monitoring, and how ODOT and the local jurisdictions would reach consensus on the implementation and amendments to the monitoring program.

---

<sup>4</sup> See *Preservation Coalition v. Pierce*, 667 F.2d 851, 860 (9th Cir. 1992)



This reliance on a monitoring program with no specificity, timeline or guarantee of implementation or success represents additional significant unmitigated impacts in the EA.

## The indirect or secondary impacts of mitigation have not been analyzed.

The EA improperly defers the analysis of the indirect/secondary impacts from mitigation to the Revised EA. EA page 3-31 notes “[s]econdary impacts from implementing mitigation measures may require additional avoidance, minimization, or mitigation measures. An assessment of the effects associated with mitigation will be included in the Revised EA.” Mitigation measures would have their own set of environmental impacts that are not disclosed. Impacts from these measures need to be evaluated and disclosed in the EA and be subject to public comment. The reviewing agencies and the public may not have an opportunity to review and comment on the indirect/secondary impacts of mitigation.

## Agencies and the public did not have sufficient opportunity to review or comment on the Project.

The County has not had ample time to review the Project. The EA relies on thousands of pages of supporting appendices and other documents, which are highly technical and require the County and other municipalities to engage expert consultants to review and analyze. It is impossible to conduct a full review in such a short time frame. Moreover, the public has encountered several roadblocks that have thwarted this process.

- The County is aware that the City of West Linn spent two weeks of the comment period trying to obtain proper traffic model inputs from ODOT before they were finally provided on March 29, 2023, which has severely impacted and delayed their analysis and ability to comment.
- Further, the public was not given a sufficient opportunity to comment on the Project at public hearings. These hearings were poorly publicized: other than two overview email notices sent to a handful of public staff when the EA was published and when the 15-day extension was granted, there was no separate notification or announcement from ODOT alerting the public that hearings were being held. Details of the hearing were also difficult to find on ODOT’s website.
- In person events were only noted on the calendar link, meaning that the public had to dig through several layers of the site to find that information. Moreover, the “drop in” events were held during normal business hours and thus were not accessible to anyone who works a standard schedule.

These factors all limited meaningful public participation.

### III. Detailed Transportation Comments

Our primary concern is that the diverted traffic from I-205 onto County roadways and our partner City streets results in unmitigated impacts not disclosed in the EA. The lack of adequate mitigation on our facilities will result in safety impacts to people driving, moving freight, riding bikes, walking, and taking transit on non-highway facilities.

The following discussion summarizes our primary points of concern and offers examples of the unmitigated impacts not disclosed by transportation-related topic area. As discussed in *I. Introduction*, **not all areas of concern nor every example of unmitigated impacts are identified** herein. Rather, we are providing examples to demonstrate how the EA is deficient in its identification and mitigation of impacts.

Our primary points of concern relate to:

- Significant Diversion of Traffic to County and City Facilities
- Unmitigated Safety Impacts
- Unmitigated Congestion Impacts
- High Levels of Traffic Adding Stress for People Walking and Rolling
- Tolling is Not Shifting Travel Mode
- Lack of Commitment to the Mitigation Measures
- Truck Traffic on Local Roadways
- Reasonably Foreseeable Future Actions in the Project Corridor Should be Part of Mitigation

#### Significant Diversion of Traffic Volumes to County and City Facilities

The EA presents detailed analysis for two scenarios: a Short Term of 2027 (i.e., the year when the construction of the additional lanes on I-205 was assumed to be completed) as well as a Long Term scenario identified as 2045. The EA and the TTR (Appendix C of the EA) provide very minimal information about the impacts of “pre-completion tolling” which is defined as the period between when tolling is initiated in 2024 and completion of construction in 2027.

Our review of the EA reveals that it is difficult to separate the benefits and impacts of tolling on the transportation system from the construction of the additional lanes on I-205. This difficulty is exacerbated by the fact that I-205 is currently an inadequate facility, causing trips to reroute off the freeway onto local streets to avoid the congestion. As cited on page 3-1 of the EA, 20–30% of traffic currently using I-205 to travel to Oregon City reroutes in the PM peak period; the EA further acknowledges that this rerouting can increase to as much as 50%. If pre-completion tolling is implemented, it will exacerbate these existing conditions.

The EA needs to be modified to clearly define the differences in impacts between tolling and I-205 widening. This could be accomplished through the introduction of a new alternative that analyzes the proposed widening and seismic improvements on I-205 with an alternative, non-tolling funding source, and then comparing the impacts of that alternative against the current Project. Without this analysis, our communities cannot understand the true impacts of tolling on the local transportation system and our cities and rural areas.

As documented in the EA, but not adequately mitigated, our impacted streets and roadways do not have adequate vehicular capacity, intersection control, or pedestrian or bicycle facilities to address the increases in congestion, the impacts to safety, and the high level of stress that this Project presents to people walking and rolling in either 2027 or 2045.

The EA also documents (as evidenced in Figures 5-8 through 5-12 of the TTR) that our impacted facilities are inadequate to serve 2045 traffic. As discussed in the EA, the 2045 Build scenario results in an increase in traffic volumes by more than 50% at several locations as compared to the No Build. Some examples of unmitigated facilities shown in the comparison of 2045 Build versus No Build include:

- A 40-50% traffic increase on the Arch Bridge, which is a 2-lane historic bridge with a narrow sidewalk and a “sharrow” where cyclists share the lane with the automobiles. Due to the grade and existing traffic, cyclists often choose to use the sidewalk instead of the travel lane. ODOT, in collaboration with Oregon City and West Linn prepared the “Pedestrian-Bicycle Bridge Concept Plan” in 2021 that documents the existing needs of this bridge.
- A 50-60% traffic increase on Borland Road east of Stafford Road. The County has spent substantial resources in planning for future (non-tolled) needs at the Borland Road/Stafford Road intersection, including significant capital and maintenance dollars on constructing a roundabout to increase the capacity and safety of the intersection. Borland Road to the east of this intersection is abutted by rural industrial, commercial, residential, and recreational uses. This roadway is narrow and lacks shoulders of sufficient width for people walking or riding bikes. The significant volume of traffic that will be diverted to this roadway is not sufficiently mitigated. This is also discussed in the safety section below.
- A 50–60% traffic increase on Borland Road between Ek Road and Fields Bridge. This section of Borland Road is also narrow without any usable shoulders. The significant volume of traffic that will be diverted to this roadway is also not sufficiently mitigated.

Table 5.3 of TTR identifies streets that are expected to more than double in traffic volume in 2027 as compared to the 2027 No Build, such as:

- Traffic on Borland Road, east of Stafford, is anticipated to increase by 112%.
- Traffic on Lone Elder east of OR 99E is anticipated to increase by 104%.

Several other roadways will experience a traffic increase of over 25% when tolling is initiated.

For the pre-completion tolling scenario, the EA only includes information about increased volume on selected API arterials and intersections but does not undertake the other analysis that was conducted for year 2027 or year 2045. This lack of information on impacted facilities limits our ability to understand how tolling truly affects our rural and city facilities. The EA needs to be amended to fully document the impacts on our communities.

Further, the impacts to Ek Road are not accounted for in the EA. In fact, during the EA scoping it was Clackamas County staff who identified the need to include Ek Road in the modeling analyses as it parallels I-205 through the corridor. The published EA and TTR does not provide adequate information on the increase in volume along Ek Road, but rather assumes that traffic will use Mountain Road. Since some of the near-term mitigation could be influenced by the usage of Ek Road, it needs to be incorporated into the analyses and appropriately mitigated.

Lastly, it should be noted that with modern navigation apps, many motorists will adjust their routes of travel to “avoid tolls” resulting in instant changes to traffic patterns. The real-time rerouting of traffic onto County and city roadways can result in an abrupt increase in through traffic on our roadways, limiting the ability of people using intersecting streets along these routes, and presenting further difficulties (beyond that documented in the EA) for people to travel within the County. Without proper mitigation, these abrupt traffic volume changes result in the rapid degradation of safety performance and shift the burdens of safety mitigation and crash response to local law enforcement and public works teams to provide traffic control. On the whole, injuries and lost quality of life will increase, and in many cases, in already equity-challenged communities.

## Unmitigated Safety Impacts

As demonstrated in the EA, many of the diversion routes have intersections and roadway segments that exceed ODOT’s critical crash rate today and/or are listed as Top 5% or 10% Safety Priority Index System (SPIS) sites. We are unclear how adding more traffic to these locations is not considered a significant impact.

Any diversion of traffic from a freeway facility results in an overall decrease in safety as shown in ODOT’s crash rate Table V below.<sup>5</sup> Fatal and serious injury rates on freeways are less than 1.5 per million miles of vehicle travel (MMVT), whereas rural arterials have rates in excess of 11 MMVT and collector crash rates can be over 40 MMVT. Diverting traffic to roadways with higher safety risks is contrary to both ODOT’s and Clackamas County’s Transportation Safety Action Plans (TSAPs), both of which have a goal to eliminate fatal and serious injury crashes by 2035.

---

<sup>5</sup> [https://www.oregon.gov/odot/Data/Documents/Crash\\_Rate\\_Tables\\_2020.pdf](https://www.oregon.gov/odot/Data/Documents/Crash_Rate_Tables_2020.pdf)

**TABLE V: 2020 Fatal & Serious Injury Highway Crash Rates and Casualty Rates**

Table V tabulates data for mainline state highway crashes that resulted in death or a suspected serious injury (INJ-A). ODOT's fatality and injury definitions are adopted from the Model Minimum Uniform Crash Criteria (MMUCC), Fourth Edition.

JURISDICTION AND FUNCTIONAL CLASSIFICATION	MILES*	ANNUAL VEHICLE MILES*	FATAL & SERIOUS INJURY (INJ-A) CRASHES*	DEATHS AND SERIOUS INJURIES*	FATAL & INJ-A CRASH RATE**	FATAL & INJ-A CASUALTY RATE**
<b>TOTAL STATE HWY SYSTEM</b>	<b>7,377.44</b>	<b>19,388,425,028</b>	<b>825</b>	<b>967</b>	<b>4.26</b>	<b>4.99</b>
Interstate Freeways	729.57	8,466,908,094	95	107	1.12	1.26
Other Fwys/Expressways	66.88	1,289,794,763	16	17	1.24	1.32
Non-Freeways (combined)	6,580.99	9,631,722,171	714	843	7.41	8.75
Other Principal Arterials	3,256.45	7,433,739,009	509	597	6.85	8.03
Minor Arterials	1,968.43	1,843,069,966	148	180	8.03	9.77
Urban Collectors	47.31	55,830,059	7	8	12.54	14.33
Rural Major Collectors	1,272.62	296,635,232	49	57	16.52	19.22
Rural Minor Collectors	34.03	2,348,898	1	1	42.57	42.57
Rural Local	2.15	69,007	0	0	0.00	0.00
<b>URBAN HWY SYSTEM</b>	<b>1,141.30</b>	<b>10,341,826,489</b>	<b>376</b>	<b>418</b>	<b>3.64</b>	<b>4.04</b>

To help further emphasize the EA's deficiency in addressing safety impacts, Clackamas County staff reviewed the effects of the diversion to four primary corridors identified in the EA -- Stafford Road, Borland Road, Rosemont Road, and the Canby/I-5 corridor. These rural corridors serve as vital connections between urban communities. The impacted roadways along these corridors are typically two-lane, carrying between 7,000 and 14,000 vehicles per day under current conditions. These roadways are often characterized by only having 11-foot travel lanes and, in most cases, 0- to 4-foot shoulders. Further details on each corridor are presented below.

### Borland Road Corridor

As documented in the EA, Borland Road between Ek Road and Fields Bridge is expected to have increases of up to 8,000 ADT in 2027, resulting in a total expected 2027 ADT of more than 16,000 vehicles. Under today's conditions, Borland Road carries 5,500 ADT. Our detailed analysis of the current conditions indicates that the crash experience in this corridor is very close to the expected crashes/mile/year for similar facilities, but that the rear-end crashes are overrepresented. This over-representation of rear-end crashes is indicative of the frequency and density of intersections along this corridor and the high percentage of through traffic currently using the facility. With the significant increase in through traffic anticipated in 2027 attributable to the tolling, the total crash rates in this corridor are expected to at least double to 2.7 crashes / mile / year for total crashes and to 1.5 Fatal-Injury C crashes/mile/year in 2027. Without appropriate mitigation to address rear-end crashes, our analysis suggests the crash rates would likely be even higher.

The anticipated volumes and crash patterns identify that Borland Road meets the thresholds for needing mitigation improvements, including a center turn lane at intersections and driveways

along with paved shoulders and rumble strips. These mitigation measures are not included in the EA.

## Stafford Road Corridor

Stafford Road between Ek Road and Mountain Road is predicted to have an increase of 2,800 ADT going from approximately 13,000 ADT to nearly 16,000 ADT on a two-lane road with 11-foot travel lanes with little or no shoulders. People on Trail Road, a local road serving over 50 lots, currently see times of the day when accessing Stafford Road is challenging and residents have expressed concerns regarding access and safety.

Under current conditions, there are 4.6 crashes/mile/year, nearly double the expected rate; and severe crashes are 2.33 crashes/mile/year, again nearly double the expected amount. Adding 2,800 vehicles per day to this route would elevate the crash rates to about 5.5 crashes/mile/year and 2.75 severe crashes/mile/year. In addition, roadway departure and wet condition crashes are overrepresented.

The volumes and crash patterns show that Stafford Road meets the thresholds for needing mitigation impacts, including paved shoulders with rumble strips and either an overlay or high friction surface treatment to increase friction during wet weather. In addition, installing a left turn lane should be considered for Trail Road or connecting Trail Road to the proposed roundabout at the Stafford Road/Mountain Road intersection or traffic signal at Ek Road. These mitigation measures are not included in the EA.

## Rosemont Road Corridor

Rosemont Road provides a critical link to the Salamo area of West Linn and is a route that allows toll avoidance of the Tualatin River bridges for people traveling to and from the west and south. This facility was not analyzed in the EA despite having a predicted ADT increase of 1,500 in 2027 and 500 in 2045. Safety performance is already poor for this facility, with total and severe crash rates more than 22% and 30% higher than the expected values (i.e., 1.92 and 1.06 crashes/mile/year, respectively).

Rear-end and roadway departure crashes are over-represented for this road, reflecting the challenges of a two-lane rural road with no shoulders currently carrying 10,000 vehicles per day. Adding 1,500 more vehicles with no mitigation further degrades the safety performance. The volumes and crash patterns identify that Rosemont Road needs to be improved to include turn lanes and shoulders with rumble strips.

The EA documents that the Stafford Road/Rosemont Road roundabout will be impacted by the traffic volume increases. This roundabout is already over capacity under current volumes and no mitigation for the increase in traffic volumes is proposed.

None of these clearly needed mitigation measures within the Rosemont Road corridor are included in the EA.

## Canby/I-5 Corridor

The EA documents increases in traffic volumes along OR 99E associated with drivers exiting I-5 near Canby at either Miley Road or Ehlen Road to avoid tolling, but does not analyze the impacts to the Arndt Road-Knights Bridge Road intersection nor to Barlow Road between Arndt Road and OR 99E.

Per the EA, tolling is anticipated to increase traffic volumes on Arndt Road between Airport Road and Knights Bridge Road by 3,000 ADT in 2027 and by 2,000 ADT in 2045. The EA makes no mention of the fact that this corridor has daily truck volumes in excess of 20%. These high truck volumes have significant impacts on the capacity and safety of the roadway to handle the increase in tolling-related diversion traffic. This corridor provides access to an active quarry and to freight moving to and from Canby's vibrant and growing industrial area. With this vehicle mix and these unique industrial/quarry uses, the EA needs to document both the operational and safety impacts of tolling on this corridor and of the businesses along it.

Our analysis of Arndt Road suggests that existing safety performance is affected by queue spill-back associated with the signalized Arndt Road/Knights Bridge Road intersection. Rear-end crashes are over-represented; the County is planning to add a queue warning system for eastbound Arndt Road to address this issue. Adding 3,000 more vehicles per day will increase overall volumes from 18,000 ADT to 21,000 in 2027. This added traffic will result in higher levels of congestion, necessitating an additional turning lane at the traffic signal to address queue storage and capacity needs. Based on historical trends on this roadway, the impact of 3,000 vehicles per day in the 2027 tolling scenario would be the equivalent of 10 years' worth of traffic growth in this corridor if tolling did not occur.

Further, safety performance is currently poor on Arndt Road east of Knights Bridge Road with crashes double the expected rate (4.3 crashes/mile/year) and nearly triple the expected rate for severe crashes (3 severe crashes/mile/year). Rear-end crashes are over-represented as are injury crashes and are associated with the existing queue spillbacks on each end of the corridor. A westbound queue warning system for the Arndt Road/Knights Bridge Road intersection would help, and reconfiguration of the Barlow Road/Arndt Road intersection is needed.

As with other parts of this corridor, the Barlow Road/Arndt Road intersection also has poor safety performance with crashes more than double the expected rate at 2.3 crashes/year and 0.97 severe crashes per year versus an expected rate of 0.64. With nearly 11,000 vehicles per day on Barlow Road south of the intersection and less than 700 vehicles per day north of Arndt, the intersection needs to be realigned to reflect existing travel patterns.

The last portion of this corridor includes Barlow Road between Arndt Road and OR 99E, including the portion that is aligned through the City of Barlow. Analysis shows that safety

performance is poor with both total and severe crashes triple the expected rates at 6.6 and 3.3 crashes/mile/year, respectively. Rear-end crashes influenced by Arndt Road and OR 99E are over-represented. Although the County has proposed a speed zone reduction from 35 MPH to 30 MPH in this corridor, including funding for radar feedback signs, the increases in traffic may require additional improvements to maintain adequate safety. With rear-end crashes being overrepresented, mitigation of a center turn lane would address the safety issues.

None of these needed safety mitigation measures are included in the EA.

## Unmitigated Congestion Impacts

We are unclear how ODOT can make the conclusion that “of the 50 study intersections, most would not experience new impacts under the Build condition.” Per Table 5-49 of the TTR, more than 20% of intersections would not meet applicable mobility standards under the Build Condition in both 2027 and 2045.

For the limited number of congestion mitigation measures identified for 2027, the results of the mitigation measures on congestion, i.e., the resultant level of service and volume-to-capacity ratio, was not documented in the EA. (In fact, no congestion mitigation measures are identified for 2045; rather the EA refers to a “monitoring program” for future mitigation.) How can the conclusion be drawn that the mitigation measures are effective in addressing the significant impacts created by the Project?

A primary example of an unmitigated impact and lack of enforceable mitigation is at the Ek Road/Borland Road intersection. Table 6-4 and Figure 6-5 of the TTR identify the need for an all-way stop-control or a roundabout by the year 2045, “pending future analyses.” These two traffic control devices have very different vehicular capacities, right-of-way impacts and significant costs of construction. How and when will the “future analyses” be conducted and what assurance does the community have that the mitigation measures will be in place by the time tolling begins? Also, how can an improvement to this intersection not be needed in 2027?

## High Levels of Traffic Add Stress for People Walking and Rolling

As documented in the EA and the TTR, many of the roadways that will need to shoulder the burden of the diverted traffic do not have any facilities or have only very limited facilities for people walking and rolling. As documented in Table 4-8 of the TTR, the majority of the impacted facilities are rated as having the highest level of traffic stress for cyclists without any diverted traffic. Table 4-9 also documents the lack of pedestrian facilities in the rural area.

The County is very concerned about the safety of cyclists and pedestrians with the significant increase in traffic volume on these roadways that are already rated as having the highest levels



of traffic stress. How can significant increases in traffic not result in definable and mitigatable impacts? It is also unclear whether ODOT's rural Level of Traffic Stress (LTS) methodology was used for these facilities. Per ODOT's Analysis Procedures Manual, there are different methodologies employed for rural contexts versus urban contexts. Many of the impacted County roadways would be considered rural, not urban, facilities. With the implementation of tolling, the rural facilities will be impacted by urban levels of traffic.

Examples of unmitigated impacts on cyclists and pedestrians include volume increases on parallel routes to I-205 and the Oregon City Arch Bridge:

- The EA identifies that parallel routes to I-205 such as SW Borland Road and Willamette Falls Drive could experience 30–100% increases in ADT (page 3-12) under the Build Alternative. Mitigation measures for these increases in daily traffic volumes have not been identified.
- The EA discloses that the daily volumes will increase up to 50% in downtown Oregon City and across the Oregon City Arch Bridge. As was previously noted, this is already a sub-standard facility, and is the only location for pedestrians and bicyclists to cross the Willamette River. The cumulatively significant increase in volume will have negative impacts on the pedestrian and bikeway environment at this location.

Given the lack of clear mitigation measures for these high stress facilities, the County concludes that there are impacts to cyclists and pedestrians that are not sufficiently mitigated in the EA. We also are concerned that the LTS assessment for both pedestrians and cyclists in the future year does not sufficiently acknowledge the near-term impacts to pedestrians and cyclists that will occur due to increases in traffic volume as soon as tolling begins. Many of the pedestrian facilities and bikeway facilities are already substandard. Since the rating scale for LTS is not very granular, it does not recognize the potential impacts, especially on facilities already rated as LTS 4 (the highest LTS). How can there be no significant impacts to facilities already rated as having the highest LTS?

The EA specifically notes on page 1-2, paragraph 1.2: Governor's Transportation Vision Panel that "Community livability" is a key issue. It also recommends bike and pedestrian investments to reduce fatalities and injuries. Tolling impacts are not mitigated, will degrade the safety on local roads, and will reduce community livability by increasing traffic on neighborhood streets.

## Tolling is Not Shifting Travel Mode

There is insufficient investment in the pedestrian, bikeway, and transit systems to affect mode shift. ODOT has not addressed these concerns, which were raised in our September 15, 2022 comments on the Draft TTR. The Project does nothing to contribute to an improved environment for transit riders through the I-205 Corridor. The EA identifies on pages 3-5 through 3-6 that limited transit service exists. While the report claims "slightly higher" transit ridership, the mode share figured in Table 5-5 indicates there would only be 800 additional transit trips throughout

the entire Metro Region, which is a marginal increase at best. “The need for improved transit and other transportation choices” is one of the three priority issues that ODOT was directed to address by the Oregon Transportation Commission (page 1-2 of EA).

A map of the transit in the area should be included in the TTR and the EA. In the EA, ODOT acknowledges (on pages 3-5 and 3-6) that there is limited transit service, insufficient pedestrian systems and a lack of quality bikeways in the area. So how did ODOT determine that there will be a shorter transit travel time through the corridor (as shown on page 3-25 of the EA) when there is currently no transit service on Borland Road, Stafford Road, or I-205? More clarity is needed on how the shorter transit time is achieved.

With insufficient travel mode choice in the region (Table 3-2), it is unclear how the desired greenhouse gas reduction aspirations can be met, especially in light of the fact that the cumulative impacts related to climate change identify a need to shift mode away from single-occupancy vehicles. Investment in non-auto facilities is essential if tolling can truly be expected to provide options for people to shift to a different mode of travel, rather than simply shifting traffic to local streets, as appears to be the case under the current Project. The Project should be modified to incorporate improvements to transit and pedestrian infrastructure as part of the solution to the stated Need to reduce traffic congestion and improve safety or, at the very least, analyze such an alternative.

The EA does not provide adequate mitigation to sufficiently address the lack of travel choices in the corridor. Additional mitigation must be added, including but not limited to, collaborating with transit service providers to support availability and enhancements of transit and other transportation services along I-205, especially for historically and currently excluded and underserved communities traveling through the area.

## Lack of Commitment to the Mitigation Measures

Tables 6-1 through 6-6 of the TTR identify mitigation measures for implementation by 2027, many of which are on County or city facilities. Implementation of the mitigation measures by ODOT will require an intergovernmental agreement between the affected jurisdictions. The EA does not specify whether the County and cities are being asked to help fund the mitigation.

For example, the mitigation for SW Borland Road between SW Stafford Road and the Tualatin River Bridge (Table 3-15 of the EA) states “Contribute to...” The EA does not state what the contribution amount will be or how the other portion of this mitigation measure will be funded.

There will be a long period of time between when impacts will begin to occur (i.e., 2024 when tolling begins) and when identified mitigation measures can be feasibly funded, designed and constructed. As a result, the local communities will experience significant impacts for several years before mitigation measures, if they are even feasible, are fully constructed.

Many of the proposed mitigation measures would require the acquisition of right-of-way, have topographical and/or adjacent land impacts that lead to significant questions of construction feasibility, and could be extremely costly to actually construct. How will ODOT address these issues and assure our communities that the impacts will be sufficiently mitigated?

The EA also proposes mitigation measures that are technically infeasible. A good example of this is the widening and signalization mitigation proposed at the OR 99E/South End Road intersection. OR 99E parallels the rail tracks and the Willamette River, so no widening of this intersection can occur to the west, and there are significant topographic constraints to the east in the form of a solid rock bluff adjacent to OR 99E. To add lanes to the intersection, OR 99E would need to shift eastward well in advance of the intersection. Between the costs of widening and the impacted embankment areas, it would not be feasible to complete this mitigation project prior to 2027, if at all.

Finally, there is a lack of clarity on the mitigation measures proposed, how they will be shaped by local officials and the impacted communities, and a realistic timeline for implementation. The EA states that “any mitigation proposed to address near-term impacts that is determined to also help alleviate pre-completion tolling impacts could be implemented before tolling begins.” This statement defers the analysis of pre-completion tolling impacts. The EA needs to analyze the impacts from pre-completion tolling, identify which mitigation measures will be required to address the significant impacts of pre-completion tolling, and condition tolling to start no sooner than completion of these mitigation measures.

## Truck Traffic on Local Roadways

Traffic and air quality modeling assumes that truck traffic on local roadways will *decrease* with the Project, while passenger car traffic will increase as a result of diversion. This assumption, which is used to justify the lack of local modeling and consideration of air toxics and noise, is not supported by evidence. In particular, the County is concerned that ODOT has not properly accounted for the movement of aggregate materials from the rock quarries near Canby and Vancouver or access to the developing warehouse/industrial district in Canby.

## Reasonably Foreseeable Future Actions in the Project Corridor Should be Part of Mitigation

If a project is identified as a Reasonably Foreseeable Future Action (RFFA) in Section 4.4 of the Cumulative Impact Technical report, and is within the Project corridor, it should be considered eligible for mitigation funding. Examples include 2018 Regional Transportation Plan (RTP) projects 10127, 10128, 11242, and 12089. While these projects are on the 2018 RTP, they are not guaranteed to be funded. In order to achieve the benefits that are described as a part of the Project, the RFFAs need to be constructed.

## IV. Other Topical Issues

In general, the County is concerned that the analysis of other topical areas in the EA focuses on impacts to the highway system while ignoring local impacts in areas that will experience increased traffic from diversion. The geographic boundary associated with the API for the following resources (identified in Table 4-1 of Appendix Q) should be modified to extend onto the roadways that experience diversion and where there are identified mitigation projects: Land Use, Geology and Soils, Hazardous Materials, Vegetation and Wildlife, Wetland and Water Resources, and Historical and Archeological Resources. This is necessary to address the full extent of direct and indirect impacts of the Project. In other areas, including air quality and noise, where the API has been defined to include certain local roadways and communities that would experience diversion, there is no meaningful or quantitative analysis of impacts. Our detailed comments are outlined below.

### Air Quality

#### MSAT Analysis

Under the Build Alternative, the projected addition of diverted traffic to non-highway roadways will increase the generation of mobile source air toxics (MSATs) along those roadways, which will increase the concentration of MSATs at specific locations. However, the EA does not adequately address the potential increase of MSATs at affected locations and the associated potential health hazards. The following factors raise concerns without providing adequate analysis to understand the potential health hazards.

- Table 6-3 of the Air Quality Technical Report identifies an 11% increase of non-highway vehicle miles traveled (VMT) under the Build Alternative.
- Table 6-5 of the Air Quality Technical Report identifies a 12% increase in annual benzene emissions along non-highway roadways under the Build Alternative.
- Figure 3-4 of the EA shows average daily traffic on specific non-highway roadways could increase by up to 31% under the Build Alternative.
- Sensitive receptors (e.g., residences, Willamette Primary School) are in close proximity to affected non-highway roadways and would be exposed to increased MSAT concentrations.
- The quantitative analysis of MSAT provided in the Air Quality Technical Report is limited to aggregate emissions and does not address concentrations at affected non-highway locations.
- As identified in Table 5-2 of the Air Quality Technical Report, concentrations of MSATs at one intersection near the project location exceed Oregon Department of Environmental Quality Benchmarks.<sup>6</sup>

---

<sup>6</sup> The benchmarks “are based on concentration levels that would result in a cancer risk of one-in-a-million additional cancers based on a lifetime of exposure. For non-carcinogens, the benchmarks are levels you

- Section 3.2.2 of the EA states the following: “The localized changes in MSAT concentrations would likely be most pronounced on roadways where traffic volumes would be higher under the Build Alternative relative to the No Build Alternative due to rerouted trips. However, the magnitude and the duration of these potential increases compared to the No Build Alternative cannot be reliably quantified due to incomplete or unavailable information in forecasting project-specific MSAT concentrations and related health impacts.”
- Section 6.2.2 of the Air Quality Technical Report provides approximately two pages of justification for the decision to not characterize the magnitude of the changes in MSAT concentrations at affected locations. The discussion in Section 6.2.2 raises significant human health concerns without resolving them.

The sum of limitations raised within Section 6.2.2 of the Air Quality Technical Analysis does not absolve ODOT from a good-faith effort to characterize the increase in MSAT concentrations along affected non-highway roadways. ODOT should model MSAT concentrations at two or more locations and compare these to established health risk levels, such as the Oregon Air Toxics Benchmarks. Analysis would be limited to two alternatives (No Build, Build) and could be corroborated with existing air quality monitoring data. If the benchmarks are exceeded, then a more detailed health risk assessment should be conducted. While the analysis would entail some level of uncertainty, understanding the magnitude of potential MSAT concentrations is critical for understanding potential health impact on residents. This information is necessary for the decision-makers as well as the affected communities.

Additionally, the assumption that truck traffic and associated MSAT emissions will decrease on local roadways should be revisited. As noted above, the County is concerned that ODOT has not properly accounted for the movement of aggregate materials from the rock quarries near Canby and Vancouver and access to the developing warehouse/industrial district in Canby. Further, Borland Road, which parallels a significant segment of I-205 and is one of the primary roads that would experience an increase in traffic from diversion, currently does not allow truck traffic; therefore, there would effectively be no change in truck traffic on this roadway, but the volume of passenger cars would increase dramatically, along with associated emissions of MSAT. A health risk assessment should be conducted to evaluate impacts from the increase in MSAT along Borland Road and other affected roadways.

Appendix D2, Truck Toll Sensitivity Analysis- Air Quality, only addresses the potential for criteria air pollutant and GHG emissions, stating that even with variable rate tolling for trucks, VMT would be reduced, and therefore “air quality” impacts would be less than significant. But this logic completely ignores MSAT concentrations on local roadways from increased truck diversion from variable rate tolling. The air quality analysis of variable rate truck tolling (Appendix D2) should be revised to consider MSAT health impacts on local streets.

---

could breathe for a lifetime without any non-cancer health effects” (<https://www.oregon.gov/deq/air-toxics/Pages/Benchmarks.aspx>).

## Cumulative MSAT Analysis

The cumulative air quality analysis does not appear to address potential for cumulative projects (including the RMPP) to increase traffic and therefore increase MSAT concentrations along affected non-highway roadways. The cumulative air quality analysis in the EA references FHWA expectations of declining MSAT emissions to conclude that the Build Alternative would not have negative cumulative effects on air quality. While overall emissions are expected to decline, the Build Alternative in conjunction with the cumulative projects has the potential to significantly increase traffic on non-highway roadways. The MSAT analysis of the I-205 Toll Project should take into account the impacts of the RMPP and other cumulative projects on the specific non-highway roadways that will be impacted by the Build Alternative.

The cumulative MSAT analysis should address affected non-highway roadways that will experience increased traffic and intersections where the level of service will decline. ODOT should model cumulative MSAT concentrations at two or more locations and compare these to established health risk levels, such as the Oregon Air Toxics Benchmarks. If the benchmarks are exceeded, then a more detailed health risk assessment should be conducted.

## Geographic Boundary of MSAT Emissions Analysis

The project elements are located entirely within Clackamas County and most of the air quality API is located within Clackamas County; however, the geographic boundary of Multnomah County was used for the MOVES modeling of MSAT emissions. The County is concerned that the geographic boundary used in the analysis does not accurately reflect actual conditions. ODOT should disclose how the geographic boundary was determined and whether emission estimates using Clackamas County as the geographic boundary would differ from those presented.

## Other

The project area is located within an EPA-designated carbon monoxide maintenance area. This should be clarified in the EA.

While air pollutant emissions in the API are projected to be much lower in the future compared to current conditions due to improvements in vehicle technology and implementation of stricter emissions standards, Appendix Q of the EA cites that several of the RFFAs identify “reduced emissions” as a project objective, including the OR 43 Multimodal Improvement (RTP 10127) and Willamette Falls Drive Multimodal Improvements (RTP 10128). These projects should be identified as mitigation and funded through the Project if they are being listed as contributing to improved air quality.

The air toxics monitoring data presented in the Air Quality Technical Report is from a former monitoring station about 7 miles from the Abernethy Bridge. Closer and more recent monitoring data should be used to characterize existing air quality in the region. The Tualatin monitoring station air toxics data is closer to the project area (approximately 3.6 miles from the Tualatin

River Bridges), is more recent and more representative of a near-highway environment. The Tualatin monitoring data shows higher levels of air toxics, which should be taken into account for the analysis of the I-205 Toll Project. This data is available from the Oregon Department of Environmental Quality.

## Climate Change

The TTR (page 65) in Table 5-4 identifies that the Regional VMT will increase on non-highway roads and will decrease on the highway. The people who are choosing to shift their trips off of the highway do not have choices in travel options, and will therefore put additional strain on the local roadway system.

EA Appendix Q, page 25, identifies that “Tolling can encourage shifts away from single occupant-vehicle and a shift in travel time, which can reduce emissions associated with vehicle idling.” While the report notes that the Build Alternative is expected to have a relatively “small effect” on choice on travel mode in the region, it should be more clear that it is a “negligible” impact with only a shift of 800 trips regionally to transit (of the 5,245,000 trips) and an increase of only 200 Active Transportation trips of the total 1,276,800 trips across the region.

One significant reason that trips are not shifting to another mode is because other modes of transportation are not available in this area. To take a trip using transit would require two to four times as much time for most travelers.

In addition, there are insufficient bikeway facilities in the area.

- As the analysis of the bikeway facilities demonstrates, the majority have a Bicycle Level of Traffic Stress (BLTS) rating of R3 and R4, and are not expected to improve.
- As noted on page 47 of the TTR, “Most study corridors are already at the highest or worst level (BLTS 4) when considering the overall corridor as a whole.”
- The report goes on to say, “In rural areas (denoted with an “R”), shoulders are more important to the BLTS results because safety concerns tend to be higher (ODOT 2020a). All of Stafford Road, most of SW Borland and parts of 99E are considered rural.”
- Even though a significant additional volume of traffic is anticipated in these corridors with the Build Alternative, the granularity of the BLTS rating system does not demonstrate any difference with the score, with the corridor going from a BLTS 4 to a BLTS 4, which means that no mitigation for the impacts to bikeway travel were proposed through the corridor.

If tolling is expected to be a tool to reduce GHG emissions, there must be reasonable mode choices. To achieve congestion management, as identified in the Project purpose, investments in bikeway and transit infrastructure are necessary as a part of the mitigation so that people have reasonable travel alternatives. For example:

- Investments need to be made in a complete protected bikeway path throughout the corridor, including along Stafford Road, SW Borland, and parts of OR 99E.
- Bikeway improvements as well as the RFFA OR 43 Multimodal Improvement (RTP 10127) and RFFA Willamette Falls Drive Multimodal Improvements (RTP 10128) are needed to help achieve the proposed GHG emissions reductions.
- There needs to be regular, reliable transit service throughout the corridor, addressing both through and local trips, to provide a viable mode option.

The pedestrian and bicycle level of stress analysis presented in the EA does not recognize the rural nature of many of the County roadways where diversion would occur. ODOT's Analysis Procedures Manual outlines procedures for assessing rural roadways and identifying potential risks and mitigation measures.

Emissions may be reduced on I-205, but due to diversion air quality will become worse within the communities when congestion shifts. This puts more families at greater risk and may create additional hardships due to healthcare costs, missed work and permanent illness. As with other analyses in the EA, the benefits and impacts are focused on I-205 and ignore impacts to local communities.

Additional information is needed on the economic impact to downtown Oregon City and Canby. The EA states that businesses in Oregon City and Canby would benefit from pass-through traffic, but no documentation is provided beyond that statement. What other considerations were there when making the assumption that the increase in volume would improve business? Parking is limited in some areas and thus would not support someone trying to stop on a pass-through trip. There should be a mitigation program for the businesses that may be negatively impacted in Oregon City, Canby and West Linn. More traffic volume may not be better if it is in the form of congested traffic.

On page 3-60, Table 3-30: Under the Build Alternative, the EA claims there would be higher levels of opportunity (traffic exposure-oriented) consumer spending in three commercial districts because of the projected higher traffic volumes compared to the No Build Alternative. This is questionable at best considering conditions will be gridlocked. It seems more likely that people will avoid the area due to congested conditions. Logic would imply that individuals who elect to travel longer distances to avoid the costs of tolling are less likely to be the "opportunity shoppers" referred to in Appendix F, Economic Technical Report.

Estimated toll rates are expensive; with no real rates it is impossible to say what the true economic impact will be to individuals and families. Our rough estimate given the financial data provided is that it would cost a household at least \$2,000 to \$2,400 per year (\$166 to \$200 per month).

It is not clear whether commercial use will be tolled at a higher rate. Will these costs be passed through to consumers and further exacerbate the economic hardships families and businesses experience?



On page 3-77 of the EA it states that the Project would result in the “same or improved access to jobs.” However, if a person has problems traveling to a new job now, how will tolling improve access? This is not a positive impact as stated as it is based on representative scenarios which have many technical errors (see comments under the subheading of *Social Resources and Communities/Environmental Justice*). Additionally, some representative scenarios show that EJs and EJ communities will be forced to choose between paying a toll or traveling on a non-toll path which is more congested as a direct result of the Project (increased non-toll path travel times under the Build Alternative in comparison to the No Build Alternative). The Project creates an even larger divide between socioeconomic households at different levels and creates more disadvantages for those who already have trouble accessing jobs.

On pages 19 & 23 of the Economics Technical Report (EA Appendix F) there are contradictions: on page 19 it states that “detailed household spending is not available at the state, regional, and API levels, household income is assumed”; yet on page 23 it states “based on analysis of spending by households in the API, the existing spending by cost category can be estimated”. This contradiction needs to be explained and resolved.

## Noise

Some noise level increases on local roadways are disclosed, in some places up to 6 dBA, but there is no discussion of sensitive receptors located along these segments, and whether impacts would be significant. There is also no discussion of noise thresholds for significance or local policies related to noise. Mitigation is identified for I-205 segments only. The increases in local roadway noise appear to be a significant, unmitigated impact.

While EA Appendix Q states that the Build Alternative would not have negative cumulative effects related to noise, the EA states on pages 3-66 and 3-67:

“Along non-highway roads in the API, changes in traffic noise levels under the Build Alternative would range from 6 dBA lower to 6 dBA higher than existing noise levels because of changes in traffic volumes. The largest reduction in noise levels would occur along the segment of Willamette Falls Drive east of 19th Street, where traffic volumes would be lower than under the No Build Alternative, and the largest increase would occur along the segment of SW Borland Road east of SW Stafford Road, where traffic volumes would be higher than under the No Build Alternative. Figure 3-14 shows the estimated increases in traffic noise levels on non-highway roads under the Build Alternative as compared to existing conditions. Most locations would experience 0 to 3 dB higher noise levels under the Build Alternative compared to the No Build Alternative, which would be barely perceptible to the human ear.”

The analysis does not appear to address the potential for cumulative projects (including the RMPP) to increase traffic and therefore increase noise levels along affected non-highway roadways. The noise analysis of the Project should take into account the impacts of the RMPP

and other cumulative projects on the specific non-highway roadways that will be impacted by the Build Alternative. Mitigation needs to be identified for significant cumulative impacts.

Figure 3-13 of the EA, which depicts the noise API, does not include all of the non-highway roads that will have significantly increased traffic. This figure should be revised to address all non-highway roads that will experience notable diversion as a result of the Project. For instance, Figure 3-4 of the EA shows an 11% increase in traffic on OR 99E near Canby, which is not shown in Figure 3-13.

Some noise walls were not included as mitigation as they were not feasible from a cost perspective; because there is no feasible mitigation, the EA should disclose that a residual significant noise impact will occur which is not mitigated, thereby triggering the need for an EIS.

## Social Resources and Communities / Environmental Justice

Overall, the EA does not adequately address impacts to EFCs and EJ communities. This should be a prime focus as “Impacts of tolling on communities experiencing low income” is one of the three priority issues that ODOT was directed to address by the Oregon Transportation Commission (page 1-2 of EA).

The EFCs and the EJ communities will experience the impact of diversion during pre-completion tolling, and this is not addressed in the EA. There are high concentrations of these communities in several of the areas where impacts to the transportation system have been clearly identified in the EA, especially near OR 99E, from Jennings Avenue south through Oregon City, as well as in Canby and the surrounding areas. The EA must document how these areas will be impacted in the pre-completion tolling scenario.

The base map used in almost all of the figures inaccurately displays the “urban area” in this section, and throughout the document. For example, the industrial areas east of I-205 along OR 212 and the Clackamas Town Center area north of OR 224 and west of I-205 are both fully developed and highly urbanized. The EA maps appear to be displaying incorporated areas and census designated places, but this does not properly identify what is “urban” according to US Census data. The maps should be revised to utilize the 2010 or 2020 Urban Area as defined by the US Census Bureau. This revision would accurately show additional urban areas within Canby, Oregon City, West Linn, and other jurisdictions.<sup>7</sup>

While it is noted on page 35 of EA Appendix Q that, “In the short-term it is possible that the construction of the Build Alternative and the RFFAs could overlap leading to detours and travel time delay for people accessing social resources,” it is much more likely that the implementation of pre-completion tolling will create delay for people to access social resources, and that some

---

<sup>7</sup> For reference, the US Census 2010 Urban Areas map for this area is available online at: [https://www2.census.gov/geo/maps/dc10map/UAUC\\_RefMap/ua/ua71317\\_portland\\_or--wa/DC10UA71317.pdf](https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua71317_portland_or--wa/DC10UA71317.pdf)

of the critical active transportation RFFAs will not be constructed due to lack of funding, further negatively impacting EFCs and EJ communities.

There is a need for active transportation investments throughout the corridor -- not just spot improvements at very minimal locations -- so that persons with low income and other EFC/EJ communities have choices of different modes. Page 27 of EA Appendix Q identifies that a “historic lack of transportation improvements and investment in these communities has led to increased safety risks, including risk of traffic fatality and limited access to transit and active transportation networks (Oregon Walks 2021; Cohen and Hoffman 2019)”. As a part of this Project, this needs to change. Unfortunately, the proposed mitigation does not sufficiently address these issues faced by EFCs or EJ populations.

Page 28 of EA Appendix Q states that the “Build Alternative would have beneficial or neutral effects on environmental justice populations related to access to social resources and travel times, air quality, roadway safety, and travel mode shift” and goes on to say “with the implementation of mitigation measures, no disproportionately high or adverse effect on environmental justice populations would occur under the Build Alternative. **The RFFAs would also be required to mitigate any disproportionately high and adverse effects on environmental justice populations** (emphasis added in bold).”

Overall, it appears that the RFFAs are needed to address the impacts to EFCs/EJ communities and should be included in the mitigation measures that are constructed with the Project.

The analysis of both Social Resources and Communities and EJ (Appendices I and J) relies on Representative Scenarios, which included trips that started in areas with higher concentrations of EFCs and ended in areas with social resources. Representative Scenarios 1 and 8 describe people who will now be forced to choose between paying a toll or taking a non-toll route that is now longer and less safe due to the Project (the Build Alternative increases volumes and travel time in comparison to the No Build Alternative). This is a significant and unmitigated impact created by the Project that disproportionately affects EFC/EJ communities on the outskirts of the proposed tolling location. Further, all Representative Scenarios could be affected by the RMPP and thus do not accurately assess cumulative conditions.

Other technical issues with the representative scenarios that were used are listed below. In addition to the issues noted, all of these scenarios assume bus routes that are undefined and do not correspond to claims of travel time estimations. In giving alternative travel options (public transport, bus, etc.), far more specificity is needed as to which specific routes will yield equivalent or less travel times.

#### **Scenario Description 2**

- The map is inaccurate and shows a trip from Rivergrove to Oregon City, not Tualatin to Oak Grove.
- There is direct transit that should be added, and it would require 1 hour and 52 minutes to make the trip.

### **Scenario Description 3**

- The scenario describes going to a farm outside of Oregon City, but the map shows traveling to the hilltop/central Oregon City.

### **Scenario Description 4**

- This scenario does not travel through the toll corridor.
- The scenario indicates that there would be no difference in travel time between Wilsonville and Portland between Existing Conditions and the year 2045. Also, this would indicate that the tolling on I-205 has no impact to travel time on I-5. Are these conclusions accurate?
- The assumed toll-free travel route does not align with plausible navigation decisions.

### **Scenario Description 5**

- This scenario does not travel through the toll corridor.
- The scenario describes a student living in SE Portland, but the map has the person traveling from Clackamas Town Center, which is in unincorporated Clackamas County (likely with a Happy Valley zip code).
- The travel time range of 1-2 hours is extremely large in comparison to the “minute” of travel time savings for automobiles using the freeway.
- The trip cannot be done as described. The assumed toll-free travel route does not align with plausible navigation decisions.

### **Scenario Description 6**

- The map does not display a trip from Rivergrove to Oregon City; it shows a trip from Tualatin to Oregon City.

### **Scenario Description 7**

- How would the No Build Alternative increase travel time by 10 minutes at 11 PM?

### **Scenario Description 12**

- The map is incorrect and does not match the scenario description.
- McLoughlin Promenade is located in Oregon City, not Gladstone.

### **Scenario Description 16**

- The toll path under this scenario does not provide an improved travel time.

### **Scenarios 9, 10, 11 and 15**

- The assumed toll-free travel routes do not align with plausible navigation decisions.

The Social Resources and Communities Technical Report (EA Appendix I), Section 7 discusses short-term and long-term impacts.

- The impacts of tolling and congestion pricing happen immediately and in the near term. All of the items listed in Section 7.2 need to be incorporated into Section 7.1 Short Term Impacts.
- When describing long-term impacts in Avoidance, Minimization, and/or Mitigation Commitments in both the Social Resources and Communities Technical Report

(Appendix I of the EA, pages 57-58) and Environmental Justice Technical Report (Appendix J of the EA, pages 50-51), three different options are summarized for how the Oregon Transportation Commission (OTC) will develop the Low-Income Toll Program.

Those options range from:

- (1) toll discounts and exemptions;
- (2) providing focused discounts for more specified demographics based on specific income levels, and
- (3) using a verification process that leverages existing low-income service programs or exploring self-certification to qualify for enrollment.

These options need to be exercised as early as possible in the pre-completion tolling period to allow efficient and measured pre-implementation and implementation of one or more of the OTC's Low-Income Tolling options. The report does not provide a realistic timeline of preparing for option three, in particular. We strongly recommend that the OTC give as much time and resources to existing low-income service programs to help implement a feasible verification process.

There was no discussion about the disproportionate impact on populations relying upon transit, and the lack of transit resources within and through the corridor. Also, the lack of other complete bikeways through the corridor limits the fare-free options for people who do not drive. While the low-income toll program addresses the disproportionate burden on low-income populations, the Project is not making any significant improvements to transit or bikeways which could be alternative modes for people taking trips through the corridor. In the Cumulative Impacts Technical Report (Appendix Q of the EA), there is a continued reliance upon the RFFAs to provide the benefits for cyclists and pedestrians.

Social services are offered during business hours, which are during peak travel times. The cost to get to appointments will not lessen if people receiving the services have to pay the tolls or take alternative routes. Instead the time to get to appointments and cost will increase, adversely impacting those individuals even more.

How will penalties impact those who can least afford tolling and how might those create further financial hardships?

While the EA states that "ODOT is prioritizing equity throughout the Project development process" (EA page 1-6), the Project fails to achieve equity-related goals for historically underserved and disproportionately affected communities.

- The Project does not increase access to job centers or other important community centers. In fact, it would represent a new financial burden through use of a toll path, or reduced access through a longer, more congested, and less safe non-toll path.
- The Project shifts air quality effects from I-205 to surrounding communities.
- The Project may negatively impact local businesses in underserved communities.
- The Project does not enhance or expand multimodal transportation choices.

## Land Use

The Land Use API needs to be expanded to include areas of significant diversion and mitigation. For example, Willamette Park and Fields Bridge Park should be considered as they will be impacted by diversion.

We are concerned with the compliance/consistency analysis for following items:

- Oregon Highway Plan (OHP) Policy 1F and Policy 1G Action 1G 1
- Oregon City Transportation System Plan
- West Linn Comprehensive Plan Goal 12, Chapter 2 *Goal 4: Maintain, protect and improve the existing transportation system*
- Stafford Hamlet Community Vision – Goal to Minimize additional traffic and infrastructure impacts

There is no discussion of compliance or consistency with OHP Tolling and Congestion Pricing Policy Amendment, which was adopted by the OTC on January 12, 2023. Goal 6 supports investments in multimodal access and addressing impacts to neighborhood health, safety and congestion.

The Land Use review only takes into account areas within 100 feet of I-205. The land use impact of the diversion on to the local roads is not taken into account. Land use review should be conducted along all of the primary diversion routes that will have an increase in daily traffic volume due to the implementation of tolling.

Land use for the Stafford area is guided by a 3-party agreement which allows for the cities to begin concept planning the area for urban uses upon completion of the improvements along I-205. The land use discussion should analyze the indirect growth-inducing impact of urbanization of the Stafford area which will be caused by the Project.

The Oregon City Arch Bridge should also be evaluated as a 4(f) resource in the land use section. Before approving a project that uses Section 4(f) property, FHWA must determine that there is no feasible and prudent alternative that avoids the Section 4(f) properties and that the project includes all possible planning to minimize harm to the Section 4(f) properties. The Project will result in the increased use of the Arch Bridge (a 40-50% increase in daily volumes), and feasible and prudent alternatives must be further evaluated. A managed toll lane or alternative non-toll funding sources are feasible and prudent alternatives.

The EA should disclose if any County planning permits are required as a part of the Project or mitigation. County right-of-way (ROW) permits will be required for mitigation projects in County ROW.

## Historic and Archaeological Resources

The historic and archaeological API should be expanded to include areas of significant traffic diversion, as well as transportation mitigation measures that would involve visual changes or ground disturbing activities. Due to the narrow nature of the API for the Historic and Archeological Resources section, the report does not address the impact to the extremely important resource of the historic Highway 43 Arch Bridge which connects Oregon City and West Linn. It will be the only toll-free crossing option between Oregon City and West Linn with the implementation of tolls and congestion management. The County requested a discussion of the issues related to the Arch Bridge and the condition of the bridge in our September 15, 2022 comment letter on the Draft TTR.

The Oregon City-West Linn Pedestrian Bridge Concept Plan report outlines the historic significance of the bridge, as well as the need for improvements to the pedestrian and bikeway access in this area.

Figure 5-11 in the TTR specifically identifies an expected increase of 40-50% in daily volume of traffic across the Arch Bridge. There needs to be greater detail provided on impacts of the increased daily volume on this resource, as well as the impact of this increased volume on the local circulation in downtown Oregon City. While there may be existing or cumulative capacity issues with the Arch Bridge, an increase of 40-50% would mean the Project contributes significantly to a cumulative impact. If there is no feasible mitigation to bring conditions to an acceptable level of service, an EIS should be prepared rather than a FONSI.

## Biological Resources

The EA does not disclose the potential secondary impacts from mitigation on vegetation, wildlife, wetlands, and water resources. The EA should describe which mitigation measures would require work outside of the developed right-of-way and whether these measures would impact biological resources. Proposed mitigation includes roundabouts which could impact undeveloped areas next to the right-of-way.

## Public Involvement / Agency Coordination / Consultation

The 60-day public comment period provided by ODOT was woefully insufficient for the public to review and evaluate 3,000 pages of text and several very complicated models. While shorter public comment periods may be the standard practice in other states where tolling is normalized, this will be Oregon's first toll program in the Portland metropolitan area and the first toll program in the State applied to roadways, not just bridges. It is imperative that it is done correctly. Indeed, the public engagement report only details a 10-week period from August 3rd to October 15, 2021 and no other public engagement before and after that period. Instead, ODOT is rushing to implement a project that is based on inadequate and deficient data and analysis, significantly increasing the likelihood ODOT will make mistakes that will negatively affect the communities we are elected to represent for years to come. Thus, it would be

appropriate and prudent for ODOT to extend the public comment period, as is allowable under the NEPA regulations.

Further, governmental agencies and the public experienced several roadblocks that inhibited their ability to review and comment on the EA. For example, the EA, appendices and associated materials were initially published only in English and translated materials were not available for several days. The public engagement report notes that outreach included “[d]istributing flyers containing information about the Project and the comment period in English and Spanish to the Borland Road Free Clinic and Tualatin School House Food Pantry along I-205.” ODOT should have distributed flyers to sites in West Linn, Oregon City, or other portions of Clackamas County.

The public hearings and public in-person information sessions were poorly publicized and held during typical working hours. Particularly underserved communities cannot take time off of work and risk lost income to attend these informational sessions. Additional informational sessions on the EA should be held outside of normal office hours, particularly in areas of environmental justice concern.

## **V. Conclusion**

The full extent of environmental impacts from the Portland Metro Area Value Pricing Project (or the first phase of the Oregon Toll Program) needs to be evaluated. We must understand the combined impacts of tolling on I-205 and the RMPP to enable the development of appropriate mitigation and informed decision making. The County cannot afford to invest in mitigation projects only to find out that the RMPP makes them stranded investments, or simply the wrong investments. The County has raised this and other key issues throughout the process, yet these concerns remain ignored.

At this time, it is essential that a FONSI is NOT issued, and that ODOT/FHWA be required to complete an EIS. The EIS should include the information that has been identified as missing or needed to supplement the current analysis. Substantial new technical information and analysis is needed to truly understand the impacts of the Project and required mitigation – this includes, but is not limited to:

- Modeling the impacts of implementing the RMPP at the same time as I-205 tolling
- Modeling the impacts of pre-completion tolling (with and without the RMPP)
- Fully evaluating and modeling an alternative with a completed six-lane facility and no tolling

We look forward to receiving your response to our comments and would welcome an opportunity to discuss our concerns further with key ODOT representatives. Our goal is to partner with ODOT to provide for the safe travel of all of our residents, businesses, visitors, and the movement of freight, regardless of the facility that people use to move within and to/from the County and our local cities.



**ODOT I-205 Toll EA - RECORD #2838 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Cody  
**Last Name :** Field  
**Affiliation :** City of Tualatin  
**Submission Method :** Letter  
**Q3. Comments :** Good morning,

Attached to this email, please find comments on behalf of the Tualatin City Council on the I-205 Toll Project Environmental Assessment. Please let us know if you have any questions.

Thank you,

**Attachments :** 2023\_0421\_I-205\_EA\_Tualatin.pdf (1 mb)



April 21, 2023

Mandy Putney  
Oregon Department of Transportation  
Urban Mobility Office  
355 Capitol Street NE, MS 11  
Salem, OR 97301

*Via Email*

**RE: City of Tualatin comments on the I-205 Toll Project Environmental Assessment (EA)**

Dear Ms. Putney:

On behalf of the City Council of Tualatin, we appreciate the opportunity to comment on the I-205 Toll Project Draft Environmental Assessment (EA). Our community lies within the area of potential impact (API) for both the I-205 Toll Project and the Regional Mobility Pricing Project (RMPP), therefore tolling and congestion pricing are major issues of concern for our residents and businesses. Tualatin's elected officials and city staff have followed the regional tolling discussions closely over the past several years and have stayed in frequent communication with ODOT and with other impacted jurisdictions. After review of the Draft EA and in conversation with regional partners, we have identified several serious concerns with the analysis presented in the EA, which are outlined below:

**Diversion resulting from the I-205 Toll Project will significantly impact the safety, livability, and economic vitality of our Community.** The EA analysis showed significant amounts of traffic currently on I-205 would instead use local roads to get around the tolls, resulting in significant impacts to our city and the communities around us. Tualatin is already experiencing the impact of drivers rerouting onto local arterials to avoid traffic on the freeway, particularly on SW Borland Road.<sup>1</sup> ODOT's analysis identifies multiple intersections in Tualatin that will not meet standards under the Build Alternative in either 2027 or 2045, indicating that the I-205 Toll Project will only exacerbate an existing problem. There are likely additional roadways and intersections that ODOT did not analyze that will fall below standards after the implementation of tolling. This lack of proper analysis of these significant unmitigated impacts will have very real consequences for our community.

It is common knowledge that traffic on local arterials is much more dangerous than freeway traffic. Analysis shows that there are 8.4 serious crashes (crashes with fatal or Injury A classifications in ODOT crash data) per 100 million vehicle miles on arterials compared to only 1.6 serious crashes on the freeway.<sup>2</sup> ODOT has confirmed these safety issues in their own analysis.<sup>3</sup> Each driver rerouting onto a local road to avoid a toll is six times more likely to cause a serious crash. Based on the estimates in the

---

<sup>1</sup> I-205 Toll Project Environmental Assessment, Oregon Department of Transportation, February 2023, page 3-1

<sup>2</sup> Regional Transportation Safety Plan, Oregon Metro, May 11, 2012, p.24

<sup>3</sup> 2020 State Highway Crash Rate Tables, Oregon Department of Transportation, May 2020, p. 10, [2020 State Highway Crash Rate Tables \(oregon.gov\)](https://www.oregon.gov/ODOT/Programs/Planning/2020%20State%20Highway%20Crash%20Rate%20Tables)

EA, it is anticipated that the additional traffic diverting onto local roadways would result in several additional fatal and serious-injury crashes in our communities each year. This far outweighs any safety benefits that would be realized on I-205, and presents a significant impact that is directly opposite to the stated purpose and need of this project.

Additionally, the increase in traffic will cause delays to emergency vehicles attempting to access local hospitals. Tolling would cause significant diversion of traffic along 65<sup>th</sup> Avenue and Borland Road, and through their already-congested intersection, impeding emergency vehicles traveling to and from Legacy Meridian Park Hospital, the only hospital in Tualatin and one of few major hospitals in this part of the region.

Our residents and businesses have expressed concerns about the many ways tolling will impact the livability of our city. Diverting traffic will make our local streets less walkable and less bike friendly, two transit modes that ODOT has suggested will help mitigate diversion. As the diverted traffic makes our streets scarier and increases actual crash rates, fewer people will choose to walk or bike in this area, and many will choose to drive instead, shifting more mode-share to motor vehicles, thus another significant impact and effect of tolling that is contrary to the purpose and need of this project.

The significant diversion around tolls on I-205 would also go through the Stafford/Borland area, which consists of Urban Reserve land likely to develop in the future. Regional planning for this area envisions fairly dense communities with an emphasis on walking and biking for local trips. Traffic diverting around tolls and/or congestion on I-205 would use the major streets through these communities. This would be a significant impact to walking and biking and quality of life in these future communities.

The EA did not demonstrate that tolling would shift travel mode for a significant number of people, and thus did not demonstrate it would accomplish a key element of the purpose and need of the project. In fact, considering the EA analysis and the anticipated effects of tolling on communities, tolling on I-205 would likely decrease walk/bike mode share and push more people to motor vehicles, contrary to the goals of this project. The EA modeling also shows more traffic using longer and increasingly congested diversion routes, meaning that tolling would actually increase vehicular emissions and their resulting impact on climate change. We share Clackamas County's concern that diverted traffic will increase the mobile source air toxins along local roads and will ultimately contribute to climate change and risks to public health.<sup>4</sup> Unfortunately, the Draft EA does not adequately address these concerns.

Tualatin has very few public transit routes that offer a viable alternative to driving, and there is no existing TriMet route parallel to the I-205 corridor. The diversity of origin and destination locations makes this area difficult to effectively serve with transit. The lack of viable transit options makes it infeasible to achieve the hoped-for transit ridership.

The Environmental Analysis process did not provide adequate opportunities for and/or did not adequately consider comments from our agency, other agencies, and the public. While many meetings were held, they were largely the ODOT project team disseminating information. Public and/or agency feedback was often confined to specific topic areas without addressing the real big picture questions. While our citizens and staff raised many questions and issues, and project team staff may have had their ears open, we find little evidence of these comments affecting the EA in substantive ways.

Furthermore, diversion caused by tolling creates a serious equity issue. Many working-class, lower income and BIPOC community members rely on services along Borland Road like the Borland Free Clinic

---

<sup>4</sup> I-205 Toll Project Environmental Assessment Findings Technical Letter, Clackamas County, April 19, 2023, p. 24 - 28, attached as Appendix A.

and the Tualatin Food Pantry. These locations will become much harder to reach when drivers begin using Borland Road significantly more as a diversion route. ODOT claims to have prioritized equity throughout the process; however, the inequities of the I-205 Toll Project are clearly stated in the EA document: “...under the Build Alternative in 2027 and 2045, some traffic would reroute to local streets in order to avoid tolls, resulting in **potential adverse effects for areas with higher concentrations of environmental justice populations in Canby and Tualatin**, as well as environmental justice populations traveling to a hub of social resources in Oregon City.”<sup>5</sup> The public engagement process also did not provide adequate opportunities for members of the public, including equity communities, to provide feedback on these impacts. The City of Tualatin submitted a letter requesting additional public engagement opportunities after release of the EA to no avail.

The economy in Tualatin will also suffer from the I-205 toll project, despite assertions that the Build Alternative will have “cumulative positive economic effects.”<sup>6</sup> Tualatin’s City Council and staff have heard many concerns from our business community regarding the potential impacts of tolling. The cost of tolls for businesses that depend on freight movement and shipping will ultimately be passed down to consumers. This troublesome externality is paid little-to-no attention in the Draft EA, in an obvious effort to downplay the negative economic impacts of the I-205 toll project. Additionally, many employees may choose to stop commuting to their jobs in Tualatin due to freeway tolls and/or local traffic caused by diversion. This will ultimately put even more strain on an already delicate labor market. Tualatin is home to several major employers that rely on our transportation system such as Lam Research, Legacy Meridian Park Hospital, Pacific Foods, Milgard Windows, UPS, and Amazon. The short-term increase in construction jobs created by the I-205 toll project will not balance out the long-term economic effects to communities like Tualatin.

**The mitigation measures proposed in the Environmental Assessment are insufficient.** As noted above, Tualatin is one of the communities that will experience increased traffic rerouting to local roads to avoid tolls. ODOT studied a limited number of intersections within the City and identified three key intersections that will perform worse under the Build Alternative in either 2027 or 2045. We do not agree that ODOT’s proposed mitigation measures in the Draft EA sufficiently address the level of traffic and safety concerns that will occur as a result of the I-205 Toll project. The EA identified unacceptable traffic operations at the intersections of Nyberg Street with both the Northbound Ramps of Interstate 5 and the Southbound Ramps of Interstate 5, and that tolling on I-205 would add significant traffic, making congestion significantly worse at both of these ramp intersections. However, no mitigation measures are identified for either intersection. The EA also identified significant additional traffic at the 65<sup>th</sup>/Borland intersection (next to Legacy Meridian Park Hospital) and, while a mitigation measure to add a northbound right turn lane is proposed, there would likely be several years of significant impact before it is constructed. The analysis did not show it fully addressed the impact. This project as proposed would actually increase traffic congestion in this part of the region, which is the opposite of its purpose and need.

We also have serious concerns about how ODOT will fund the necessary mitigation measures identified throughout the region. ODOT’s Level 2 Traffic and Revenue study (T&R Study) determined that the “forecasted I-205 net toll revenues would finance \$500-800 million construction funding from toll bonds.”<sup>7</sup> This amount of revenue cannot sufficiently fund construction of the project and administration of the program in addition to funding mitigation measures. We remain concerned about the lack of transparency around how mitigation measures will be funded. As Clackamas County emphasizes in their

---

<sup>5</sup> I-205 Toll Project Environmental Assessment, p. 3-93

<sup>6</sup> I-205 Toll Project Environmental Assessment, p. 3-125

<sup>7</sup> Fact Sheet: I-205 Toll Project Level 2 Toll Traffic and Revenue Study, Oregon Department of Transportation, December 16, 2022; page 4

technical letter, many of the proposed mitigation measures are vague with respect to timing, and other logistical details, rendering them unenforceable. Additionally, many of the mitigation measures are technically infeasible.

While the EA contemplates implementing tolling before completing the widening of I-205, ODOT did not analyze a scenario in which tolls are in place but I-205 remains largely in its current configuration. With the EA-listed cost of the projects and anticipated revenue it could be a decade or more after tolls are in place before the I-205 construction project is complete. The EA does not contemplate the significant impacts of tolling and significant impacts in our communities in this scenario with the freeway project not completed.

The EA was defined in such a way that tolling was the only option considered in the analysis. Other options, such as funding the I-205 project with other means (either existing or increased funding sources such as gas tax, vehicle-mile tax, vehicle registration fee, etc., or new funding sources), or tolling only the new third lane (perhaps while allowing high-occupancy vehicles) were not considered. Other concepts suggested by agency staff, such as revised toll locations to reduce diversion, were likewise not considered. This process did not follow NEPA requirements in that alternative options were never really considered.

The proposed toll project would have massive initial costs to construct the tolling infrastructure and develop the tolling program. It would necessitate many millions in ongoing costs to administer the program, work out its specifics, collect revenue, follow-up on unpaid tolls, establish any discount programs for lower-income or other qualifying people, deal with the inevitable legal issues, and all the other unforeseen costs of running a major program like this. These public dollars would be much better spent funding the I-205 project through existing, expanded, or alternative funding sources.

**The cumulative impacts of the I-205 Toll Project and the Regional Mobility Pricing Project (RMPP) will adversely affect Tualatin.** We disagree with ODOT's decision to segment the Portland Metro Area Value Pricing Project into smaller components. Analyzing the I-205 tolling project without considering the RMPP is shortsighted and does not take into account whether proposed mitigation measures identified in the Draft EA will sufficiently address the increased diversion from the RMPP. We believe that both projects must be analyzed together to accurately assess the impact of region-wide tolling. If ODOT and Metro are confident enough to propose and include the RMPP in the 2023 Regional Transportation Plan update, ODOT needs to consider it a Reasonably Foreseeable Future Action for the purposes of the Draft I-205 EA.

Finally, we feel that ODOT relied on faulty modeling in the Draft EA. Rather than modeling an actual toll and how it would affect people's decisions and travel patterns, the modeling uses a simulated delay that is estimated to approximate the effects of tolling. This means that all of the modeling in the EA is built upon a guess that a certain number of minutes of additional delay would be roughly equivalent to the amount of toll implemented. The accuracy, or inaccuracy, of this guess is perpetuated throughout the thousands of pages of analysis based upon it. Simulating the effects of a toll by equating it to a specific traffic delay does not accurately capture the behavior of drivers that are not accustomed to tolling.

We agree with the specific objections and technical concerns raised by Clackamas County in their response letter, and incorporate that letter herein by reference.

In conclusion, tolling of Interstate 205 between Tualatin and Oregon City would have significant impact on our community, our citizens, our employees, and the environment. These significant impacts cannot be mitigated, or would not be mitigated, with this proposal. Therefore, a Finding of No Significant

Impact (FONSI) must not be issued for this project. While the proposed improvement of I-205 is sorely needed, it should be funded through existing and alternative sources, rather than implementing a tolling program against the will of the people with significant unaddressed impacts.

Sincerely,

A handwritten signature in blue ink that reads "Frank Bubenik". The signature is fluid and cursive, with the first name "Frank" being larger and more prominent than the last name "Bubenik".

Frank Bubenik  
Mayor, City of Tualatin  
On behalf of the Tualatin City Council

CC: Kris Strickler, Oregon Department of Transportation  
Keith Lynch, Federal Highway Administration  
Thomas Parker, Federal Highway Administration  
Senator Rob Wagner  
Representative Jules Walters  
Brendan Finn, Oregon Department of Transportation  
Rian Windsheimer, Oregon Department of Transportation  
Lynn Peterson, Metro Council President  
Gerritt Rosenthal, Metro Councilor, District 3  
Tualatin City Council

Attachment:

- Clackamas County Board of Commissioners letter and Staff Technical letter



Mandy Putney  
Oregon Dept. of Transportation  
355 Capitol Street NE  
Salem, OR 97301  
*Via email*

April 19, 2023

Dear Ms. Putney:

Thank you for the opportunity to provide comments on the I-205 Toll Project Environmental Assessment (EA). Clackamas County would like to take this opportunity to once again reiterate its **request for a 30-day extension** to the public comment period as the current 60-day period is insufficient for review of the EA, which contains over 2,000 pages of analysis that needs to be carefully reviewed.

Despite the short amount of review time available, the County has identified serious procedural concerns and deficiencies in the EA that can only be fully addressed through the **completion of a comprehensive Environmental Impact Statement (EIS)**.

An overview of our concerns with the draft EA is included below. More detailed comments can be found in the attached technical letter. The County also joins in and concurs with the substantive comments and the technical reports submitted by other governmental entities, including but not limited to the City of West Linn, the City of Oregon City, the City of Canby, the City of Lake Oswego, and the City of Tualatin.

1. This project would cause significant impacts due to diversion of traffic onto County and City roadways.
  - The proposed tolling would shift trips off I-205 onto the local system, resulting in significant safety and congestion impacts that ODOT is unable to mitigate below the level of significance.
  - The EA acknowledges that the project could cause as much as 50% of the current afternoon peak period traffic to reroute to local streets.

- Impacts caused by the proposed project are in addition to those already occurring in this area due to the existing bottleneck on the freeway.
  - Additional analysis is necessary to evaluate the difference of impacts between I-205 widening with tolling and widening without tolling.
2. Increased traffic volumes on the local system would cause high levels of traffic stress for people walking and rolling along County and City roadways.
- The EA documents that impacted roadways do not have adequate vehicular capacity, intersection control, or pedestrian or bicycle facilities to address the increases in congestion, or the impacts to safety that this project presents to people walking and rolling. Currently, the EA does not propose adequate mitigation for these impacts.
3. Tolling will not change people's travel modes.
- Clackamas County and our cities lack viable alternatives to car travel such as transit. This means that people would not be able to consistently utilize other travel modes that reduce greenhouse gas emissions. ODOT is not proposing mitigation to address the lack of transit or the lack of a complete protected bikeway path through the tolling corridor; as a result, vehicular miles traveled would not be reduced under the Project as suggested in the EA, but rather shifted to the local roadway network. Additionally, because the diversion routes are longer and will be more congested, vehicular hours traveled would also not be reduced under the current proposal.
4. Mitigation measures proposed in the EA are inadequate and lack commitment.
- The mitigation measures proposed are poorly defined, unenforceable, and unlikely to be constructed.
  - The proposed transportation "monitoring program" is undefined and therefore we are unable to evaluate its effectiveness.
  - In short, we have no confidence that the significant negative impacts of the project can or will be adequately mitigated or that the suggested mitigation will be constructed in time to prevent significant impacts when tolling is scheduled to begin.
5. The EA lacks analysis of the impacts of pre-completion tolling.
- The project asserts that tolls would be initiated prior to construction of the third lane of I-205 yet provides little to no analysis of the impacts of tolling before the



third lane is added. This is an unacceptable significant impact that will be experienced by the region for years and an example of the inadequacy of the current analysis and proposal.

6. The local economy would be significantly, negatively impacted by the Proposal.
  - The proposed project would negatively impact our local economy, which is contrary to the assertion by ODOT that the additional traffic and congestion on the local system would improve business conditions. Like most of the EA, the benefits and impacts are improperly focused on I-205 while ignoring impacts to local communities. More localized analysis must be completed to understand the true impacts to our communities and local economy.
7. This project would significantly impact low-income residents, seniors, and other vulnerable populations.
  - The current proposal would force vulnerable residents either to devote needed income to tolling or travel on more congested local routes because the Low Income Toll program is too restrictive in who it serves.
  - As mentioned previously, increased traffic on local roads would significantly reduce safety for travelers on these roads, and lower-income residents may be the most likely to take transit or alternative modes. Therefore, the project would hurt the most vulnerable of our community in multiple ways – by impacting their budget, their time, and their health.
8. The cumulative impacts of I-5 and I-205 Tolling must be evaluated.
  - It is critical that an EIS be required to evaluate the cumulative impacts of the Regional Mobility Pricing Project (“RMPP”) and the I-205 Tolling project. The current EA provides an improperly narrow assessment of the I-205 project under an unlikely set of assumptions and essentially ignores the RMPP, which is anticipated to commence within a year of the I-205 project. As a result, many of the impact conclusions and mitigation requirements described in the EA could be invalid.
  - The EA does not meet NEPA’s requirement to provide the full picture of implications, environmental consequences, viable alternatives, and mitigation solutions associated with ODOT’s plan to implement tolling more broadly in the Portland Metro area, and instead only looks at a small isolated piece of the larger project. The preparation of separate staggered EAs for projects related in proximity, timing, and administration is an inefficient use of local, State, and federal resources.

As a participating agency, we firmly believe that the EA does not currently support a Finding of No Significant Impact (FONSI). Instead, the County urges the Federal Highway Administration to direct ODOT to proceed with an Environmental Impact Statement (EIS) for this project, combined with the RMPP, to address the deficiencies and issues identified above and in the attached technical letter.

Thank you for your consideration.

Sincerely,

Clackamas County Board of Commissioners



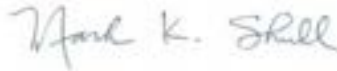
Tootie Smith, Chair



Commissioner Paul Savas



Commissioner Martha Schrader



Commissioner Mark Shull



Commissioner Ben West

CC: Kris Strickler, Oregon Department of Transportation  
Keith Lynch, Federal Highway Administration  
Metro Councilor Juan Carlos Gonzalez, JPACT Chair  
Oregon Congressional Delegation  
Oregon State Legislators  
Metro  
City of Canby  
City of Lake Oswego  
City of Oregon City  
City of Tualatin  
City of West Linn

# **Comments on the I-205 Toll Project Environmental Assessment**

Prepared by Clackamas County Department of Transportation and Development

April 12, 2023

# Contents

I.	Introduction .....	1
II.	Overall Issues .....	2
	ODOT and FHWA should proceed with an EIS.....	2
	ODOT should conduct a tiered environmental review of regional congestion projects. ....	5
	The RMPP is a reasonably foreseeable project that needs to be analyzed prior to making a decision regarding tolling on I-205. ....	6
	The Project does not meet the stated Need.....	7
	The Purpose Statement is so narrow that it eliminates the possibility of reasonable alternatives.....	7
	The Project does not meet the stated Goals and Objectives. ....	8
	The Project is a moving target.....	9
	The local community should not be forced to pay for the maintenance of a State facility. ....	10
	The Project should be revised to eliminate pre-completion tolling and nighttime tolling. ....	10
	Pre-Completion Tolling .....	10
	Nighttime Tolling .....	11
	The Project EA cannot result in a FONSI because the mitigation measures are unenforceable and unlikely to be performed. ....	12
	The monitoring program is a prime example of unenforceable mitigation.....	12
	The indirect or secondary impacts of mitigation have not been analyzed.....	13
	Agencies and the public did not have sufficient opportunity to review or comment on the Project. ....	13
III.	Detailed Transportation Comments .....	14
	Significant Diversion of Traffic Volumes to County and City Facilities .....	14
	Unmitigated Safety Impacts .....	16
	Borland Road Corridor.....	17
	Stafford Road Corridor.....	18
	Rosemont Road Corridor.....	18
	Canby/I-5 Corridor .....	19
	Unmitigated Congestion Impacts .....	20
	High Levels of Traffic Add Stress for People Walking and Rolling .....	20
	Tolling is Not Shifting Travel Mode.....	21
	Lack of Commitment to the Mitigation Measures .....	22

Truck Traffic on Local Roadways .....	23
Reasonably Foreseeable Future Actions in the Project Corridor Should be Part of Mitigation .....	23
IV. Other Topical Issues .....	24
Air Quality .....	24
MSAT Analysis .....	24
Cumulative MSAT Analysis .....	26
Geographic Boundary of MSAT Emissions Analysis .....	26
Other .....	26
Climate Change .....	27
Noise .....	29
Social Resources and Communities / Environmental Justice .....	30
Land Use .....	34
Historic and Archaeological Resources .....	35
Biological Resources .....	35
Public Involvement / Agency Coordination / Consultation .....	35
V. Conclusion .....	36

# I. Introduction

Clackamas County (County) appreciates the opportunity to offer comments and questions on the *I-205 Toll Project Environmental Assessment (EA)*, as issued by the Oregon Department of Transportation (ODOT) and the Federal Highway Administration (FHWA) in February 2023.

As indicated in the County's requests for extensions, a 15-day extension was insufficient considering the EA relies on thousands of pages of supporting appendices and other documents. While we have identified many serious issues with the EA's analysis within the constrained comment period, the County and partner agencies could have provided a more thorough review with the additional time requested. As such, this letter should not be viewed as outlining every example of the EA's deficiencies, including unmitigated impacts. Rather, we are providing a multitude of examples which support the fact that additional analysis and information is required, particularly surrounding safety, diversion, and mitigation concerns.

**Safety:** The County is concerned with the safety of the entire regional transportation network, including non-highway roadways. While increased safety and decreased congestion are included in the purpose and need, the Project fails to meet this need as the Project will, in fact, *decrease* safety and *increase* congestion on local roadways. Further, the County found several examples in the EA of unmitigated safety impacts for vehicles, cyclists, and pedestrians.

**Diversion Impacts:** Based on our review, the EA does not take a "hard look" at the environmental consequences of diversion from I-205 onto County and city roadways. The EA fails to adequately analyze the impacts to the local community that will bear the burden of increased diversion. While the definition of the study area includes the local roadways and communities that would experience diversion, in many cases there is no meaningful analysis of localized impacts. This is especially true regarding impacts associated with transportation, air quality, and noise.

**Mitigation Measures:** The proposed mitigation measures are problematic on many levels.

- Mitigation measures are vague with respect to timing and other logistical details, rendering them unenforceable.
- The EA does not establish that the mitigation measures offered reduce all of the significant impacts of the Project to a level that would warrant a Finding of No Significant Impact (FONSI).
- The EA fails to disclose the conditions of the roadway network with mitigation. As a result, local agencies have no idea whether the proposed mitigation measures will address the identified significant impacts within their jurisdictions. The burden of analysis of the environmental impacts of the I-205 Toll Project and the Regional Mobility Pricing Project (RMPP) is on ODOT and FHWA, not local agencies.

**Pre-Completion Tolling:** Pre-completion tolling should be removed from the Project or the impacts should be fully analyzed. Due to pre-completion tolling, local communities will be significantly impacted for a number of years before mitigation is implemented. To address the issues of pre-completion tolling the EA states “any mitigation proposed to address near-term impacts that is determined to help alleviate pre-completion tolling impacts could be implemented before tolling begins.” This fails to assess which measures are needed for pre-completion tolling impacts, who will decide which measures to implement and when. The EA should disclose which mitigation measures are needed to address the impacts of pre-completion tolling and when they will be implemented. The EA improperly defers this discussion.

**Cumulative Effects with RMPP:** In addition to the inadequacies in the analysis of the I-205 Tolling Project alone, the EA fails to analyze the cumulative effects with the RMPP. The cumulative or “combined” impacts of I-205 tolling and the RMPP need to be disclosed to allow for informed decision-making and full understanding of the scope of environmental consequences.

The County’s review has identified serious procedural concerns and deficiencies in the EA that can only be fully addressed through the completion of a comprehensive Environmental Impact Statement (EIS) for this Project. Preparation of an EIS will provide for more rigorous analysis of project alternatives, disclosure of cumulative and indirect effects, comprehensive mitigation planning, and public engagement opportunities. The EIS must analyze and disclose the full scope of environmental impacts from the I-205 Toll Project and the RMPP, which are collectively referenced within the current EA as the Portland Metro Area Value Pricing Project, or the first phase of the Oregon Toll Program (see page 1-2 of the EA).

ODOT states in the EA that they plan to issue a Revised EA (page 1-7 of the EA); however, agencies and the public are not guaranteed an opportunity to comment on a Revised EA. It would be unacceptable to release a “Finding of No Significant Impact” until ODOT and FHWA have shown that there will be no residual significant impacts from the Project.

## II. Overall Issues

ODOT and FHWA should proceed with an EIS.

As outlined in subsequent sections of this comment letter, there are significant, unmitigated environmental consequences associated with the Project. If an EA determines that the environmental impacts of a proposed Federal action will be significant, an EIS must be prepared.

Pursuant to FHWA's NEPA regulations, "[a]ctions that significantly affect the environment require an EIS." 23 C.F.R. 771.115(a). Section 771.115(a) incorporates the definition of "significant" from Section 1508.27 of the pre-2020 CEQ NEPA Regulations. While the CEQ NEPA regulations were amended in 2020 to, in part, remove the definition of "significant," FHWA has not amended its regulations since the 2020 amendments were implemented, and therefore the definition is still relevant to FHWA actions and guides ODOT's analysis of the impacts of the Project. As demonstrated below, the Project significantly affects the environment and should be analyzed in an EIS.

*§1508.27 Significantly. "Significantly" as used in NEPA requires considerations of both context and intensity:*

*(a) Context. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short and long-term effects are relevant.*

- As discussed throughout this comment letter, there will be significant and adverse short-term effects from pre-completion tolling and long-term effects from diversion which have not been sufficiently disclosed or mitigated.

*(b) Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action. The following should be considered in evaluating intensity:*

*(1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect will be beneficial.*

- While on the balance certain effects of the Project may be beneficial on I-205, there will be undeniable significant adverse local effects to communities from diversion to local roadways that have not been properly disclosed.

*(2) The degree to which the proposed action affects public health or safety.*

- As discussed further in this comment letter under the heading *III. Detailed Transportation Comments*, there are major public safety concerns for multiple modes of travel on local roadways. As discussed under the heading *IV. Other Topical Issues*, the localized impacts of air toxics and noise on public health have not been considered.



(3) *Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.*

- The effects of the Project on historic and archaeological resources and biological resources have not been fully evaluated along roadways experiencing significant diversion, nor have the secondary impacts of mitigation been evaluated on these resources. For example, the Project increases traffic volumes across the historic Oregon City Arch Bridge by 40-50%. The Bridge is not included in the Historic Area of Potential Impact or the discussion of 4(f) resources. See further discussion under the Historical and Archaeological Resources and Biological Resources subheadings under *IV. Other Topical Issues*.

(4) *The degree to which the effects on the quality of the human environment are likely to be highly controversial.*

- As noted in the Public Engagement Report for the EA, the Project is highly controversial with 60% of survey respondents disagreeing with the alternatives ODOT proposed for environmental review (Alternative 3/the Project and Alternative 4). Of those that disagreed, 52% strongly disagreed (page 40 of EA Appendix R) “ODOT acknowledges that most commenters who provided input during the comment period opposed the Project and tolling in general” (page 104 of Appendix R).

(5) *The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.*

- The project relies on highly uncertain future mitigation actions to mitigate significant impacts, most notably a long-term monitoring program. See further discussion under the subheading *The monitoring program is a prime example of unenforceable mitigation*.

(6) *The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.*

- This project is essentially the first phase of the Oregon Toll Program and Portland Metro Area Value Pricing Project. Given the interrelated diversion effects and associated mitigation, the I-205 Tolling and RMPP should be analyzed together as one project. See further discussion under the subheading *The RMPP is a reasonably foreseeable project that needs to be analyzed prior to making a decision regarding tolling on I-205*.

(7) *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.*

- The Portland Metro Area Value Pricing Project has been improperly segmented into smaller component parts: I-205 Tolling and the RMPP. By not assessing the effects of tolling I-205 and the RMPP, the cumulative significant impacts of the larger project have not been disclosed.

## ODOT should conduct a tiered environmental review of regional congestion projects.

CEQ's NEPA Implementation Regulations allow agencies to review national or regional plans using a "tiered" analysis wherein the agency (or agencies) first look at the broad impacts of large-scale programs or policies, and then use those studies to guide subsequent analyses for smaller individual projects that make up the larger program or policy. See 40 C.F.R. 1508.1(ff) (defining "tiering" as "coverage of general matters in broader environmental impact statements or environmental assessments ... with subsequent narrower statements or environmental analyses ... incorporating by reference the general discussions and concentrating solely on the issues specific to the statement subsequently prepared."); see also 40 C.F.R. 1501.11.

U.S. Department of Transportation guidance acknowledges the common practice of using a tiered EIS to evaluate the effects of tolling projects on a larger scale.<sup>1</sup> From the U.S. Department of Transportation's (DOT's) *Procedures for Considering Environmental Impacts* (DOT 5610.1C, emphasis added in bold):

*g. Tiering. Tiering of EISs as discussed in CEO 1502.20 is encouraged when it will improve or simplify the environmental processing of proposed DOT actions. Preparation of tiered EISs should be considered **for complex transportation proposals (e.g. major urban transportation investments, airport master plans, aid to navigation systems, etc.) or for a number of discrete but closely related Federal actions.***

In this instance, ODOT should prepare an EIS for the Portland Metro Area Value Pricing Project, or at a minimum evaluate both the I-205 Toll and RMPP projects cumulatively within their respective EISs, for the following reasons:

---

<sup>1</sup> U.S. Department of Transportation, February 2022; NEPA Reviews of Tolling and Road Pricing Projects Case Studies, page 6. Accessed at: [https://www.environment.fhwa.dot.gov/pubs\\_resources\\_tools/publications/case\\_studies/Introduction-NEPA\\_and\\_Tolling\\_Case\\_Studies.pdf](https://www.environment.fhwa.dot.gov/pubs_resources_tools/publications/case_studies/Introduction-NEPA_and_Tolling_Case_Studies.pdf)

- 1) There are significant impacts for which there are no feasible and/or enforceable mitigation measures. The I-205 Toll Project alone will result in significant and unavoidable impacts associated with diverted traffic. See further discussion under the heading *III. Detailed Transportation Comments*.
- 2) Since the Project is a large, complex transportation proposal and is closely related to another major federal action, namely the RMPP, it should be analyzed together with the RMPP under a single NEPA document.
- 3) The Portland Metro Area Value Pricing Project is controversial and affects millions of people in the region. The processing of the projects under separate EAs sets a dangerous precedent for FHWA that is counter to the purposes of NEPA.

**The RMPP is a reasonably foreseeable project that needs to be analyzed prior to making a decision regarding tolling on I-205.**

ODOT should have evaluated the cumulative impacts of the RMPP and the I-205 Tolling Project because the RMPP is a reasonably foreseeable action that will impact the local community.

Under CEQ regulations, an agency must evaluate the cumulative effects of a project, which are defined in the regulations as the “effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions” 40 C.F.R. 1508.1(g)(3). “Reasonably foreseeable” means “sufficiently likely to occur such that a person of ordinary prudence would take it into account in reaching a decision” 40 C.F.R. 1508.1(aa).

ODOT is incorrect to characterize the RMPP’s impacts as not “reliably quantifiable or quantified at this time” when environmental review for the RMPP has already commenced. ODOT/FHWA anticipate completing the environmental review of the RMPP within the year and implementing the RMPP within one year of I-205.<sup>2</sup> This analysis cannot be deferred to the RMPP environmental review process. Our review of initial modeling results from the RMPP indicates that there will be additional impacts to diversion onto local roads, possibly at different levels and in different locations than disclosed in the EA.

Without this cumulative assessment, the public and County have been deprived of the “big picture” in terms of real-world implications, environmental consequences, viable alternatives, and mitigation solutions. The impacts and mitigation associated with the projects are

---

<sup>2</sup> ODOT, 2023. RMPP Project Schedule. Available online at: [https://www.oregon.gov/odot/tolling/PublishingImages/I-5\\_I-205\\_Projects\\_TimelineNarrow\\_01.27.2023.jpg](https://www.oregon.gov/odot/tolling/PublishingImages/I-5_I-205_Projects_TimelineNarrow_01.27.2023.jpg)

interconnected and the full impact of both projects has not been discussed or disclosed in the I-205 Toll Project EA. The analysis of the two projects combined could completely alter the nature and severity of impacts and mitigation analyzed for I-205. As stated in our September 15, 2022 comments on the Draft Transportation Technical Report (TTR): “Traffic diversion will be different for I-205 versus I-205 and I-5. The traffic analysis is inherently flawed without looking at the broader tolling context as impacts may shift to other roads, worsen or make some current improvements unneeded.”

Either the RMPP should be evaluated in the cumulative analysis of the I-205 Toll EA or, ideally, ODOT/FHWA should prepare an EIS that fully evaluates both components of the Portland Metro Area Value Pricing Project. Analysis of both projects together will allow for a more comprehensive review of feasible alternatives, diversion impacts, and mitigation planning.

## The Project does not meet the stated Need.

The EA does not explain how the Project meets the Needs defined in Section 1.4 of the EA. The EA makes the assumption that the Project will improve congestion, resolve unreliable travel issues, increase safety, and reduce climate change impacts. In reality, the created diversion from the highway system onto local roadways will merely displace these issues. Further, the impacts and costs on local roadways and communities are not fully assessed or defined.

One of the fundamental needs for the Project is to improve transportation safety, which is not achieved. Overall, the Project does not increase safety for the region. The Project diverts traffic to local roadways that have greater safety issues than I-205 (see heading *III. Detailed Transportation Comments* discussion below).

“Critical Projects Need Construction Funding” is included within the Project Need statement (page 1-4 of the EA). While critical projects do need infrastructure financing, there are a variety of tools to access funding for this Project that do not involve tolling.

## The Purpose Statement is so narrow that it eliminates the possibility of reasonable alternatives.

The EA includes tolling on I-205 in the Project purpose statement which restricts the range of reasonable alternatives. Since many freeway projects throughout the country are funded without tolling, we do not believe that tolling is the only mechanism to fund these improvements.

The following guidance from *Linking the Transportation Planning and NEPA processes* is located in FHWA’s regulations:

“Consistent with NEPA, the purpose and need statement should be a statement of a transportation problem, not a specific solution. However, the purpose and need

statement should be specific enough to generate alternatives that may potentially yield real solutions to the problem at-hand. A purpose and need statement that yields only one alternative may indicate a purpose and need that is too narrowly defined.” 23 CFR Appendix A to Part 450.

The purpose and need statement for the Project has been designed to yield one solution. The problem is regional congestion on both I-205 and I-5, and thus the I-205 Toll Project must be analyzed with the RMPP project.

Reasonable alternatives that should be analyzed include a tolled/managed third lane only and funding from sources other than tolling. In fact, ODOT must analyze and disclose an alternative with construction of the improvements without tolling in order for agencies and the public to understand the effects of ODOT’s proposal. Alternative methods for pricing I-205 such as ramp tolling should be analyzed as one of the alternatives.

In addition, the elimination of pre-completion and nighttime tolling should be included for any toll alternatives, as discussed further under the subheading *The Project should be revised to eliminate pre-completion tolling and nighttime tolling*.

In a 2015 guidance document, FHWA cautions that even if there is a valid justification for eliminating non-tolled alternatives, it may be advisable to continue examining non-tolled alternatives if there is public opposition to tolls.<sup>3</sup> There is strong public opposition to the Project. As noted in the EA Public Engagement Summary, 60% of survey respondents disagreed with the alternatives ODOT proposed for environmental review (Alternative 3/the Project and Alternative 4). Of those that disagreed, 52% **strongly disagreed** (page 40 of EA Appendix R). In the Public Engagement Summary “ODOT acknowledges that most commenters who provided input during the comment period opposed the Project and tolling in general” (page 104 of Appendix R). The RMPP is similarly controversial. During public engagement on the RMPP, 70% of respondents disagreed (of which 59% **strongly disagreed**) with a minimum toll for any use of the highway (page 23 of the RMPP Spring 2022 Engagement Report).

## The Project does not meet the stated Goals and Objectives.

The EA provides no explanation as to how the Project meets the goals and objectives that were established through input with agencies, the public, and other stakeholders.

### **Goal: Provide benefits for historically and currently excluded and underserved communities.**

- How does the Project support equitable and reliable access to job centers, schools, and health care facilities? The Project is forcing Equity Framework Communities (EFC) and Environmental Justice (EJ) communities on the outskirts of the Area of Potential Impact

---

<sup>3</sup> FHWA, “Public–Private Partnership Oversight: How FHWA Reviews P3s” (Jan. 2015), p. 20.

(API) to either devote needed income to tolling or travel on more congested local routes. Due to the increases in traffic on local roads, these roads will actually be less safe for travel. EFCs and EJ communities do not have the luxury of being able to travel outside of peak hours to reach work, school, health care facilities or social services.

- How has the Project been designed to support travel options for excluded and underserved communities? The Project has been proposed in an area without reliable regional transit and bicycle facilities, and does not provide mitigation to fund development of these facilities.

**Goal: Limit additional traffic diversion from tolls on I-205 to adjacent roads and neighborhoods.** Alternatives 1 and 2 were not advanced in part because they would result in higher traffic volumes near Oregon City due to diversion. It is unclear how the Project lessens or avoids this issue. How has the Project been designed to limit rerouting from tolling and to minimize impacts on quality of life for local communities? Increased traffic and congestion on local roadways will worsen air quality, increase noise, and decrease safety on non-highway facilities as discussed throughout this comment letter.

**Goal: Support safe travel regardless of mode of transportation.** The EA focuses too heavily on I-205 benefits and does not disclose the anticipated increase in crashes on the non-highway system. Any conclusions regarding the perceived safety benefit on I-205 from the Project and local roadways from mitigation must also consider increased traffic/crashes on local roadways.

**Goal: Contribute to regional improvements in air quality and support the State's climate change efforts.** While congestion on I-205 would be improved, traffic and congestion would increase on non-highway facilities throughout the local community, meaning there would be even more motor vehicle emissions near residences, schools, parks, and other sensitive receptors. Such diverted traffic would travel at slower speeds than if it was on I-205 and the diversion routes are longer than I-205. Both of these factors would result in greater air quality impacts.

**Goal: Support regional economic growth.** How does the Project provide reliable and efficient movement of goods and people on local roadways experiencing diversion from tolling? The EA does not provide evidence that increased pass-through trips in the form of congested peak hour traffic on local roadways will benefit local businesses. Heavy traffic on local roadways would be a deterrent to retail customers, particularly during peak hours.

## The Project is a moving target.

The EA states that some of the mitigation “may” be incorporated into the project. “Chapter 3 describes potential mitigation measures that would reduce the effects of rerouting. These measures could become part of the Build Alternative” (page 2-7 of EA).

- How will this selection be made?

- Will these measures no longer be considered “mitigation measures” and instead become “project commitments”?
- Will the EA analysis be revised to incorporate these measures as part of the Project?

This seemingly innocuous statement fundamentally confuses the environmental review process -- the review of the Project itself -- and the comparison among alternatives. The EA should clearly distinguish what the Project is, what significant impacts would result, what feasible mitigation measures would be implemented for each alternative, who would implement/fund the mitigation measures, and the residual impact after mitigation.

## The local community should not be forced to pay for the maintenance of a State facility.

Why would tolls pay for maintenance? It is already an extra burden on users to pay for the improvement; why also make them pay for maintenance? No other area of the State pays extra to maintain the State facility in their neighborhood. ODOT has claimed that this makes the bonding more attractive to investors so they know the highway will be in good condition and people will want to use it. But it would be just as attractive for bonding if ODOT committed Statewide funding to keep it in adequate condition like every other mile of interstate in Oregon. This would be a double hit for the local population.

Also, there is no money being set aside for future mitigation projects. ODOT should pay for more local improvements, including maintenance of local roads that will be overloaded because of diversion.

## The Project should be revised to eliminate pre-completion tolling and nighttime tolling.

### Pre-Completion Tolling

For the I-205 Project, tolling is proposed to begin at the end of 2024/beginning of 2025, before the construction of the third lane is completed. To fully understand the impacts of pre-completion tolling and provide clearer information on which intersections and locations need immediate mitigation, a full modeling analysis needs to be completed of the impacts of applying tolling without the third lane on I-205, both with and without the implementation of the RMPP. ODOT has not addressed these concerns, which were raised in our September 15, 2022 comments on the Draft TTR.

The Project should allow for the completion of Phase 1A in 2025 and other local construction projects -- such as the Stafford Road/Childs Road roundabout scheduled to be under construction by Clackamas County during the pre-completion tolling period -- prior to tolling, so that the supporting local road system does not create additional construction bottlenecks on primary diversion routes.

There is a large temporal delay between when impacts will occur and when mitigation will be implemented. Due to pre-completion tolling, local communities will be significantly impacted for a number of years before mitigation is implemented. Neither the EA nor the Level 2 Toll Traffic and Revenue Study sufficiently address the timing of completion of mitigation. Most mitigation measures cannot be completed prior to construction as scheduled. As noted above, there will be local projects in the areas along critical routes that will not be completed and elements of the I-205 construction project itself (e.g., the required blasting) that will likely cause even greater diversion.

In the near term, pre-completion tolling will cause up to 30% of the trips that would have been on I-205 to divert onto local roadways during the years of construction. The specific roads that will be impacted the most are:

- SW Borland Road/Willamette Falls Drive
- SW Stafford Road
- OR 99E
- OR 213, and
- OR 43

Therefore, it is clear that the impacts to the local system and local communities will be experienced immediately, as soon as the tolls begin to be collected. This will be especially acute for EFCs and EJ communities since, under the pre-completion tolling scenario, none of the benefits of the third lane will be experienced. The types of impacts these communities will be faced with during pre-completion tolling (identified as Long Term Impacts in Table 3-37) include:

- Higher transportation costs for social and emergency service providers;
- The cost of tolls on low-income households, which may include older adults and people experiencing a disability;
- Language and technological barriers to using and understanding the electronic toll system, and
- Delays and longer travel times near intersections, which could affect access to social resources in Canby, Gladstone, Lake Oswego, Oregon City, Tualatin, West Linn, and unincorporated Clackamas County near Stafford Hamlet and Canby.

Pre-completion tolling should be removed from the Project or fully analyzed in the NEPA review. If pre-completion tolling remains in the Project description it is likely that an EIS will be needed to disclose the significant adverse transportation impacts during the construction period which cannot be mitigated. The NEPA document should also identify which of the two pre-completion tolling alternatives is preferred.

## Nighttime Tolling

The County is opposed to nighttime tolling because, while it will raise very little revenue, at the same time it will decrease safety due to diversion of nighttime traffic onto surrounding local roads. Drivers should remain on the well-lit, safe highway after dark rather than divert to unlit,



narrow, winding rural roads. Safety, as always, should be the prime consideration. ODOT has not addressed these concerns, which were raised in our September 15, 2022 comments on the Draft TTR.

## The Project EA cannot result in a FONSI because the mitigation measures are unenforceable and unlikely to be performed.

CEQ guidance approves the use of a “mitigated FONSI” when the NEPA process results in enforceable mitigation measures (76 F.R. 3843, 3848 n.21). Many of the mitigation measures identified by ODOT are unenforceable because they rely on implementation by local municipalities and agencies that are not controlled by ODOT.<sup>4</sup> These mitigation measures will require an intergovernmental agreement or letter of commitment between ODOT and the affected jurisdictions. What if ODOT and the local jurisdictions are unable to reach an agreement? These agreements should be executed prior to making a decision on the Project.

Additionally, CEQ guidance states that an agency should not rely on mitigation measures necessary for a mitigated FONSI if it is not reasonable to foresee the availability of sufficient resources to perform or ensure the performance of the mitigation (76 F.R. 3843, 3848). It is not reasonably foreseeable that local municipalities will have the funding to undertake the necessary mitigation measures set forth in the EA. It is still unclear what percentage of mitigation would be funded by ODOT.

The vagueness of the timing and funding of the mitigation measures render them unenforceable. As discussed previously, neither the EA nor the Level 2 Toll Traffic and Revenue Study sufficiently address the time schedule for completing mitigation.

There are also mitigation measures proposed that would require the acquisition of right-of-way and have significant construction feasibility issues that could result in unfundable projects and/or significant time delays for construction. See further discussion under the heading *III. Detailed Transportation Comments*. How will ODOT address these issues?

## The monitoring program is a prime example of unenforceable mitigation.

There are no specific mitigation measures proposed for implementation after 2027. Instead, the EA relies entirely on a “transportation mitigation monitoring program.” We were unable to find any details on the scope of this program, the length of the monitoring period, the transportation network that will be monitored, how it will be administered and funded, and what standards will apply. It is also unclear what measures could be implemented as a result of monitoring, how mitigation might change in response to monitoring, and how ODOT and the local jurisdictions would reach consensus on the implementation and amendments to the monitoring program.

---

<sup>4</sup> See *Preservation Coalition v. Pierce*, 667 F.2d 851, 860 (9th Cir. 1992)

This reliance on a monitoring program with no specificity, timeline or guarantee of implementation or success represents additional significant unmitigated impacts in the EA.

## The indirect or secondary impacts of mitigation have not been analyzed.

The EA improperly defers the analysis of the indirect/secondary impacts from mitigation to the Revised EA. EA page 3-31 notes “[s]econdary impacts from implementing mitigation measures may require additional avoidance, minimization, or mitigation measures. An assessment of the effects associated with mitigation will be included in the Revised EA.” Mitigation measures would have their own set of environmental impacts that are not disclosed. Impacts from these measures need to be evaluated and disclosed in the EA and be subject to public comment. The reviewing agencies and the public may not have an opportunity to review and comment on the indirect/secondary impacts of mitigation.

## Agencies and the public did not have sufficient opportunity to review or comment on the Project.

The County has not had ample time to review the Project. The EA relies on thousands of pages of supporting appendices and other documents, which are highly technical and require the County and other municipalities to engage expert consultants to review and analyze. It is impossible to conduct a full review in such a short time frame. Moreover, the public has encountered several roadblocks that have thwarted this process.

- The County is aware that the City of West Linn spent two weeks of the comment period trying to obtain proper traffic model inputs from ODOT before they were finally provided on March 29, 2023, which has severely impacted and delayed their analysis and ability to comment.
- Further, the public was not given a sufficient opportunity to comment on the Project at public hearings. These hearings were poorly publicized: other than two overview email notices sent to a handful of public staff when the EA was published and when the 15-day extension was granted, there was no separate notification or announcement from ODOT alerting the public that hearings were being held. Details of the hearing were also difficult to find on ODOT’s website.
- In person events were only noted on the calendar link, meaning that the public had to dig through several layers of the site to find that information. Moreover, the “drop in” events were held during normal business hours and thus were not accessible to anyone who works a standard schedule.

These factors all limited meaningful public participation.

### III. Detailed Transportation Comments

Our primary concern is that the diverted traffic from I-205 onto County roadways and our partner City streets results in unmitigated impacts not disclosed in the EA. The lack of adequate mitigation on our facilities will result in safety impacts to people driving, moving freight, riding bikes, walking, and taking transit on non-highway facilities.

The following discussion summarizes our primary points of concern and offers examples of the unmitigated impacts not disclosed by transportation-related topic area. As discussed in *I. Introduction*, **not all areas of concern nor every example of unmitigated impacts are identified** herein. Rather, we are providing examples to demonstrate how the EA is deficient in its identification and mitigation of impacts.

Our primary points of concern relate to:

- Significant Diversion of Traffic to County and City Facilities
- Unmitigated Safety Impacts
- Unmitigated Congestion Impacts
- High Levels of Traffic Adding Stress for People Walking and Rolling
- Tolling is Not Shifting Travel Mode
- Lack of Commitment to the Mitigation Measures
- Truck Traffic on Local Roadways
- Reasonably Foreseeable Future Actions in the Project Corridor Should be Part of Mitigation

#### Significant Diversion of Traffic Volumes to County and City Facilities

The EA presents detailed analysis for two scenarios: a Short Term of 2027 (i.e., the year when the construction of the additional lanes on I-205 was assumed to be completed) as well as a Long Term scenario identified as 2045. The EA and the TTR (Appendix C of the EA) provide very minimal information about the impacts of “pre-completion tolling” which is defined as the period between when tolling is initiated in 2024 and completion of construction in 2027.

Our review of the EA reveals that it is difficult to separate the benefits and impacts of tolling on the transportation system from the construction of the additional lanes on I-205. This difficulty is exacerbated by the fact that I-205 is currently an inadequate facility, causing trips to reroute off the freeway onto local streets to avoid the congestion. As cited on page 3-1 of the EA, 20–30% of traffic currently using I-205 to travel to Oregon City reroutes in the PM peak period; the EA further acknowledges that this rerouting can increase to as much as 50%. If pre-completion tolling is implemented, it will exacerbate these existing conditions.

The EA needs to be modified to clearly define the differences in impacts between tolling and I-205 widening. This could be accomplished through the introduction of a new alternative that analyzes the proposed widening and seismic improvements on I-205 with an alternative, non-tolling funding source, and then comparing the impacts of that alternative against the current Project. Without this analysis, our communities cannot understand the true impacts of tolling on the local transportation system and our cities and rural areas.

As documented in the EA, but not adequately mitigated, our impacted streets and roadways do not have adequate vehicular capacity, intersection control, or pedestrian or bicycle facilities to address the increases in congestion, the impacts to safety, and the high level of stress that this Project presents to people walking and rolling in either 2027 or 2045.

The EA also documents (as evidenced in Figures 5-8 through 5-12 of the TTR) that our impacted facilities are inadequate to serve 2045 traffic. As discussed in the EA, the 2045 Build scenario results in an increase in traffic volumes by more than 50% at several locations as compared to the No Build. Some examples of unmitigated facilities shown in the comparison of 2045 Build versus No Build include:

- A 40-50% traffic increase on the Arch Bridge, which is a 2-lane historic bridge with a narrow sidewalk and a “sharrow” where cyclists share the lane with the automobiles. Due to the grade and existing traffic, cyclists often choose to use the sidewalk instead of the travel lane. ODOT, in collaboration with Oregon City and West Linn prepared the “Pedestrian-Bicycle Bridge Concept Plan” in 2021 that documents the existing needs of this bridge.
- A 50-60% traffic increase on Borland Road east of Stafford Road. The County has spent substantial resources in planning for future (non-tolled) needs at the Borland Road/Stafford Road intersection, including significant capital and maintenance dollars on constructing a roundabout to increase the capacity and safety of the intersection. Borland Road to the east of this intersection is abutted by rural industrial, commercial, residential, and recreational uses. This roadway is narrow and lacks shoulders of sufficient width for people walking or riding bikes. The significant volume of traffic that will be diverted to this roadway is not sufficiently mitigated. This is also discussed in the safety section below.
- A 50–60% traffic increase on Borland Road between Ek Road and Fields Bridge. This section of Borland Road is also narrow without any usable shoulders. The significant volume of traffic that will be diverted to this roadway is also not sufficiently mitigated.

Table 5.3 of TTR identifies streets that are expected to more than double in traffic volume in 2027 as compared to the 2027 No Build, such as:

- Traffic on Borland Road, east of Stafford, is anticipated to increase by 112%.
- Traffic on Lone Elder east of OR 99E is anticipated to increase by 104%.

Several other roadways will experience a traffic increase of over 25% when tolling is initiated.

For the pre-completion tolling scenario, the EA only includes information about increased volume on selected API arterials and intersections but does not undertake the other analysis that was conducted for year 2027 or year 2045. This lack of information on impacted facilities limits our ability to understand how tolling truly affects our rural and city facilities. The EA needs to be amended to fully document the impacts on our communities.

Further, the impacts to Ek Road are not accounted for in the EA. In fact, during the EA scoping it was Clackamas County staff who identified the need to include Ek Road in the modeling analyses as it parallels I-205 through the corridor. The published EA and TTR does not provide adequate information on the increase in volume along Ek Road, but rather assumes that traffic will use Mountain Road. Since some of the near-term mitigation could be influenced by the usage of Ek Road, it needs to be incorporated into the analyses and appropriately mitigated.

Lastly, it should be noted that with modern navigation apps, many motorists will adjust their routes of travel to “avoid tolls” resulting in instant changes to traffic patterns. The real-time rerouting of traffic onto County and city roadways can result in an abrupt increase in through traffic on our roadways, limiting the ability of people using intersecting streets along these routes, and presenting further difficulties (beyond that documented in the EA) for people to travel within the County. Without proper mitigation, these abrupt traffic volume changes result in the rapid degradation of safety performance and shift the burdens of safety mitigation and crash response to local law enforcement and public works teams to provide traffic control. On the whole, injuries and lost quality of life will increase, and in many cases, in already equity-challenged communities.

## Unmitigated Safety Impacts

As demonstrated in the EA, many of the diversion routes have intersections and roadway segments that exceed ODOT’s critical crash rate today and/or are listed as Top 5% or 10% Safety Priority Index System (SPIS) sites. We are unclear how adding more traffic to these locations is not considered a significant impact.

Any diversion of traffic from a freeway facility results in an overall decrease in safety as shown in ODOT’s crash rate Table V below.<sup>5</sup> Fatal and serious injury rates on freeways are less than 1.5 per million miles of vehicle travel (MMVT), whereas rural arterials have rates in excess of 11 MMVT and collector crash rates can be over 40 MMVT. Diverting traffic to roadways with higher safety risks is contrary to both ODOT’s and Clackamas County’s Transportation Safety Action Plans (TSAPs), both of which have a goal to eliminate fatal and serious injury crashes by 2035.

---

<sup>5</sup> [https://www.oregon.gov/odot/Data/Documents/Crash\\_Rate\\_Tables\\_2020.pdf](https://www.oregon.gov/odot/Data/Documents/Crash_Rate_Tables_2020.pdf)

**TABLE V: 2020 Fatal & Serious Injury Highway Crash Rates and Casualty Rates**

Table V tabulates data for mainline state highway crashes that resulted in death or a suspected serious injury (INJ-A). ODOT's fatality and injury definitions are adopted from the Model Minimum Uniform Crash Criteria (MMUCC), Fourth Edition.

JURISDICTION AND FUNCTIONAL CLASSIFICATION	MILES*	ANNUAL VEHICLE MILES*	FATAL & SERIOUS INJURY (INJ-A) CRASHES*	DEATHS AND SERIOUS INJURIES*	FATAL & INJ-A CRASH RATE**	FATAL & INJ-A CASUALTY RATE**
<b>TOTAL STATE HWY SYSTEM</b>	<b>7,377.44</b>	<b>19,388,425,028</b>	<b>825</b>	<b>967</b>	<b>4.26</b>	<b>4.99</b>
Interstate Freeways	729.57	8,466,908,094	95	107	1.12	1.26
Other Fwys/Expressways	66.88	1,289,794,763	16	17	1.24	1.32
Non-Freeways (combined)	6,580.99	9,631,722,171	714	843	7.41	8.75
Other Principal Arterials	3,256.45	7,433,739,009	509	597	6.85	8.03
Minor Arterials	1,968.43	1,843,069,966	148	180	8.03	9.77
Urban Collectors	47.31	55,830,059	7	8	12.54	14.33
Rural Major Collectors	1,272.62	296,635,232	49	57	16.52	19.22
Rural Minor Collectors	34.03	2,348,898	1	1	42.57	42.57
Rural Local	2.15	69,007	0	0	0.00	0.00
<b>URBAN HWY SYSTEM</b>	<b>1,141.30</b>	<b>10,341,826,489</b>	<b>376</b>	<b>418</b>	<b>3.64</b>	<b>4.04</b>

To help further emphasize the EA's deficiency in addressing safety impacts, Clackamas County staff reviewed the effects of the diversion to four primary corridors identified in the EA -- Stafford Road, Borland Road, Rosemont Road, and the Canby/I-5 corridor. These rural corridors serve as vital connections between urban communities. The impacted roadways along these corridors are typically two-lane, carrying between 7,000 and 14,000 vehicles per day under current conditions. These roadways are often characterized by only having 11-foot travel lanes and, in most cases, 0- to 4-foot shoulders. Further details on each corridor are presented below.

### Borland Road Corridor

As documented in the EA, Borland Road between Ek Road and Fields Bridge is expected to have increases of up to 8,000 ADT in 2027, resulting in a total expected 2027 ADT of more than 16,000 vehicles. Under today's conditions, Borland Road carries 5,500 ADT. Our detailed analysis of the current conditions indicates that the crash experience in this corridor is very close to the expected crashes/mile/year for similar facilities, but that the rear-end crashes are overrepresented. This over-representation of rear-end crashes is indicative of the frequency and density of intersections along this corridor and the high percentage of through traffic currently using the facility. With the significant increase in through traffic anticipated in 2027 attributable to the tolling, the total crash rates in this corridor are expected to at least double to 2.7 crashes / mile / year for total crashes and to 1.5 Fatal-Injury C crashes/mile/year in 2027. Without appropriate mitigation to address rear-end crashes, our analysis suggests the crash rates would likely be even higher.

The anticipated volumes and crash patterns identify that Borland Road meets the thresholds for needing mitigation improvements, including a center turn lane at intersections and driveways

along with paved shoulders and rumble strips. These mitigation measures are not included in the EA.

## Stafford Road Corridor

Stafford Road between Ek Road and Mountain Road is predicted to have an increase of 2,800 ADT going from approximately 13,000 ADT to nearly 16,000 ADT on a two-lane road with 11-foot travel lanes with little or no shoulders. People on Trail Road, a local road serving over 50 lots, currently see times of the day when accessing Stafford Road is challenging and residents have expressed concerns regarding access and safety.

Under current conditions, there are 4.6 crashes/mile/year, nearly double the expected rate; and severe crashes are 2.33 crashes/mile/year, again nearly double the expected amount. Adding 2,800 vehicles per day to this route would elevate the crash rates to about 5.5 crashes/mile/year and 2.75 severe crashes/mile/year. In addition, roadway departure and wet condition crashes are overrepresented.

The volumes and crash patterns show that Stafford Road meets the thresholds for needing mitigation impacts, including paved shoulders with rumble strips and either an overlay or high friction surface treatment to increase friction during wet weather. In addition, installing a left turn lane should be considered for Trail Road or connecting Trail Road to the proposed roundabout at the Stafford Road/Mountain Road intersection or traffic signal at Ek Road. These mitigation measures are not included in the EA.

## Rosemont Road Corridor

Rosemont Road provides a critical link to the Salamo area of West Linn and is a route that allows toll avoidance of the Tualatin River bridges for people traveling to and from the west and south. This facility was not analyzed in the EA despite having a predicted ADT increase of 1,500 in 2027 and 500 in 2045. Safety performance is already poor for this facility, with total and severe crash rates more than 22% and 30% higher than the expected values (i.e., 1.92 and 1.06 crashes/mile/year, respectively).

Rear-end and roadway departure crashes are over-represented for this road, reflecting the challenges of a two-lane rural road with no shoulders currently carrying 10,000 vehicles per day. Adding 1,500 more vehicles with no mitigation further degrades the safety performance. The volumes and crash patterns identify that Rosemont Road needs to be improved to include turn lanes and shoulders with rumble strips.

The EA documents that the Stafford Road/Rosemont Road roundabout will be impacted by the traffic volume increases. This roundabout is already over capacity under current volumes and no mitigation for the increase in traffic volumes is proposed.

None of these clearly needed mitigation measures within the Rosemont Road corridor are included in the EA.

## Canby/I-5 Corridor

The EA documents increases in traffic volumes along OR 99E associated with drivers exiting I-5 near Canby at either Miley Road or Ehlen Road to avoid tolling, but does not analyze the impacts to the Arndt Road-Knights Bridge Road intersection nor to Barlow Road between Arndt Road and OR 99E.

Per the EA, tolling is anticipated to increase traffic volumes on Arndt Road between Airport Road and Knights Bridge Road by 3,000 ADT in 2027 and by 2,000 ADT in 2045. The EA makes no mention of the fact that this corridor has daily truck volumes in excess of 20%. These high truck volumes have significant impacts on the capacity and safety of the roadway to handle the increase in tolling-related diversion traffic. This corridor provides access to an active quarry and to freight moving to and from Canby's vibrant and growing industrial area. With this vehicle mix and these unique industrial/quarry uses, the EA needs to document both the operational and safety impacts of tolling on this corridor and of the businesses along it.

Our analysis of Arndt Road suggests that existing safety performance is affected by queue spill-back associated with the signalized Arndt Road/Knights Bridge Road intersection. Rear-end crashes are over-represented; the County is planning to add a queue warning system for eastbound Arndt Road to address this issue. Adding 3,000 more vehicles per day will increase overall volumes from 18,000 ADT to 21,000 in 2027. This added traffic will result in higher levels of congestion, necessitating an additional turning lane at the traffic signal to address queue storage and capacity needs. Based on historical trends on this roadway, the impact of 3,000 vehicles per day in the 2027 tolling scenario would be the equivalent of 10 years' worth of traffic growth in this corridor if tolling did not occur.

Further, safety performance is currently poor on Arndt Road east of Knights Bridge Road with crashes double the expected rate (4.3 crashes/mile/year) and nearly triple the expected rate for severe crashes (3 severe crashes/mile/year). Rear-end crashes are over-represented as are injury crashes and are associated with the existing queue spillbacks on each end of the corridor. A westbound queue warning system for the Arndt Road/Knights Bridge Road intersection would help, and reconfiguration of the Barlow Road/Arndt Road intersection is needed.

As with other parts of this corridor, the Barlow Road/Arndt Road intersection also has poor safety performance with crashes more than double the expected rate at 2.3 crashes/year and 0.97 severe crashes per year versus an expected rate of 0.64. With nearly 11,000 vehicles per day on Barlow Road south of the intersection and less than 700 vehicles per day north of Arndt, the intersection needs to be realigned to reflect existing travel patterns.

The last portion of this corridor includes Barlow Road between Arndt Road and OR 99E, including the portion that is aligned through the City of Barlow. Analysis shows that safety



performance is poor with both total and severe crashes triple the expected rates at 6.6 and 3.3 crashes/mile/year, respectively. Rear-end crashes influenced by Arndt Road and OR 99E are over-represented. Although the County has proposed a speed zone reduction from 35 MPH to 30 MPH in this corridor, including funding for radar feedback signs, the increases in traffic may require additional improvements to maintain adequate safety. With rear-end crashes being overrepresented, mitigation of a center turn lane would address the safety issues.

None of these needed safety mitigation measures are included in the EA.

## Unmitigated Congestion Impacts

We are unclear how ODOT can make the conclusion that “of the 50 study intersections, most would not experience new impacts under the Build condition.” Per Table 5-49 of the TTR, more than 20% of intersections would not meet applicable mobility standards under the Build Condition in both 2027 and 2045.

For the limited number of congestion mitigation measures identified for 2027, the results of the mitigation measures on congestion, i.e., the resultant level of service and volume-to-capacity ratio, was not documented in the EA. (In fact, no congestion mitigation measures are identified for 2045; rather the EA refers to a “monitoring program” for future mitigation.) How can the conclusion be drawn that the mitigation measures are effective in addressing the significant impacts created by the Project?

A primary example of an unmitigated impact and lack of enforceable mitigation is at the Ek Road/Borland Road intersection. Table 6-4 and Figure 6-5 of the TTR identify the need for an all-way stop-control or a roundabout by the year 2045, “pending future analyses.” These two traffic control devices have very different vehicular capacities, right-of-way impacts and significant costs of construction. How and when will the “future analyses” be conducted and what assurance does the community have that the mitigation measures will be in place by the time tolling begins? Also, how can an improvement to this intersection not be needed in 2027?

## High Levels of Traffic Add Stress for People Walking and Rolling

As documented in the EA and the TTR, many of the roadways that will need to shoulder the burden of the diverted traffic do not have any facilities or have only very limited facilities for people walking and rolling. As documented in Table 4-8 of the TTR, the majority of the impacted facilities are rated as having the highest level of traffic stress for cyclists without any diverted traffic. Table 4-9 also documents the lack of pedestrian facilities in the rural area.

The County is very concerned about the safety of cyclists and pedestrians with the significant increase in traffic volume on these roadways that are already rated as having the highest levels

of traffic stress. How can significant increases in traffic not result in definable and mitigatable impacts? It is also unclear whether ODOT's rural Level of Traffic Stress (LTS) methodology was used for these facilities. Per ODOT's Analysis Procedures Manual, there are different methodologies employed for rural contexts versus urban contexts. Many of the impacted County roadways would be considered rural, not urban, facilities. With the implementation of tolling, the rural facilities will be impacted by urban levels of traffic.

Examples of unmitigated impacts on cyclists and pedestrians include volume increases on parallel routes to I-205 and the Oregon City Arch Bridge:

- The EA identifies that parallel routes to I-205 such as SW Borland Road and Willamette Falls Drive could experience 30–100% increases in ADT (page 3-12) under the Build Alternative. Mitigation measures for these increases in daily traffic volumes have not been identified.
- The EA discloses that the daily volumes will increase up to 50% in downtown Oregon City and across the Oregon City Arch Bridge. As was previously noted, this is already a sub-standard facility, and is the only location for pedestrians and bicyclists to cross the Willamette River. The cumulatively significant increase in volume will have negative impacts on the pedestrian and bikeway environment at this location.

Given the lack of clear mitigation measures for these high stress facilities, the County concludes that there are impacts to cyclists and pedestrians that are not sufficiently mitigated in the EA. We also are concerned that the LTS assessment for both pedestrians and cyclists in the future year does not sufficiently acknowledge the near-term impacts to pedestrians and cyclists that will occur due to increases in traffic volume as soon as tolling begins. Many of the pedestrian facilities and bikeway facilities are already substandard. Since the rating scale for LTS is not very granular, it does not recognize the potential impacts, especially on facilities already rated as LTS 4 (the highest LTS). How can there be no significant impacts to facilities already rated as having the highest LTS?

The EA specifically notes on page 1-2, paragraph 1.2: Governor's Transportation Vision Panel that "Community livability" is a key issue. It also recommends bike and pedestrian investments to reduce fatalities and injuries. Tolling impacts are not mitigated, will degrade the safety on local roads, and will reduce community livability by increasing traffic on neighborhood streets.

## Tolling is Not Shifting Travel Mode

There is insufficient investment in the pedestrian, bikeway, and transit systems to affect mode shift. ODOT has not addressed these concerns, which were raised in our September 15, 2022 comments on the Draft TTR. The Project does nothing to contribute to an improved environment for transit riders through the I-205 Corridor. The EA identifies on pages 3-5 through 3-6 that limited transit service exists. While the report claims "slightly higher" transit ridership, the mode share figured in Table 5-5 indicates there would only be 800 additional transit trips throughout

the entire Metro Region, which is a marginal increase at best. “The need for improved transit and other transportation choices” is one of the three priority issues that ODOT was directed to address by the Oregon Transportation Commission (page 1-2 of EA).

A map of the transit in the area should be included in the TTR and the EA. In the EA, ODOT acknowledges (on pages 3-5 and 3-6) that there is limited transit service, insufficient pedestrian systems and a lack of quality bikeways in the area. So how did ODOT determine that there will be a shorter transit travel time through the corridor (as shown on page 3-25 of the EA) when there is currently no transit service on Borland Road, Stafford Road, or I-205? More clarity is needed on how the shorter transit time is achieved.

With insufficient travel mode choice in the region (Table 3-2), it is unclear how the desired greenhouse gas reduction aspirations can be met, especially in light of the fact that the cumulative impacts related to climate change identify a need to shift mode away from single-occupancy vehicles. Investment in non-auto facilities is essential if tolling can truly be expected to provide options for people to shift to a different mode of travel, rather than simply shifting traffic to local streets, as appears to be the case under the current Project. The Project should be modified to incorporate improvements to transit and pedestrian infrastructure as part of the solution to the stated Need to reduce traffic congestion and improve safety or, at the very least, analyze such an alternative.

The EA does not provide adequate mitigation to sufficiently address the lack of travel choices in the corridor. Additional mitigation must be added, including but not limited to, collaborating with transit service providers to support availability and enhancements of transit and other transportation services along I-205, especially for historically and currently excluded and underserved communities traveling through the area.

## Lack of Commitment to the Mitigation Measures

Tables 6-1 through 6-6 of the TTR identify mitigation measures for implementation by 2027, many of which are on County or city facilities. Implementation of the mitigation measures by ODOT will require an intergovernmental agreement between the affected jurisdictions. The EA does not specify whether the County and cities are being asked to help fund the mitigation.

For example, the mitigation for SW Borland Road between SW Stafford Road and the Tualatin River Bridge (Table 3-15 of the EA) states “Contribute to...” The EA does not state what the contribution amount will be or how the other portion of this mitigation measure will be funded.

There will be a long period of time between when impacts will begin to occur (i.e., 2024 when tolling begins) and when identified mitigation measures can be feasibly funded, designed and constructed. As a result, the local communities will experience significant impacts for several years before mitigation measures, if they are even feasible, are fully constructed.

Many of the proposed mitigation measures would require the acquisition of right-of-way, have topographical and/or adjacent land impacts that lead to significant questions of construction feasibility, and could be extremely costly to actually construct. How will ODOT address these issues and assure our communities that the impacts will be sufficiently mitigated?

The EA also proposes mitigation measures that are technically infeasible. A good example of this is the widening and signalization mitigation proposed at the OR 99E/South End Road intersection. OR 99E parallels the rail tracks and the Willamette River, so no widening of this intersection can occur to the west, and there are significant topographic constraints to the east in the form of a solid rock bluff adjacent to OR 99E. To add lanes to the intersection, OR 99E would need to shift eastward well in advance of the intersection. Between the costs of widening and the impacted embankment areas, it would not be feasible to complete this mitigation project prior to 2027, if at all.

Finally, there is a lack of clarity on the mitigation measures proposed, how they will be shaped by local officials and the impacted communities, and a realistic timeline for implementation. The EA states that “any mitigation proposed to address near-term impacts that is determined to also help alleviate pre-completion tolling impacts could be implemented before tolling begins.” This statement defers the analysis of pre-completion tolling impacts. The EA needs to analyze the impacts from pre-completion tolling, identify which mitigation measures will be required to address the significant impacts of pre-completion tolling, and condition tolling to start no sooner than completion of these mitigation measures.

## Truck Traffic on Local Roadways

Traffic and air quality modeling assumes that truck traffic on local roadways will *decrease* with the Project, while passenger car traffic will increase as a result of diversion. This assumption, which is used to justify the lack of local modeling and consideration of air toxics and noise, is not supported by evidence. In particular, the County is concerned that ODOT has not properly accounted for the movement of aggregate materials from the rock quarries near Canby and Vancouver or access to the developing warehouse/industrial district in Canby.

## Reasonably Foreseeable Future Actions in the Project Corridor Should be Part of Mitigation

If a project is identified as a Reasonably Foreseeable Future Action (RFFA) in Section 4.4 of the Cumulative Impact Technical report, and is within the Project corridor, it should be considered eligible for mitigation funding. Examples include 2018 Regional Transportation Plan (RTP) projects 10127, 10128, 11242, and 12089. While these projects are on the 2018 RTP, they are not guaranteed to be funded. In order to achieve the benefits that are described as a part of the Project, the RFFAs need to be constructed.

## IV. Other Topical Issues

In general, the County is concerned that the analysis of other topical areas in the EA focuses on impacts to the highway system while ignoring local impacts in areas that will experience increased traffic from diversion. The geographic boundary associated with the API for the following resources (identified in Table 4-1 of Appendix Q) should be modified to extend onto the roadways that experience diversion and where there are identified mitigation projects: Land Use, Geology and Soils, Hazardous Materials, Vegetation and Wildlife, Wetland and Water Resources, and Historical and Archeological Resources. This is necessary to address the full extent of direct and indirect impacts of the Project. In other areas, including air quality and noise, where the API has been defined to include certain local roadways and communities that would experience diversion, there is no meaningful or quantitative analysis of impacts. Our detailed comments are outlined below.

### Air Quality

#### MSAT Analysis

Under the Build Alternative, the projected addition of diverted traffic to non-highway roadways will increase the generation of mobile source air toxics (MSATs) along those roadways, which will increase the concentration of MSATs at specific locations. However, the EA does not adequately address the potential increase of MSATs at affected locations and the associated potential health hazards. The following factors raise concerns without providing adequate analysis to understand the potential health hazards.

- Table 6-3 of the Air Quality Technical Report identifies an 11% increase of non-highway vehicle miles traveled (VMT) under the Build Alternative.
- Table 6-5 of the Air Quality Technical Report identifies a 12% increase in annual benzene emissions along non-highway roadways under the Build Alternative.
- Figure 3-4 of the EA shows average daily traffic on specific non-highway roadways could increase by up to 31% under the Build Alternative.
- Sensitive receptors (e.g., residences, Willamette Primary School) are in close proximity to affected non-highway roadways and would be exposed to increased MSAT concentrations.
- The quantitative analysis of MSAT provided in the Air Quality Technical Report is limited to aggregate emissions and does not address concentrations at affected non-highway locations.
- As identified in Table 5-2 of the Air Quality Technical Report, concentrations of MSATs at one intersection near the project location exceed Oregon Department of Environmental Quality Benchmarks.<sup>6</sup>

---

<sup>6</sup> The benchmarks “are based on concentration levels that would result in a cancer risk of one-in-a-million additional cancers based on a lifetime of exposure. For non-carcinogens, the benchmarks are levels you

- Section 3.2.2 of the EA states the following: “The localized changes in MSAT concentrations would likely be most pronounced on roadways where traffic volumes would be higher under the Build Alternative relative to the No Build Alternative due to rerouted trips. However, the magnitude and the duration of these potential increases compared to the No Build Alternative cannot be reliably quantified due to incomplete or unavailable information in forecasting project-specific MSAT concentrations and related health impacts.”
- Section 6.2.2 of the Air Quality Technical Report provides approximately two pages of justification for the decision to not characterize the magnitude of the changes in MSAT concentrations at affected locations. The discussion in Section 6.2.2 raises significant human health concerns without resolving them.

The sum of limitations raised within Section 6.2.2 of the Air Quality Technical Analysis does not absolve ODOT from a good-faith effort to characterize the increase in MSAT concentrations along affected non-highway roadways. ODOT should model MSAT concentrations at two or more locations and compare these to established health risk levels, such as the Oregon Air Toxics Benchmarks. Analysis would be limited to two alternatives (No Build, Build) and could be corroborated with existing air quality monitoring data. If the benchmarks are exceeded, then a more detailed health risk assessment should be conducted. While the analysis would entail some level of uncertainty, understanding the magnitude of potential MSAT concentrations is critical for understanding potential health impact on residents. This information is necessary for the decision-makers as well as the affected communities.

Additionally, the assumption that truck traffic and associated MSAT emissions will decrease on local roadways should be revisited. As noted above, the County is concerned that ODOT has not properly accounted for the movement of aggregate materials from the rock quarries near Canby and Vancouver and access to the developing warehouse/industrial district in Canby. Further, Borland Road, which parallels a significant segment of I-205 and is one of the primary roads that would experience an increase in traffic from diversion, currently does not allow truck traffic; therefore, there would effectively be no change in truck traffic on this roadway, but the volume of passenger cars would increase dramatically, along with associated emissions of MSAT. A health risk assessment should be conducted to evaluate impacts from the increase in MSAT along Borland Road and other affected roadways.

Appendix D2, Truck Toll Sensitivity Analysis- Air Quality, only addresses the potential for criteria air pollutant and GHG emissions, stating that even with variable rate tolling for trucks, VMT would be reduced, and therefore “air quality” impacts would be less than significant. But this logic completely ignores MSAT concentrations on local roadways from increased truck diversion from variable rate tolling. The air quality analysis of variable rate truck tolling (Appendix D2) should be revised to consider MSAT health impacts on local streets.

---

could breathe for a lifetime without any non-cancer health effects” (<https://www.oregon.gov/deq/air-toxics/Pages/Benchmarks.aspx>).

## Cumulative MSAT Analysis

The cumulative air quality analysis does not appear to address potential for cumulative projects (including the RMPP) to increase traffic and therefore increase MSAT concentrations along affected non-highway roadways. The cumulative air quality analysis in the EA references FHWA expectations of declining MSAT emissions to conclude that the Build Alternative would not have negative cumulative effects on air quality. While overall emissions are expected to decline, the Build Alternative in conjunction with the cumulative projects has the potential to significantly increase traffic on non-highway roadways. The MSAT analysis of the I-205 Toll Project should take into account the impacts of the RMPP and other cumulative projects on the specific non-highway roadways that will be impacted by the Build Alternative.

The cumulative MSAT analysis should address affected non-highway roadways that will experience increased traffic and intersections where the level of service will decline. ODOT should model cumulative MSAT concentrations at two or more locations and compare these to established health risk levels, such as the Oregon Air Toxics Benchmarks. If the benchmarks are exceeded, then a more detailed health risk assessment should be conducted.

## Geographic Boundary of MSAT Emissions Analysis

The project elements are located entirely within Clackamas County and most of the air quality API is located within Clackamas County; however, the geographic boundary of Multnomah County was used for the MOVES modeling of MSAT emissions. The County is concerned that the geographic boundary used in the analysis does not accurately reflect actual conditions. ODOT should disclose how the geographic boundary was determined and whether emission estimates using Clackamas County as the geographic boundary would differ from those presented.

## Other

The project area is located within an EPA-designated carbon monoxide maintenance area. This should be clarified in the EA.

While air pollutant emissions in the API are projected to be much lower in the future compared to current conditions due to improvements in vehicle technology and implementation of stricter emissions standards, Appendix Q of the EA cites that several of the RFFAs identify “reduced emissions” as a project objective, including the OR 43 Multimodal Improvement (RTP 10127) and Willamette Falls Drive Multimodal Improvements (RTP 10128). These projects should be identified as mitigation and funded through the Project if they are being listed as contributing to improved air quality.

The air toxics monitoring data presented in the Air Quality Technical Report is from a former monitoring station about 7 miles from the Abernethy Bridge. Closer and more recent monitoring data should be used to characterize existing air quality in the region. The Tualatin monitoring station air toxics data is closer to the project area (approximately 3.6 miles from the Tualatin

River Bridges), is more recent and more representative of a near-highway environment. The Tualatin monitoring data shows higher levels of air toxics, which should be taken into account for the analysis of the I-205 Toll Project. This data is available from the Oregon Department of Environmental Quality.

## Climate Change

The TTR (page 65) in Table 5-4 identifies that the Regional VMT will increase on non-highway roads and will decrease on the highway. The people who are choosing to shift their trips off of the highway do not have choices in travel options, and will therefore put additional strain on the local roadway system.

EA Appendix Q, page 25, identifies that “Tolling can encourage shifts away from single occupant-vehicle and a shift in travel time, which can reduce emissions associated with vehicle idling.” While the report notes that the Build Alternative is expected to have a relatively “small effect” on choice on travel mode in the region, it should be more clear that it is a “negligible” impact with only a shift of 800 trips regionally to transit (of the 5,245,000 trips) and an increase of only 200 Active Transportation trips of the total 1,276,800 trips across the region.

One significant reason that trips are not shifting to another mode is because other modes of transportation are not available in this area. To take a trip using transit would require two to four times as much time for most travelers.

In addition, there are insufficient bikeway facilities in the area.

- As the analysis of the bikeway facilities demonstrates, the majority have a Bicycle Level of Traffic Stress (BLTS) rating of R3 and R4, and are not expected to improve.
- As noted on page 47 of the TTR, “Most study corridors are already at the highest or worst level (BLTS 4) when considering the overall corridor as a whole.”
- The report goes on to say, “In rural areas (denoted with an “R”), shoulders are more important to the BLTS results because safety concerns tend to be higher (ODOT 2020a). All of Stafford Road, most of SW Borland and parts of 99E are considered rural.”
- Even though a significant additional volume of traffic is anticipated in these corridors with the Build Alternative, the granularity of the BLTS rating system does not demonstrate any difference with the score, with the corridor going from a BLTS 4 to a BLTS 4, which means that no mitigation for the impacts to bikeway travel were proposed through the corridor.

If tolling is expected to be a tool to reduce GHG emissions, there must be reasonable mode choices. To achieve congestion management, as identified in the Project purpose, investments in bikeway and transit infrastructure are necessary as a part of the mitigation so that people have reasonable travel alternatives. For example:



- Investments need to be made in a complete protected bikeway path throughout the corridor, including along Stafford Road, SW Borland, and parts of OR 99E.
- Bikeway improvements as well as the RFFA OR 43 Multimodal Improvement (RTP 10127) and RFFA Willamette Falls Drive Multimodal Improvements (RTP 10128) are needed to help achieve the proposed GHG emissions reductions.
- There needs to be regular, reliable transit service throughout the corridor, addressing both through and local trips, to provide a viable mode option.

The pedestrian and bicycle level of stress analysis presented in the EA does not recognize the rural nature of many of the County roadways where diversion would occur. ODOT's Analysis Procedures Manual outlines procedures for assessing rural roadways and identifying potential risks and mitigation measures.

Emissions may be reduced on I-205, but due to diversion air quality will become worse within the communities when congestion shifts. This puts more families at greater risk and may create additional hardships due to healthcare costs, missed work and permanent illness. As with other analyses in the EA, the benefits and impacts are focused on I-205 and ignore impacts to local communities.

Additional information is needed on the economic impact to downtown Oregon City and Canby. The EA states that businesses in Oregon City and Canby would benefit from pass-through traffic, but no documentation is provided beyond that statement. What other considerations were there when making the assumption that the increase in volume would improve business? Parking is limited in some areas and thus would not support someone trying to stop on a pass-through trip. There should be a mitigation program for the businesses that may be negatively impacted in Oregon City, Canby and West Linn. More traffic volume may not be better if it is in the form of congested traffic.

On page 3-60, Table 3-30: Under the Build Alternative, the EA claims there would be higher levels of opportunity (traffic exposure-oriented) consumer spending in three commercial districts because of the projected higher traffic volumes compared to the No Build Alternative. This is questionable at best considering conditions will be gridlocked. It seems more likely that people will avoid the area due to congested conditions. Logic would imply that individuals who elect to travel longer distances to avoid the costs of tolling are less likely to be the "opportunity shoppers" referred to in Appendix F, Economic Technical Report.

Estimated toll rates are expensive; with no real rates it is impossible to say what the true economic impact will be to individuals and families. Our rough estimate given the financial data provided is that it would cost a household at least \$2,000 to \$2,400 per year (\$166 to \$200 per month).

It is not clear whether commercial use will be tolled at a higher rate. Will these costs be passed through to consumers and further exacerbate the economic hardships families and businesses experience?

On page 3-77 of the EA it states that the Project would result in the “same or improved access to jobs.” However, if a person has problems traveling to a new job now, how will tolling improve access? This is not a positive impact as stated as it is based on representative scenarios which have many technical errors (see comments under the subheading of *Social Resources and Communities/Environmental Justice*). Additionally, some representative scenarios show that EJs and EJ communities will be forced to choose between paying a toll or traveling on a non-toll path which is more congested as a direct result of the Project (increased non-toll path travel times under the Build Alternative in comparison to the No Build Alternative). The Project creates an even larger divide between socioeconomic households at different levels and creates more disadvantages for those who already have trouble accessing jobs.

On pages 19 & 23 of the Economics Technical Report (EA Appendix F) there are contradictions: on page 19 it states that “detailed household spending is not available at the state, regional, and API levels, household income is assumed”; yet on page 23 it states “based on analysis of spending by households in the API, the existing spending by cost category can be estimated”. This contradiction needs to be explained and resolved.

## Noise

Some noise level increases on local roadways are disclosed, in some places up to 6 dBA, but there is no discussion of sensitive receptors located along these segments, and whether impacts would be significant. There is also no discussion of noise thresholds for significance or local policies related to noise. Mitigation is identified for I-205 segments only. The increases in local roadway noise appear to be a significant, unmitigated impact.

While EA Appendix Q states that the Build Alternative would not have negative cumulative effects related to noise, the EA states on pages 3-66 and 3-67:

“Along non-highway roads in the API, changes in traffic noise levels under the Build Alternative would range from 6 dBA lower to 6 dBA higher than existing noise levels because of changes in traffic volumes. The largest reduction in noise levels would occur along the segment of Willamette Falls Drive east of 19th Street, where traffic volumes would be lower than under the No Build Alternative, and the largest increase would occur along the segment of SW Borland Road east of SW Stafford Road, where traffic volumes would be higher than under the No Build Alternative. Figure 3-14 shows the estimated increases in traffic noise levels on non-highway roads under the Build Alternative as compared to existing conditions. Most locations would experience 0 to 3 dB higher noise levels under the Build Alternative compared to the No Build Alternative, which would be barely perceptible to the human ear.”

The analysis does not appear to address the potential for cumulative projects (including the RMPP) to increase traffic and therefore increase noise levels along affected non-highway roadways. The noise analysis of the Project should take into account the impacts of the RMPP

and other cumulative projects on the specific non-highway roadways that will be impacted by the Build Alternative. Mitigation needs to be identified for significant cumulative impacts.

Figure 3-13 of the EA, which depicts the noise API, does not include all of the non-highway roads that will have significantly increased traffic. This figure should be revised to address all non-highway roads that will experience notable diversion as a result of the Project. For instance, Figure 3-4 of the EA shows an 11% increase in traffic on OR 99E near Canby, which is not shown in Figure 3-13.

Some noise walls were not included as mitigation as they were not feasible from a cost perspective; because there is no feasible mitigation, the EA should disclose that a residual significant noise impact will occur which is not mitigated, thereby triggering the need for an EIS.

## Social Resources and Communities / Environmental Justice

Overall, the EA does not adequately address impacts to EFCs and EJ communities. This should be a prime focus as “Impacts of tolling on communities experiencing low income” is one of the three priority issues that ODOT was directed to address by the Oregon Transportation Commission (page 1-2 of EA).

The EFCs and the EJ communities will experience the impact of diversion during pre-completion tolling, and this is not addressed in the EA. There are high concentrations of these communities in several of the areas where impacts to the transportation system have been clearly identified in the EA, especially near OR 99E, from Jennings Avenue south through Oregon City, as well as in Canby and the surrounding areas. The EA must document how these areas will be impacted in the pre-completion tolling scenario.

The base map used in almost all of the figures inaccurately displays the “urban area” in this section, and throughout the document. For example, the industrial areas east of I-205 along OR 212 and the Clackamas Town Center area north of OR 224 and west of I-205 are both fully developed and highly urbanized. The EA maps appear to be displaying incorporated areas and census designated places, but this does not properly identify what is “urban” according to US Census data. The maps should be revised to utilize the 2010 or 2020 Urban Area as defined by the US Census Bureau. This revision would accurately show additional urban areas within Canby, Oregon City, West Linn, and other jurisdictions.<sup>7</sup>

While it is noted on page 35 of EA Appendix Q that, “In the short-term it is possible that the construction of the Build Alternative and the RFFAs could overlap leading to detours and travel time delay for people accessing social resources,” it is much more likely that the implementation of pre-completion tolling will create delay for people to access social resources, and that some

---

<sup>7</sup> For reference, the US Census 2010 Urban Areas map for this area is available online at: [https://www2.census.gov/geo/maps/dc10map/UAUC\\_RefMap/ua/ua71317\\_portland\\_or--wa/DC10UA71317.pdf](https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua71317_portland_or--wa/DC10UA71317.pdf)

of the critical active transportation RFFAs will not be constructed due to lack of funding, further negatively impacting EFCs and EJ communities.

There is a need for active transportation investments throughout the corridor -- not just spot improvements at very minimal locations -- so that persons with low income and other EFC/EJ communities have choices of different modes. Page 27 of EA Appendix Q identifies that a “historic lack of transportation improvements and investment in these communities has led to increased safety risks, including risk of traffic fatality and limited access to transit and active transportation networks (Oregon Walks 2021; Cohen and Hoffman 2019)”. As a part of this Project, this needs to change. Unfortunately, the proposed mitigation does not sufficiently address these issues faced by EFCs or EJ populations.

Page 28 of EA Appendix Q states that the “Build Alternative would have beneficial or neutral effects on environmental justice populations related to access to social resources and travel times, air quality, roadway safety, and travel mode shift” and goes on to say “with the implementation of mitigation measures, no disproportionately high or adverse effect on environmental justice populations would occur under the Build Alternative. **The RFFAs would also be required to mitigate any disproportionately high and adverse effects on environmental justice populations** (emphasis added in bold).”

Overall, it appears that the RFFAs are needed to address the impacts to EFCs/EJ communities and should be included in the mitigation measures that are constructed with the Project.

The analysis of both Social Resources and Communities and EJ (Appendices I and J) relies on Representative Scenarios, which included trips that started in areas with higher concentrations of EFCs and ended in areas with social resources. Representative Scenarios 1 and 8 describe people who will now be forced to choose between paying a toll or taking a non-toll route that is now longer and less safe due to the Project (the Build Alternative increases volumes and travel time in comparison to the No Build Alternative). This is a significant and unmitigated impact created by the Project that disproportionately affects EFC/EJ communities on the outskirts of the proposed tolling location. Further, all Representative Scenarios could be affected by the RMPP and thus do not accurately assess cumulative conditions.

Other technical issues with the representative scenarios that were used are listed below. In addition to the issues noted, all of these scenarios assume bus routes that are undefined and do not correspond to claims of travel time estimations. In giving alternative travel options (public transport, bus, etc.), far more specificity is needed as to which specific routes will yield equivalent or less travel times.

#### **Scenario Description 2**

- The map is inaccurate and shows a trip from Rivergrove to Oregon City, not Tualatin to Oak Grove.
- There is direct transit that should be added, and it would require 1 hour and 52 minutes to make the trip.

### **Scenario Description 3**

- The scenario describes going to a farm outside of Oregon City, but the map shows traveling to the hilltop/central Oregon City.

### **Scenario Description 4**

- This scenario does not travel through the toll corridor.
- The scenario indicates that there would be no difference in travel time between Wilsonville and Portland between Existing Conditions and the year 2045. Also, this would indicate that the tolling on I-205 has no impact to travel time on I-5. Are these conclusions accurate?
- The assumed toll-free travel route does not align with plausible navigation decisions.

### **Scenario Description 5**

- This scenario does not travel through the toll corridor.
- The scenario describes a student living in SE Portland, but the map has the person traveling from Clackamas Town Center, which is in unincorporated Clackamas County (likely with a Happy Valley zip code).
- The travel time range of 1-2 hours is extremely large in comparison to the “minute” of travel time savings for automobiles using the freeway.
- The trip cannot be done as described. The assumed toll-free travel route does not align with plausible navigation decisions.

### **Scenario Description 6**

- The map does not display a trip from Rivergrove to Oregon City; it shows a trip from Tualatin to Oregon City.

### **Scenario Description 7**

- How would the No Build Alternative increase travel time by 10 minutes at 11 PM?

### **Scenario Description 12**

- The map is incorrect and does not match the scenario description.
- McLoughlin Promenade is located in Oregon City, not Gladstone.

### **Scenario Description 16**

- The toll path under this scenario does not provide an improved travel time.

### **Scenarios 9, 10, 11 and 15**

- The assumed toll-free travel routes do not align with plausible navigation decisions.

The Social Resources and Communities Technical Report (EA Appendix I), Section 7 discusses short-term and long-term impacts.

- The impacts of tolling and congestion pricing happen immediately and in the near term. All of the items listed in Section 7.2 need to be incorporated into Section 7.1 Short Term Impacts.
- When describing long-term impacts in Avoidance, Minimization, and/or Mitigation Commitments in both the Social Resources and Communities Technical Report

(Appendix I of the EA, pages 57-58) and Environmental Justice Technical Report (Appendix J of the EA, pages 50-51), three different options are summarized for how the Oregon Transportation Commission (OTC) will develop the Low-Income Toll Program.

Those options range from:

- (1) toll discounts and exemptions;
- (2) providing focused discounts for more specified demographics based on specific income levels, and
- (3) using a verification process that leverages existing low-income service programs or exploring self-certification to qualify for enrollment.

These options need to be exercised as early as possible in the pre-completion tolling period to allow efficient and measured pre-implementation and implementation of one or more of the OTC's Low-Income Tolling options. The report does not provide a realistic timeline of preparing for option three, in particular. We strongly recommend that the OTC give as much time and resources to existing low-income service programs to help implement a feasible verification process.

There was no discussion about the disproportionate impact on populations relying upon transit, and the lack of transit resources within and through the corridor. Also, the lack of other complete bikeways through the corridor limits the fare-free options for people who do not drive. While the low-income toll program addresses the disproportionate burden on low-income populations, the Project is not making any significant improvements to transit or bikeways which could be alternative modes for people taking trips through the corridor. In the Cumulative Impacts Technical Report (Appendix Q of the EA), there is a continued reliance upon the RFFAs to provide the benefits for cyclists and pedestrians.

Social services are offered during business hours, which are during peak travel times. The cost to get to appointments will not lessen if people receiving the services have to pay the tolls or take alternative routes. Instead the time to get to appointments and cost will increase, adversely impacting those individuals even more.

How will penalties impact those who can least afford tolling and how might those create further financial hardships?

While the EA states that "ODOT is prioritizing equity throughout the Project development process" (EA page 1-6), the Project fails to achieve equity-related goals for historically underserved and disproportionately affected communities.

- The Project does not increase access to job centers or other important community centers. In fact, it would represent a new financial burden through use of a toll path, or reduced access through a longer, more congested, and less safe non-toll path.
- The Project shifts air quality effects from I-205 to surrounding communities.
- The Project may negatively impact local businesses in underserved communities.
- The Project does not enhance or expand multimodal transportation choices.

## Land Use

The Land Use API needs to be expanded to include areas of significant diversion and mitigation. For example, Willamette Park and Fields Bridge Park should be considered as they will be impacted by diversion.

We are concerned with the compliance/consistency analysis for following items:

- Oregon Highway Plan (OHP) Policy 1F and Policy 1G Action 1G 1
- Oregon City Transportation System Plan
- West Linn Comprehensive Plan Goal 12, Chapter 2 *Goal 4: Maintain, protect and improve the existing transportation system*
- Stafford Hamlet Community Vision – Goal to Minimize additional traffic and infrastructure impacts

There is no discussion of compliance or consistency with OHP Tolling and Congestion Pricing Policy Amendment, which was adopted by the OTC on January 12, 2023. Goal 6 supports investments in multimodal access and addressing impacts to neighborhood health, safety and congestion.

The Land Use review only takes into account areas within 100 feet of I-205. The land use impact of the diversion on to the local roads is not taken into account. Land use review should be conducted along all of the primary diversion routes that will have an increase in daily traffic volume due to the implementation of tolling.

Land use for the Stafford area is guided by a 3-party agreement which allows for the cities to begin concept planning the area for urban uses upon completion of the improvements along I-205. The land use discussion should analyze the indirect growth-inducing impact of urbanization of the Stafford area which will be caused by the Project.

The Oregon City Arch Bridge should also be evaluated as a 4(f) resource in the land use section. Before approving a project that uses Section 4(f) property, FHWA must determine that there is no feasible and prudent alternative that avoids the Section 4(f) properties and that the project includes all possible planning to minimize harm to the Section 4(f) properties. The Project will result in the increased use of the Arch Bridge (a 40-50% increase in daily volumes), and feasible and prudent alternatives must be further evaluated. A managed toll lane or alternative non-toll funding sources are feasible and prudent alternatives.

The EA should disclose if any County planning permits are required as a part of the Project or mitigation. County right-of-way (ROW) permits will be required for mitigation projects in County ROW.

## Historic and Archaeological Resources

The historic and archaeological API should be expanded to include areas of significant traffic diversion, as well as transportation mitigation measures that would involve visual changes or ground disturbing activities. Due to the narrow nature of the API for the Historic and Archeological Resources section, the report does not address the impact to the extremely important resource of the historic Highway 43 Arch Bridge which connects Oregon City and West Linn. It will be the only toll-free crossing option between Oregon City and West Linn with the implementation of tolls and congestion management. The County requested a discussion of the issues related to the Arch Bridge and the condition of the bridge in our September 15, 2022 comment letter on the Draft TTR.

The Oregon City-West Linn Pedestrian Bridge Concept Plan report outlines the historic significance of the bridge, as well as the need for improvements to the pedestrian and bikeway access in this area.

Figure 5-11 in the TTR specifically identifies an expected increase of 40-50% in daily volume of traffic across the Arch Bridge. There needs to be greater detail provided on impacts of the increased daily volume on this resource, as well as the impact of this increased volume on the local circulation in downtown Oregon City. While there may be existing or cumulative capacity issues with the Arch Bridge, an increase of 40-50% would mean the Project contributes significantly to a cumulative impact. If there is no feasible mitigation to bring conditions to an acceptable level of service, an EIS should be prepared rather than a FONSI.

## Biological Resources

The EA does not disclose the potential secondary impacts from mitigation on vegetation, wildlife, wetlands, and water resources. The EA should describe which mitigation measures would require work outside of the developed right-of-way and whether these measures would impact biological resources. Proposed mitigation includes roundabouts which could impact undeveloped areas next to the right-of-way.

## Public Involvement / Agency Coordination / Consultation

The 60-day public comment period provided by ODOT was woefully insufficient for the public to review and evaluate 3,000 pages of text and several very complicated models. While shorter public comment periods may be the standard practice in other states where tolling is normalized, this will be Oregon's first toll program in the Portland metropolitan area and the first toll program in the State applied to roadways, not just bridges. It is imperative that it is done correctly. Indeed, the public engagement report only details a 10-week period from August 3rd to October 15, 2021 and no other public engagement before and after that period. Instead, ODOT is rushing to implement a project that is based on inadequate and deficient data and analysis, significantly increasing the likelihood ODOT will make mistakes that will negatively affect the communities we are elected to represent for years to come. Thus, it would be



appropriate and prudent for ODOT to extend the public comment period, as is allowable under the NEPA regulations.

Further, governmental agencies and the public experienced several roadblocks that inhibited their ability to review and comment on the EA. For example, the EA, appendices and associated materials were initially published only in English and translated materials were not available for several days. The public engagement report notes that outreach included “[d]istributing flyers containing information about the Project and the comment period in English and Spanish to the Borland Road Free Clinic and Tualatin School House Food Pantry along I-205.” ODOT should have distributed flyers to sites in West Linn, Oregon City, or other portions of Clackamas County.

The public hearings and public in-person information sessions were poorly publicized and held during typical working hours. Particularly underserved communities cannot take time off of work and risk lost income to attend these informational sessions. Additional informational sessions on the EA should be held outside of normal office hours, particularly in areas of environmental justice concern.

## **V. Conclusion**

The full extent of environmental impacts from the Portland Metro Area Value Pricing Project (or the first phase of the Oregon Toll Program) needs to be evaluated. We must understand the combined impacts of tolling on I-205 and the RMPP to enable the development of appropriate mitigation and informed decision making. The County cannot afford to invest in mitigation projects only to find out that the RMPP makes them stranded investments, or simply the wrong investments. The County has raised this and other key issues throughout the process, yet these concerns remain ignored.

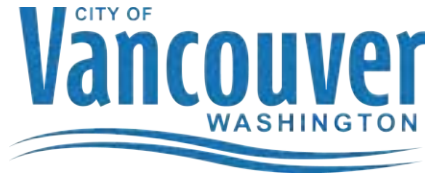
At this time, it is essential that a FONSI is NOT issued, and that ODOT/FHWA be required to complete an EIS. The EIS should include the information that has been identified as missing or needed to supplement the current analysis. Substantial new technical information and analysis is needed to truly understand the impacts of the Project and required mitigation – this includes, but is not limited to:

- Modeling the impacts of implementing the RMPP at the same time as I-205 tolling
- Modeling the impacts of pre-completion tolling (with and without the RMPP)
- Fully evaluating and modeling an alternative with a completed six-lane facility and no tolling

We look forward to receiving your response to our comments and would welcome an opportunity to discuss our concerns further with key ODOT representatives. Our goal is to partner with ODOT to provide for the safe travel of all of our residents, businesses, visitors, and the movement of freight, regardless of the facility that people use to move within and to/from the County and our local cities.

**ODOT I-205 Toll EA - RECORD #2839 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Amanda  
**Last Name :** Delapena  
**Affiliation :** City of Vancouver  
**Submission Method :** Letter  
**Q3. Comments :** Good afternoon Mandy,  
Attached please find correspondence from Mayor McEnerny-Ogle including the City of Vancouver's comments on the Draft Environmental Assessment for the I-205 Toll Project.  
Best regards,  
**Attachments :** 2023\_0421\_I-205\_EA\_Vancouver.pdf (224 kb)



April 21, 2023

Mandy Putney  
Director of Strategic Initiatives  
Urban Mobility Office  
Oregon Department of Transportation  
Via Email: [Mandy.Putney@odot.oregon.gov](mailto:Mandy.Putney@odot.oregon.gov)

Re: I-205 Draft Environmental Assessment

Dear Mandy,

Thank you for continued collaboration with the City of Vancouver as planning for the Oregon Department of Transportation's (ODOT) Toll Program evolves. As a Participating Agency of I-205 Toll Project Draft Environmental Assessment (EA), we are submitting comments on the Draft EA via this letter and via ODOT's online comment portal.

There are two primary purposes for the City's submittal of comments for the I-205 Toll Project Draft EA:

1. The limits of the I-205 Project are approximately 15 miles south of the Washington-Oregon border. Although Project limits are not immediately adjacent or connected to the City of Vancouver's multimodal network, the users of our system may be impacted by changes in regional traffic flows and cumulative impacts resulting from the project.
2. We anticipate that the Draft EA for ODOT's Regional Mobility Pricing Project (RMPP) that is scheduled for release later this year will have similar detail and analysis as the Draft I-205 Project EA. Sharing our comments on the I-205 Project Draft EA helps define and give preview to the issues we are tracking in the RMPP.

Attachment A is the City of Vancouver's Policy Framework on the ODOT Toll Program. The following are primary themes of that Framework and serve as a basis for the City's comments on the Draft EA:

1. Analysis conducted as part of implementing any toll proposal must be region-wide and include the entire bi-state transportation network.
2. Mitigation of impacts from toll projects must consider the entire regional system and be equally applicable in both Oregon and Washington. Also, mitigations must include increased transit options regardless of state of origin.
3. Tolling revenues should be used to address operational, safety, and congestion management issues throughout the bi-state region.
4. Implementation of tolling should be collaborative, equitable and include ongoing opportunities for meaningful participation by policymakers and community members from throughout the entire bi-state region.

Comments on Draft I-205 EA:

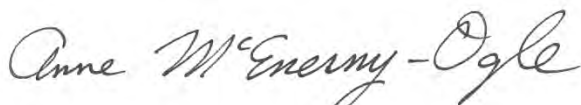
1. In all of the technical areas analyzed, the defined Areas of Potential Impact (API) do not extend to capture areas in SW Washington. We understand that, per National Environmental Policy Act technical requirements, the APIs are not required to extend that far. However, we expect analysis

for the Regional Mobility Pricing Project (RMPP) to analyze areas of SW Washington in order to capture potential impacts and mitigations in SW Washington.

2. The Environmental Justice technical report for the RMPP should include the same information used in the I-205 Project Draft EA analysis but go further and include, at a minimum, details about:
  - a. Mitigations to address barriers related to language or access to banking needs related to the toll program.
  - b. Establishment of programs in SW Washington and/or partnerships with third party vendors that result in access to in-person cash services in SW Washington in order to support travel needs for all users along tolled facilities.
  - c. How benefits of a Low-Income Toll Program will be applicable for all impacted SW Washington stakeholders. Access to these benefits shall be equitably distributed across state lines.
3. Policy and program options defined in the ODOT Low-Income Toll Program Report (2022) and supported by the Oregon Transportation Commission shall be reflected in the I-205 Project Final Assessment and future RMPP Draft Environmental Assessment.
4. For both the I-205 Project and RMPP, ODOT needs to further define:
  - a. Long-term monitoring processes for operational, congestion management, and safety.
  - b. Performance targets for operational improvements, congestion management, and safety prior to implementation of tolling. These targets should be set over different periods of time such as 5 year, 10 year, 15 year, etc. Criteria to define these targets should prioritize enhancements for climate and equity.
  - c. How toll revenues may be spent in Washington State as part of a mitigation program, especially for transit enhancements.
5. For the I-205 Toll Project and the RMPP, ODOT should collaborate with and use media outlets based in SW Washington to provide information about the ODOT Toll Program.

We look forward to further coordination and communication as the ODOT Toll Programs proceeds.

Sincerely,



Anne McEnery-Ogle, Mayor  
City of Vancouver

Attachment:

City of Vancouver Policy Framework on ODOT Toll Program



March 22, 2022 Lucinda Broussard  
ODOT Toll Program Director  
Urban Mobility Office Matthew L. Garrett Building  
123 NW Flanders St., Portland, OR 97209

Dear Lucinda,

On March 21, 2022, Vancouver City Council endorsed a policy framework that reflects the Council’s position on the Oregon Department of Transportation (ODOT) Toll Program and will guide City leadership and staff in all aspects of participation in the Program. The framework states concern about potential impacts to residents of the City and Southwest Washington and the equitable distribution of benefits associated with various tolling and congestion pricing concepts. An earlier version of the framework was endorsed by City Council in 2018 when the Policy Advisory Committee for the Value Pricing Program was concluding recommendations for that Program. Key concepts from the 2018 policy framework remain but are updated to reflect the path of the current Program as well as new Council membership.

Below, please find the policy framework that we have endorsed as a Council body.

The Vancouver City Council recognizes the significant impacts of freeway/highway congestion on the bi-state region, and the need to manage the transportation system to maximize existing infrastructure and move more people in ways that address our climate and equity goals as the region grows. Our Council embraces the need for policymakers and agencies to work together to fund and implement improvements to the bi-state regional transportation system, including bottleneck removal and operational and multi-modal enhancements. Given the significant costs of any mitigation strategy, the Vancouver City Council is compelled to advocate on behalf of our residents for fair and equitable solutions. The current I-205 Toll Project and the Regional Mobility Pricing Project currently under consideration will have direct and substantial impacts on commuters from around the Portland- Vancouver Metropolitan region. In particular, the ~60,000 or more daily commuters from Southwest Washington who use the I-5 and I-205 corridors to enter Oregon and that have no other alternate routes will be inequitably impacted. For the Vancouver City Council to accept a program that prices users to manage congestion and fund facility improvements, it must provide equitable distribution of benefits and reflect the following principles:

**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 and design processes for any long-term change to the regional, bi-state system.

- The current tolling proposals for I-5 and I-205 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.

## **Attachment: City of Vancouver Policy Framework on ODOT Toll Program**

- A full analysis of the regional bi-state transportation system is required to understand potential future impacts of a priced regional system. In Oregon, this analysis must include I-84, I-405, OR-26 and OR- 217, as well as all regionally significant bottlenecks, including the Interstate 5 Bridge. In Washington, this analysis should include SR-14 and SR-500. This analysis must be conducted prior to implementation of a tolled system, should be the basis for determining what roadways are included in it, and define timeframes for when they would be priced.
- The analysis of tolling impacts must include impacts to Washington residents of all income ranges.

### **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 currently 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, constitutional restrictions in Oregon currently limit the use of tolling revenues to capital improvements and cannot fund expanded transit service and operational costs.
- Prior to implementation of any congestion pricing concept, ODOT must commit to identifying and proposing remedies to the state legislature to address the regulatory barriers to using tolling revenues to fund transit operations, and geographic limitations on where funding can be directed.

### **Regional Project Implementation**

Tolling revenues should be used to address operational, safety, and congestion management issues throughout the bi-state region, including regionally significant bottleneck projects within the defined ODOT Toll Program area, transit enhancements and other multi-modal improvements. We support 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.
- Replacement of the Interstate 5 Bridge must be included in all traffic analysis related to congestion relief projects and associated safety and operational improvements.
- Tolling revenues should be used to support capacity, operational and multimodal improvements identified in and consistent with adopted regional plans.

### **Regional Engagement**

- In order to ensure that residents and policymakers throughout the region have the opportunity for meaningful participation, the Toll Program/congestion pricing process must allow sufficient time for analysis and integration of feedback.
- The current I-5 and I-205 Toll Program proposals represent a significant change to our

**Attachment: City of Vancouver Policy Framework on ODOT Toll Program**

regional transportation system. Inevitable implementation glitches in a highly congested corridor could have crippling effects on the entire system. Implementation 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 Transportation Commission (OTC) 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 the full Oregon Toll Program is collaborative and equitable. This will allow future efforts to address regional transportation challenges, like the Interstate 5 Bridge Replacement Program, to proceed in a positive, productive and expeditious manner.

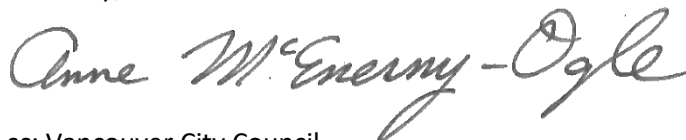
The Vancouver City Council supports the ODOT Commitments drafted in February 2022 and the Equity and Mobility Advisory Committee’s Foundational Statements approved in November, 2021. The Council will continue to monitor and participate in the process and will use all levers at our disposal to ensure that Southwest Washington residents are not disproportionately negatively impacted and receive equitable benefit from changes that impact them.

Council understands and is willing to use the opportunities we have to ensure that changes occur in order to support the residents of Vancouver and Clark County. The key elements of our policy framework have so far not been adequately addressed, and we expect changes by the most near-term milestones of the Toll Program, the Preliminary Engineering phase of the I-205 Project or any subsequent phase of that Project or the Regional Mobility Pricing Project. We look forward to continuing to collaborate on these projects for the betterment and improved quality of life of this entire region.

My colleagues and I look forward to continued coordination with ODOT and the OTC to achieve the most effective and equitable outcome possible.

Thank you for the opportunity to comment.

Sincerely,



cc: Vancouver City Council  
Garet Prior, ODOT Toll Program Policy Manager

**ODOT I-205 Toll EA - RECORD #2840 DETAIL**

**Submission Date :** 4/20/2023  
**First Name :** Kathy  
**Last Name :** Mollusky  
**Affiliation :** City of West Linn  
**Submission Method :** Letter  
**Q3. Comments :** Hello Mandy,  
The attached comment documents supersede those previously submitted.  
Sorry for the extra submission.  
**Attachments :** 2023\_0420\_I-205\_EA\_West\_Linn.pdf (17 mb)





# City of West Linn

April 21, 2023

VIA EMAIL AND FIRST CLASS MAIL

E-Mail: I205TollEA@odot.oregon.gov

Mandy Putney  
Strategic Initiatives Director  
Oregon Department of Transportation  
ODOT Urban Mobility Office  
18277 SW Boones Ferry Road  
Tualatin, OR 97224

Re: ***Comments on I-205 Toll Project Environmental Assessment  
Submitted by the City of West Linn***

Dear Ms. Putney:

This letter and the enclosed attachments constitute the comments submitted by the City of West Linn, Oregon (the "City") on the I-205 Toll Project ("Project") draft Environmental Assessment dated February 2023 (the "draft EA") authored by the Federal Highway Administration ("FHWA") and the Oregon Department of Transportation ("ODOT") (collectively, the "Agencies") under the National Environmental Policy Act ("NEPA").<sup>1</sup> The City also joins in and concurs with the substantive comments on the draft EA submitted by governmental entities, including but not limited to Clackamas County, Washington County, the Cities of Oregon City, Lake Oswego, Tualatin, as well as the objections submitted by these parties in having insufficient time to adequately review and evaluate the draft EA, and ODOT's refusal to extend the public comment period to facilitate such review. Given the many shortfalls in the draft EA, it is clear that the Project cannot support a Finding of No Significant Impacts ("FONSI"), but rather should go through a full Environmental Impact Statement ("EIS") analysis.

Among the issues not addressed by the draft EA, but that are vitally important to the citizens of West Linn, include but are not necessarily limited to:

- The draft EA does not identify who ODOT considers eligible for credit programs due to income, and what relief will these households receive. Nor does the draft EA evaluate whether an opt-in credit program will create a new set of obstacles for those potentially eligible for another program (e.g., generating another level of bureaucracy for impacted individuals, or entities to navigate);

---

<sup>1</sup> As noted in more detail below, the City of West Linn is submitting these comments notwithstanding its view that ODOT has provided insufficient time for a detailed and thorough analysis of the draft EA. The City of West Linn renews its request that ODOT extend the public comment period, and submits these comments while reserving its rights to seek additional time to evaluate and comment on the draft EA, whether through the administrative process or, if necessary, seeking judicial relief seeking the same.



- The draft EA does not state or indicate whether the City will receive any improvements to transit to offset noted impacts; nor does it explain what transit alternatives will be evaluated and potentially implemented in advance of the tolling program being implemented;
- The draft EA does not consider the impact on local charitable organizations such as the Food Pantry, where the delivery drivers are volunteers and are often themselves seniors on fixed incomes;
- The draft EA provides that the only mitigation measure needed in the City is a small section of pedestrian improvements on one street. If traffic on Willamette Falls Drive is projected to increase by 100%, as stated in the draft EA, the conclusion is that there are no additional impacts which strain credibility; and
- The impacts on businesses in the West Linn community from the Project are poorly defined in the draft EA and some, such as the extent of opportunistic shopping and dining, are overly optimistic. Related assumptions in the EA regarding localized job creation and increased incomes for business owners from tolling diversion are similarly flawed and false because ODOT failed to both consult with local business owners and ground their data in actual economic reality.

The implementation of the proposed Tolling Program on such a compressed portion of I-205 makes little to no sense as there are so many opportunities for diversion off I-205 and onto local City streets, thereby placing virtually all of the impacts of the Project on several small communities, most notably West Linn and Oregon City, rather than spreading the impacts fairly on a more regional basis. Along with this comment letter, the City is providing reports by two expert consultants which focus on and address deficiencies in the modeling conducted by the Agencies to support the draft EA, and the inadequate and deficient analysis of the socioeconomic and environmental justice (“EJ”) aspects of the draft EA, which are summarized here. The full text of the reports attached hereto are incorporated by reference and should be considered as part of the City of West Linn’s comments to the draft EA.

### **1) The Agencies Have Not Provided Adequate Public Participation and Public Involvement Opportunities**

The public participation opportunities and time to comment on the draft EA have been woefully insufficient, particularly given that this is the State of Oregon’s first tolling project and the extensive and unprecedented impacts it will have on a broad swathe of the community. Under NEPA, the Agencies involved in the decision-making process have an obligation to make diligent efforts to involve the public and to ensure meaningful public participation. As the City detailed in its March 9, 2023 letter to ODOT, additional time for public comment should have been provided given the extremely voluminous documentation supporting the draft EA. In addition, the opportunities for public engagement have been insufficient. The only public hearing held was largely during business hours, and at least 30% of the speakers at that hearing indicated they had been notified about the hearing fewer than 24 hours before it started. Notwithstanding that both proposed toll gantries lie within the City of West Linn, there were zero in-person public participation events in the City. Given all of the circumstances, the Agencies have clearly failed to meet the public participation and public involvement requirements of NEPA.



# City of West Linn

In addition, it took ODOT nine days to provide the City with requested modeling data, including ODOT initially misdirecting the City to request the data from Metro. On March 14, 2023, counsel for West Linn requested ODOT to provide “all final model datasets (inputs & outputs) for all years (2015, 2027, & 2045) for both the macro-level model (Regional Travel Demand Model) and the meso-level model (Dynameq DTA model) related to the I-205 Toll Project Environmental Assessment.” In response, ODOT represented to counsel for West Linn that ODOT did not have the models, and that they were under Metro’s custodianship. Upon contacting Metro, Metro advised that “while Metro ran the initial models, ODOT’s consultant team actually has the final datasets that were used in the EA.” Upon being so advised by Metro, counsel for West Linn immediately renewed its request for the modeling data from ODOT. ODOT finally provided the requested modeling data on March 29, 2023, almost two full weeks after the initial request, even though ODOT had been in possession of the information the entire time. This runaround in and of itself is reason enough to have provided a 90-day public comment period.

Like many other municipalities and county governments, the City of West Linn has repeatedly asked ODOT to extend the public comment period to allow it sufficient time to review and evaluate the draft EA and its 17 appendices and related modeling. In a letter dated April 5, 2023, ODOT denied the requests of the City and other municipalities for additional time to comment, whereby ODOT referred largely to outreach and engagement between “the summer of 2020” and the time period prior to the release of the draft EA. While those prior efforts to allegedly engage the public in the past are appreciated, any outreach and engagement prior to the release of the draft EA at the end of February 2023, is immaterial to the comment period. The public comment period for the draft EA began only after the draft EA was released, and what level of public comment is appropriate is based on the size and scope of the document alone. ODOT does not get to curtail otherwise appropriate public comment because of public outreach it may have done before. The draft EA is the decision document at issue, and the level of public comment that should be provided is based solely on that document.<sup>2</sup> Given the many inadequacies identified in the draft EA and with the limited comment period provided, it is appropriate for the Agencies to provide additional time for review to provide the impacted community with sufficient and meaningful opportunity to comment on this monumental change to the transportation system.

## **2. The Agencies Should Have Prepared an EIS and Not an EA**

The draft EA does not meet the requirements of the NEPA, 42 U.S.C. § 4321 et seq., because it was unreasonable for the Agencies to forego preparation of an EIS as the Project clearly will have a significant impact on the human environment. A stated goal of the draft EA “is for FHWA to determine a Finding of No Significant Impact.” As presented, it clearly appears that the Agencies predetermined the NEPA analysis in the draft EA by committing itself to an outcome, the issuance of a FONSI, and thereafter the Agencies failed to take the required “hard look” at the consequences of the Project due to its bias in favor of that outcome. In examining the adequacy of a draft EA, Courts examine whether the document has “adequately considered and elaborated [on] the possible consequences of the proposed agency action when concluding that it will have no significant impact on the environment, and whether its determination that no EIS is required is a reasonable conclusion.” *Ctr. for*

---

<sup>2</sup> A more appropriate analysis for the duration of the public comment period should be based on the amount of time a member of the public that had not previously heard of the project would need to thoroughly and appropriately review and evaluate the document. Forty-five (45) days is clearly not sufficient.



## City of West Linn

*Biological Diversity v. Nat'l Highway Traffic Safety Admin.*, 538 F.3d 1172, 1215 (9th Cir. 2008). “If there is a substantial question whether an action “may have a significant effect” on the environment, then the agency must prepare an . . .EIS[.]” *Id.* at 1185. It is unquestionable that the Project will have a significant effect on the environment and the surrounding communities, and therefore performance of an EA is insufficient as a matter of law, and an EIS must be conducted.

### **3. The Draft EA Fails to Provide Mitigation Measures, and Therefore Cannot Reach a FONSI**

Concrete mitigation plans were not provided in the draft EA. Rather, some limited mitigation options are considered, though funding for these plans are not listed, nor are the impacts fully analyzed. Contrary to the requirements of NEPA, these mitigation plans are not commitments of any kind, nor is there any discussion how and by whom these asserted mitigation measures will be funded.

Specific to West Linn, the draft EA has failed to propose mitigation of impacts at many intersections within the City. Rather than identify impacted intersections and propose mitigation measures (which should be part of ODOT’s analysis), the City was asked by ODOT to provide a list of mitigation measures that would be necessary. Mitigation measures identified by the City of West Linn, all of which would need to be completely funded by ODOT, include, but are not necessarily limited to:

- Completion of Willamette Falls Drive from Fields Bridge Park to Highway 43, including filling the gaps in multimodal (pathways/sidewalks) elements;
- Completion of the planned roundabout improvements at the intersection of Highway 43 and Willamette Falls Drive;
- Improvement of Highway 43 to at least McKillican Street;
- Completion of planned improvements for I-205 and the 10<sup>th</sup> Street interchange in both northbound and southbound directions, including the planned roundabout for a northbound ramp;
- The provision of public transit service to the affected communities in order to effectively reduce congestion on I-205 and surrounding roadways, including an extension of the transit route to Tualatin from Oregon City through West Linn;
- Enhancement and reconfiguration of exit ramps at the intersection of I-205 and Highway 43 southbound; to handle additional traffic; and
- Improvements at all other possible bypass routes, including Johnson Road and Blakenship Road and at Southwest Pete’s Mountain Road/Tualatin Avenue, again to handle additional traffic.

Until the mitigation plans are fully defined and analyzed, the issuance of a FONSI is inappropriate, and the Agencies are required to proceed with an EIS.



#### **4. The Draft EA Fails to Clearly Define the Project Purpose and Alternatives**

The draft EA describes the Project as “variable rate tolls on the Interstate 205 (“I-205”) Abernathy Bridge and Tualatin River Bridges to raise revenue for construction of planned improvements to I-205, including seismic upgrades and widening, and to manage congestion.” (Draft EA at 1-1.) The stated purpose of the Project is to “use variable-rate tolls on the I-205 Abernathy Bridge and Tualatin River Bridges to raise revenue for construction of planned improvements on I-205 from Stafford Road to OR 213 and to manage congestion.” As such, that the purpose of the Project appears to be the Project itself, as there is no distinction between the description of the Project and its purpose. Moreover, the draft EA shows that the I-205 Toll Project will increase congestion on arterial roads near the tolls, and therefore, exacerbates the problem it purports to address. The lack of clarity surrounding the two alternatives, the purpose of the Project, the need for the Project, and the benefits of the build alternative, makes it impossible to distinguish the true impact the tolling itself would have on the human environment. As such, the next step in this process must be an EIS.

#### **5. The Draft EA Fails to Adequately Analyze Impacts to EJ Communities**

The draft EA does not consider the disproportionate impact the Project will have on local residents or on EJ communities. Absent analyzing the impacts to specific EJ communities, it is not possible to interpret the intensity of the impacts. Without this analysis, the agency essentially ignores the requirement to analyze whether or not EJ communities will be disproportionately impacted by the Project in a significant way. However, the fact that these communities will be impacted by traffic and safety issues and higher costs, suggests that both the context and intensity of impact that will result from the Project will in fact be significant, and that an EIS should appropriately be performed.

#### **6. The Modeling Conducted for the EA is Flawed and Should Not be Relied Upon**

Modeling was conducted and relied upon by the Agencies in developing the draft EA, including the Regional Travel Demand Model (“RTDM”) and the Dynamic Traffic Assignment (“DTA”) model. Upon review of the modeling assumptions, methodology and results for the I-205 Tolling Project draft EA, and an assessment of the traffic related impacts, several major issues going to the validity and validation of the models have been identified. These include, but are not necessarily limited to the following:

- To establish trust in the results of a travel demand model, it is important to follow a rigorous and transparent process that includes data calibration, sensitivity analysis, validation, and peer review. A typical peer review process would be iterative, and for a project of this size many months would be necessary to understand the calibration process, any sensitivity analyses, and validation process; no local agency was involved in such a process and none was documented in the report;
- The models were calibrated using pre-Covid travel patterns which raises questions as to the veracity of the data used to generate future travel patterns and tolling impacts;
- Traffic diversion is based entirely on the regional macroscopic model which has an entirely different assignment (volume/delay) algorithm than the mesoscopic DTA model that was used



## City of West Linn

to assess localized impacts. The DTA model is smaller in scope and does not include a connection with I-5 in the north, and therefore is incapable of allowing traffic to divert to I-205 or vice versa. In effect, the route choice model in the RTDM, (static assignment algorithm), determines the diversion potential for long trips that could use I-5 or I-205. Thus, traffic diversion could be severely underestimated on local streets near the tolling gantries;

- Both models use a generalized cost function for route choice, but the speeds and travel times are different between the two models. So while the RTDM was used for the diversion, the DTA model would have different diversion characteristics. As a result, the localized impacts could be very different;
- The modeling report states: “[i]n some locations the DTA model constrained demand so that a notable amount of unserved demand resulted. In these cases, the post-processed volumes when input to the Synchro or Vissim models did not reflect the expected level of constrained congestion. In these cases, unserved demand as captured by the DTA model was included in the DTA model volumes prior to post-processing.” If there are upstream bottlenecks that are not fixed, then the unserved demand should not be included in the analysis. This calls into question the validity of the intersection analysis;
- When assessing the origin-destination patterns from the model for both personal and commercial vehicles, a very low correlation between our provider of location based services and commercial vehicles was identified, which indicates that truck and freight impacts were severely underestimated;
- The DTM model scope is limited to the immediate area surrounding the I-205 bridge, preventing evaluation of the impact of toll on long distance trips; and
- Analysis of the Traffic Operations in Appendix C raised significant questions relating to the quality of data inputs; lack of specificity as to impacts that require mitigation; and several shortfalls related to the mitigations in Table 6-1.

Notwithstanding the limited time provided to review and evaluate the voluminous draft EA and its appendices, it is clear that the draft EA is woefully deficient, and fails to set forth the analysis and study that is required under NEPA. Failures to comply with NEPA include, but are not limited to, the Agencies providing insufficient public engagement and opportunity for comment, the failure to fully evaluate the impacts this Project will have on EJ communities, the failure to set forth specific mitigation measures, including how such measures will be funded and implemented, and the reliance upon deficient and improperly executed modeling. A project of this magnitude and unprecedented nature must be conducted in a deliberate and thoughtful manner, and consistent with the mandates and requirements of NEPA. For the reasons set forth herein and in the attached reports, the Agencies have failed to comply with NEPA through the proposed issuance of the draft EA and desired FONSI. This Project should be evaluated through an EIS, and the City of West Linn objects that the same is not currently being performed.



City of  
**West Linn**

The City of West Linn reserves all of its legal rights should the Agencies improperly elect to proceed with the issuance of the EA and a FONSI.

A handwritten signature in black ink, appearing to read "Rory Bialostosky".

Rory Bialostosky, Interim Mayor

A handwritten signature in black ink, appearing to read "Mary Baumgardner".

Mary Baumgardner, Council President

A handwritten signature in black ink, appearing to read "Scott Erwin".

Scott Erwin, Councilor

Leo Groner, Councilor

## MEMORANDUM

---

**Date:** April 17, 2023 **TG:** 23054.00

---

**To:** Maureen Bayer – Jordan Ramis

---

**From:** Bruce Haldors, John Duesing, John Lewis – Transpo Group

---

**CC:** David A. Rabbino – Jordan Ramis

---

**Subject:** I-205 Toll Project – ODOT EA and Model Review

---

This memorandum provides a summary of Transpo's initial review of the modeling assumptions, methodology, and results for the I-205 Tolling Project EA and an assessment of the traffic related impacts associated with the tolling on I-205 to local West Linn roadways. It is important to note that Transpo received the model files on March 31, 2023. Due to the delay in being provided the model and other relevant data and information there was insufficient time to prepare a formal report regarding our review and evaluation of the modeling results included by ODOT in the Traffics and Benefits Section in Appendix C: I-205 Toll Project Transportation Report. As a result, we have prepared a brief summary review and included a set of key questions and comments that we believe ODOT needs to respond to as part of the public comment process. We believe our review has revealed significant deficiencies in the modeling work done, and as a result, in the modeling results as well. We do not believe they demonstrate the required analysis required to be completed under NEPA.

### Summary Review

The EA purports to provide a detailed analysis of the transportation-related aspects of the proposed I-205 Toll Project. The report covers the anticipated impacts of the toll project on various transportation modes, such as vehicle travel time, transit service, bicycle and pedestrian access, and freight mobility. The Transportation section uses data to support its findings and recommendations. The report provides detailed data on traffic volume, travel patterns, and congestion levels, which are used to evaluate the project's impact.

The report covers a wide range of topics, including traffic modeling, toll pricing, and implementation strategies. Overall, the "I-205 Toll Project Transportation Technical Report" provides a detailed analysis of the transportation-related aspects of the proposed I-205 toll project. One of the central issues of the I-205 Toll Project is how much diversion and demand is affected by the tolling itself.

There are several factors that can influence the demand and diversion and it centers around toll pricing. The report describes congestion pricing which refers to the practice of setting toll prices higher during periods of peak demand, such as rush hour, and lower during periods of lower demand, such as overnight or on weekends. The goal of congestion pricing is to encourage drivers to shift their travel times to less congested periods or to alternative modes of transportation, thereby reducing traffic congestion and improving overall travel times.

In summary, while several factors can influence toll pricing, congestion pricing is typically the most important feature in determining toll rates.



The level of demand for a transportation facility can be determined by analyzing various data sources such as traffic counts, travel surveys, and demographic data. Here are some of the methods typically used to determine the level of demand for a transportation facility:

- **Traffic counts:** One of the simplest and most common methods is to conduct traffic counts using sensors, cameras, or manual counts. These counts can provide information on the volume and types of vehicles using the facility and their travel patterns.
- **Travel surveys:** Travel surveys can provide more detailed information about the travel behavior of users, such as their trip purposes, modes of transportation, and travel times. These surveys can be conducted through telephone interviews, mail surveys, or online surveys.
- **Demographic data:** Demographic data, such as population density, employment, and income levels, can provide insights into the potential demand for a transportation facility. For example, high population density and employment levels in a particular area may indicate a higher demand for public transportation.
- **Modeling:** Transportation models can be used to estimate the level of demand for a facility based on various inputs, such as population and employment data, land use patterns, and transportation network data. Two specific models were used for this project: the regional travel demand model (RTDM) and a more localized mesoscopic Dynamic Traffic Assignment (DTA) model.

Overall, the level of demand for a transportation facility can be determined through a combination of these methods. Travel demand models are complex mathematical models that attempt to predict the behavior of travelers in response to various factors, such as travel time, cost, and mode of transportation. To ensure the accuracy and reliability of travel demand models, several steps are typically taken to verify and validate their results. Here are some of the methods used to establish the trustworthiness of travel demand model results:

- **Data calibration:** The model calibrated real-world data such as traffic counts, travel surveys, and other relevant data sources. The calibration process involves adjusting the model's parameters and assumptions to match the observed data, which helps to improve the accuracy of the model's predictions.
- **Sensitivity analysis:** Sensitivity analysis involves testing the model's results against various scenarios and assumptions to evaluate their impact on the model's predictions. This can help to identify areas of uncertainty and potential sources of error in the model.
- **Validation:** Validation involves comparing the model's predictions against real-world data that was not used in the model's calibration. This can help to verify the accuracy of the model's predictions and identify areas where the model may need further refinement.
- **Peer review:** The results of travel demand models are often subject to peer review by other transportation professionals and experts in the field. This can help to identify potential weaknesses in the model and provide feedback on areas for improvement.

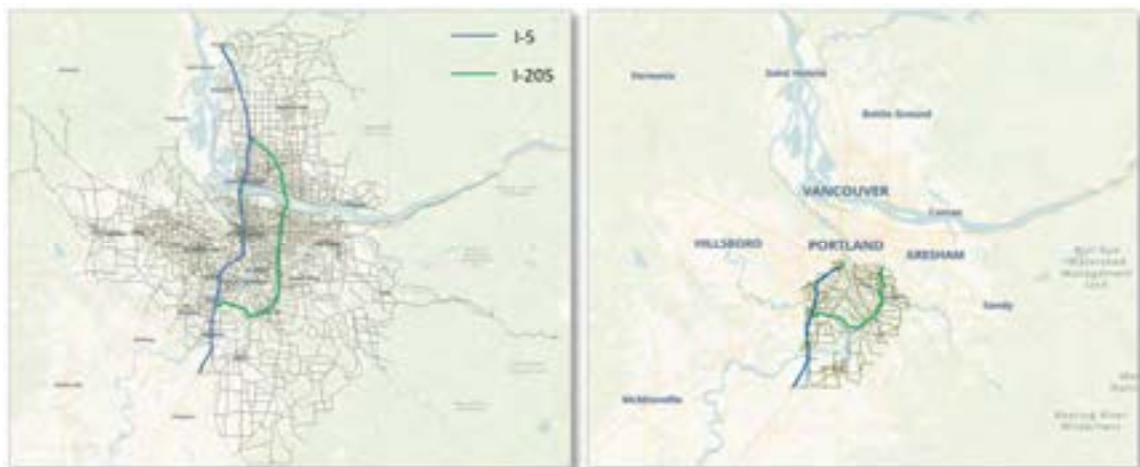
Overall, to establish trust in the results of a travel demand model, it is important to follow a rigorous and transparent process that includes data calibration, sensitivity analysis, validation, and peer review. A typical peer review process would be iterative and for a project of this size many months would be necessary to understand the calibration process, any sensitivity analyses, and validation process. For the I-205 Toll Project, no local agency was involved in such a process, and none was documented in the report.

## Review of RTDM/DTA Models

Based on our preliminary review several issues were identified:

1. From the information provided it appears that the models were calibrated using pre-Covid travel patterns which raises questions as to the accuracy of the data used to generate current and future travel patterns and tolling impacts. Additionally, while it appears a very comprehensive analysis of the Value of Time (VOT) and market segmentation was done, this was all based on pre-Covid information which raises questions about its validity and applicability in a post-Covid environment.
2. Any regional diversion to avoid the toll is based entirely on the regional macroscopic model (RTDM) and not the DTA model. This is because the DTA model is smaller in geographical scope and does not include the connection with I-5 in the north and therefore is incapable of allowing traffic to divert to I-205 or vice versa. See Figure 1 below). In addition, the two models have very different assignment (volume/delay) algorithms which affect the level of diversion associated with the toll. So, while the route choice model in the RTDM, (static assignment algorithm), determines the diversion potential for long trips that could use I-5 or I-205, the local diversion estimates are based on the DTA model and a different traffic assignment algorithm (DTA). This means that traffic diversion is likely different regionally and locally and could result in underestimation of impacts to local streets near the tolling. Sensitivity testing of this could provide further validation of model results, but we saw no such sensitivity testing in the report.

Figure 1 – Model Extents: RTDM (left) & DTA Model (right)

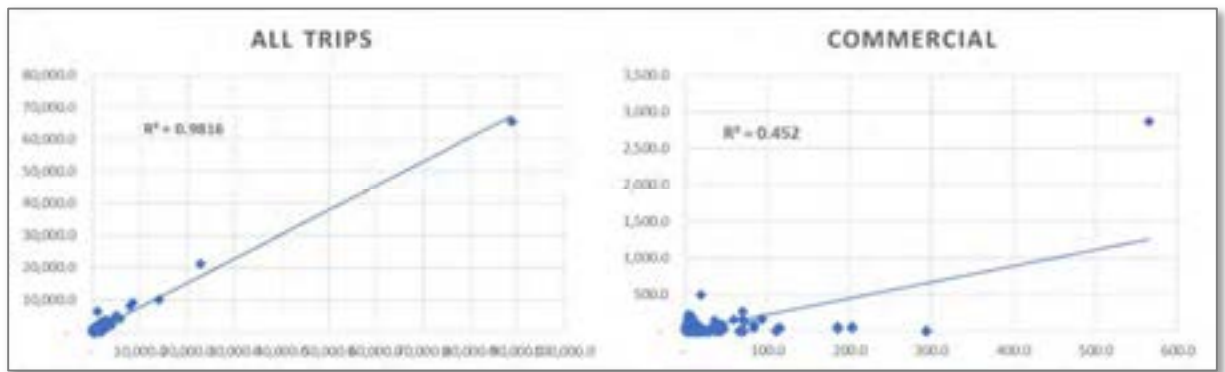


3. There are questions about how future intersection volumes were estimated. The report states *“In some locations the DTA model constrained demand so that a notable amount of unserved demand resulted. In these cases, the post-processed volumes when input to the Synchro or Vissim models did not reflect the expected level of constrained congestion. In these cases, unserved demand as captured by the DTA model was included in the DTA model volumes prior to post-processing. More details on this approach are contained in Appendix A.”* This raises the question that if there are upstream bottlenecks that are

preventing the traffic to reach the intersection that are not being fixed, why include the unserved demand in the analysis. This post process adjustment method raises questions about the accuracy of the level of growth and validity of the intersection analyses.

4. Transpo used a provider of Location-based services (LBS), Replica, to assess the origin-destination patterns from the model for both personal vehicles and commercial vehicles. We found very good correlation between Replica and the model for personal vehicles (R-squared of 0.95) but a very low correlation (R-squared of 0.45) for commercial vehicles. This means truck and freight impacts could be significantly questioned. Trucks have a much larger impact on traffic operations. Underestimating the number of trucks could result in significantly underestimating the traffic impacts.

Figure 2 – District to District Trip Comparison: Model vs Replica Data



5. Only the Assignment component of the RTDM was provided. The EA document discusses shifts in mode (e.g., single occupant vehicles (SOV) to high-occupancy vehicles (HOV)) in response to the tolls, however, since the full model was not provided, there is no way to review the mode choice component that would determine these mode shifts. The full model should be provided for full review.

## RTDM Model

The extent of the RTDM model is illustrated in Figure 3. The model covers the city of Portland, I-5, I-205 and other corridors and bridges which are included. This enables the model to cover alternative routes for the tolling analysis of the I-205 Bridge.

*Figure 3 - EMME Model Extents*



### **RTDM Model Summary**

The following modeling databases were received and reviewed:

- Base Year - 2015
- Future Year - 2027: No Build, Build
- Future Year - 2045: No Build, Build

### **Scenarios**

- Hourly Scenarios and Daily (24 hour) Scenarios were available.
- No transit alternatives mode or assignments are included in the model.

### **Trip Generation and Growth Comparison**

- Truck volumes increase by 30-36% between 2015 and 2027, and between 2027 & 2045.
- Single Occupancy Vehicles (SOV) and High Occupancy vehicles (HOV) traffic volumes grow approximately 16-17% from 2015 to 2027 but grow by about 10% from 2027 to 2045.

- The growth projection factors seem reasonable but have not been confirmed due to time constraints.

Trip Distribution and Mode Choice

- Trip distribution and Mode Choice model components were not available in the received model file as the table below summarizes those trips.

Demand Class	AM Peak Hour				
	Trip Generation			Growth Factors	
	2016	2027	2045	<u>2015 to 2027</u>	<u>2027 to 2045</u>
SOV	240,924	279,737	302,203	16%	8%
HOV	110,140	124,350	135,646	13%	9%
Truck	6,702	8,801	11,949	31%	36%
<b>Total</b>	<b><u>357,766</u></b>	<b><u>412,888</u></b>	<b><u>449,798</u></b>	<b><u>15%</u></b>	<b><u>9%</u></b>

Demand Class	PM Peak Hour				
	Trip Generation			Growth Factors	
	2016	2027	2045	<u>2015 to 2027</u>	<u>2027 to 2045</u>
SOV	295,731	345,660	376,660	17%	9%
HOV	108,131	125,979	135,734	17%	8%
Truck	4,611	6,049	8,209	31%	36%
<b>Total</b>	<b><u>408,473</u></b>	<b><u>477,688</u></b>	<b><u>520,603</u></b>	<b><u>17%</u></b>	<b><u>9%</u></b>

**Difference Network Analysis**

A volume difference plot was produced to review the diversionary impact of the proposed toll on the I-205 bridge. Figure 4 illustrates the volume difference plot on a wider model extent whereas Figure 5 presents the volume difference plot for the network immediately around the I-205 bridge.

Observations:

As tolling is implemented on the I-205 bridge corridor, the following traffic diversions were observed:

- From I-205 To S Highway 99E the diversion appears to be significant.
- Local diversion to SE Borland Rd appears to be significant.

Figure 4 - PM Peak Traffic Volume Difference Plot (2045 Build – 2045 No Build) – Wider Model Context

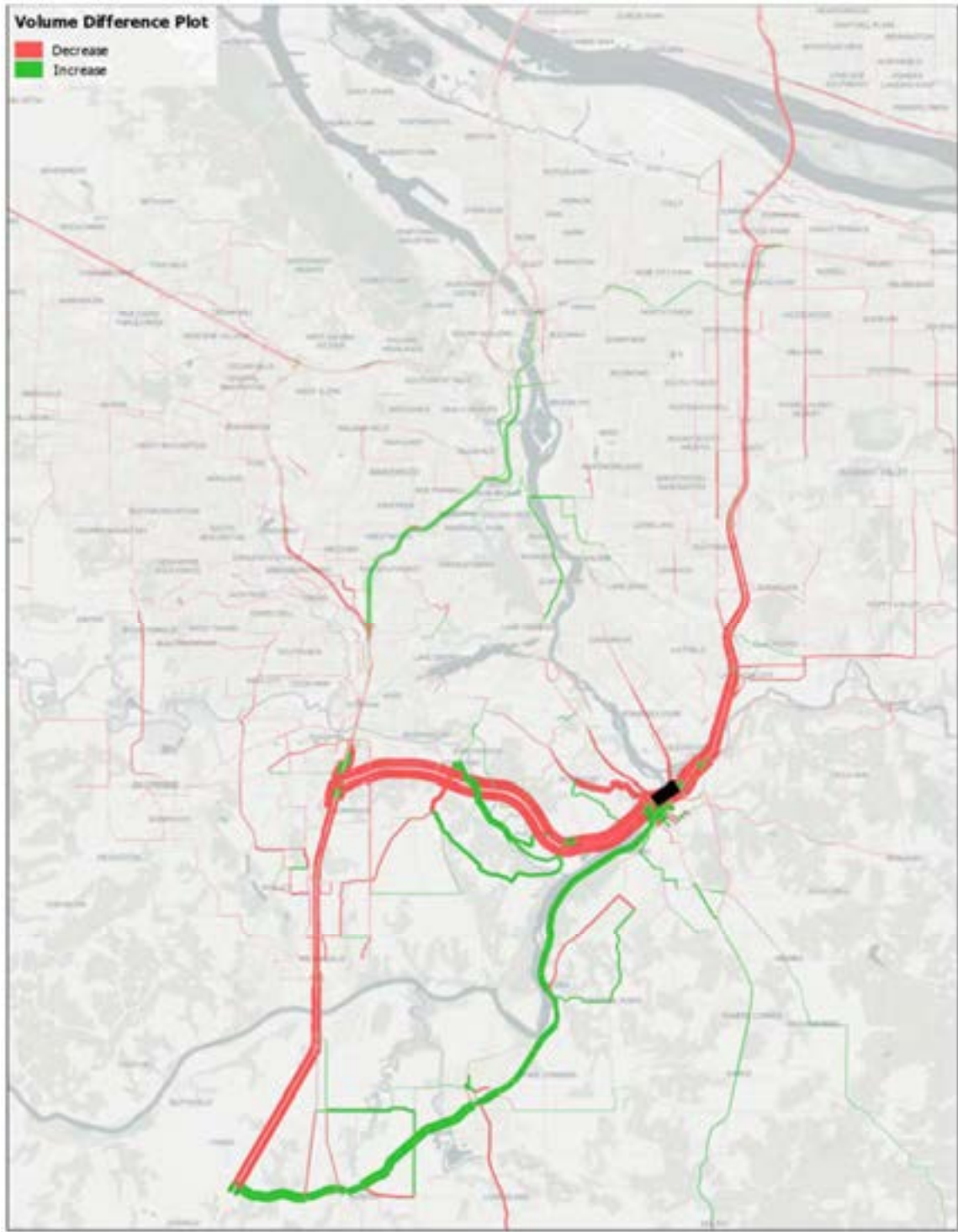
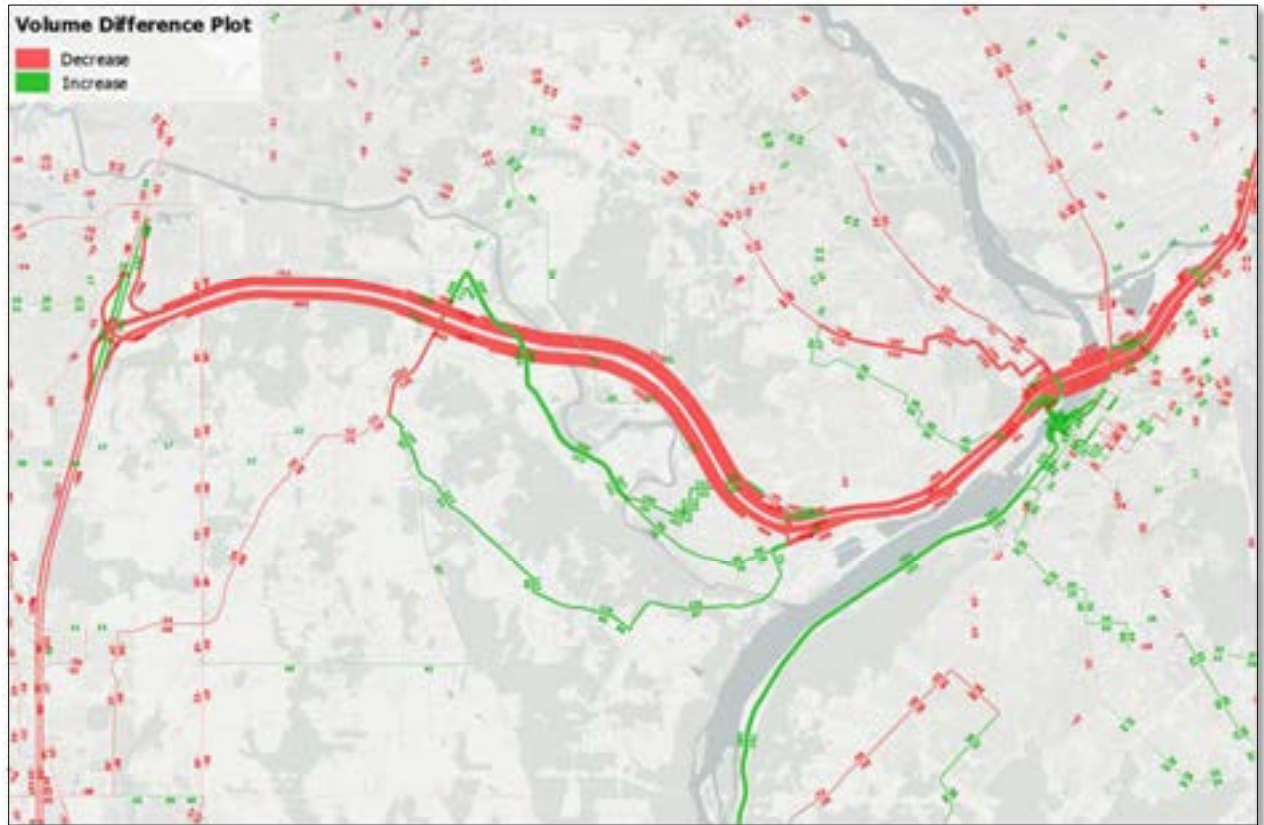


Figure 5 - PM Peak Traffic Volume Difference Plot (2045 Build – 2045 No Build) – Around I-205 Bridge



### **Select Link Analysis on I-205**

A select link analysis was performed to understand the origin and destination of traffic using the I-205 toll bridge. Figure 6 illustrates the select link traffic volume plot on a wider model context whereas Figure 7 presents the select link plot for the network immediately around the I-205 bridge in the RTDM model.

#### **Observations:**

- Long distance traffic accounts for less than 50% of the traffic using the tolled I-205 bridge over the Willamette River. .
- **According to the select link analysis for the 2045 Build PM peak, over 50% (51 to 53%) of the traffic using the I-205 Bridge comes from the areas nearby the bridge corridor which suggests significant opportunity for diversion.** See Figure 5 for additional information.

Figure 6 - 2045 Build PM Peak Traffic Select Link Analysis for the I-205 Bridge – Wider Model Context





Figure 7 - Select Link Analysis for Vehicles Using the I-205 Bridge – 2045 Build PM Peak Traffic Volume



- **Unanswered questions regarding the RTDM**
  - Only the Assignment Model is available. Trip generation and Trip Distribution, Mode Choice Components were not found. The full model should be provided for full review.
  - Scenarios inside the 2027\_NoBuild database are named “2045 Scenarios”; the naming nomenclature is not fully understood.

## Review of Traffic Operations in Appendix C

1. The diversion impacts are measured using “jurisdictional mobility standards,” (Section 5.4); Mobility Standards from 2013 Clackamas County Comprehensive Plan, 2011 Oregon Highway Plan, 2016 West Linn Transportation System Plan (TSP), 2013 Oregon City TSP, and 2017 Gladstone TSP.
  - a. Given how dated some of the information is, some being a decade old, are these acceptable measures of effectiveness today?
  - b. Secondly, should the mobility standards that are not met in the No-Build alternative, and subsequently worsen in the Build alternative, appropriately be considered as “no impact” because the mobility standard is already not being met?
  - c. Were these standards reviewed and agreed upon by the project stakeholders, and if so, when was that review and agreement reached, and does it remain effective?
2. Future Year Intersection Operations (Years 2027 & 2045; AM & PM): - Tables 5-14, 5-15, 5-17 & 5-18 clearly indicate there are impacts to diversion routes/intersections due to increased traffic volumes related to the Build scenario in both 2027 and 2045. The tables show the intersection performance metrics under the No Build and Build conditions. The text summarizes the results by grouping the intersections as follows:
  - a. Intersections that do not meet the “mobility standard” in both the No Build and Build alternatives. In some locations, the delay is already very significant (>300 seconds) in the No Build.
  - b. Intersections that worsen under the Build alternative; and
  - c. Intersections that do not meet the “mobility standard” under the No Build but do meet the standard under the Build condition.

Are these intersections considered significantly impacted by the EA? While the document appears to be relatively thorough regarding the analysis and results, it does not specify whether the intersections that experience significant impacts (in our opinion) will require mitigation.

3. Also, it was noted that the software used for this analysis is Synchro 10/HCM2000. Why wasn't Synchro 11/HCM2010 utilized for the analysis? There are significant differences in how delay is handled from HCM 2000 and 2010 which could affect the outcome of the intersection analysis. A white paper prepared by Kittelson Associates (*Comparison of Urban Streets Methodologies in HCM 2010 and HCM 2000*) the initial summary states:

*It must be remembered that the methodology in HCM 2010 represents a fundamental change from that in HCM 2000. Hence, it should be expected that some differences in the predicted travel speed and level of service will occur for some facilities when using the new methodology. It should also be remembered that each of the methodological changes were developed through extensive research, calibrated with field data, validated, and reviewed by many professionals.*

Queuing and Blocking Report  
 Future Build

06/20/2022

Intersection: 1: Stafford & SW Borland Rd

Movement	EB	EB	WB	NB	NB	B163	SB	SB	B160	B159	B157
Directions Served	LT	R	LTR	LT	TR	T	LT	TR	T	T	T
Maximum Queue (ft)	738	240	338	334	256	230	573	533	1173	873	244
Average Queue (ft)	441	106	167	189	66	109	341	262	466	261	62
95th Queue (ft)	904	294	492	354	253	613	667	590	1700	1151	306
Link Distance (ft)	707		657	329	329	1026	492	492	1781	1371	436
Upstream Blk Time (%)	41		12	12	9	7	27	7	19	15	10
Queuing Penalty (veh)	0		0	53	40	66	194	52	270	211	148
Storage Bay Dist (ft)		215									
Storage Blk Time (%)	55	1									
Queuing Penalty (veh)	74	2									

4. We did not have time to go through all the queuing analysis performed. However, we did notice in some instances (Stafford and Borland for example above) that there are queues of 600+ feet with storage blocked 55% of the time. This is the disadvantage of using Synchro/Sim Traffic over a true microsimulation model software in that the queues and their impacts on other downstream and upstream intersections are not considered. How these react in a systems traffic analysis may result in impacts between intersections that are not realized by using HCM/Synchro Methodologies.
5. Proposed mitigations are listed in Table 6-1.  
 The proposed mitigation(s) are listed in terms of traffic operation and safety. Our question(s) are about traffic operations.
  - a. How were these mitigations developed? There is no discussion or reporting of conditions after the proposed mitigations were implemented. Where are the results?
  - b. Are the short term (2027) mitigations a part of the project? i.e., included in the project and budgeted for?
  - c. Long term monitoring is mentioned for the 2045 mitigation treatments and implementation if warranted. Is there another agreement stating this and who will be responsible for developing the mitigation plan? Again, were these mitigation plans analyzed?

As mentioned, we have not been able to review many things thoroughly, but the above review concentrated on issues and questions that we believe are most critical to the project. If there is need, we can take a deeper dive into the models and analysis. In the meantime, if you have any questions or need additional information, please feel free to contact us. Thank you.



# Technical Memorandum

Date: April 17, 2023

To: David Rabbino, Jordan Ramis; Maureen Bayer, Jordan Ramis

From: Gretchen Greene, PhD and Rabia Ahmed, Greene Economics

cc: City of West Linn

Thank you for this opportunity to comment on the I-205 Toll Project Draft Environmental Assessment (draft EA). Our comments on the document are based on our experience analyzing the socioeconomic and environmental justice (EJ) aspects of National Environmental Policy Act (NEPA) compliance, a thorough review of the draft EA and technical appendices, and several guidance documents surrounding NEPA, EJ, and tolling projects. Our comments are organized first into an Executive Summary, second a deeper examination of the failure to specify mitigation, third the failure to adequately analyze impacts to the local populations, and finally comments specifically related to EJ communities. In addition, there are a few comments about revenues and the economic analysis. A final section compares and distinguishes the draft EA with another tolling draft EA that did use the FONSI approach in New York.

There are many guidance documents related to how to analyze equity concerns in NEPA processes. These are used throughout our comments to evaluate how the analyses should be conducted by the appropriate Agencies involved herein. The guidance documents cited include:

- ODOT. 2015. Guidelines for Addressing Title VI and Environmental Justice in Transportation Planning. January (**ODOT EJ Guidelines**);
- National Academies of Science, Engineering and Medicine. 2018. Environmental Justice Analyses When Considering Toll Implementation or Rate Changes Final Report. (**NASEM EJ Tolling**);
- US Department of Transportation Federal Highway Administration. 2013. Guidebook for State, Regional, and Local Governments on Addressing Potential Equity Impacts of Road Pricing. April. (**FHWA Equity Pricing**); and
- Federal Interagency Working Group on Environmental Justice and NEPA Committee. 2016. Promising Practices for EJ Methodologies in NEPA Reviews. March (**All Fed EJ NEPA**).

For each of the comments below, references have been provided related to the recommended direction from one or more of these guidance documents. For convenience the shorthand reference name shown in bold above is used in the text.

## **I. INTRODUCTION and OVERVIEW**

The I-205 Toll Project draft EA falls short of the NEPA required analysis in several significant ways described in more detail in subsequent subsections. However, there are some major deficiencies that permeate the draft EA including:

- failure to specify mitigation measures;
- failure to reduce safety risks under the Build alternative;
- failure to clearly define the project purpose and alternatives; and
- failure to adequately analyze impacts to EJ communities.

Given the many shortfalls in the draft EA, it is clear at this point that the project should not proceed to a Finding of No Significant Impacts or FONSI, but rather should go through an Environmental Impact Statement (EIS) analysis. Details of these points are provided in the numbered comments below.

### **I.A. Mitigation plans are not specified and therefore impacts are significant.**

We acknowledge that an agency need not, in the context of a draft EA, specify the mitigation measures that will be taken to complete the project. However, as pointed out in the NASEM EJ Tolling report on how to conduct environmental justice analyses for toll implementation,

“Given the timing of planning and NEPA studies, it may not be possible to fully define all pricing and account management policies; however, **the absence of definition appears to undermine the basis for a finding of no significant adverse impacts** as it relates to low-income households’ willingness to use transponders, in particular.”<sup>1</sup> (emphasis added)

Strategies for avoidance, minimization, and mitigation techniques are offered as options to consider in the draft EA. But they are not clearly specified, nor are funding sources for the mitigation identified, and neither is there a firm commitment to carrying out any of the identified techniques. For example, one mitigation option was presented as “ODOT may establish a group consisting of local leaders, staff, and/or elected officials to meet with ODOT

---

<sup>1</sup> National Academies of Science, Engineering and Medicine. 2018. Environmental Justice Analyses When Considering Toll Implementation or Rate Changes Final Report. Page 86 Available at: <https://doi.org/10.17226/24992>.

staff on an agreed upon basis... to be a direct line of communication with ODOT to address rerouting concerns” (Appendix C Section 6.1 page 161). The draft EA does not include how this potential mitigation option will be funded or created, or if they will follow through with this mitigation option. Due to this absence of specificity, it is not possible to determine how local populations, particularly local EJ populations, will be impacted. Therefore, it would be inappropriate for the draft EA to result in a FONSI.

**I.B. The Build alternative poses an overall greater safety risk to local populations and violates the ‘do no additional harm’ directive.**

Guidance from the **FHWA Equity Pricing** document directs an agency to,

“Evaluate equity impacts of the base case or “No Build” alternative as well as the impact of the road pricing project... Part of the baseline evaluation is that, at a minimum, an agency should ‘do no additional harm’ with a road pricing project.”<sup>2</sup>

Notwithstanding this mandate, the Build alternative in the draft EA clearly will increase the numbers of crashes in the Area of Potential Impact (API) compared to the No Build alternative as traffic is diverted off I-205 to other road segments and local intersections. Building on the analysis in Section 5.3.7 of Appendix C of the draft EA (pages 138 to 152), there will be increased rates of crashes on local roadways by 2045 under the Build, compared to the No Build alternative (see Table 1). For the several intersections analyzed, the draft EA shows an overall increase in crashes of 22 percent, including a 17 percent increase in injuries and fatalities.

**Table 1 – Change in Forecasted Crashes at Analyzed Intersections for Build Alternative Compared to No Build Alternative - 2045**

<b>Intersections</b>	<b>Fatalities/Injuries</b>	<b>Property Damage Only</b>	<b>Total</b>
Stafford and SW Borland	13%	17%	15%
SW Stafford and I-205 N Ramp	19%	26%	23%
SW Stafford and I-205 S Ramp	31%	39%	36%
SW Stafford and SW Ek	25%	42%	35%
OR 99E and South End	0%	33%	20%
OR 99E and New Era Rd	8%	8%	8%
<b>Total</b>	<b>17%</b>	<b>26%</b>	<b>22%</b>

Source: Elaborations on data found in Section 5.3.7 of Appendix C of the draft EA (pages 138 to 152)

<sup>2</sup> FHWA Equity Pricing, Section 4.1 Page 15

Additional information provided by the agency in Appendix C shows that pedestrian and bicycle accidents would also increase with the Build alternative compared with the No Build alternative:

**Table 2 – Change in Forecasted Crashes on Analyzed Road Segments for Build Alternative Compared to No Build Alternative - 2045**

Roadway Segment	Pedestrian	Bike	Fatalities and Injuries	Property Damage Only	Total
SW Borland Rd	0%	0%	-7%	-10%	-9%
OR 213	0%	0%	3%	920%	<b>198%</b>
OR 43	0%	0%	-14%	-13%	<b>-13%</b>
OR 99E	0%	8%	5%	3%	<b>4%</b>
SW Stafford Rd	0%	0%	24%	24%	<b>24%</b>
Willamette Falls Dr.	50%	0%	34%	35%	<b>35%</b>
<b>Total</b>	<b>11%</b>	<b>7%</b>	<b>7%</b>	<b>14%</b>	<b>11%</b>

Source: Elaborations on data found in Section 5.3.7 of Appendix C of the draft EA (pages 138 to 152)

These estimates suggest an overall increase in crashes of 11 percent for pedestrians, and an 11 percent increase overall, and an overall 7% increase in fatalities and injuries.

### **I.C. Project Definition is Not Clear and the Alternatives Analyzed are Insufficient.**

NEPA guidance directs authors to describe and analyze any reasonable alternatives. In a draft EA, this is limited to “when reasonable alternatives are reasonably available.”<sup>3</sup> Though four other alternatives were initially considered, these alternatives were limited and not advanced in the draft EA. The Engagement Summary for the draft EA stated, “The dual purpose of the Project is to manage congestion and to raise revenue for congestion relief projects, such as the I-205 Improvements Project” (Section 10.4.11 Page 116). This purpose could include several options to manage congestion and raise revenue. However, all four alternatives initially included in the early draft EA proceedings included tolling in the same section of I-205 across all lanes. The draft EA did not consider adding tolls along a different section of I-205 or I-5 where other large roadway construction projects are sanctioned and where congestion is even greater. They did not consider tolling only the additional third lane they plan to construct, which is what WSDOT did to help with congestion on I-405<sup>4</sup>. These

<sup>3</sup> 40 CFR 1502.2(d-g). [Available here](#).

<sup>4</sup> WSDOT. I-405 Corridor Program Final EIS.

other alternatives could lessen the disproportionate impact residents within the API will bear with the addition of two tolling gantries that are nearly unavoidable. These potential alternatives are also reasonable, as an express toll lane project was instituted in Washington, and tolling in Oregon has been approved to support construction of roadways<sup>5</sup>. Instituting a larger tolling system, or a single lane toll could still meet the needs presented in the draft EA – funding, improving travel time reliability, improving freight movement, improving safety, reducing climate change contributions, and increasing seismic resiliency (draft EA Section 1.4 Pages 1-4 – 1-6). Other alternatives should be considered before moving forward with the project.

#### **I.D. The draft EA does not account for the disproportionate impact the I-205 tolling project will have on local Environmental Justice (EJ) communities.**

Within the API, 20 percent of residents are experiencing low-income, and 20 percent identify as a racial or ethnic minority.<sup>6</sup> There are also hundreds of people experiencing chronic homelessness within the API.<sup>7</sup> Together, these groups account for the EJ communities that should be considered in the draft EA. Despite the prevalence of EJ communities and individuals near the proposed toll project, the draft EA does not adequately analyze the disproportionate impacts the Build alternative will have on this populace. In particular, the draft EA fails to analyze EJ impacts at the correct geographic scale. Also, the lack of specificity surrounding the proposed tolling tiers prevents us from fully understanding the financial implication tolls may have on EJ communities in the API. The lack of analysis regarding typical commute times for these community members, and the disproportionate health impacts from worsened air quality due to traffic diversion constitute additional deficiencies of the draft EA. The draft EA does not state how ODOT plans to make transponders accessible for low-income populations, how low-income tolling will be accomplished, appropriately analyze EJ commute timing, or properly analyze changes in employment and service availability under the Build alternative. The details of each of these deficiencies is explained more fully in the section below titled, “IV Impacts to Environmental Justice Communities.”

## **II. Mitigation is Not Specified**

Within the main I-205 Toll Project draft EA and the numerous technical reports, concrete mitigation plans were not provided. Rather, mitigation options are considered, though as noted above the funding for these plans is not listed nor are their impacts fully analyzed. The

---

<sup>5</sup> House Bill 2017 “Keep Oregon Moving.”

<sup>6</sup> EA Appendix J Section 5 Table 5-2 Page 19

<sup>7</sup> EA Appendix J Section 5.2 Page 26



draft EA fails to articulate a mitigation strategy, fails to address mitigation plans for EJ communities, and contradicts itself with the proposed mitigation.

## **II.A. The draft EA fails to articulate the mitigation strategy to decision makers and the public.**

Following the **FHWA Equity Pricing** guidance,

“In order for road pricing projects to succeed, the implementing State, regional, and local agencies **must** understand equity issues, **develop** mitigating measures, and **articulate the issues and mitigation strategy to both decisionmakers and the public.**” (Section 1.1 Page 1)

The draft EA presents mitigation options that are vague, have not been fully developed,<sup>8</sup> are not fully analyzed, and are listed without a source of funding. These mitigation plans are neither commitments nor are they analyzed to an extent where their impacts can be understood. Until the mitigation plans are fully defined and analyzed, the issuance of a FONSI is inappropriate, and the need for an EIS essentially a requirement. Despite this, ODOT would like the FHWA to “identify ODOT’s mitigation commitments” if a FONSI is issued, at which point ODOT would not be required to conduct a proper analysis on the mitigation impacts (draft EA Section 1.6 Page 1-8). In another section of the draft EA, it states “ODOT will identify final mitigation strategies in coordination with the local jurisdictions and with input from comments on this Environmental Assessment” resulting in a revised draft EA.<sup>9</sup> It is unclear if ODOT is requesting FHWA to determine whether there are significant environmental impacts for this project and to identify which mitigation plans they should put in place or if ODOT will establish committed mitigation plans in a finalized EA. As a result, ODOT’s draft EA is not consistent with FHWA guidance.

## **II.B. The draft EA offers avoidance, minimization and mitigation plans as options rather than guarantees, making it impossible to fully deduce the impact the Build alternative will have on EJ communities in the API.**

ODOT’s presentation in the draft EA does not allow for anyone to fully understand or evaluate the full impact the Build alternative will have on EJ communities in the API. For

---

<sup>8</sup> ODOT is in the process of developing a low-income toll program. There are presently three options with many variations under consideration. It is unclear how ODOT will address low-income households within the tolling program based on the large number of options still under consideration. It is impossible to deduce how low-income households will be impacted without knowing the extent of this tolling program. (Appendix J Section 7 Page 50)

<sup>9</sup> The City of West Linn believes that if this draft EA is followed up with a revised draft EA, that document will be required to go through the public comment process. The City of West Linn reserves its rights in this regard.

example, the OR 99E and Ivy Street Intersection in Canby, located within an EJ TAZ,<sup>10</sup> would experience worse traffic operations under the Build alternative in 2045.<sup>11</sup> Without mitigation, under the Build alternative this intersection would have a disproportionately negative impact on the EJ community. The draft EA does not offer a definitive plan to address these impacts. To potentially address mobility concerns, the draft EA states ODOT should “consider operational improvements at OR 99E and Pine St to facilitate more traffic use of that intersection to reach downtown Canby, thereby alleviating some traffic impact at Ivy St” (App C Section 6 Page 173). This mitigation plan is vague and presented without supporting information to prove the improvements to other intersections will alleviate traffic in the EJ TAZ. Nor is any information provided regarding how these proposed mitigation measures will be funded. To minimize the increase of transportation costs on low-income drivers, the draft EA presents three ambiguous mitigation options that vary in the amount of transportation cost reduced (App J Section 6 Page 50). Without an established plan in place, or an identified funding source for the mitigation measures, it is impossible to deduce the true economic and safety impact the Build alternative will have on low-income and EJ households.

### **II.C. The lack of mitigation is in direct contradiction with the draft EA itself.**

The draft EA states in Section 1.5, page 1-6, “Past land use and transportation investments have resulted in negative cultural, health, and economic effects on local communities and populations, and have disproportionately affected historically and currently excluded and underserved communities.” Later, on page 2-6, the draft EA states that a goal of the project is to “Limit additional traffic diversion from tolls on I-205 to adjacent roads and neighborhoods;

- i. Design the toll system to limit rerouting from tolling.
- ii. Design the toll system to minimize impacts on quality-of-life factors, such as health, noise, safety, job access, travel costs, and environmental quality for local communities from traffic rerouting.”

The draft EA fails, however, to set forth how any of these goals have been or will be accomplished.

### **III. Impacts to Local Residents Not Analyzed**

The draft EA does not consider the disproportionate impact the I-205 Toll Project will have on local residents. The Transportation Technical Report notes that a high percentage of

---

<sup>10</sup> See Appendix J Section 7 Page 50

<sup>11</sup> See Appendix C Section 5.3.3 Page 121

Abernathy Bridge users originate from nearby areas – 22 percent from the West Linn/Gladstone area with fewer travelers coming from areas further away (draft EA Appendix C Section 4.2.1 Page 26). This poses an equity issue, as local residents will bear the brunt of the safety and economic impacts, whilst others receive the same benefits with a smaller burden. The draft EA does not consider mitigation options for local residents, the economic impact of tolling for local residents, or how traffic diversion disproportionately increases safety concerns for local residents.

### **III.A. The draft EA does not consider mitigation options to reduce the disproportionate economic impact tolling will have on local residents.**

The **FHWA Equity Pricing** guidance states that agencies should,

“Analyze the potential for adverse impacts and evaluate both whether it is disproportionate on the community and whether it includes potential environmental, human health, social, economic, and cultural impacts.”<sup>12</sup>

ODOT concluded that 74 percent of trips using I-205 initiate, terminate, or both between SW Stafford Road and OR 213 (Appendix C Section 4.2.2 Page 27). Therefore, only 26 percent of trips are through trips made by those living farther away from the proposed tolling facilities. Despite making note of the high percentage of local use of I-205, ODOT does not analyze how this might result in a disproportionate economic impact to residents. Many West Linn and other local residents, especially those from Clackamas County made comments stating that this group would bear a disproportionate burden due to their proximity to the proposed toll facilities.<sup>13</sup> These comments were not addressed in the draft EA. Not only were the economic impacts not analyzed separately for local residents that utilize I-205 more frequently, but mitigation was not considered to lessen this burden. ODOT’s failure to analyze the economic impact the proposed tolls would have on local residents and lack of mitigation consideration is in not in line with the FHWA equity guidance. As such, proceeding forward with a FONSI would be inappropriate.

---

<sup>12</sup> US Department of Transportation Federal Highway Administration. 2013. Guidebook for State, Regional, and Local Governments on Addressing Potential Equity Impacts of Road Pricing. April. (Section 4.2 Page 16)

<sup>13</sup> WSP and EnviroIssues. 2021. I-205 Toll Project Engagement Summary: Summer-Fall 2020. Prepared for Oregon Department of Transportation. March. Pages 50 – 67.

### **III.B. Local residents, such as those living in Clackamas County and/or West Linn were not considered. This failure represents horizontal inequities not analyzed.**

Step 2 of the **FHWA Equity Pricing** guidance states,

“Determine who may potentially be impacted by the project. What kind of equity is important?” (Section 1.1 Page 1)

With 74 percent of all traffic either originating, terminating, or both between I-205/Stafford Road and the I-205/OR 213 intersections,<sup>14</sup> the populations who live in these areas will be using the toll roads more frequently than travelers or commuters traveling through the API. The disproportionate impact to local residents represents horizontal inequity<sup>15</sup> and is inconsistent with FHWA guidance.

For example, the median household in the API is expected to see an annual toll fee of \$575, (Section 3.4.2, Environmental Consequences, Economics, page 3-61), but the local households were not considered. Following the **FHWA Pricing Guidance** mandate for equity, an estimate of the dollar value for the households located within the area where 74 percent of trips either originate or terminate (within the area I 205/Stafford Rd. and the I205/OR 213) is also needed.

### **III.C. The significant increase in congestion in intersections under the Build alternative impacts local communities disproportionately, and no mitigation is identified.**

Congestion and traffic are already significant issues within the API on local roadways. We understand that traffic volumes will increase in 2045 due to population growth, but the Build alternative results in significantly worse conditions for many intersections during peak travel times and this is unacceptable. Rather than reduce congestion, which is listed as one of the needs for this project, the project simply pushes congestion onto arterial roads where it further impacts local communities. The draft EA fails to identify clear mitigation measures to reduce congestion on arterial roads.

For example, 25 of the 50 intersections, or 50% of the studied intersections, will experience higher v/c (volume to capacity) ratios and longer delays (seconds/vehicle) under the Build alternative compared to the No Build alternative during AM peak hours in 2045 (draft EA Appendix C Section 5.3.3 Table 5-14 Pages 106-108). Additionally, 15, or 30% of the intersections would not operate within mobility standards during AM peak hours under the

---

<sup>14</sup> See Figure 4.2 Page 27, Appendix C I205 Toll Project Transportation Technical Report.

<sup>15</sup> US Department of Transportation Federal Highway Administration. 2013. Guidebook for State, Regional, and Local Governments on Addressing Potential Equity Impacts of Road Pricing. April., page 8.

Build alternative. Of the 50 intersections studied, 13 intersections would fail mobility standards under both alternatives in 2045. However, of the 13 intersections that would fail under both alternatives, 11, or 85%, would perform worse under the Build alternative (draft EA Appendix C Section 5.3.3 Page 105).

15 of the 50, or 30% of the intersections studied will experience higher v/c ratios and longer delays under the Build alternative compared to the No Build Alternative during PM peak hours in 2045 (draft EA Appendix C Section 5.3.3 Table 5-15 Pages 111- 112). Additionally, 23 intersections would not operate within mobility standards during PM peak hours under the Build alternative. Again, 19 intersections would fail mobility standards under both alternatives in 2045, but of these 19 intersections, 13, or 68%, would perform worse under the Build Alternative (draft EA Appendix C Section 5.3.3 Page 109).

### **III.D. The Build alternative poses a greater safety risk for residents in the API that utilize active modes of transport that is not acknowledged in the draft EA.**

In general, the Build Alternative results in decreased traffic on I-205 and increased traffic on arterial roads and intersections due to toll avoidance.<sup>16</sup> Increased traffic and congestion on arterial roads and intersections will impact those who utilize active modes of transportation, walking or biking, within the API. The increase in diverted traffic to arterial roads in and of itself would pose an increased safety risk for those utilizing active modes of transport at unsignalized intersections. However, the results of this analysis are not mirrored in the draft EA because the analysis in the draft EA at unsignalized intersection in 2045 include unfunded future projects to improve intersection infrastructure and safety. For example, the bicycle level of traffic stress analysis, every study corridor was given the same score under both alternatives. Some of the analyses included planned infrastructure and safety projects and others excluded unfunded future projects.<sup>17</sup>

Again, the lack of bicycle safety concerns acknowledged highlights ODOT's failure to take increased arterial traffic into account under the Build alternative. For the pedestrian level of traffic stress analysis, every corridor was given the same score under both alternatives except for four corridors, two of which scored worse under the Build alternative and two

---

<sup>16</sup> Figure 5-7 in Appendix C Section 5.3.2 on page 73 broadly describes the changes in daily traffic expected under the Build alternative compared to the No Build alternative. Traffic on I-205 is expected to decrease between 16 and 5 percent, while some roads are expected to see up to 31% more daily traffic.

<sup>17</sup> See Appendix C Section 5.3.5 pages 129-132 Tables 5-24 through 5-29. We did not use the comparison including future projects because there is no funding in place for these projects. As these projects may or may not be built, it is not prudent or appropriate to include them within the analysis.

under the No Build alternative.<sup>18</sup> According to ODOT’s analysis, the Build alternative will result in slightly worsened safety for those utilizing modes of active transport within the API. The minimal predicted impact to active transportation safety despite increased traffic volumes expected on local roadways does not make sense. It is unclear if ODOT performed a complete analysis that captured the change in traffic volume, especially during peak hours, and how that might negatively impact safety conditions for those utilizing active modes of transport.

### **III.E. The draft EA does not fully consider the impact the Build alternative will have on small local businesses.**

The draft EA states “there would be higher levels of opportunity (traffic exposure-oriented) consumer spending” from 2027 through 2045 under the Build alternative due to toll avoidance and traffic diversion onto local roadways (draft EA Section 3.4.2 Page 3-60). The model used by ODOT calculated annual consumer spending benefits under the Build alternative relative to the No Build alternative resulting in \$313,000 in economic output, \$108,000 in labor income and 3 job years (draft EA Section 3.4.2 Table 3-30 Page 3-60). The draft EA analysis, however, does not account for how increased local roadway traffic might decrease local patronage or note if local businesses have the parking capacity to handle greater influxes during peak traffic hours.

Moreover, the following section of the draft EA states “The household spending category indicates that **because regional households would spend an additional portion of their transportation budget on toll payments, they would in turn reduce their spending in other categories**, such as retail, entertainment and recreation, and restaurants and food services” (draft EA Section 3.4.3 Page 3-61) (emphasis added). The draft EA then notes total annual household spending in the API from 2027 to 2045 on retail, entertainment and recreation, and food services would decrease by \$131.7 million (draft EA Section 3.4.3 Table 3-33 Page 3-62). Though other industries like construction would see a boost in annual spending and economic output, local, small businesses will be negatively impacted under the Build alternative affecting local residents and EJ communities. The draft EA does not include any plans to mitigate the negative impact tolling will have on small businesses via reduced household spending and changes in traffic volume.

---

<sup>18</sup> See Appendix C Section 5.3.5 pages 132-136 Tables 5-30 through 5-35. We did not use the comparison including future projects because there is no funding in place for these projects, so intersections with a range of values were assigned the score on the lower end of the range to represent the intersection without improvement projects. As these projects may or may not be built, it is not prudent or appropriate to include them within the analysis.

## **IV. Impacts to Environmental Justice Communities**

The comments in section I.D. outline the many ways in which the draft EA fails to correctly analyze the impacts to EJ communities. Details of these points are set forth below. ODOT must examine the tolling program ramifications before moving forward so that the true impact to EJ community members is fully understood and mitigated.

### **IV.A. The draft EA does not analyze environmental justice impacts at the appropriate geographic level and specificity.**

While Section 3.8 of the draft EA (Environmental Justice) identifies EJ communities by Census Tract on Map 3-16 (page 3-87) with other more specific maps provided within Appendix J, most of the analysis of impacts, to the extent it is performed, is conducted at the API level. This is highlighted in Table 3-38 (page 3-88) and the preceding text, where race/ethnicity and income data for the overall API is compared with counties, the Metropolitan Statistical Area (MSA), and Washington and Oregon state. However, the analysis of impacts occurs at the aggregated scale of the API, and as such defeats the purpose of analyzing impacts to EJ sub-populations. For example, the draft EA states, "... the population in the API has similar or lower percentages of environmental justice populations than the four counties, Portland MSA, and Oregon and Washington State as a whole, as shown in Table 3-38." (Section 3.8.1; Page 3-86). This high level of geographic detail is not sufficiently granular to determine true disproportionate impacts on EJ communities, especially those related to road pricing projects. The Environmental Justice Technical Report includes a more detailed EJ TAZ (transportation analysis zone) analysis but impacts to specific EJ TAZ within Clackamas County are only identified in the Rerouting Traffic to Local Streets section (Appendix J Page 38). The other Build Alternative Environmental Consequences sections offer a general summary of the impacts to all TAZ in the API.

We agree with the authors of the draft EA that there will likely be disproportionate impacts on EJ communities due to the project, specifically with respect to traffic and safety issues, higher costs, and electronic tolling. Following guidance for the determination of whether an agency should proceed to an EIS or a FONSI, the question stands upon whether or not an impact is significant, and this determination requires consideration of both the context **and** the intensity<sup>19</sup> (or severity) of the impact.

Absent analyzing the impacts to specific EJ communities, it is not possible to interpret the intensity of the impacts. Without this analysis, ODOT is essentially ignoring the requirement to analyze whether or not EJ communities will be disproportionately impacted by the project

---

<sup>19</sup> See CFR 1508.27 (a) – (b)

in a significant way. However, the fact that these communities will be impacted by three categories of the impacts (traffic and safety issues, higher costs, and electronic tolling) suggests both the context and intensity of impacts will in fact be significant, and that an EIS should appropriately be performed.

#### **IV.B. The draft EA does not fully consider how reduced household spending will impact EJ communities.**

Building off comment III.E. above, the draft EA does not include an analysis of how reduced household spending at retail, entertainment and recreation, and restaurant and food service businesses will impact EJ communities within the API. The Build alternative would result in 1,699 fewer job years per year from 2027 to 2045 in the services just mentioned (draft EA Section 3.4.3 Table 3-34 Page 3-62). Minority populations are more likely to work in service occupations,<sup>20</sup> and therefore more likely to lose their job or have a decrease in work hours due to reduced spending in these service areas. While access to social resources, travel-time, cost of tolls, rerouting, roadway safety, active transportation, noise, air quality and ability to use the toll system are analyzed for impacts to EJ community members (draft EA Section 3.8.3 Table 3-40 Pages 3- 95 through 97), job loss is not considered. ODOT claims most of the job years will be offset through investment of toll revenue in construction and professional services (draft EA Section 3.4.3 Page 3-61). However, EJ community members may not be qualified or considered for these positions. Therefore, lower employment in retail, entertainment and recreation, and restaurant and food services due to the reallocation of household spending will negatively impact EJ community members working in these industries through under and unemployment. These community members are already less financially stable than higher income residents, so under and unemployment can be detrimental to these community members. ODOT must analyze how lower employment in these service industries will impact EJ community members and create a plan to mitigate this impact.

Finally, the draft EA points out that the median household will experience a mere 0.7 percent difference in transportation costs as a percent of the total household budget (Section 3.4.2, Environmental Consequences, Economics, page 3-61) due to the expected \$575 annual toll fees. But a low income household – for example a household of two people, at the federal poverty level of \$19,720<sup>21</sup> - would see that same \$575 expenditure as a nearly three percent (2.9) increase in total household budget. This distinction represents a significantly disproportionate impact on low income households. For context, the same 2.9 percent

---

<sup>20</sup> (BLS) US Bureau of Labor Statistics. 2020. Labor Force Characteristics by Race and Ethnicity, 2020. Available at: [Labor force characteristics by race and ethnicity, 2020: BLS Reports: U.S. Bureau of Labor Statistics](#)

<sup>21</sup> Federal Poverty Guidelines. 2023. Available at: [detailed-guidelines-2023.pdf \(hhs.gov\)](#)



increase to the median household budget used in the draft EA (\$88,400) would represent \$2,577 per year.

**IV.C. The draft EA assumes commuters and travelers will change the time of day they drive to avoid the highest tolling periods even though the most common industry sectors in the API generally require specific work hours and EJ community members are more likely to work hourly paying jobs.**

As stated in the Transportation Technical report, the model used in this analysis noted vehicle hours traveled (VHT) would lower significantly during peak traffic periods with the highest toll rates and the hours right before and after these periods would experience lower VHT. They attribute this change to “the trend that some travelers would change the time of day that they make their trip to avoid the highest tolls” (Appendix C Section 5.3.1 Page 67).

The report further notes that VHT on arterial roadways under the Build alternative will decrease during peak traffic and high tolling periods on arterial roads because, “every limited-access roadway trip also includes an arterial road component. When limited-access roadway trips shift to a time outside of the peak period to avoid the higher tolls, the arterial portion of those trips would also shift to that time. Therefore, overall VHT on both types of facilities would decrease during these periods” (Appendix C Section 5.3.1. Page 70).

This conclusion fails to consider increased arterial road use during peak traffic hours to avoid tolls that would contribute to increased VHT for certain populations, particularly those in the EJ communities. The report assumes a significant number of drivers will have the ability to change their travel times to avoid the highest tolling period. However, “manufacturing, health care and social assistance, and retail trade were the three largest industry sectors in the API for total employment in 2018” (draft EA Section 3.4.1 Page 3-55).

These sectors generally require employees to work standard hours onsite, meaning a large percentage of those working within the API would not have the option to change their travel times to avoid peak toll hours. This is especially true for EJ community members that are more likely to work hourly paying jobs with specific start and end times at a designated work site<sup>22</sup>. While VHT for some members of the community travelling on I-205 under the Build scenario may reduce during high tolling rate hours, those who are forced to travel during these hours and who choose to avoid the high tolls will likely create greater congestion on arterial roads and thus increase VHT on those roads. Individuals experiencing higher VHT will

---

<sup>22</sup> (BLS) US Bureau of Labor Statistics. 2020. Labor Force Characteristics by Race and Ethnicity, 2020. Available at: [Labor force characteristics by race and ethnicity, 2020: BLS Reports: U.S. Bureau of Labor Statistics.](#)

likely be those who cannot afford high tolls, including EJ community members.<sup>23</sup> Ultimately the assumption that many drivers will have the ability to alter their drive times to avoid high tolling hours is unfounded and has led ODOT to underestimate VHT on arterial roads during peak traffic hours and neglect to recognize how this might disproportionately impact EJ populations in the API.

#### **IV.D. The draft EA does not consider the disproportionate health impacts from worsened air quality on EJ communities.**

According to the EPA,

“Many people are disproportionately impacted by air pollution, including those who live in communities of color and low-income communities... Residents of low-income communities may experience increased health impacts from air pollution due to many environmental, social and economic factors.”<sup>24</sup>

There are several EJ communities within the API located near non-highway roads that will receive increased traffic volumes under the Build alternative. The draft EA states that a “particular concern for the Project is the potential to increase pollutant emissions by shifting vehicles from the highway onto local roadways with lower travel speeds and more intersections” (draft EA Appendix D Section 4.3.2 Page 17). These concerns are warranted as net MSAT (mobile source air toxic) emissions in 2027 on “non-highway emissions would be 1% to 13% higher than the No Build alternative” and MSAT emission in 2045 on “non-highway emission would be up to 8% higher than the No Build alternative” (Appendix D Section 6.3 Page 30). Under the Build alternative, communities near local roadways will have poorer air quality and increased health risks. This analysis applies to the entire API, and therefore does not identify specific communities that may experience worse air quality under the Build alternative. While ODOT acknowledges “the localized changes in MSAT concentrations would likely be most pronounced on roadways where traffic volumes would be higher under the Build Alternative relative to the No Build Alternative due to rerouted trips... the magnitude and the duration of these potential increases compared to the No Build Alternative cannot be reliably quantified due to incomplete or unavailable information” (draft EA Section 3.2.2 Page 3-49). Therefore, neither we nor ODOT can determine to what degree air quality will worsen

---

<sup>23</sup> Interestingly, significant traffic on this section of I-205 led to this proposed project. If the traffic is this severe, it would be safe to assume that those who could change their travel time from peak hours would already have done so to reduce their VHT. ODOT provides no analysis of this fact.

<sup>24</sup> US EPA. 2022. EPA Research: Environmental Justice and Air Pollution. November. Available at: [EPA Research: Environmental Justice and Air Pollution | US EPA](#).

under the build alternative in EJ communities. Additionally, ODOT does not consider how poor air quality has a disproportionate impact on EJ communities more so than other residents due to socioeconomic factors. A more detailed analysis quantifying MSAT concentration changes under the Build alternative is needed to fully understand the potential health impacts the Build alternative will impose on EJ communities through reduced air quality near local roadways.

#### **IV.E. The draft EA does not consider the disproportionate financial effects of increase in vehicle crashes and pedestrian/bicycle accidents on EJ communities.**

As discussed previously, the Build alternative clearly involves increased numbers of crashes in the API compared to the No Build alternative as traffic is diverted off I 205 to other road segments and local intersections.

Vehicle losses due to crashes can impact some EJ populations disproportionately, especially those who need to work hourly and onsite. Without a working vehicle, these individuals would likely be unable to reach their worksite and, thus, lose valuable income opportunities. For these individuals, car damage can be detrimental and result in significant loss of income either in the form of under employment or job loss altogether. In cases where new employment is difficult to find, this could also divert resources from social services and other programs geared towards EJ communities. It can also be a challenge when it comes to accessing health and other services.

In addition, the expense of repairing car damage can disproportionately affect EJ populations due to their lower earning power. Some of these individuals may not have the appropriate level of vehicle insurance to cover all repair costs. Limited affordability for a repair shop could disproportionately affect EJ populations, who might need their vehicle repaired quickly to return to work and also may not be able to afford to have their vehicles towed to a repair shop quickly.

Research on this topic has shown that low-income households spend larger portions of their household income on vehicle ownership, with the figure below showing how this breaks down by income (see Figure 1).<sup>25</sup>

---

<sup>25</sup> Reproduced from Bauer, et.al. 2021. When Might lower-income Drivers Benefit from Electric Vehicles? Quantifying the Economic Equity Implications of Electric Vehicle Adoption. February. Available [here](#).

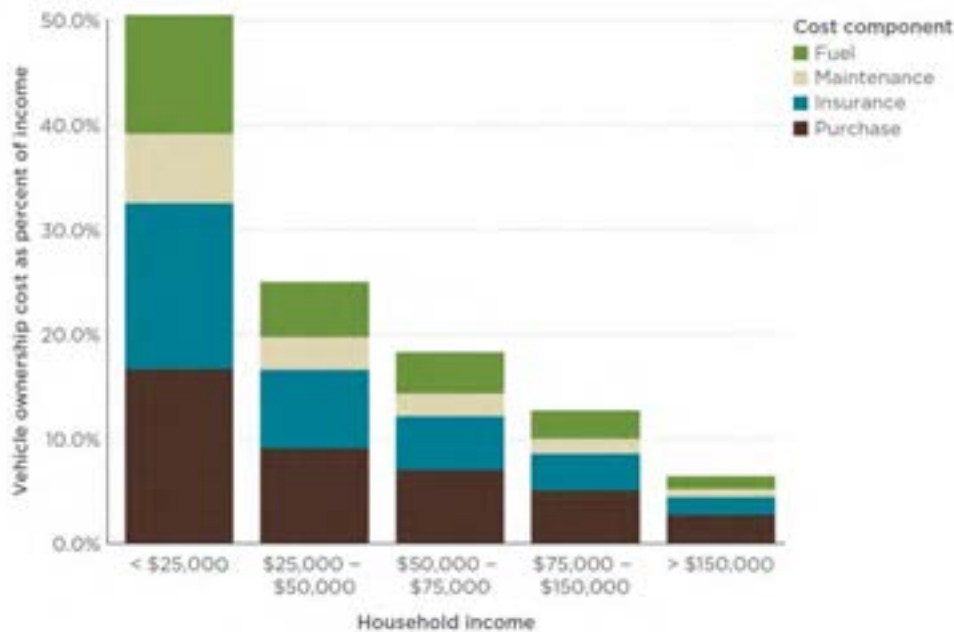


Figure 1. Total cost of vehicle ownership as percent of income, by annual household income.

#### IV.F. The draft EA does not offer specific mitigation options for making toll transponders accessible to EJ and low-income community members.

According to the **NASEM EJ Tolling** guidance,

“Large transponder deposits, initial prepayment amounts, and use of credit cards are required by many toll agencies, putting transponder usage outside the reach of large percentage of the U.S. population. It is estimated that between 10 and 20 percent of the population is unable to overcome these barriers to transponder ownership.”<sup>26</sup>

ODOT has not yet developed a plan to make transponders accessible to those in the EJ community, especially to those who may not know about the toll program, are unbanked, lack technological expertise, or lack the funds to cover the initial cost of the transponder. Under the Avoidance, Minimization and Mitigation sections of the draft EA, ODOT states customer service centers would be established so drivers can use cash to purchase transponders and provide assistance (draft EA Section 3.8.4 Page 3-99). However, it is unclear how these centers will be funded, where and how many will be built, and how ODOT will make transponders accessible for EJ and low-income communities. ODOT created a Low-Income Toll Report in 2022 to the Oregon legislature. The proposed low-income toll program

<sup>26</sup> National Academies of Science, Engineering and Medicine. 2018. Environmental Justice Analyses When Considering Toll Implementation or Rate Changes Final Report. Available at: <https://doi.org/10.17226/24992>. (Section 3.1.3 Page 48)

plans to provide free transponders for low-income households<sup>27</sup>, but the program has not yet been approved or funded, nor have the logistics been considered.

According to the same **NASEM EJ Tolling** guidance document,

“Ensuring access to transponders is a form of mitigation that should be considered in initial program design.”<sup>28</sup>

ODOT has not yet determined how to make transponders accessible, established low-income tolling criteria or levels, nor indicated how much more tolls will cost with invoicing fees, which goes against the early establishment of transponder mitigation included in the NASEM guidance report.

#### **IV.G. The draft EA does not consider the disproportionate financial effects of increased tolling due during peak hours.**

According to the **NASEM EJ Tolling** guidance,

“Those who purport to be interested in vertical equity and social justice should consider differences in commuting behavior **by time of day**, distance traveled, and auto ownership of low-income persons.”<sup>29</sup> (emphasis added)

ODOT plans to institute a variable toll rate with the most expensive rates occurring during peak travel times in the morning and afternoon. Unlike those with salaried positions, flexible work schedules and telework options, those who work in industries that require specific work hours onsite cannot shift their travel schedules to avoid the more expensive tolls. This is especially true for EJ community members who are more likely to work in industries with hourly paying jobs with specific start and stop times<sup>30</sup>. Even though EJ community members are not as likely able to change their travel times due to the nature of their jobs, ODOT failed to analyze the difference in commuting behavior for this population and how variable toll rates might affect EJ community members more so than the general population. This shortcoming goes against the NASEM EJ guidance for toll implementation. Further analysis is

---

<sup>27</sup> ODOT. 2022. Oregon Toll Program Low-Income Toll Report: Options to Develop a Low-Income Toll Program and Best Practices for Implementation. September. Section 2.2 Page 17.

<sup>28</sup> National Academies of Science, Engineering and Medicine. 2018. Environmental Justice Analyses When Considering Toll Implementation or Rate Changes Final Report. Available at: <https://doi.org/10.17226/24992>. [Section 3.1.3](#) Page 58

<sup>29</sup> Ibid.

<sup>30</sup> (BLS) US Bureau of Labor Statistics. 2020. Labor Force Characteristics by Race and Ethnicity, 2020. Available at: [Labor force characteristics by race and ethnicity, 2020 : BLS Reports: U.S. Bureau of Labor Statistics](#)

needed to understand how a variable toll rate would impact EJ community members due to their limited ability to alter their travel times.

## **V. Revenue Use and Economic Analysis**

### **V.A. Where is the toll funding going? And why is the Federal government not funding this?**

draft EA has not provided a clear statement on how the toll funding will be used. draft EA Section 1.4.1 Page 1-4 states,

“Available funding for transportation has not kept pace with the cost of maintaining the transportation system or the cost of construction of new transportation and congestion-relief projects... State and federal funding sources have not been adjusted to reflect increasing construction costs, rising inflation, a more fuel-efficient vehicle fleet, and growing transportation infrastructure demand. Despite recent federal investments in transportation infrastructure, including the Infrastructure Investment and Jobs Act of 2021, federal funding has not kept pace with rising transportation costs over the last several decades (Congressional Budget Office 2020). The federal gas tax has not been adjusted since October 1993, and federal funds have been supplemented by increasing state-based contributions including from sources outside of state fuel taxes (Oregon Legislative Revenue Office 2022).”

While all the above may be true, ODOT fails to articulate how and where the toll funding will be used. For example, ODOT notes that the tolls must be spent on roadway projects, but there is no specification as to where the roadway projects are in relation to where the toll is collected. ODOT’s failure in this regard is notable, particularly because “judicious use of revenues generated by a pricing project is the single most important way of mitigating equity effects.” - FHWA (Section 6.1 Page 24)

### **V.B. The Economics Technical Report does not provide sufficient information about the methods used to calculate the results.**

The economics technical report for the EA<sup>31</sup> is not clear about the sources of information used to identify the annual net benefits claimed (over \$104 million in undiscounted dollars, page 29, EA Appendix F). Some information is covered in the “Overview of the WSP Benefit-Cost Analysis model” that was an attachment to the I-205 Toll Project Economics Methodology Memorandum,<sup>32</sup> but even so, details of how the estimates were used are lacking. For example, while the economics technical report does identify the source for estimating the “value of time for truck freight transportation” (\$160 per hour, page 26,

---

<sup>31</sup> WSP, 2023. Appendix F I 205 Toll Project Economics Technical Report, February.

<sup>32</sup> Tim Thornton, WSP, 2021. Economics Methodology Memorandum, I-205 Toll Project, September 1.

Appendix F, and EA page 3-57), it is not clear why this value is selected nor what alternative values were considered. In the article cited, (Guerrero, 2019) the \$160 estimate is for the “Value of Reliability,” which the authors derived by surveying shippers about the tradeoffs they make. But on the FHWA website, the value of reliability, or VOR is distinct from the value of travel time (VOT), in that VOR is the “monetary value of reducing variability of travel time.”<sup>33</sup> But the EA does not, to our knowledge address the reduced variability of travel time or if so, does not clarify this benefit, which would more closely correspond to the Guerrero article. Further, the quotations below from the FHWA website show research that suggests both VOR and VOT are much lower than \$160 on average,

In the trucking industry, shippers and carriers value travel time at \$25 to \$200 per hour (depending on the product being carried).<sup>(2)</sup> A recent study in the area of freight transportation found that the VOT ranged from \$12.80 to \$283 per shipment hour, and the **average value was \$37 per shipment hour**. VOR ranged from \$51 to \$290 per shipment hour, and the average of the distribution of VOR **was \$55 per shipment hour**.<sup>(34, 35)</sup> This indicates that freight shippers valued travel time reliability 1.5 times as much as travel time savings.<sup>34</sup>

While the Overview of the WSP model, travel time savings for truck drivers is estimated using USDOT Guidance at \$29.50 per hour,<sup>35</sup> which is very near the average of \$37 per shipment hour cited by the FHWA above, the estimate of VOR used in the EA (\$160 per hour) is more than three times the average cited by the FHWA review. This calls into question whether the economic analysis may have grossly overestimated the \$19 million in value of time savings reported as a benefit on page 29 of Appendix F, in Table 6-6.

Also, the economics methods memo assures the reader that the analysis is based on “industry accepted practices and federal guidance regarding benefit-cost analysis including the valuation of benefits such as travel time savings and reliability.”<sup>36</sup> However, the effective compliance with guidance documents hinges on how the information has been interpreted and applied. So, additional information is needed to understand if, for example, was travel time savings for automobiles only evaluated for the toll-paying drivers who reduced their travel times on I 205? Or, was the additional travel time experience by those who diverted

---

<sup>33</sup> FHWA, “Benefit Cost: Value of Travel Time and Value of Reliability” highlighted box in “Does Travel Time Reliability Matter – Primer,” Office of Operations, US Federal Highway Administration Website: <https://ops.fhwa.dot.gov/publications/fhwahop19062/whatis.htm>

<sup>34</sup> FHWA, “Benefit Cost: Value of Travel Time and Value of Reliability” highlighted box in “Does Travel Time Reliability Matter – Primer,” Office of Operations, US Federal Highway Administration Website: <https://ops.fhwa.dot.gov/publications/fhwahop19062/whatis.htm>

<sup>35</sup> Attachment to Tim Thornton, WSP, 2021. Economics Methodology Memorandum, I-205 Toll Project, September 1, Overview of WSP BCA, Draft #4, Feb. 11, 2021.

<sup>36</sup> Page 6, Tim Thornton, WSP, 2021. Economics Methodology Memorandum, I-205 Toll Project, September 1.

from I 205 also added? More transparency is needed regarding exactly how the analysis was conducted. Also, failure to specify these details calls into question the entire analysis.

## **VI. Comparison with a Tolling draft EA and FONSI in New York**

ODOT attempts to use the use of FONSI's at other tolling projects around the country to justify its efforts to use one here. As will be discussed below, none of the other projects are comparable, and ODOT is engaging in an apples to oranges comparison.

In 2022, an environmental assessment was conducted for the Central Business District (CBD) Tolling Program in New York that resulted in a FONSI.<sup>37</sup>The tolling concept and the reasons for instituting tolls in New York were similar to those claimed by ODOT for the I-205 Toll Project. There are, however, distinct differences in the level of mitigation commitment, tolling area size, clarity of need, clarity of where tolling revenue will go, and variety of alternatives considered between the two projects. Though the CBD Tolling Program in New York resulted in a FONSI, the impacts of I-205 Toll Project draft EA should be further analyzed in an EIS due to the differences elaborated upon in the following comments.

### **VI.A. The CBD Tolling Program covers the entire Central Business District in Manhattan, while the I-205 Tolling Program proposes to cover a single 7 mile stretch of highway.**

The CBD Tolling Program encompasses the Central Business District in Manhattan, the largest metropolitan region in the United States. (CBD draft EA section 1.2 Page 1-4). The size of the project equitably distributes the economic burden across a larger population. The programmatic benefits and impacts are spread evenly within the project area, unlike the I-205 Toll Project, which considers only two tolls within a 7-mile stretch of I-205 (I-205 draft EA Section 2.1.2 Page 2-1). The proposed I-205 tolls place the economic burden on a much smaller population, as local users are most dominant on this section of I-205<sup>38</sup>. The disproportionate impact to local users was not analyzed in the I-205 Toll Project draft EA, compounding the need for an EIS to better understand how significantly these community members are impacted by the proposed tolling project.

### **VI.B. The CBD Tolling Program will use toll revenue to improve transit within the CBD, while the I-205 Tolling Program is unclear if the revenue will remain in the area it is collected.**

---

<sup>37</sup> USDOT. 2022. Central Business District (CBD) Tolling Program Environmental Assessment. August.

<sup>38</sup> I-205 EA Section 3.1.1 Page 3-1: "About 25% of I-205 trips in the API are through trips, and about 75% are local trips, meaning they enter and/or exit I-205 at one of the five interchanges in the API."



The purpose of the CBD Tolling Program was to reduce congestion and “generate revenue to fund \$15 billion to improve subway, bus, and commuter rail systems in MTA’s 2020–2024 Capital Plan or successor plans” (CBD EA Page ES 1). The New York EA clearly states that revenue collected from the tolls will be used to improve transit services into the CBD. The revenue is going toward projects that will further reduce traffic by providing more transit options and ensure EJ and low-income households have a toll-free mode of transport to enter the CBD. Conversely, the I-205 Toll Project draft EA is not clear on how the toll revenue will be spent beyond purportedly paying for the planned improvements on I-205 from Stafford Road to OR 213 (I-205 draft EA Section 1.3 Page 1-4). The Oregon Constitution stipulates that “revenues collected from the use or operation of motor vehicles is to be spent on roadway projects” (I-205 draft EA Section 1.4.1 Page 1-4), but neither the Oregon Constitution nor the draft EA stipulates that the revenue remain in the region it was collected. The FHWA guidance states that,

“Judicious use of revenues generated by a pricing project is the single most important way of mitigating equity effects.”<sup>39</sup>

ODOT’s failure to articulate how and commit where the purported toll revenue will be used is contrary to the FHWA guidance, and at odds with the EA from New York.

The New York CBD Tolling Program helps mitigate equity effects by committing revenue to improving transit, benefitting low-income and EJ community members. The I-205 Toll Program makes no such commitment, and has not determined how or where toll revenue will be spent beyond paying for the planned improvements to I-205, which do not include transit expansion or improvements. The I-205 Toll Project draft EA simply does not align with FHWA guidance on addressing equity impacts of road pricing.

#### **VI.C. The CBD Tolling Program has a mitigation plan to address the economic impacts to local residents, while the I-205 Tolling Program does not include any specific mitigation plans for local residents.**

The CBD Tolling Project considered the disproportionate burden tolls could have on locals who may enter or exit the CBD more frequently than other populations. Rather than tolling a vehicle every time it passed through a toll gantry, “noncommercial passenger vehicles entering the CBD would be tolled once per day” (CBD EA page ES-10). This tolling method ensures local residents who frequently travel in and out of the CBD do not face disproportionate economic impacts compared to those who enter or exit the CBD less

---

<sup>39</sup> US Department of Transportation Federal Highway Administration. 2013. Guidebook for State, Regional, and Local Governments on Addressing Potential Equity Impacts of Road Pricing. April. Section 6.1 Page 24.

frequently. Within the I-205 Toll Project draft EA, disproportionate impacts to local residents are not considered or analyzed. While ODOT plans to institute a low-income toll program, they have not identified any mitigation to lessen the economic burden that will be put on communities like West Linn and Gladstone, where over 22 percent of I-205 trips crossing the Abernathy Bridge originate<sup>40</sup>. Without further analysis or determined mitigation, local Oregon residents will face significant impacts, requiring an EIS.

**VI.D. The CBD Tolling Program includes clear mitigation measures for low-income drivers, while the I-205 Tolling Program has not decided how costs will be mitigated for low-income drivers on I-205.**

The CBD Toll Program established clear mitigation plans for low-income drivers and taxis and FHV's. For example, "the Project will include a tax credit for CBD tolls paid by residents of the Manhattan CBD whose New York adjusted gross income for the taxable year is less than \$60,000" (CBD EA ES-15). The project also committed to establishing an EJ Community Group that would meet biannually to discuss updated data and listen to potential concerns (CBD EA ES-15). The CBD Toll Program EA clearly states how they planned to mitigate the disproportionate economic impact placed on low-income populations. With clear, established mitigation plans the CBD Toll Project ensured low-income communities would not bear a significant economic impact due to the proposed tolls.

On the other hand, the I-205 draft EA has done no more than suggest a number of mitigation options but has not committed or planned funding for any of the suggested mitigation. The Transportation Technical report states "ODOT may establish a group consisting of local leaders, staff, and/or elected officials to meet with ODOT staff on an agreed upon basis immediately after tolling is implemented to be a direct line of communication with ODOT to address rerouting concerns" (I-205 EA App C Section 6.1 Page 161) (emphasis added). At the outset, it is unclear if this group will be established. Even if it is, it will be established after tolling is implemented, not before, which essentially precludes any consideration of the proposed mitigation measures prior to implementation of the tolling program. ODOT also plans to institute a low-income tolling program but provides no details. For example, we do not yet know if low-income drivers will receive credits, a reduction, or stipend and ODOT has not yet determined how significant the reduction/credit/stipend will be<sup>41</sup>. The lack of clarity surrounding what mitigation will or will not be enacted according to the I-205 Toll Project draft EA makes it impossible to determine the significance of the proposed tolls on low-

---

<sup>40</sup> See Figure 4-1

<sup>41</sup> WSP for ODOT. Low-income Toll Report: Options to Develop a Low-Income Toll Program and Best Practices for Implementation – a Report to the Oregon Legislature. September.

income and EJ communities especially, and places it completely at odds with the CBD Tolling Program enacted in New York.

**VI.E. The CBD Tolling Program’s purpose and project are clearly aligned and connected, while the I-205 Tolling program’s purpose and project are not clearly aligned.**

The CBD Tolling Program EA states “the Project purpose is to reduce traffic congestion in the Manhattan CBD in a manner that will generate revenue for future transportation improvements” (CBD EA Section 1.3 Page 1-10). The correlation between the purpose and project is clear. Tolls will dissuade some drivers from driving in the CBD and improvements to transportation will also encourage drivers to use public transit rather than drive themselves in the Manhattan CBD. The I-205 Toll Project draft EA states “the purpose of the Project is to use variable-rate tolls on the I-205 Abernethy Bridge and Tualatin River Bridges to raise revenue for construction of planned improvements on I-205 from Stafford Road to OR 213 and to manage congestion” (I-204 EA Section 1.3 Page 1-4). For the I-205 project, the purpose itself is the tolls in this very specific area. Setting aside the lack of specifics in terms of what and where the “construction of planned improvements on I-205” is to take place between Stafford Road and OR 213, the authors of the draft EA state the purpose of the tolls is to manage congestion. Their own analysis shows the I-205 project will increase congestion on arterial roads near the tolls<sup>42</sup>. The I-205 project does not seek to address the congestion that poses a much larger problem in other parts of the Portland Metro Area is not considered at all. The purpose also singles out both the Abernathy and Tualatin bridges as tolled locations when initial alternatives considered tolling at only one bridge. Unlike the CBD Tolling Program EA, the I-205 Toll Program draft EA seems like it was biased toward one alternative, which prematurely narrowed its purpose and misaligned the project and its purpose.

**VI.F. The CBD Tolling Program considered twelve varied alternatives before narrowing down the alternatives considered to two, while the I-205 Tolling project considered five very similar alternatives before considering two in the EA.**

The CBD Tolling Program EA initially considered twelve different alternatives, four of which considered tolling options (T), while one considered non-toll pricing alternatives (NTP), five considered non pricing alternatives (O), and one no action alternative (NA)<sup>43</sup>. The

---

<sup>42</sup> See I-205 Toll Project draft EA Section 5.3.2 Traffic Volumes and Potential Rerouting Page 72-82

<sup>43</sup> The preliminary alternatives considered are as follows – NA 1: No Action, NTP 1: Parking pricing strategies, T 1: Pricing on full roadways – raise tolls or implement variable tolls on existing toll facilities, T 2: Pricing on full roadways – Toll East and Harlem Bridges, T 3: high-occupancy toll (HOT) lanes, T 4: Zone-based pricing – CBD Tolling program, O 1: Parking pricing – reduce government-issued parking permits, O 2: Provide additional taxi stands to reduce cruising, O 3: Create incentives for teleworking, O 4: Ration license plates, O 5: Mandatory carpooling, O 6: Truck time-of-day restrictions (CBD EA Section 2.3 Table 2-1 Page 2-4).

alternatives presented varied greatly in revenue generating and congestion reducing methods. The CBD EA contained a table explaining how the CBD tolling alternative best met the purpose, need and objectives of the project (CBD Tolling Project EA Section 2.3 Page 2-6 and 2-7). The I-205 Toll Project draft EA only analyzed 5 alternatives, all of which considered tolling across all lanes at one or both bridges along the specified section of I-205<sup>44</sup>. ODOT did not consider the use of HOT lanes, or other methods of congestion relief. An EIS would ensure other alternatives are further explored and analyzed for their impact on local and EJ residents.

## **VII. Summary and Conclusion**

The I-205 Toll Project draft EA consists of a deficient NEPA analysis due to a number of significant shortcomings highlighted in the comments above. Most notably,

- The draft EA **does not follow best practices** nor meet the standards supported by the four Environmental Justice and Equity Guidance documents introduced at the top of this letter.
- The draft EA also **fails to properly analyze how local residents** in cities like West Linn and elsewhere in Clackamas County, could be impacted by the Build alternative. Even though 75 percent of all trips along the considered stretch of I-205 originate, terminate or both locally, impacts from the Build alternative on local residents are essentially ignored throughout the draft EA.
- The ambiguous mitigation plans included in the draft EA limit our understanding of the impact the Build alternative could have on local residents, particularly EJ community members. Without substantial, concrete mitigation plans, local and **EJ residents will bear disproportionate health, safety, and financial burdens** under the proposed Build alternative.
- Though the project needs include reducing congestion and improving safety conditions, this is only achieved on I-205. Local roadways will experience increased congestion and reduced safety conditions for vehicle operators and those utilizing active modes of transport. Yet the **draft EA ignores how the shift to local roadways**

---

<sup>44</sup> Alternative 1: vehicles would be tolled crossing the Abernathy bridge in any direction, Alternative 2: vehicles would be charged a single toll for crossing Abernathy Bridge with toll gantries on the bridge and OR 43 and OR 99E, Alternative 3: vehicle would be tolled at both bridge locations, Alternative 4: vehicles would be tolled at four segments between Stafford Road and OR 213, Alternative 5: a single zone toll structure would be used to toll vehicles on I-205 between Stafford Road and OR 213 the full amount regardless of distance traveled. (I-205 EA Section 2.2 Pages 2-8 through 2-12).

will disproportionately burden local communities, while benefiting all users of the I-205 corridor in consideration.

Compared to another toll project EA in New York that resulted in a FONSI, the I-205 Toll Project draft EA falls short or differs significantly on several important aspects including the number of alternatives initially considered, the geographic size of the project, clarity of mitigation for low-income and local resident drivers and alignment of the project needs and purpose.

These differences stress why an EIS analysis is the only path forward for the I-205 Toll Project. The I-205 Toll Project Draft Environmental Assessment offers ambiguous mitigation measures, fails to identify the horizontal inequities that will be felt by residents under the Build alternative and includes many shortcomings within the EJ impact analysis. An EIS analysis is necessary to ensure that an appropriate number of alternatives are considered and fully analyzed for their impact on the Oregonians most affected by the proposed Toll Project – local residents and EJ community members. Further, most of these issues were raised by local communities repeatedly through comments and meetings during the scoping process. However, these issues were still not addressed in the draft EA. Until these issues are resolved, the project will continue to be highly controversial.

**ODOT I-205 Toll EA - RECORD #2841 DETAIL****Submission Date :** 4/21/2023**First Name :** Mark**Last Name :** Ottenad**Affiliation :** City of Wilsonville**Submission Method :** Letter**Q3. Comments :** Dear Directors Finn and Putney,

The City of Wilsonville appreciates the opportunity to provide comment on the Oregon Department of Transportation's (ODOT) I-205 Toll Project Environmental Assessment (EA).

Please find attached our comments for your consideration.

Thank you.

- Mark

**Attachments :** 2023\_0421\_I-205\_EA\_Wilsonville.pdf (317 kb)



April 20, 2023

*Submitted via email to  
I205TollEA@odot.oregon.gov*

Brendan Finn, Director, Urban Mobility Office  
Mandy Putney, Project Director, I-205  
Oregon Department of Transportation  
Attn: I-205 EA Comment  
ODOT Urban Mobility Office  
18277 SW Boones Ferry Road  
Tualatin, OR 97224

**RE: I-205 Toll Project EA Comment**

Dear Directors Finn and Putney:

The City of Wilsonville appreciates the opportunity to provide comment on the Oregon Department of Transportation's (ODOT) I-205 Toll Project Environmental Assessment (EA).

As a participating agency in the I-205 Toll Project Draft Agency Coordination Plan, the City of Wilsonville has significant interest in this project that could carry major ramifications for both highway traffic and local-area streets congestion. The City's South Metro Area Regional Transit (SMART) Director also participates on the Equity and Mobility Advisory Committee and the Tolling-Transit Work Group.

As a city with a residential population over 27,000 that hosts over 20,000 jobs, thousands of workers commute daily to Wilsonville from every corner of the Portland metro region and North Willamette Valley. Approximately half of these jobs (10,000) are in manufacturing and wholesale distribution where both commuting workforce mobility and the timely movement of freight are crucial for Oregon's continued economic development. Of these 20,000 jobs, 90% are held by commuting workers who live outside of Wilsonville. Thus, public transit mobility options such as those offered by the City's South Metro Area Regional Transit agency are key to reducing vehicle miles traveled and associated traffic congestion.

The City shares concerns about the EA that are raised in letters of comment by:

- The Clackamas County Board of County Commissioners dated April 19, 2023, and the attached technical Comments on the I-205 Toll Project Environmental Assessment dated April 12, 2023.
- The Clackamas County Coordinating Committee (C4) dated April 10, 2023.

The EA raises additional issues of concern for the City, as noted following.

**1. EA API analysis area is too small to capture accurately the potential traffic impacts of tolling:**

Footnote 12 on page 3-1 of the EA indicates that “A relatively small portion of I-5 was included within the API because most sections of I-5 would not experience substantial differences in traffic volumes between the No Build and Build Alternatives.”

The API size appears to focus on too small of an area and does not focus on interchanges or road segments, like Stafford Road south of Mountain Road, that need to be analyzed to understand full impact of diversion on local roads.

The EA shows an overall daily decrease in traffic on Stafford Road; however, the EA indicates that 2045 PM peak data shows a 40%-50% increase in volumes north and south of Mountain Road under the Build scenario, directly attributed to I-205 tolling diversion. This increase in PM peak traffic could have significant impacts to roadways and intersections south of Mountain Road, specifically the 65th/Stafford/Elligsen roads intersection, that are outside of the API and not documented in the EA. Already the 65th/Stafford/Elligsen roads intersection is failing to meet standards during the PM peak hour. The API should be extended west and south, incorporating Stafford Road, Elligsen Road, Boeckman Road and Wilsonville Road through Wilsonville, to document PM peak traffic impacts on additional routes until those impacts are negligible. EA should analyze these key routes and intersections, which handle extensive PM peak hour traffic from major employers in Tualatin and Wilsonville, as well as impacting routes through existing neighborhoods.

**2. The EA fails to address adequately mitigation measures for intersections that fail to meet standards under the Build Alternatives.**

EA page 3-21 states that in “2027, five intersections would meet standards under the No Build Alternative but would not meet them under the Build Alternative during the AM and/or PM peak hour.” Table 3-7 illustrates the number of intersections that “Meets Standards with No Build, but Not with Build.”

This raises the question of What is the mitigation for the intersections not meeting standards under the Build scenario? The EA indicates that mitigation measures are needed, but does not address what these measures should be. The EA should provide one or more mitigation measures for each intersection that fails to meet standards.

**3. The EA fails to analyze fully traffic diversion impacts onto I-5 from traffic that seeks to avoid the I-205 tolls.**

EA pages 3-80 to 3-81 state that “Two Tualatin intersections (I-5 northbound ramps and Nyberg Street and I-5 southbound ramps and Nyberg Street) would meet standards under the No Build Alternative and *not meet standards under the Build Alternative* during the



PM peak hour in 2027. The Build Alternative would have longer delays (by less than 10 seconds at the I-5 northbound ramps and about 20 seconds at the I-5 southbound ramps) than the No Build Alternative. These differences could have an impact on people and public service providers, such as emergency vehicles, traveling to nearby social resources, including medical facilities, parks, and shopping centers. The southbound ramps intersection is in a geographic area with a higher percentage of low-income populations, minority populations, and people experiencing a disability than Clackamas County as a whole.” Emphasis added.

While Table 3-49, Present Actions and Reasonably Foreseeable Future Actions, indicates that Metro RTP Project ID 11304, I-5 South Operational Improvements, and Project ID 11402, I-5 Northbound: Auxiliary Lane Extension Nyberg to Lower Boones Ferry, appears to indicate that these projects are a mitigation measure, the EA does not describe how this measure would mitigate the traffic impacts.

This issue also raises concerns raised in Item 1 above, that the EA API analysis area is too small to capture accurately the potential traffic impacts of tolling. The EA appears to conclude that traffic diversion onto I-5 from drivers seeking to avoid I-205 tolls is only minimal, with increased traffic during the PM peak hour. Again, however, such a small API analysis area may be failing to capture the true, regional impact of I-205 tolls on the interstate highway system and adjacent local roads.

**4. Failure to analyze the cumulative impacts of tolling all of I-205 and Metro-area I-5 as proposed in the Regional Mobility Pricing Project (RMPP) provides insufficient data to fully understand tolling impacts of the I-205 Toll Project.**

The City agrees with the finding of the Clackamas County Board of County Commissioners letter of comment, pages 6-7, that indicates:

“ODOT/FHWA anticipate completing the environmental review of the RMPP within the year and implementing the RMPP within one year of I-205. This analysis cannot be deferred to the RMPP environmental review process. Our review of initial modeling results from the RMPP indicates that there will be additional impacts to diversion onto local roads, possibly at different levels and in different locations than disclosed in the EA.

“Without this cumulative assessment, the public and County have been deprived of the ‘big picture’ in terms of real-world implications, environmental consequences, viable alternatives, and mitigation solutions. The impacts and mitigation associated with the projects are interconnected and the full impact of both projects has not been discussed or disclosed in the I-205 Toll Project EA. The analysis of the two projects combined could completely alter the nature and severity of impacts and mitigation analyzed for I-205. As stated in our September 15, 2022 comments on the Draft Transportation Technical Report (TTR): ‘Traffic diversion will be different for I-205 versus I-205 and I-5. The traffic analysis is inherently flawed without looking at the

broader tolling context as impacts may shift to other roads, worsen or make some current improvements unneeded.’

“Either the RMPP should be evaluated in the cumulative analysis of the I-205 Toll EA or, ideally, ***ODOT/FHWA should prepare an EIS that fully evaluates both components of the Portland Metro Area Value Pricing Project. Analysis of both projects together will allow for a more comprehensive review of feasible alternatives, diversion impacts, and mitigation planning.***” Emphasis added.

##### **5. Lack of detailed study of public transit alternatives and capital improvement projects to support mobility options.**

The EA acknowledges the various public transit “providers in the API include the Tri-County Metropolitan Transportation District of Oregon (TriMet), Canby Area Transit, South Clackamas Transportation District, and South Metro Area [Regional] Transit. In addition, Clackamas Community College operates a shuttle service between its Oregon City campus and Clackamas Town Center. There are three park-and-ride lots in the API.” Page 3-5.

The EA also enunciates a number of worthy goals and objectives, including:

**“Goal: Support safe travel regardless of mode of transportation.**

- Enhance vehicle safety on I-205 by reducing congested conditions.
- Support safe multimodal travel options (e.g., pedestrians, bicycles, transit, automobiles) on roadways affected by tolling.

**“Goal: Support multimodal transportation choices.**

- Support shifts to higher occupancy vehicles (including carpooling) and other modes of transportation (e.g., transit, walk, bike, telework).

“Collaborate with transit providers to support availability and enhancements of transit and other transportation services along I-205, especially for historically and currently excluded and underserved communities.” Page 1-7, emphasis in original.

However, the EA fails to propose sufficient public transit alternatives and capital improvement projects to support mobility options. The EA states that:

***“The Build Alternative is projected to have a relatively small effect on travel mode choice in the region, with the trend indicating slightly fewer single-occupancy vehicle trips and slightly more high-occupancy vehicle, transit, and active transportation trips, as shown in Table 3-2. These changes in mode would likely be due to the lower travel costs compared to one person in a car paying the full toll.”*** Page 3-11, emphasis added.

The Build Alternative should be robust in design such that it has a ***significant effect on travel mode choice in the region.*** The data table on page 3-11 indicates that Transit trips

increase by only 800 trips or 0.11% — barely one percent increase in transit trips. This hardly perceptible increase in transit utilization fails to meet the objectives of the EA goals for Transit.

***“Future transit ridership levels in the API would be similar between the No Build Alternative and the Build Alternative.”*** Page 3-26, emphasis added.

**Table 3-2. Comparison of Trips by Travel Mode in 2045: Build Alternative to No Build Alternative**

Travel Mode	No Build Trips	Build Trips	Difference (Build minus No Build)
Single-Occupancy Vehicle	5,248,000	5,245,000	-3,000
High-Occupancy Vehicle	4,307,000	4,309,000	+2,000
Transit	696,500	697,300	+800
Active	1,276,600	1,276,800	+200
<b>Total</b>	<b>11,528,100</b>	<b>11,528,100</b>	<b>0</b>

Source: Appendix C, I-205 Toll Project Transportation Technical Report (Section 5.3.1)

+800 = 0.11% increase in Transit trips

In examining the “Mitigation Type: Transit projects” for the primary six areas of the API, the EA proposes that only 27% of all projects relate to transit improvements. **This data demonstrates that the EA has failed to advance a sufficient number and quality of transit-related mitigation measures to make a meaningful, significant impact to increase transit utilization that is a primary objective of the EA Build Alternative.**

Table No. – Proposed Mitigation Area	Total No. of Mitigation Projects	No. of Transit Mitigation Projects	Percent Transit of All Mitigation Projects
Table 3-12. Proposed Mitigation for OR 99E/Gladstone/Oregon City Area	18	8	44%
Table 3-13. Proposed Mitigation for OR 99E/Canby Area	6	1	17%
Table 3-14. Proposed Mitigation for Willamette Falls Drive/West Linn Area	3	0	0%
Table 3-15. Proposed Mitigation for SW Stafford Road and SW Borland Road Area	5	0	0%
Table 3-16. Proposed Mitigation for OR 43/Lake Oswego Area	2	1	50%
Table 3-17. Proposed Mitigation for the Tualatin Area	3	0	0%
<b>TOTALS</b>	<b>37</b>	<b>10</b>	<b>27%</b>

To support the EA’s stated goals to “Support safe travel regardless of mode of transportation” and “Support multimodal transportation choices,” considerable greater investments in

transit mitigation measures are required. Thus, the EA should be revised to place a much greater emphasis on improving public transit utilization as a realistic mobility option that reduces the impacts of tolls and vehicle miles traveled by sponsoring more and better transit mitigation projects that provide a greater effect on travel choices favoring transit use.

The City appreciates state and federal transportation officials taking into account the City's issues of concern that we share with other local jurisdictions and members of the public. Thank you for your efforts to create a more complete and resilient transportation system for the benefit of our region.

Sincerely,

A handwritten signature in blue ink that reads "Julie Fitzgerald". The signature is written in a cursive style.

Julie Fitzgerald, Mayor  
City of Wilsonville

cc: Oregon Transportation Commission (OTC): [OTCAdmin@odot.state.or.us](mailto:OTCAdmin@odot.state.or.us)  
ODOT Region 1 Area Commission on Transportation: [Region1ACT@odot.state.or.us](mailto:Region1ACT@odot.state.or.us)  
Joint Policy Advisory Committee (JPACT), Metro: [transportation@oregonmetro.gov](mailto:transportation@oregonmetro.gov)  
Clackamas County Coordinating Committee ("C4"): [twilson2@clackamas.us](mailto:twilson2@clackamas.us)  
Washington County Coordinating Committee ("WCCC"): [lutdir@co.washington.or.us](mailto:lutdir@co.washington.or.us)

**ODOT I-205 Toll EA - RECORD #2842 DETAIL**

**Submission Date :** 4/19/2023  
**First Name :** Chanin  
**Last Name :** Bays  
**Affiliation :** Clackamas County Board of Commissioners  
**Submission Method :** Letter  
**Q3. Comments :** Ms. Putney and ODOT Staff:  
Please accept the attached letter from the Clackamas County Board of Commissioners providing comments on the Draft I-205 Toll Project Environmental Assessment.  
We respectfully request acknowledgement that our comment has been received and will be included in the record.  
**Attachments :** 2023\_0419\_I-205\_EA\_Clackamas\_Board.pdf (840 kb)



Mandy Putney  
Oregon Dept. of Transportation  
355 Capitol Street NE  
Salem, OR 97301  
*Via email*

April 19, 2023

Dear Ms. Putney:

Thank you for the opportunity to provide comments on the I-205 Toll Project Environmental Assessment (EA). Clackamas County would like to take this opportunity to once again reiterate its **request for a 30-day extension** to the public comment period as the current 60-day period is insufficient for review of the EA, which contains over 2,000 pages of analysis that needs to be carefully reviewed.

Despite the short amount of review time available, the County has identified serious procedural concerns and deficiencies in the EA that can only be fully addressed through the **completion of a comprehensive Environmental Impact Statement (EIS)**.

An overview of our concerns with the draft EA is included below. More detailed comments can be found in the attached technical letter. The County also joins in and concurs with the substantive comments and the technical reports submitted by other governmental entities, including but not limited to the City of West Linn, the City of Oregon City, the City of Canby, the City of Lake Oswego, and the City of Tualatin.

1. This project would cause significant impacts due to diversion of traffic onto County and City roadways.
  - The proposed tolling would shift trips off I-205 onto the local system, resulting in significant safety and congestion impacts that ODOT is unable to mitigate below the level of significance.
  - The EA acknowledges that the project could cause as much as 50% of the current afternoon peak period traffic to reroute to local streets.

- Impacts caused by the proposed project are in addition to those already occurring in this area due to the existing bottleneck on the freeway.
  - Additional analysis is necessary to evaluate the difference of impacts between I-205 widening with tolling and widening without tolling.
2. Increased traffic volumes on the local system would cause high levels of traffic stress for people walking and rolling along County and City roadways.
- The EA documents that impacted roadways do not have adequate vehicular capacity, intersection control, or pedestrian or bicycle facilities to address the increases in congestion, or the impacts to safety that this project presents to people walking and rolling. Currently, the EA does not propose adequate mitigation for these impacts.
3. Tolling will not change people's travel modes.
- Clackamas County and our cities lack viable alternatives to car travel such as transit. This means that people would not be able to consistently utilize other travel modes that reduce greenhouse gas emissions. ODOT is not proposing mitigation to address the lack of transit or the lack of a complete protected bikeway path through the tolling corridor; as a result, vehicular miles traveled would not be reduced under the Project as suggested in the EA, but rather shifted to the local roadway network. Additionally, because the diversion routes are longer and will be more congested, vehicular hours traveled would also not be reduced under the current proposal.
4. Mitigation measures proposed in the EA are inadequate and lack commitment.
- The mitigation measures proposed are poorly defined, unenforceable, and unlikely to be constructed.
  - The proposed transportation "monitoring program" is undefined and therefore we are unable to evaluate its effectiveness.
  - In short, we have no confidence that the significant negative impacts of the project can or will be adequately mitigated or that the suggested mitigation will be constructed in time to prevent significant impacts when tolling is scheduled to begin.
5. The EA lacks analysis of the impacts of pre-completion tolling.
- The project asserts that tolls would be initiated prior to construction of the third lane of I-205 yet provides little to no analysis of the impacts of tolling before the

third lane is added. This is an unacceptable significant impact that will be experienced by the region for years and an example of the inadequacy of the current analysis and proposal.

6. The local economy would be significantly, negatively impacted by the Proposal.
  - The proposed project would negatively impact our local economy, which is contrary to the assertion by ODOT that the additional traffic and congestion on the local system would improve business conditions. Like most of the EA, the benefits and impacts are improperly focused on I-205 while ignoring impacts to local communities. More localized analysis must be completed to understand the true impacts to our communities and local economy.
7. This project would significantly impact low-income residents, seniors, and other vulnerable populations.
  - The current proposal would force vulnerable residents either to devote needed income to tolling or travel on more congested local routes because the Low Income Toll program is too restrictive in who it serves.
  - As mentioned previously, increased traffic on local roads would significantly reduce safety for travelers on these roads, and lower-income residents may be the most likely to take transit or alternative modes. Therefore, the project would hurt the most vulnerable of our community in multiple ways – by impacting their budget, their time, and their health.
8. The cumulative impacts of I-5 and I-205 Tolling must be evaluated.
  - It is critical that an EIS be required to evaluate the cumulative impacts of the Regional Mobility Pricing Project (“RMPP”) and the I-205 Tolling project. The current EA provides an improperly narrow assessment of the I-205 project under an unlikely set of assumptions and essentially ignores the RMPP, which is anticipated to commence within a year of the I-205 project. As a result, many of the impact conclusions and mitigation requirements described in the EA could be invalid.
  - The EA does not meet NEPA’s requirement to provide the full picture of implications, environmental consequences, viable alternatives, and mitigation solutions associated with ODOT’s plan to implement tolling more broadly in the Portland Metro area, and instead only looks at a small isolated piece of the larger project. The preparation of separate staggered EAs for projects related in proximity, timing, and administration is an inefficient use of local, State, and federal resources.



As a participating agency, we firmly believe that the EA does not currently support a Finding of No Significant Impact (FONSI). Instead, the County urges the Federal Highway Administration to direct ODOT to proceed with an Environmental Impact Statement (EIS) for this project, combined with the RMPP, to address the deficiencies and issues identified above and in the attached technical letter.

Thank you for your consideration.

Sincerely,

Clackamas County Board of Commissioners



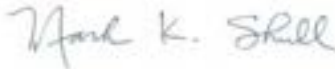
Tootie Smith, Chair



Commissioner Paul Savas



Commissioner Martha Schrader



Commissioner Mark Shull



Commissioner Ben West

CC: Kris Strickler, Oregon Department of Transportation  
Keith Lynch, Federal Highway Administration  
Metro Councilor Juan Carlos Gonzalez, JPACT Chair  
Oregon Congressional Delegation  
Oregon State Legislators  
Metro  
City of Canby  
City of Lake Oswego  
City of Oregon City  
City of Tualatin  
City of West Linn

# **Comments on the I-205 Toll Project Environmental Assessment**

Prepared by Clackamas County Department of Transportation and Development

April 12, 2023

# Contents

I. Introduction .....	1
II. Overall Issues .....	2
ODOT and FHWA should proceed with an EIS.....	2
ODOT should conduct a tiered environmental review of regional congestion projects. ....	5
The RMPP is a reasonably foreseeable project that needs to be analyzed prior to making a decision regarding tolling on I-205. ....	6
The Project does not meet the stated Need.....	7
The Purpose Statement is so narrow that it eliminates the possibility of reasonable alternatives.....	7
The Project does not meet the stated Goals and Objectives. ....	8
The Project is a moving target.....	9
The local community should not be forced to pay for the maintenance of a State facility. ....	10
The Project should be revised to eliminate pre-completion tolling and nighttime tolling. ....	10
Pre-Completion Tolling .....	10
Nighttime Tolling .....	11
The Project EA cannot result in a FONSI because the mitigation measures are unenforceable and unlikely to be performed. ....	12
The monitoring program is a prime example of unenforceable mitigation.....	12
The indirect or secondary impacts of mitigation have not been analyzed.....	13
Agencies and the public did not have sufficient opportunity to review or comment on the Project. ....	13
III. Detailed Transportation Comments .....	14
Significant Diversion of Traffic Volumes to County and City Facilities .....	14
Unmitigated Safety Impacts .....	16
Borland Road Corridor.....	17
Stafford Road Corridor.....	18
Rosemont Road Corridor.....	18
Canby/I-5 Corridor .....	19
Unmitigated Congestion Impacts .....	20
High Levels of Traffic Add Stress for People Walking and Rolling .....	20
Tolling is Not Shifting Travel Mode.....	21
Lack of Commitment to the Mitigation Measures .....	22

Truck Traffic on Local Roadways .....	23
Reasonably Foreseeable Future Actions in the Project Corridor Should be Part of Mitigation .....	23
IV. Other Topical Issues .....	24
Air Quality .....	24
MSAT Analysis .....	24
Cumulative MSAT Analysis .....	26
Geographic Boundary of MSAT Emissions Analysis .....	26
Other .....	26
Climate Change .....	27
Noise .....	29
Social Resources and Communities / Environmental Justice .....	30
Land Use .....	34
Historic and Archaeological Resources .....	35
Biological Resources .....	35
Public Involvement / Agency Coordination / Consultation .....	35
V. Conclusion .....	36

# I. Introduction

Clackamas County (County) appreciates the opportunity to offer comments and questions on the *I-205 Toll Project Environmental Assessment (EA)*, as issued by the Oregon Department of Transportation (ODOT) and the Federal Highway Administration (FHWA) in February 2023.

As indicated in the County's requests for extensions, a 15-day extension was insufficient considering the EA relies on thousands of pages of supporting appendices and other documents. While we have identified many serious issues with the EA's analysis within the constrained comment period, the County and partner agencies could have provided a more thorough review with the additional time requested. As such, this letter should not be viewed as outlining every example of the EA's deficiencies, including unmitigated impacts. Rather, we are providing a multitude of examples which support the fact that additional analysis and information is required, particularly surrounding safety, diversion, and mitigation concerns.

**Safety:** The County is concerned with the safety of the entire regional transportation network, including non-highway roadways. While increased safety and decreased congestion are included in the purpose and need, the Project fails to meet this need as the Project will, in fact, *decrease* safety and *increase* congestion on local roadways. Further, the County found several examples in the EA of unmitigated safety impacts for vehicles, cyclists, and pedestrians.

**Diversion Impacts:** Based on our review, the EA does not take a "hard look" at the environmental consequences of diversion from I-205 onto County and city roadways. The EA fails to adequately analyze the impacts to the local community that will bear the burden of increased diversion. While the definition of the study area includes the local roadways and communities that would experience diversion, in many cases there is no meaningful analysis of localized impacts. This is especially true regarding impacts associated with transportation, air quality, and noise.

**Mitigation Measures:** The proposed mitigation measures are problematic on many levels.

- Mitigation measures are vague with respect to timing and other logistical details, rendering them unenforceable.
- The EA does not establish that the mitigation measures offered reduce all of the significant impacts of the Project to a level that would warrant a Finding of No Significant Impact (FONSI).
- The EA fails to disclose the conditions of the roadway network with mitigation. As a result, local agencies have no idea whether the proposed mitigation measures will address the identified significant impacts within their jurisdictions. The burden of analysis of the environmental impacts of the I-205 Toll Project and the Regional Mobility Pricing Project (RMPP) is on ODOT and FHWA, not local agencies.

**Pre-Completion Tolling:** Pre-completion tolling should be removed from the Project or the impacts should be fully analyzed. Due to pre-completion tolling, local communities will be significantly impacted for a number of years before mitigation is implemented. To address the issues of pre-completion tolling the EA states “any mitigation proposed to address near-term impacts that is determined to help alleviate pre-completion tolling impacts could be implemented before tolling begins.” This fails to assess which measures are needed for pre-completion tolling impacts, who will decide which measures to implement and when. The EA should disclose which mitigation measures are needed to address the impacts of pre-completion tolling and when they will be implemented. The EA improperly defers this discussion.

**Cumulative Effects with RMPP:** In addition to the inadequacies in the analysis of the I-205 Tolling Project alone, the EA fails to analyze the cumulative effects with the RMPP. The cumulative or “combined” impacts of I-205 tolling and the RMPP need to be disclosed to allow for informed decision-making and full understanding of the scope of environmental consequences.

The County’s review has identified serious procedural concerns and deficiencies in the EA that can only be fully addressed through the completion of a comprehensive Environmental Impact Statement (EIS) for this Project. Preparation of an EIS will provide for more rigorous analysis of project alternatives, disclosure of cumulative and indirect effects, comprehensive mitigation planning, and public engagement opportunities. The EIS must analyze and disclose the full scope of environmental impacts from the I-205 Toll Project and the RMPP, which are collectively referenced within the current EA as the Portland Metro Area Value Pricing Project, or the first phase of the Oregon Toll Program (see page 1-2 of the EA).

ODOT states in the EA that they plan to issue a Revised EA (page 1-7 of the EA); however, agencies and the public are not guaranteed an opportunity to comment on a Revised EA. It would be unacceptable to release a “Finding of No Significant Impact” until ODOT and FHWA have shown that there will be no residual significant impacts from the Project.

## II. Overall Issues

ODOT and FHWA should proceed with an EIS.

As outlined in subsequent sections of this comment letter, there are significant, unmitigated environmental consequences associated with the Project. If an EA determines that the environmental impacts of a proposed Federal action will be significant, an EIS must be prepared.

Pursuant to FHWA's NEPA regulations, "[a]ctions that significantly affect the environment require an EIS." 23 C.F.R. 771.115(a). Section 771.115(a) incorporates the definition of "significant" from Section 1508.27 of the pre-2020 CEQ NEPA Regulations. While the CEQ NEPA regulations were amended in 2020 to, in part, remove the definition of "significant," FHWA has not amended its regulations since the 2020 amendments were implemented, and therefore the definition is still relevant to FHWA actions and guides ODOT's analysis of the impacts of the Project. As demonstrated below, the Project significantly affects the environment and should be analyzed in an EIS.

*§1508.27 Significantly. "Significantly" as used in NEPA requires considerations of both context and intensity:*

*(a) Context. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short and long-term effects are relevant.*

- As discussed throughout this comment letter, there will be significant and adverse short-term effects from pre-completion tolling and long-term effects from diversion which have not been sufficiently disclosed or mitigated.

*(b) Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action. The following should be considered in evaluating intensity:*

*(1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect will be beneficial.*

- While on the balance certain effects of the Project may be beneficial on I-205, there will be undeniable significant adverse local effects to communities from diversion to local roadways that have not been properly disclosed.

*(2) The degree to which the proposed action affects public health or safety.*

- As discussed further in this comment letter under the heading *III. Detailed Transportation Comments*, there are major public safety concerns for multiple modes of travel on local roadways. As discussed under the heading *IV. Other Topical Issues*, the localized impacts of air toxics and noise on public health have not been considered.

(3) *Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.*

- The effects of the Project on historic and archaeological resources and biological resources have not been fully evaluated along roadways experiencing significant diversion, nor have the secondary impacts of mitigation been evaluated on these resources. For example, the Project increases traffic volumes across the historic Oregon City Arch Bridge by 40-50%. The Bridge is not included in the Historic Area of Potential Impact or the discussion of 4(f) resources. See further discussion under the Historical and Archaeological Resources and Biological Resources subheadings under *IV. Other Topical Issues*.

(4) *The degree to which the effects on the quality of the human environment are likely to be highly controversial.*

- As noted in the Public Engagement Report for the EA, the Project is highly controversial with 60% of survey respondents disagreeing with the alternatives ODOT proposed for environmental review (Alternative 3/the Project and Alternative 4). Of those that disagreed, 52% strongly disagreed (page 40 of EA Appendix R) “ODOT acknowledges that most commenters who provided input during the comment period opposed the Project and tolling in general” (page 104 of Appendix R).

(5) *The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.*

- The project relies on highly uncertain future mitigation actions to mitigate significant impacts, most notably a long-term monitoring program. See further discussion under the subheading *The monitoring program is a prime example of unenforceable mitigation*.

(6) *The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.*

- This project is essentially the first phase of the Oregon Toll Program and Portland Metro Area Value Pricing Project. Given the interrelated diversion effects and associated mitigation, the I-205 Tolling and RMPP should be analyzed together as one project. See further discussion under the subheading *The RMPP is a reasonably foreseeable project that needs to be analyzed prior to making a decision regarding tolling on I-205*.



(7) *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.*

- The Portland Metro Area Value Pricing Project has been improperly segmented into smaller component parts: I-205 Tolling and the RMPP. By not assessing the effects of tolling I-205 and the RMPP, the cumulative significant impacts of the larger project have not been disclosed.

## ODOT should conduct a tiered environmental review of regional congestion projects.

CEQ's NEPA Implementation Regulations allow agencies to review national or regional plans using a "tiered" analysis wherein the agency (or agencies) first look at the broad impacts of large-scale programs or policies, and then use those studies to guide subsequent analyses for smaller individual projects that make up the larger program or policy. See 40 C.F.R. 1508.1(ff) (defining "tiering" as "coverage of general matters in broader environmental impact statements or environmental assessments ... with subsequent narrower statements or environmental analyses ... incorporating by reference the general discussions and concentrating solely on the issues specific to the statement subsequently prepared."); see also 40 C.F.R. 1501.11.

U.S. Department of Transportation guidance acknowledges the common practice of using a tiered EIS to evaluate the effects of tolling projects on a larger scale.<sup>1</sup> From the U.S. Department of Transportation's (DOT's) *Procedures for Considering Environmental Impacts* (DOT 5610.1C, emphasis added in bold):

*g. Tiering. Tiering of EISs as discussed in CEO 1502.20 is encouraged when it will improve or simplify the environmental processing of proposed DOT actions. Preparation of tiered EISs should be considered **for complex transportation proposals (e.g. major urban transportation investments, airport master plans, aid to navigation systems, etc.) or for a number of discrete but closely related Federal actions.***

In this instance, ODOT should prepare an EIS for the Portland Metro Area Value Pricing Project, or at a minimum evaluate both the I-205 Toll and RMPP projects cumulatively within their respective EISs, for the following reasons:

---

<sup>1</sup> U.S. Department of Transportation, February 2022; NEPA Reviews of Tolling and Road Pricing Projects Case Studies, page 6. Accessed at: [https://www.environment.fhwa.dot.gov/pubs\\_resources\\_tools/publications/case\\_studies/Introduction-NEPA\\_and\\_Tolling\\_Case\\_Studies.pdf](https://www.environment.fhwa.dot.gov/pubs_resources_tools/publications/case_studies/Introduction-NEPA_and_Tolling_Case_Studies.pdf)

- 1) There are significant impacts for which there are no feasible and/or enforceable mitigation measures. The I-205 Toll Project alone will result in significant and unavoidable impacts associated with diverted traffic. See further discussion under the heading *III. Detailed Transportation Comments*.
- 2) Since the Project is a large, complex transportation proposal and is closely related to another major federal action, namely the RMPP, it should be analyzed together with the RMPP under a single NEPA document.
- 3) The Portland Metro Area Value Pricing Project is controversial and affects millions of people in the region. The processing of the projects under separate EAs sets a dangerous precedent for FHWA that is counter to the purposes of NEPA.

**The RMPP is a reasonably foreseeable project that needs to be analyzed prior to making a decision regarding tolling on I-205.**

ODOT should have evaluated the cumulative impacts of the RMPP and the I-205 Tolling Project because the RMPP is a reasonably foreseeable action that will impact the local community.

Under CEQ regulations, an agency must evaluate the cumulative effects of a project, which are defined in the regulations as the “effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions” 40 C.F.R. 1508.1(g)(3). “Reasonably foreseeable” means “sufficiently likely to occur such that a person of ordinary prudence would take it into account in reaching a decision” 40 C.F.R. 1508.1(aa).

ODOT is incorrect to characterize the RMPP’s impacts as not “reliably quantifiable or quantified at this time” when environmental review for the RMPP has already commenced. ODOT/FHWA anticipate completing the environmental review of the RMPP within the year and implementing the RMPP within one year of I-205.<sup>2</sup> This analysis cannot be deferred to the RMPP environmental review process. Our review of initial modeling results from the RMPP indicates that there will be additional impacts to diversion onto local roads, possibly at different levels and in different locations than disclosed in the EA.

Without this cumulative assessment, the public and County have been deprived of the “big picture” in terms of real-world implications, environmental consequences, viable alternatives, and mitigation solutions. The impacts and mitigation associated with the projects are

---

<sup>2</sup> ODOT, 2023. RMPP Project Schedule. Available online at: [https://www.oregon.gov/odot/tolling/PublishingImages/I-5\\_I-205\\_Projects\\_TimelineNarrow\\_01.27.2023.jpg](https://www.oregon.gov/odot/tolling/PublishingImages/I-5_I-205_Projects_TimelineNarrow_01.27.2023.jpg)

interconnected and the full impact of both projects has not been discussed or disclosed in the I-205 Toll Project EA. The analysis of the two projects combined could completely alter the nature and severity of impacts and mitigation analyzed for I-205. As stated in our September 15, 2022 comments on the Draft Transportation Technical Report (TTR): “Traffic diversion will be different for I-205 versus I-205 and I-5. The traffic analysis is inherently flawed without looking at the broader tolling context as impacts may shift to other roads, worsen or make some current improvements unneeded.”

Either the RMPP should be evaluated in the cumulative analysis of the I-205 Toll EA or, ideally, ODOT/FHWA should prepare an EIS that fully evaluates both components of the Portland Metro Area Value Pricing Project. Analysis of both projects together will allow for a more comprehensive review of feasible alternatives, diversion impacts, and mitigation planning.

## The Project does not meet the stated Need.

The EA does not explain how the Project meets the Needs defined in Section 1.4 of the EA. The EA makes the assumption that the Project will improve congestion, resolve unreliable travel issues, increase safety, and reduce climate change impacts. In reality, the created diversion from the highway system onto local roadways will merely displace these issues. Further, the impacts and costs on local roadways and communities are not fully assessed or defined.

One of the fundamental needs for the Project is to improve transportation safety, which is not achieved. Overall, the Project does not increase safety for the region. The Project diverts traffic to local roadways that have greater safety issues than I-205 (see heading *III. Detailed Transportation Comments* discussion below).

“Critical Projects Need Construction Funding” is included within the Project Need statement (page 1-4 of the EA). While critical projects do need infrastructure financing, there are a variety of tools to access funding for this Project that do not involve tolling.

## The Purpose Statement is so narrow that it eliminates the possibility of reasonable alternatives.

The EA includes tolling on I-205 in the Project purpose statement which restricts the range of reasonable alternatives. Since many freeway projects throughout the country are funded without tolling, we do not believe that tolling is the only mechanism to fund these improvements.

The following guidance from *Linking the Transportation Planning and NEPA processes* is located in FHWA’s regulations:

“Consistent with NEPA, the purpose and need statement should be a statement of a transportation problem, not a specific solution. However, the purpose and need

statement should be specific enough to generate alternatives that may potentially yield real solutions to the problem at-hand. A purpose and need statement that yields only one alternative may indicate a purpose and need that is too narrowly defined.” 23 CFR Appendix A to Part 450.

The purpose and need statement for the Project has been designed to yield one solution. The problem is regional congestion on both I-205 and I-5, and thus the I-205 Toll Project must be analyzed with the RMPP project.

Reasonable alternatives that should be analyzed include a tolled/managed third lane only and funding from sources other than tolling. In fact, ODOT must analyze and disclose an alternative with construction of the improvements without tolling in order for agencies and the public to understand the effects of ODOT’s proposal. Alternative methods for pricing I-205 such as ramp tolling should be analyzed as one of the alternatives.

In addition, the elimination of pre-completion and nighttime tolling should be included for any toll alternatives, as discussed further under the subheading *The Project should be revised to eliminate pre-completion tolling and nighttime tolling*.

In a 2015 guidance document, FHWA cautions that even if there is a valid justification for eliminating non-tolled alternatives, it may be advisable to continue examining non-tolled alternatives if there is public opposition to tolls.<sup>3</sup> There is strong public opposition to the Project. As noted in the EA Public Engagement Summary, 60% of survey respondents disagreed with the alternatives ODOT proposed for environmental review (Alternative 3/the Project and Alternative 4). Of those that disagreed, 52% **strongly disagreed** (page 40 of EA Appendix R). In the Public Engagement Summary “ODOT acknowledges that most commenters who provided input during the comment period opposed the Project and tolling in general” (page 104 of Appendix R). The RMPP is similarly controversial. During public engagement on the RMPP, 70% of respondents disagreed (of which 59% **strongly disagreed**) with a minimum toll for any use of the highway (page 23 of the RMPP Spring 2022 Engagement Report).

## The Project does not meet the stated Goals and Objectives.

The EA provides no explanation as to how the Project meets the goals and objectives that were established through input with agencies, the public, and other stakeholders.

### **Goal: Provide benefits for historically and currently excluded and underserved communities.**

- How does the Project support equitable and reliable access to job centers, schools, and health care facilities? The Project is forcing Equity Framework Communities (EFC) and Environmental Justice (EJ) communities on the outskirts of the Area of Potential Impact

---

<sup>3</sup> FHWA, “Public–Private Partnership Oversight: How FHWA Reviews P3s” (Jan. 2015), p. 20.

(API) to either devote needed income to tolling or travel on more congested local routes. Due to the increases in traffic on local roads, these roads will actually be less safe for travel. EFCs and EJ communities do not have the luxury of being able to travel outside of peak hours to reach work, school, health care facilities or social services.

- How has the Project been designed to support travel options for excluded and underserved communities? The Project has been proposed in an area without reliable regional transit and bicycle facilities, and does not provide mitigation to fund development of these facilities.

**Goal: Limit additional traffic diversion from tolls on I-205 to adjacent roads and neighborhoods.** Alternatives 1 and 2 were not advanced in part because they would result in higher traffic volumes near Oregon City due to diversion. It is unclear how the Project lessens or avoids this issue. How has the Project been designed to limit rerouting from tolling and to minimize impacts on quality of life for local communities? Increased traffic and congestion on local roadways will worsen air quality, increase noise, and decrease safety on non-highway facilities as discussed throughout this comment letter.

**Goal: Support safe travel regardless of mode of transportation.** The EA focuses too heavily on I-205 benefits and does not disclose the anticipated increase in crashes on the non-highway system. Any conclusions regarding the perceived safety benefit on I-205 from the Project and local roadways from mitigation must also consider increased traffic/crashes on local roadways.

**Goal: Contribute to regional improvements in air quality and support the State's climate change efforts.** While congestion on I-205 would be improved, traffic and congestion would increase on non-highway facilities throughout the local community, meaning there would be even more motor vehicle emissions near residences, schools, parks, and other sensitive receptors. Such diverted traffic would travel at slower speeds than if it was on I-205 and the diversion routes are longer than I-205. Both of these factors would result in greater air quality impacts.

**Goal: Support regional economic growth.** How does the Project provide reliable and efficient movement of goods and people on local roadways experiencing diversion from tolling? The EA does not provide evidence that increased pass-through trips in the form of congested peak hour traffic on local roadways will benefit local businesses. Heavy traffic on local roadways would be a deterrent to retail customers, particularly during peak hours.

## The Project is a moving target.

The EA states that some of the mitigation “may” be incorporated into the project. “Chapter 3 describes potential mitigation measures that would reduce the effects of rerouting. These measures could become part of the Build Alternative” (page 2-7 of EA).

- How will this selection be made?

- Will these measures no longer be considered “mitigation measures” and instead become “project commitments”?
- Will the EA analysis be revised to incorporate these measures as part of the Project?

This seemingly innocuous statement fundamentally confuses the environmental review process -- the review of the Project itself -- and the comparison among alternatives. The EA should clearly distinguish what the Project is, what significant impacts would result, what feasible mitigation measures would be implemented for each alternative, who would implement/fund the mitigation measures, and the residual impact after mitigation.

## The local community should not be forced to pay for the maintenance of a State facility.

Why would tolls pay for maintenance? It is already an extra burden on users to pay for the improvement; why also make them pay for maintenance? No other area of the State pays extra to maintain the State facility in their neighborhood. ODOT has claimed that this makes the bonding more attractive to investors so they know the highway will be in good condition and people will want to use it. But it would be just as attractive for bonding if ODOT committed Statewide funding to keep it in adequate condition like every other mile of interstate in Oregon. This would be a double hit for the local population.

Also, there is no money being set aside for future mitigation projects. ODOT should pay for more local improvements, including maintenance of local roads that will be overloaded because of diversion.

## The Project should be revised to eliminate pre-completion tolling and nighttime tolling.

### Pre-Completion Tolling

For the I-205 Project, tolling is proposed to begin at the end of 2024/beginning of 2025, before the construction of the third lane is completed. To fully understand the impacts of pre-completion tolling and provide clearer information on which intersections and locations need immediate mitigation, a full modeling analysis needs to be completed of the impacts of applying tolling without the third lane on I-205, both with and without the implementation of the RMPP. ODOT has not addressed these concerns, which were raised in our September 15, 2022 comments on the Draft TTR.

The Project should allow for the completion of Phase 1A in 2025 and other local construction projects -- such as the Stafford Road/Childs Road roundabout scheduled to be under construction by Clackamas County during the pre-completion tolling period -- prior to tolling, so that the supporting local road system does not create additional construction bottlenecks on primary diversion routes.

There is a large temporal delay between when impacts will occur and when mitigation will be implemented. Due to pre-completion tolling, local communities will be significantly impacted for a number of years before mitigation is implemented. Neither the EA nor the Level 2 Toll Traffic and Revenue Study sufficiently address the timing of completion of mitigation. Most mitigation measures cannot be completed prior to construction as scheduled. As noted above, there will be local projects in the areas along critical routes that will not be completed and elements of the I-205 construction project itself (e.g., the required blasting) that will likely cause even greater diversion.

In the near term, pre-completion tolling will cause up to 30% of the trips that would have been on I-205 to divert onto local roadways during the years of construction. The specific roads that will be impacted the most are:

- SW Borland Road/Willamette Falls Drive
- SW Stafford Road
- OR 99E
- OR 213, and
- OR 43

Therefore, it is clear that the impacts to the local system and local communities will be experienced immediately, as soon as the tolls begin to be collected. This will be especially acute for EFCs and EJ communities since, under the pre-completion tolling scenario, none of the benefits of the third lane will be experienced. The types of impacts these communities will be faced with during pre-completion tolling (identified as Long Term Impacts in Table 3-37) include:

- Higher transportation costs for social and emergency service providers;
- The cost of tolls on low-income households, which may include older adults and people experiencing a disability;
- Language and technological barriers to using and understanding the electronic toll system, and
- Delays and longer travel times near intersections, which could affect access to social resources in Canby, Gladstone, Lake Oswego, Oregon City, Tualatin, West Linn, and unincorporated Clackamas County near Stafford Hamlet and Canby.

Pre-completion tolling should be removed from the Project or fully analyzed in the NEPA review. If pre-completion tolling remains in the Project description it is likely that an EIS will be needed to disclose the significant adverse transportation impacts during the construction period which cannot be mitigated. The NEPA document should also identify which of the two pre-completion tolling alternatives is preferred.

## Nighttime Tolling

The County is opposed to nighttime tolling because, while it will raise very little revenue, at the same time it will decrease safety due to diversion of nighttime traffic onto surrounding local roads. Drivers should remain on the well-lit, safe highway after dark rather than divert to unlit,

narrow, winding rural roads. Safety, as always, should be the prime consideration. ODOT has not addressed these concerns, which were raised in our September 15, 2022 comments on the Draft TTR.

## The Project EA cannot result in a FONSI because the mitigation measures are unenforceable and unlikely to be performed.

CEQ guidance approves the use of a “mitigated FONSI” when the NEPA process results in enforceable mitigation measures (76 F.R. 3843, 3848 n.21). Many of the mitigation measures identified by ODOT are unenforceable because they rely on implementation by local municipalities and agencies that are not controlled by ODOT.<sup>4</sup> These mitigation measures will require an intergovernmental agreement or letter of commitment between ODOT and the affected jurisdictions. What if ODOT and the local jurisdictions are unable to reach an agreement? These agreements should be executed prior to making a decision on the Project.

Additionally, CEQ guidance states that an agency should not rely on mitigation measures necessary for a mitigated FONSI if it is not reasonable to foresee the availability of sufficient resources to perform or ensure the performance of the mitigation (76 F.R. 3843, 3848). It is not reasonably foreseeable that local municipalities will have the funding to undertake the necessary mitigation measures set forth in the EA. It is still unclear what percentage of mitigation would be funded by ODOT.

The vagueness of the timing and funding of the mitigation measures render them unenforceable. As discussed previously, neither the EA nor the Level 2 Toll Traffic and Revenue Study sufficiently address the time schedule for completing mitigation.

There are also mitigation measures proposed that would require the acquisition of right-of-way and have significant construction feasibility issues that could result in unfundable projects and/or significant time delays for construction. See further discussion under the heading *III. Detailed Transportation Comments*. How will ODOT address these issues?

## The monitoring program is a prime example of unenforceable mitigation.

There are no specific mitigation measures proposed for implementation after 2027. Instead, the EA relies entirely on a “transportation mitigation monitoring program.” We were unable to find any details on the scope of this program, the length of the monitoring period, the transportation network that will be monitored, how it will be administered and funded, and what standards will apply. It is also unclear what measures could be implemented as a result of monitoring, how mitigation might change in response to monitoring, and how ODOT and the local jurisdictions would reach consensus on the implementation and amendments to the monitoring program.

---

<sup>4</sup> See *Preservation Coalition v. Pierce*, 667 F.2d 851, 860 (9th Cir. 1992)



This reliance on a monitoring program with no specificity, timeline or guarantee of implementation or success represents additional significant unmitigated impacts in the EA.

## The indirect or secondary impacts of mitigation have not been analyzed.

The EA improperly defers the analysis of the indirect/secondary impacts from mitigation to the Revised EA. EA page 3-31 notes “[s]econdary impacts from implementing mitigation measures may require additional avoidance, minimization, or mitigation measures. An assessment of the effects associated with mitigation will be included in the Revised EA.” Mitigation measures would have their own set of environmental impacts that are not disclosed. Impacts from these measures need to be evaluated and disclosed in the EA and be subject to public comment. The reviewing agencies and the public may not have an opportunity to review and comment on the indirect/secondary impacts of mitigation.

## Agencies and the public did not have sufficient opportunity to review or comment on the Project.

The County has not had ample time to review the Project. The EA relies on thousands of pages of supporting appendices and other documents, which are highly technical and require the County and other municipalities to engage expert consultants to review and analyze. It is impossible to conduct a full review in such a short time frame. Moreover, the public has encountered several roadblocks that have thwarted this process.

- The County is aware that the City of West Linn spent two weeks of the comment period trying to obtain proper traffic model inputs from ODOT before they were finally provided on March 29, 2023, which has severely impacted and delayed their analysis and ability to comment.
- Further, the public was not given a sufficient opportunity to comment on the Project at public hearings. These hearings were poorly publicized: other than two overview email notices sent to a handful of public staff when the EA was published and when the 15-day extension was granted, there was no separate notification or announcement from ODOT alerting the public that hearings were being held. Details of the hearing were also difficult to find on ODOT’s website.
- In person events were only noted on the calendar link, meaning that the public had to dig through several layers of the site to find that information. Moreover, the “drop in” events were held during normal business hours and thus were not accessible to anyone who works a standard schedule.

These factors all limited meaningful public participation.

### III. Detailed Transportation Comments

Our primary concern is that the diverted traffic from I-205 onto County roadways and our partner City streets results in unmitigated impacts not disclosed in the EA. The lack of adequate mitigation on our facilities will result in safety impacts to people driving, moving freight, riding bikes, walking, and taking transit on non-highway facilities.

The following discussion summarizes our primary points of concern and offers examples of the unmitigated impacts not disclosed by transportation-related topic area. As discussed in *I. Introduction*, **not all areas of concern nor every example of unmitigated impacts are identified** herein. Rather, we are providing examples to demonstrate how the EA is deficient in its identification and mitigation of impacts.

Our primary points of concern relate to:

- Significant Diversion of Traffic to County and City Facilities
- Unmitigated Safety Impacts
- Unmitigated Congestion Impacts
- High Levels of Traffic Adding Stress for People Walking and Rolling
- Tolling is Not Shifting Travel Mode
- Lack of Commitment to the Mitigation Measures
- Truck Traffic on Local Roadways
- Reasonably Foreseeable Future Actions in the Project Corridor Should be Part of Mitigation

#### Significant Diversion of Traffic Volumes to County and City Facilities

The EA presents detailed analysis for two scenarios: a Short Term of 2027 (i.e., the year when the construction of the additional lanes on I-205 was assumed to be completed) as well as a Long Term scenario identified as 2045. The EA and the TTR (Appendix C of the EA) provide very minimal information about the impacts of “pre-completion tolling” which is defined as the period between when tolling is initiated in 2024 and completion of construction in 2027.

Our review of the EA reveals that it is difficult to separate the benefits and impacts of tolling on the transportation system from the construction of the additional lanes on I-205. This difficulty is exacerbated by the fact that I-205 is currently an inadequate facility, causing trips to reroute off the freeway onto local streets to avoid the congestion. As cited on page 3-1 of the EA, 20–30% of traffic currently using I-205 to travel to Oregon City reroutes in the PM peak period; the EA further acknowledges that this rerouting can increase to as much as 50%. If pre-completion tolling is implemented, it will exacerbate these existing conditions.

The EA needs to be modified to clearly define the differences in impacts between tolling and I-205 widening. This could be accomplished through the introduction of a new alternative that analyzes the proposed widening and seismic improvements on I-205 with an alternative, non-tolling funding source, and then comparing the impacts of that alternative against the current Project. Without this analysis, our communities cannot understand the true impacts of tolling on the local transportation system and our cities and rural areas.

As documented in the EA, but not adequately mitigated, our impacted streets and roadways do not have adequate vehicular capacity, intersection control, or pedestrian or bicycle facilities to address the increases in congestion, the impacts to safety, and the high level of stress that this Project presents to people walking and rolling in either 2027 or 2045.

The EA also documents (as evidenced in Figures 5-8 through 5-12 of the TTR) that our impacted facilities are inadequate to serve 2045 traffic. As discussed in the EA, the 2045 Build scenario results in an increase in traffic volumes by more than 50% at several locations as compared to the No Build. Some examples of unmitigated facilities shown in the comparison of 2045 Build versus No Build include:

- A 40-50% traffic increase on the Arch Bridge, which is a 2-lane historic bridge with a narrow sidewalk and a “sharrow” where cyclists share the lane with the automobiles. Due to the grade and existing traffic, cyclists often choose to use the sidewalk instead of the travel lane. ODOT, in collaboration with Oregon City and West Linn prepared the “Pedestrian-Bicycle Bridge Concept Plan” in 2021 that documents the existing needs of this bridge.
- A 50-60% traffic increase on Borland Road east of Stafford Road. The County has spent substantial resources in planning for future (non-tolled) needs at the Borland Road/Stafford Road intersection, including significant capital and maintenance dollars on constructing a roundabout to increase the capacity and safety of the intersection. Borland Road to the east of this intersection is abutted by rural industrial, commercial, residential, and recreational uses. This roadway is narrow and lacks shoulders of sufficient width for people walking or riding bikes. The significant volume of traffic that will be diverted to this roadway is not sufficiently mitigated. This is also discussed in the safety section below.
- A 50–60% traffic increase on Borland Road between Ek Road and Fields Bridge. This section of Borland Road is also narrow without any usable shoulders. The significant volume of traffic that will be diverted to this roadway is also not sufficiently mitigated.

Table 5.3 of TTR identifies streets that are expected to more than double in traffic volume in 2027 as compared to the 2027 No Build, such as:

- Traffic on Borland Road, east of Stafford, is anticipated to increase by 112%.
- Traffic on Lone Elder east of OR 99E is anticipated to increase by 104%.

Several other roadways will experience a traffic increase of over 25% when tolling is initiated.

For the pre-completion tolling scenario, the EA only includes information about increased volume on selected API arterials and intersections but does not undertake the other analysis that was conducted for year 2027 or year 2045. This lack of information on impacted facilities limits our ability to understand how tolling truly affects our rural and city facilities. The EA needs to be amended to fully document the impacts on our communities.

Further, the impacts to Ek Road are not accounted for in the EA. In fact, during the EA scoping it was Clackamas County staff who identified the need to include Ek Road in the modeling analyses as it parallels I-205 through the corridor. The published EA and TTR does not provide adequate information on the increase in volume along Ek Road, but rather assumes that traffic will use Mountain Road. Since some of the near-term mitigation could be influenced by the usage of Ek Road, it needs to be incorporated into the analyses and appropriately mitigated.

Lastly, it should be noted that with modern navigation apps, many motorists will adjust their routes of travel to “avoid tolls” resulting in instant changes to traffic patterns. The real-time rerouting of traffic onto County and city roadways can result in an abrupt increase in through traffic on our roadways, limiting the ability of people using intersecting streets along these routes, and presenting further difficulties (beyond that documented in the EA) for people to travel within the County. Without proper mitigation, these abrupt traffic volume changes result in the rapid degradation of safety performance and shift the burdens of safety mitigation and crash response to local law enforcement and public works teams to provide traffic control. On the whole, injuries and lost quality of life will increase, and in many cases, in already equity-challenged communities.

## Unmitigated Safety Impacts

As demonstrated in the EA, many of the diversion routes have intersections and roadway segments that exceed ODOT’s critical crash rate today and/or are listed as Top 5% or 10% Safety Priority Index System (SPIS) sites. We are unclear how adding more traffic to these locations is not considered a significant impact.

Any diversion of traffic from a freeway facility results in an overall decrease in safety as shown in ODOT’s crash rate Table V below.<sup>5</sup> Fatal and serious injury rates on freeways are less than 1.5 per million miles of vehicle travel (MMVT), whereas rural arterials have rates in excess of 11 MMVT and collector crash rates can be over 40 MMVT. Diverting traffic to roadways with higher safety risks is contrary to both ODOT’s and Clackamas County’s Transportation Safety Action Plans (TSAPs), both of which have a goal to eliminate fatal and serious injury crashes by 2035.

---

<sup>5</sup> [https://www.oregon.gov/odot/Data/Documents/Crash\\_Rate\\_Tables\\_2020.pdf](https://www.oregon.gov/odot/Data/Documents/Crash_Rate_Tables_2020.pdf)

**TABLE V: 2020 Fatal & Serious Injury Highway Crash Rates and Casualty Rates**

Table V tabulates data for mainline state highway crashes that resulted in death or a suspected serious injury (INJ-A). ODOT's fatality and injury definitions are adopted from the Model Minimum Uniform Crash Criteria (MMUCC), Fourth Edition.

JURISDICTION AND FUNCTIONAL CLASSIFICATION	MILES*	ANNUAL VEHICLE MILES*	FATAL & SERIOUS INJURY (INJ-A) CRASHES*	DEATHS AND SERIOUS INJURIES*	FATAL & INJ-A CRASH RATE**	FATAL & INJ-A CASUALTY RATE**
<b>TOTAL STATE HWY SYSTEM</b>	<b>7,377.44</b>	<b>19,388,425,028</b>	<b>825</b>	<b>967</b>	<b>4.26</b>	<b>4.99</b>
Interstate Freeways	729.57	8,466,908,094	95	107	1.12	1.26
Other Fwys/Expressways	66.88	1,289,794,763	16	17	1.24	1.32
Non-Freeways (combined)	6,580.99	9,631,722,171	714	843	7.41	8.75
Other Principal Arterials	3,256.45	7,433,739,009	509	597	6.85	8.03
Minor Arterials	1,968.43	1,843,069,966	148	180	8.03	9.77
Urban Collectors	47.31	55,830,059	7	8	12.54	14.33
Rural Major Collectors	1,272.62	296,635,232	49	57	16.52	19.22
Rural Minor Collectors	34.03	2,348,898	1	1	42.57	42.57
Rural Local	2.15	69,007	0	0	0.00	0.00
<b>URBAN HWY SYSTEM</b>	<b>1,141.30</b>	<b>10,341,826,489</b>	<b>376</b>	<b>418</b>	<b>3.64</b>	<b>4.04</b>

To help further emphasize the EA's deficiency in addressing safety impacts, Clackamas County staff reviewed the effects of the diversion to four primary corridors identified in the EA -- Stafford Road, Borland Road, Rosemont Road, and the Canby/I-5 corridor. These rural corridors serve as vital connections between urban communities. The impacted roadways along these corridors are typically two-lane, carrying between 7,000 and 14,000 vehicles per day under current conditions. These roadways are often characterized by only having 11-foot travel lanes and, in most cases, 0- to 4-foot shoulders. Further details on each corridor are presented below.

### Borland Road Corridor

As documented in the EA, Borland Road between Ek Road and Fields Bridge is expected to have increases of up to 8,000 ADT in 2027, resulting in a total expected 2027 ADT of more than 16,000 vehicles. Under today's conditions, Borland Road carries 5,500 ADT. Our detailed analysis of the current conditions indicates that the crash experience in this corridor is very close to the expected crashes/mile/year for similar facilities, but that the rear-end crashes are overrepresented. This over-representation of rear-end crashes is indicative of the frequency and density of intersections along this corridor and the high percentage of through traffic currently using the facility. With the significant increase in through traffic anticipated in 2027 attributable to the tolling, the total crash rates in this corridor are expected to at least double to 2.7 crashes / mile / year for total crashes and to 1.5 Fatal-Injury C crashes/mile/year in 2027. Without appropriate mitigation to address rear-end crashes, our analysis suggests the crash rates would likely be even higher.

The anticipated volumes and crash patterns identify that Borland Road meets the thresholds for needing mitigation improvements, including a center turn lane at intersections and driveways

along with paved shoulders and rumble strips. These mitigation measures are not included in the EA.

## Stafford Road Corridor

Stafford Road between Ek Road and Mountain Road is predicted to have an increase of 2,800 ADT going from approximately 13,000 ADT to nearly 16,000 ADT on a two-lane road with 11-foot travel lanes with little or no shoulders. People on Trail Road, a local road serving over 50 lots, currently see times of the day when accessing Stafford Road is challenging and residents have expressed concerns regarding access and safety.

Under current conditions, there are 4.6 crashes/mile/year, nearly double the expected rate; and severe crashes are 2.33 crashes/mile/year, again nearly double the expected amount. Adding 2,800 vehicles per day to this route would elevate the crash rates to about 5.5 crashes/mile/year and 2.75 severe crashes/mile/year. In addition, roadway departure and wet condition crashes are overrepresented.

The volumes and crash patterns show that Stafford Road meets the thresholds for needing mitigation impacts, including paved shoulders with rumble strips and either an overlay or high friction surface treatment to increase friction during wet weather. In addition, installing a left turn lane should be considered for Trail Road or connecting Trail Road to the proposed roundabout at the Stafford Road/Mountain Road intersection or traffic signal at Ek Road. These mitigation measures are not included in the EA.

## Rosemont Road Corridor

Rosemont Road provides a critical link to the Salamo area of West Linn and is a route that allows toll avoidance of the Tualatin River bridges for people traveling to and from the west and south. This facility was not analyzed in the EA despite having a predicted ADT increase of 1,500 in 2027 and 500 in 2045. Safety performance is already poor for this facility, with total and severe crash rates more than 22% and 30% higher than the expected values (i.e., 1.92 and 1.06 crashes/mile/year, respectively).

Rear-end and roadway departure crashes are over-represented for this road, reflecting the challenges of a two-lane rural road with no shoulders currently carrying 10,000 vehicles per day. Adding 1,500 more vehicles with no mitigation further degrades the safety performance. The volumes and crash patterns identify that Rosemont Road needs to be improved to include turn lanes and shoulders with rumble strips.

The EA documents that the Stafford Road/Rosemont Road roundabout will be impacted by the traffic volume increases. This roundabout is already over capacity under current volumes and no mitigation for the increase in traffic volumes is proposed.

None of these clearly needed mitigation measures within the Rosemont Road corridor are included in the EA.

## Canby/I-5 Corridor

The EA documents increases in traffic volumes along OR 99E associated with drivers exiting I-5 near Canby at either Miley Road or Ehlen Road to avoid tolling, but does not analyze the impacts to the Arndt Road-Knights Bridge Road intersection nor to Barlow Road between Arndt Road and OR 99E.

Per the EA, tolling is anticipated to increase traffic volumes on Arndt Road between Airport Road and Knights Bridge Road by 3,000 ADT in 2027 and by 2,000 ADT in 2045. The EA makes no mention of the fact that this corridor has daily truck volumes in excess of 20%. These high truck volumes have significant impacts on the capacity and safety of the roadway to handle the increase in tolling-related diversion traffic. This corridor provides access to an active quarry and to freight moving to and from Canby's vibrant and growing industrial area. With this vehicle mix and these unique industrial/quarry uses, the EA needs to document both the operational and safety impacts of tolling on this corridor and of the businesses along it.

Our analysis of Arndt Road suggests that existing safety performance is affected by queue spill-back associated with the signalized Arndt Road/Knights Bridge Road intersection. Rear-end crashes are over-represented; the County is planning to add a queue warning system for eastbound Arndt Road to address this issue. Adding 3,000 more vehicles per day will increase overall volumes from 18,000 ADT to 21,000 in 2027. This added traffic will result in higher levels of congestion, necessitating an additional turning lane at the traffic signal to address queue storage and capacity needs. Based on historical trends on this roadway, the impact of 3,000 vehicles per day in the 2027 tolling scenario would be the equivalent of 10 years' worth of traffic growth in this corridor if tolling did not occur.

Further, safety performance is currently poor on Arndt Road east of Knights Bridge Road with crashes double the expected rate (4.3 crashes/mile/year) and nearly triple the expected rate for severe crashes (3 severe crashes/mile/year). Rear-end crashes are over-represented as are injury crashes and are associated with the existing queue spillbacks on each end of the corridor. A westbound queue warning system for the Arndt Road/Knights Bridge Road intersection would help, and reconfiguration of the Barlow Road/Arndt Road intersection is needed.

As with other parts of this corridor, the Barlow Road/Arndt Road intersection also has poor safety performance with crashes more than double the expected rate at 2.3 crashes/year and 0.97 severe crashes per year versus an expected rate of 0.64. With nearly 11,000 vehicles per day on Barlow Road south of the intersection and less than 700 vehicles per day north of Arndt, the intersection needs to be realigned to reflect existing travel patterns.

The last portion of this corridor includes Barlow Road between Arndt Road and OR 99E, including the portion that is aligned through the City of Barlow. Analysis shows that safety

performance is poor with both total and severe crashes triple the expected rates at 6.6 and 3.3 crashes/mile/year, respectively. Rear-end crashes influenced by Arndt Road and OR 99E are over-represented. Although the County has proposed a speed zone reduction from 35 MPH to 30 MPH in this corridor, including funding for radar feedback signs, the increases in traffic may require additional improvements to maintain adequate safety. With rear-end crashes being overrepresented, mitigation of a center turn lane would address the safety issues.

None of these needed safety mitigation measures are included in the EA.

## Unmitigated Congestion Impacts

We are unclear how ODOT can make the conclusion that “of the 50 study intersections, most would not experience new impacts under the Build condition.” Per Table 5-49 of the TTR, more than 20% of intersections would not meet applicable mobility standards under the Build Condition in both 2027 and 2045.

For the limited number of congestion mitigation measures identified for 2027, the results of the mitigation measures on congestion, i.e., the resultant level of service and volume-to-capacity ratio, was not documented in the EA. (In fact, no congestion mitigation measures are identified for 2045; rather the EA refers to a “monitoring program” for future mitigation.) How can the conclusion be drawn that the mitigation measures are effective in addressing the significant impacts created by the Project?

A primary example of an unmitigated impact and lack of enforceable mitigation is at the Ek Road/Borland Road intersection. Table 6-4 and Figure 6-5 of the TTR identify the need for an all-way stop-control or a roundabout by the year 2045, “pending future analyses.” These two traffic control devices have very different vehicular capacities, right-of-way impacts and significant costs of construction. How and when will the “future analyses” be conducted and what assurance does the community have that the mitigation measures will be in place by the time tolling begins? Also, how can an improvement to this intersection not be needed in 2027?

## High Levels of Traffic Add Stress for People Walking and Rolling

As documented in the EA and the TTR, many of the roadways that will need to shoulder the burden of the diverted traffic do not have any facilities or have only very limited facilities for people walking and rolling. As documented in Table 4-8 of the TTR, the majority of the impacted facilities are rated as having the highest level of traffic stress for cyclists without any diverted traffic. Table 4-9 also documents the lack of pedestrian facilities in the rural area.

The County is very concerned about the safety of cyclists and pedestrians with the significant increase in traffic volume on these roadways that are already rated as having the highest levels



of traffic stress. How can significant increases in traffic not result in definable and mitigatable impacts? It is also unclear whether ODOT's rural Level of Traffic Stress (LTS) methodology was used for these facilities. Per ODOT's Analysis Procedures Manual, there are different methodologies employed for rural contexts versus urban contexts. Many of the impacted County roadways would be considered rural, not urban, facilities. With the implementation of tolling, the rural facilities will be impacted by urban levels of traffic.

Examples of unmitigated impacts on cyclists and pedestrians include volume increases on parallel routes to I-205 and the Oregon City Arch Bridge:

- The EA identifies that parallel routes to I-205 such as SW Borland Road and Willamette Falls Drive could experience 30–100% increases in ADT (page 3-12) under the Build Alternative. Mitigation measures for these increases in daily traffic volumes have not been identified.
- The EA discloses that the daily volumes will increase up to 50% in downtown Oregon City and across the Oregon City Arch Bridge. As was previously noted, this is already a sub-standard facility, and is the only location for pedestrians and bicyclists to cross the Willamette River. The cumulatively significant increase in volume will have negative impacts on the pedestrian and bikeway environment at this location.

Given the lack of clear mitigation measures for these high stress facilities, the County concludes that there are impacts to cyclists and pedestrians that are not sufficiently mitigated in the EA. We also are concerned that the LTS assessment for both pedestrians and cyclists in the future year does not sufficiently acknowledge the near-term impacts to pedestrians and cyclists that will occur due to increases in traffic volume as soon as tolling begins. Many of the pedestrian facilities and bikeway facilities are already substandard. Since the rating scale for LTS is not very granular, it does not recognize the potential impacts, especially on facilities already rated as LTS 4 (the highest LTS). How can there be no significant impacts to facilities already rated as having the highest LTS?

The EA specifically notes on page 1-2, paragraph 1.2: Governor's Transportation Vision Panel that "Community livability" is a key issue. It also recommends bike and pedestrian investments to reduce fatalities and injuries. Tolling impacts are not mitigated, will degrade the safety on local roads, and will reduce community livability by increasing traffic on neighborhood streets.

## Tolling is Not Shifting Travel Mode

There is insufficient investment in the pedestrian, bikeway, and transit systems to affect mode shift. ODOT has not addressed these concerns, which were raised in our September 15, 2022 comments on the Draft TTR. The Project does nothing to contribute to an improved environment for transit riders through the I-205 Corridor. The EA identifies on pages 3-5 through 3-6 that limited transit service exists. While the report claims "slightly higher" transit ridership, the mode share figured in Table 5-5 indicates there would only be 800 additional transit trips throughout

the entire Metro Region, which is a marginal increase at best. “The need for improved transit and other transportation choices” is one of the three priority issues that ODOT was directed to address by the Oregon Transportation Commission (page 1-2 of EA).

A map of the transit in the area should be included in the TTR and the EA. In the EA, ODOT acknowledges (on pages 3-5 and 3-6) that there is limited transit service, insufficient pedestrian systems and a lack of quality bikeways in the area. So how did ODOT determine that there will be a shorter transit travel time through the corridor (as shown on page 3-25 of the EA) when there is currently no transit service on Borland Road, Stafford Road, or I-205? More clarity is needed on how the shorter transit time is achieved.

With insufficient travel mode choice in the region (Table 3-2), it is unclear how the desired greenhouse gas reduction aspirations can be met, especially in light of the fact that the cumulative impacts related to climate change identify a need to shift mode away from single-occupancy vehicles. Investment in non-auto facilities is essential if tolling can truly be expected to provide options for people to shift to a different mode of travel, rather than simply shifting traffic to local streets, as appears to be the case under the current Project. The Project should be modified to incorporate improvements to transit and pedestrian infrastructure as part of the solution to the stated Need to reduce traffic congestion and improve safety or, at the very least, analyze such an alternative.

The EA does not provide adequate mitigation to sufficiently address the lack of travel choices in the corridor. Additional mitigation must be added, including but not limited to, collaborating with transit service providers to support availability and enhancements of transit and other transportation services along I-205, especially for historically and currently excluded and underserved communities traveling through the area.

## Lack of Commitment to the Mitigation Measures

Tables 6-1 through 6-6 of the TTR identify mitigation measures for implementation by 2027, many of which are on County or city facilities. Implementation of the mitigation measures by ODOT will require an intergovernmental agreement between the affected jurisdictions. The EA does not specify whether the County and cities are being asked to help fund the mitigation.

For example, the mitigation for SW Borland Road between SW Stafford Road and the Tualatin River Bridge (Table 3-15 of the EA) states “Contribute to...” The EA does not state what the contribution amount will be or how the other portion of this mitigation measure will be funded.

There will be a long period of time between when impacts will begin to occur (i.e., 2024 when tolling begins) and when identified mitigation measures can be feasibly funded, designed and constructed. As a result, the local communities will experience significant impacts for several years before mitigation measures, if they are even feasible, are fully constructed.

Many of the proposed mitigation measures would require the acquisition of right-of-way, have topographical and/or adjacent land impacts that lead to significant questions of construction feasibility, and could be extremely costly to actually construct. How will ODOT address these issues and assure our communities that the impacts will be sufficiently mitigated?

The EA also proposes mitigation measures that are technically infeasible. A good example of this is the widening and signalization mitigation proposed at the OR 99E/South End Road intersection. OR 99E parallels the rail tracks and the Willamette River, so no widening of this intersection can occur to the west, and there are significant topographic constraints to the east in the form of a solid rock bluff adjacent to OR 99E. To add lanes to the intersection, OR 99E would need to shift eastward well in advance of the intersection. Between the costs of widening and the impacted embankment areas, it would not be feasible to complete this mitigation project prior to 2027, if at all.

Finally, there is a lack of clarity on the mitigation measures proposed, how they will be shaped by local officials and the impacted communities, and a realistic timeline for implementation. The EA states that “any mitigation proposed to address near-term impacts that is determined to also help alleviate pre-completion tolling impacts could be implemented before tolling begins.” This statement defers the analysis of pre-completion tolling impacts. The EA needs to analyze the impacts from pre-completion tolling, identify which mitigation measures will be required to address the significant impacts of pre-completion tolling, and condition tolling to start no sooner than completion of these mitigation measures.

## Truck Traffic on Local Roadways

Traffic and air quality modeling assumes that truck traffic on local roadways will *decrease* with the Project, while passenger car traffic will increase as a result of diversion. This assumption, which is used to justify the lack of local modeling and consideration of air toxics and noise, is not supported by evidence. In particular, the County is concerned that ODOT has not properly accounted for the movement of aggregate materials from the rock quarries near Canby and Vancouver or access to the developing warehouse/industrial district in Canby.

## Reasonably Foreseeable Future Actions in the Project Corridor Should be Part of Mitigation

If a project is identified as a Reasonably Foreseeable Future Action (RFFA) in Section 4.4 of the Cumulative Impact Technical report, and is within the Project corridor, it should be considered eligible for mitigation funding. Examples include 2018 Regional Transportation Plan (RTP) projects 10127, 10128, 11242, and 12089. While these projects are on the 2018 RTP, they are not guaranteed to be funded. In order to achieve the benefits that are described as a part of the Project, the RFFAs need to be constructed.

## IV. Other Topical Issues

In general, the County is concerned that the analysis of other topical areas in the EA focuses on impacts to the highway system while ignoring local impacts in areas that will experience increased traffic from diversion. The geographic boundary associated with the API for the following resources (identified in Table 4-1 of Appendix Q) should be modified to extend onto the roadways that experience diversion and where there are identified mitigation projects: Land Use, Geology and Soils, Hazardous Materials, Vegetation and Wildlife, Wetland and Water Resources, and Historical and Archeological Resources. This is necessary to address the full extent of direct and indirect impacts of the Project. In other areas, including air quality and noise, where the API has been defined to include certain local roadways and communities that would experience diversion, there is no meaningful or quantitative analysis of impacts. Our detailed comments are outlined below.

### Air Quality

#### MSAT Analysis

Under the Build Alternative, the projected addition of diverted traffic to non-highway roadways will increase the generation of mobile source air toxics (MSATs) along those roadways, which will increase the concentration of MSATs at specific locations. However, the EA does not adequately address the potential increase of MSATs at affected locations and the associated potential health hazards. The following factors raise concerns without providing adequate analysis to understand the potential health hazards.

- Table 6-3 of the Air Quality Technical Report identifies an 11% increase of non-highway vehicle miles traveled (VMT) under the Build Alternative.
- Table 6-5 of the Air Quality Technical Report identifies a 12% increase in annual benzene emissions along non-highway roadways under the Build Alternative.
- Figure 3-4 of the EA shows average daily traffic on specific non-highway roadways could increase by up to 31% under the Build Alternative.
- Sensitive receptors (e.g., residences, Willamette Primary School) are in close proximity to affected non-highway roadways and would be exposed to increased MSAT concentrations.
- The quantitative analysis of MSAT provided in the Air Quality Technical Report is limited to aggregate emissions and does not address concentrations at affected non-highway locations.
- As identified in Table 5-2 of the Air Quality Technical Report, concentrations of MSATs at one intersection near the project location exceed Oregon Department of Environmental Quality Benchmarks.<sup>6</sup>

---

<sup>6</sup> The benchmarks “are based on concentration levels that would result in a cancer risk of one-in-a-million additional cancers based on a lifetime of exposure. For non-carcinogens, the benchmarks are levels you

- Section 3.2.2 of the EA states the following: “The localized changes in MSAT concentrations would likely be most pronounced on roadways where traffic volumes would be higher under the Build Alternative relative to the No Build Alternative due to rerouted trips. However, the magnitude and the duration of these potential increases compared to the No Build Alternative cannot be reliably quantified due to incomplete or unavailable information in forecasting project-specific MSAT concentrations and related health impacts.”
- Section 6.2.2 of the Air Quality Technical Report provides approximately two pages of justification for the decision to not characterize the magnitude of the changes in MSAT concentrations at affected locations. The discussion in Section 6.2.2 raises significant human health concerns without resolving them.

The sum of limitations raised within Section 6.2.2 of the Air Quality Technical Analysis does not absolve ODOT from a good-faith effort to characterize the increase in MSAT concentrations along affected non-highway roadways. ODOT should model MSAT concentrations at two or more locations and compare these to established health risk levels, such as the Oregon Air Toxics Benchmarks. Analysis would be limited to two alternatives (No Build, Build) and could be corroborated with existing air quality monitoring data. If the benchmarks are exceeded, then a more detailed health risk assessment should be conducted. While the analysis would entail some level of uncertainty, understanding the magnitude of potential MSAT concentrations is critical for understanding potential health impact on residents. This information is necessary for the decision-makers as well as the affected communities.

Additionally, the assumption that truck traffic and associated MSAT emissions will decrease on local roadways should be revisited. As noted above, the County is concerned that ODOT has not properly accounted for the movement of aggregate materials from the rock quarries near Canby and Vancouver and access to the developing warehouse/industrial district in Canby. Further, Borland Road, which parallels a significant segment of I-205 and is one of the primary roads that would experience an increase in traffic from diversion, currently does not allow truck traffic; therefore, there would effectively be no change in truck traffic on this roadway, but the volume of passenger cars would increase dramatically, along with associated emissions of MSAT. A health risk assessment should be conducted to evaluate impacts from the increase in MSAT along Borland Road and other affected roadways.

Appendix D2, Truck Toll Sensitivity Analysis- Air Quality, only addresses the potential for criteria air pollutant and GHG emissions, stating that even with variable rate tolling for trucks, VMT would be reduced, and therefore “air quality” impacts would be less than significant. But this logic completely ignores MSAT concentrations on local roadways from increased truck diversion from variable rate tolling. The air quality analysis of variable rate truck tolling (Appendix D2) should be revised to consider MSAT health impacts on local streets.

---

could breathe for a lifetime without any non-cancer health effects” (<https://www.oregon.gov/deq/air-toxics/Pages/Benchmarks.aspx>).

## Cumulative MSAT Analysis

The cumulative air quality analysis does not appear to address potential for cumulative projects (including the RMPP) to increase traffic and therefore increase MSAT concentrations along affected non-highway roadways. The cumulative air quality analysis in the EA references FHWA expectations of declining MSAT emissions to conclude that the Build Alternative would not have negative cumulative effects on air quality. While overall emissions are expected to decline, the Build Alternative in conjunction with the cumulative projects has the potential to significantly increase traffic on non-highway roadways. The MSAT analysis of the I-205 Toll Project should take into account the impacts of the RMPP and other cumulative projects on the specific non-highway roadways that will be impacted by the Build Alternative.

The cumulative MSAT analysis should address affected non-highway roadways that will experience increased traffic and intersections where the level of service will decline. ODOT should model cumulative MSAT concentrations at two or more locations and compare these to established health risk levels, such as the Oregon Air Toxics Benchmarks. If the benchmarks are exceeded, then a more detailed health risk assessment should be conducted.

## Geographic Boundary of MSAT Emissions Analysis

The project elements are located entirely within Clackamas County and most of the air quality API is located within Clackamas County; however, the geographic boundary of Multnomah County was used for the MOVES modeling of MSAT emissions. The County is concerned that the geographic boundary used in the analysis does not accurately reflect actual conditions. ODOT should disclose how the geographic boundary was determined and whether emission estimates using Clackamas County as the geographic boundary would differ from those presented.

## Other

The project area is located within an EPA-designated carbon monoxide maintenance area. This should be clarified in the EA.

While air pollutant emissions in the API are projected to be much lower in the future compared to current conditions due to improvements in vehicle technology and implementation of stricter emissions standards, Appendix Q of the EA cites that several of the RFFAs identify “reduced emissions” as a project objective, including the OR 43 Multimodal Improvement (RTP 10127) and Willamette Falls Drive Multimodal Improvements (RTP 10128). These projects should be identified as mitigation and funded through the Project if they are being listed as contributing to improved air quality.

The air toxics monitoring data presented in the Air Quality Technical Report is from a former monitoring station about 7 miles from the Abernethy Bridge. Closer and more recent monitoring data should be used to characterize existing air quality in the region. The Tualatin monitoring station air toxics data is closer to the project area (approximately 3.6 miles from the Tualatin

River Bridges), is more recent and more representative of a near-highway environment. The Tualatin monitoring data shows higher levels of air toxics, which should be taken into account for the analysis of the I-205 Toll Project. This data is available from the Oregon Department of Environmental Quality.

## Climate Change

The TTR (page 65) in Table 5-4 identifies that the Regional VMT will increase on non-highway roads and will decrease on the highway. The people who are choosing to shift their trips off of the highway do not have choices in travel options, and will therefore put additional strain on the local roadway system.

EA Appendix Q, page 25, identifies that “Tolling can encourage shifts away from single occupant-vehicle and a shift in travel time, which can reduce emissions associated with vehicle idling.” While the report notes that the Build Alternative is expected to have a relatively “small effect” on choice on travel mode in the region, it should be more clear that it is a “negligible” impact with only a shift of 800 trips regionally to transit (of the 5,245,000 trips) and an increase of only 200 Active Transportation trips of the total 1,276,800 trips across the region.

One significant reason that trips are not shifting to another mode is because other modes of transportation are not available in this area. To take a trip using transit would require two to four times as much time for most travelers.

In addition, there are insufficient bikeway facilities in the area.

- As the analysis of the bikeway facilities demonstrates, the majority have a Bicycle Level of Traffic Stress (BLTS) rating of R3 and R4, and are not expected to improve.
- As noted on page 47 of the TTR, “Most study corridors are already at the highest or worst level (BLTS 4) when considering the overall corridor as a whole.”
- The report goes on to say, “In rural areas (denoted with an “R”), shoulders are more important to the BLTS results because safety concerns tend to be higher (ODOT 2020a). All of Stafford Road, most of SW Borland and parts of 99E are considered rural.”
- Even though a significant additional volume of traffic is anticipated in these corridors with the Build Alternative, the granularity of the BLTS rating system does not demonstrate any difference with the score, with the corridor going from a BLTS 4 to a BLTS 4, which means that no mitigation for the impacts to bikeway travel were proposed through the corridor.

If tolling is expected to be a tool to reduce GHG emissions, there must be reasonable mode choices. To achieve congestion management, as identified in the Project purpose, investments in bikeway and transit infrastructure are necessary as a part of the mitigation so that people have reasonable travel alternatives. For example:

- Investments need to be made in a complete protected bikeway path throughout the corridor, including along Stafford Road, SW Borland, and parts of OR 99E.
- Bikeway improvements as well as the RFFA OR 43 Multimodal Improvement (RTP 10127) and RFFA Willamette Falls Drive Multimodal Improvements (RTP 10128) are needed to help achieve the proposed GHG emissions reductions.
- There needs to be regular, reliable transit service throughout the corridor, addressing both through and local trips, to provide a viable mode option.

The pedestrian and bicycle level of stress analysis presented in the EA does not recognize the rural nature of many of the County roadways where diversion would occur. ODOT's Analysis Procedures Manual outlines procedures for assessing rural roadways and identifying potential risks and mitigation measures.

Emissions may be reduced on I-205, but due to diversion air quality will become worse within the communities when congestion shifts. This puts more families at greater risk and may create additional hardships due to healthcare costs, missed work and permanent illness. As with other analyses in the EA, the benefits and impacts are focused on I-205 and ignore impacts to local communities.

Additional information is needed on the economic impact to downtown Oregon City and Canby. The EA states that businesses in Oregon City and Canby would benefit from pass-through traffic, but no documentation is provided beyond that statement. What other considerations were there when making the assumption that the increase in volume would improve business? Parking is limited in some areas and thus would not support someone trying to stop on a pass-through trip. There should be a mitigation program for the businesses that may be negatively impacted in Oregon City, Canby and West Linn. More traffic volume may not be better if it is in the form of congested traffic.

On page 3-60, Table 3-30: Under the Build Alternative, the EA claims there would be higher levels of opportunity (traffic exposure-oriented) consumer spending in three commercial districts because of the projected higher traffic volumes compared to the No Build Alternative. This is questionable at best considering conditions will be gridlocked. It seems more likely that people will avoid the area due to congested conditions. Logic would imply that individuals who elect to travel longer distances to avoid the costs of tolling are less likely to be the "opportunity shoppers" referred to in Appendix F, Economic Technical Report.

Estimated toll rates are expensive; with no real rates it is impossible to say what the true economic impact will be to individuals and families. Our rough estimate given the financial data provided is that it would cost a household at least \$2,000 to \$2,400 per year (\$166 to \$200 per month).

It is not clear whether commercial use will be tolled at a higher rate. Will these costs be passed through to consumers and further exacerbate the economic hardships families and businesses experience?



On page 3-77 of the EA it states that the Project would result in the “same or improved access to jobs.” However, if a person has problems traveling to a new job now, how will tolling improve access? This is not a positive impact as stated as it is based on representative scenarios which have many technical errors (see comments under the subheading of *Social Resources and Communities/Environmental Justice*). Additionally, some representative scenarios show that EJs and EJ communities will be forced to choose between paying a toll or traveling on a non-toll path which is more congested as a direct result of the Project (increased non-toll path travel times under the Build Alternative in comparison to the No Build Alternative). The Project creates an even larger divide between socioeconomic households at different levels and creates more disadvantages for those who already have trouble accessing jobs.

On pages 19 & 23 of the Economics Technical Report (EA Appendix F) there are contradictions: on page 19 it states that “detailed household spending is not available at the state, regional, and API levels, household income is assumed”; yet on page 23 it states “based on analysis of spending by households in the API, the existing spending by cost category can be estimated”. This contradiction needs to be explained and resolved.

## Noise

Some noise level increases on local roadways are disclosed, in some places up to 6 dBA, but there is no discussion of sensitive receptors located along these segments, and whether impacts would be significant. There is also no discussion of noise thresholds for significance or local policies related to noise. Mitigation is identified for I-205 segments only. The increases in local roadway noise appear to be a significant, unmitigated impact.

While EA Appendix Q states that the Build Alternative would not have negative cumulative effects related to noise, the EA states on pages 3-66 and 3-67:

“Along non-highway roads in the API, changes in traffic noise levels under the Build Alternative would range from 6 dBA lower to 6 dBA higher than existing noise levels because of changes in traffic volumes. The largest reduction in noise levels would occur along the segment of Willamette Falls Drive east of 19th Street, where traffic volumes would be lower than under the No Build Alternative, and the largest increase would occur along the segment of SW Borland Road east of SW Stafford Road, where traffic volumes would be higher than under the No Build Alternative. Figure 3-14 shows the estimated increases in traffic noise levels on non-highway roads under the Build Alternative as compared to existing conditions. Most locations would experience 0 to 3 dB higher noise levels under the Build Alternative compared to the No Build Alternative, which would be barely perceptible to the human ear.”

The analysis does not appear to address the potential for cumulative projects (including the RMPP) to increase traffic and therefore increase noise levels along affected non-highway roadways. The noise analysis of the Project should take into account the impacts of the RMPP

and other cumulative projects on the specific non-highway roadways that will be impacted by the Build Alternative. Mitigation needs to be identified for significant cumulative impacts.

Figure 3-13 of the EA, which depicts the noise API, does not include all of the non-highway roads that will have significantly increased traffic. This figure should be revised to address all non-highway roads that will experience notable diversion as a result of the Project. For instance, Figure 3-4 of the EA shows an 11% increase in traffic on OR 99E near Canby, which is not shown in Figure 3-13.

Some noise walls were not included as mitigation as they were not feasible from a cost perspective; because there is no feasible mitigation, the EA should disclose that a residual significant noise impact will occur which is not mitigated, thereby triggering the need for an EIS.

## Social Resources and Communities / Environmental Justice

Overall, the EA does not adequately address impacts to EFCs and EJ communities. This should be a prime focus as “Impacts of tolling on communities experiencing low income” is one of the three priority issues that ODOT was directed to address by the Oregon Transportation Commission (page 1-2 of EA).

The EFCs and the EJ communities will experience the impact of diversion during pre-completion tolling, and this is not addressed in the EA. There are high concentrations of these communities in several of the areas where impacts to the transportation system have been clearly identified in the EA, especially near OR 99E, from Jennings Avenue south through Oregon City, as well as in Canby and the surrounding areas. The EA must document how these areas will be impacted in the pre-completion tolling scenario.

The base map used in almost all of the figures inaccurately displays the “urban area” in this section, and throughout the document. For example, the industrial areas east of I-205 along OR 212 and the Clackamas Town Center area north of OR 224 and west of I-205 are both fully developed and highly urbanized. The EA maps appear to be displaying incorporated areas and census designated places, but this does not properly identify what is “urban” according to US Census data. The maps should be revised to utilize the 2010 or 2020 Urban Area as defined by the US Census Bureau. This revision would accurately show additional urban areas within Canby, Oregon City, West Linn, and other jurisdictions.<sup>7</sup>

While it is noted on page 35 of EA Appendix Q that, “In the short-term it is possible that the construction of the Build Alternative and the RFFAs could overlap leading to detours and travel time delay for people accessing social resources,” it is much more likely that the implementation of pre-completion tolling will create delay for people to access social resources, and that some

---

<sup>7</sup> For reference, the US Census 2010 Urban Areas map for this area is available online at: [https://www2.census.gov/geo/maps/dc10map/UAUC\\_RefMap/ua/ua71317\\_portland\\_or--wa/DC10UA71317.pdf](https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua71317_portland_or--wa/DC10UA71317.pdf)

of the critical active transportation RFFAs will not be constructed due to lack of funding, further negatively impacting EFCs and EJ communities.

There is a need for active transportation investments throughout the corridor -- not just spot improvements at very minimal locations -- so that persons with low income and other EFC/EJ communities have choices of different modes. Page 27 of EA Appendix Q identifies that a “historic lack of transportation improvements and investment in these communities has led to increased safety risks, including risk of traffic fatality and limited access to transit and active transportation networks (Oregon Walks 2021; Cohen and Hoffman 2019)”. As a part of this Project, this needs to change. Unfortunately, the proposed mitigation does not sufficiently address these issues faced by EFCs or EJ populations.

Page 28 of EA Appendix Q states that the “Build Alternative would have beneficial or neutral effects on environmental justice populations related to access to social resources and travel times, air quality, roadway safety, and travel mode shift” and goes on to say “with the implementation of mitigation measures, no disproportionately high or adverse effect on environmental justice populations would occur under the Build Alternative. **The RFFAs would also be required to mitigate any disproportionately high and adverse effects on environmental justice populations** (emphasis added in bold).”

Overall, it appears that the RFFAs are needed to address the impacts to EFCs/EJ communities and should be included in the mitigation measures that are constructed with the Project.

The analysis of both Social Resources and Communities and EJ (Appendices I and J) relies on Representative Scenarios, which included trips that started in areas with higher concentrations of EFCs and ended in areas with social resources. Representative Scenarios 1 and 8 describe people who will now be forced to choose between paying a toll or taking a non-toll route that is now longer and less safe due to the Project (the Build Alternative increases volumes and travel time in comparison to the No Build Alternative). This is a significant and unmitigated impact created by the Project that disproportionately affects EFC/EJ communities on the outskirts of the proposed tolling location. Further, all Representative Scenarios could be affected by the RMPP and thus do not accurately assess cumulative conditions.

Other technical issues with the representative scenarios that were used are listed below. In addition to the issues noted, all of these scenarios assume bus routes that are undefined and do not correspond to claims of travel time estimations. In giving alternative travel options (public transport, bus, etc.), far more specificity is needed as to which specific routes will yield equivalent or less travel times.

#### **Scenario Description 2**

- The map is inaccurate and shows a trip from Rivergrove to Oregon City, not Tualatin to Oak Grove.
- There is direct transit that should be added, and it would require 1 hour and 52 minutes to make the trip.

### **Scenario Description 3**

- The scenario describes going to a farm outside of Oregon City, but the map shows traveling to the hilltop/central Oregon City.

### **Scenario Description 4**

- This scenario does not travel through the toll corridor.
- The scenario indicates that there would be no difference in travel time between Wilsonville and Portland between Existing Conditions and the year 2045. Also, this would indicate that the tolling on I-205 has no impact to travel time on I-5. Are these conclusions accurate?
- The assumed toll-free travel route does not align with plausible navigation decisions.

### **Scenario Description 5**

- This scenario does not travel through the toll corridor.
- The scenario describes a student living in SE Portland, but the map has the person traveling from Clackamas Town Center, which is in unincorporated Clackamas County (likely with a Happy Valley zip code).
- The travel time range of 1-2 hours is extremely large in comparison to the “minute” of travel time savings for automobiles using the freeway.
- The trip cannot be done as described. The assumed toll-free travel route does not align with plausible navigation decisions.

### **Scenario Description 6**

- The map does not display a trip from Rivergrove to Oregon City; it shows a trip from Tualatin to Oregon City.

### **Scenario Description 7**

- How would the No Build Alternative increase travel time by 10 minutes at 11 PM?

### **Scenario Description 12**

- The map is incorrect and does not match the scenario description.
- McLoughlin Promenade is located in Oregon City, not Gladstone.

### **Scenario Description 16**

- The toll path under this scenario does not provide an improved travel time.

### **Scenarios 9, 10, 11 and 15**

- The assumed toll-free travel routes do not align with plausible navigation decisions.

The Social Resources and Communities Technical Report (EA Appendix I), Section 7 discusses short-term and long-term impacts.

- The impacts of tolling and congestion pricing happen immediately and in the near term. All of the items listed in Section 7.2 need to be incorporated into Section 7.1 Short Term Impacts.
- When describing long-term impacts in Avoidance, Minimization, and/or Mitigation Commitments in both the Social Resources and Communities Technical Report

(Appendix I of the EA, pages 57-58) and Environmental Justice Technical Report (Appendix J of the EA, pages 50-51), three different options are summarized for how the Oregon Transportation Commission (OTC) will develop the Low-Income Toll Program.

Those options range from:

- (1) toll discounts and exemptions;
- (2) providing focused discounts for more specified demographics based on specific income levels, and
- (3) using a verification process that leverages existing low-income service programs or exploring self-certification to qualify for enrollment.

These options need to be exercised as early as possible in the pre-completion tolling period to allow efficient and measured pre-implementation and implementation of one or more of the OTC's Low-Income Tolling options. The report does not provide a realistic timeline of preparing for option three, in particular. We strongly recommend that the OTC give as much time and resources to existing low-income service programs to help implement a feasible verification process.

There was no discussion about the disproportionate impact on populations relying upon transit, and the lack of transit resources within and through the corridor. Also, the lack of other complete bikeways through the corridor limits the fare-free options for people who do not drive. While the low-income toll program addresses the disproportionate burden on low-income populations, the Project is not making any significant improvements to transit or bikeways which could be alternative modes for people taking trips through the corridor. In the Cumulative Impacts Technical Report (Appendix Q of the EA), there is a continued reliance upon the RFFAs to provide the benefits for cyclists and pedestrians.

Social services are offered during business hours, which are during peak travel times. The cost to get to appointments will not lessen if people receiving the services have to pay the tolls or take alternative routes. Instead the time to get to appointments and cost will increase, adversely impacting those individuals even more.

How will penalties impact those who can least afford tolling and how might those create further financial hardships?

While the EA states that "ODOT is prioritizing equity throughout the Project development process" (EA page 1-6), the Project fails to achieve equity-related goals for historically underserved and disproportionately affected communities.

- The Project does not increase access to job centers or other important community centers. In fact, it would represent a new financial burden through use of a toll path, or reduced access through a longer, more congested, and less safe non-toll path.
- The Project shifts air quality effects from I-205 to surrounding communities.
- The Project may negatively impact local businesses in underserved communities.
- The Project does not enhance or expand multimodal transportation choices.

## Land Use

The Land Use API needs to be expanded to include areas of significant diversion and mitigation. For example, Willamette Park and Fields Bridge Park should be considered as they will be impacted by diversion.

We are concerned with the compliance/consistency analysis for following items:

- Oregon Highway Plan (OHP) Policy 1F and Policy 1G Action 1G 1
- Oregon City Transportation System Plan
- West Linn Comprehensive Plan Goal 12, Chapter 2 *Goal 4: Maintain, protect and improve the existing transportation system*
- Stafford Hamlet Community Vision – Goal to Minimize additional traffic and infrastructure impacts

There is no discussion of compliance or consistency with OHP Tolling and Congestion Pricing Policy Amendment, which was adopted by the OTC on January 12, 2023. Goal 6 supports investments in multimodal access and addressing impacts to neighborhood health, safety and congestion.

The Land Use review only takes into account areas within 100 feet of I-205. The land use impact of the diversion on to the local roads is not taken into account. Land use review should be conducted along all of the primary diversion routes that will have an increase in daily traffic volume due to the implementation of tolling.

Land use for the Stafford area is guided by a 3-party agreement which allows for the cities to begin concept planning the area for urban uses upon completion of the improvements along I-205. The land use discussion should analyze the indirect growth-inducing impact of urbanization of the Stafford area which will be caused by the Project.

The Oregon City Arch Bridge should also be evaluated as a 4(f) resource in the land use section. Before approving a project that uses Section 4(f) property, FHWA must determine that there is no feasible and prudent alternative that avoids the Section 4(f) properties and that the project includes all possible planning to minimize harm to the Section 4(f) properties. The Project will result in the increased use of the Arch Bridge (a 40-50% increase in daily volumes), and feasible and prudent alternatives must be further evaluated. A managed toll lane or alternative non-toll funding sources are feasible and prudent alternatives.

The EA should disclose if any County planning permits are required as a part of the Project or mitigation. County right-of-way (ROW) permits will be required for mitigation projects in County ROW.

## Historic and Archaeological Resources

The historic and archaeological API should be expanded to include areas of significant traffic diversion, as well as transportation mitigation measures that would involve visual changes or ground disturbing activities. Due to the narrow nature of the API for the Historic and Archeological Resources section, the report does not address the impact to the extremely important resource of the historic Highway 43 Arch Bridge which connects Oregon City and West Linn. It will be the only toll-free crossing option between Oregon City and West Linn with the implementation of tolls and congestion management. The County requested a discussion of the issues related to the Arch Bridge and the condition of the bridge in our September 15, 2022 comment letter on the Draft TTR.

The Oregon City-West Linn Pedestrian Bridge Concept Plan report outlines the historic significance of the bridge, as well as the need for improvements to the pedestrian and bikeway access in this area.

Figure 5-11 in the TTR specifically identifies an expected increase of 40-50% in daily volume of traffic across the Arch Bridge. There needs to be greater detail provided on impacts of the increased daily volume on this resource, as well as the impact of this increased volume on the local circulation in downtown Oregon City. While there may be existing or cumulative capacity issues with the Arch Bridge, an increase of 40-50% would mean the Project contributes significantly to a cumulative impact. If there is no feasible mitigation to bring conditions to an acceptable level of service, an EIS should be prepared rather than a FONSI.

## Biological Resources

The EA does not disclose the potential secondary impacts from mitigation on vegetation, wildlife, wetlands, and water resources. The EA should describe which mitigation measures would require work outside of the developed right-of-way and whether these measures would impact biological resources. Proposed mitigation includes roundabouts which could impact undeveloped areas next to the right-of-way.

## Public Involvement / Agency Coordination / Consultation

The 60-day public comment period provided by ODOT was woefully insufficient for the public to review and evaluate 3,000 pages of text and several very complicated models. While shorter public comment periods may be the standard practice in other states where tolling is normalized, this will be Oregon's first toll program in the Portland metropolitan area and the first toll program in the State applied to roadways, not just bridges. It is imperative that it is done correctly. Indeed, the public engagement report only details a 10-week period from August 3rd to October 15, 2021 and no other public engagement before and after that period. Instead, ODOT is rushing to implement a project that is based on inadequate and deficient data and analysis, significantly increasing the likelihood ODOT will make mistakes that will negatively affect the communities we are elected to represent for years to come. Thus, it would be

appropriate and prudent for ODOT to extend the public comment period, as is allowable under the NEPA regulations.

Further, governmental agencies and the public experienced several roadblocks that inhibited their ability to review and comment on the EA. For example, the EA, appendices and associated materials were initially published only in English and translated materials were not available for several days. The public engagement report notes that outreach included “[d]istributing flyers containing information about the Project and the comment period in English and Spanish to the Borland Road Free Clinic and Tualatin School House Food Pantry along I-205.” ODOT should have distributed flyers to sites in West Linn, Oregon City, or other portions of Clackamas County.

The public hearings and public in-person information sessions were poorly publicized and held during typical working hours. Particularly underserved communities cannot take time off of work and risk lost income to attend these informational sessions. Additional informational sessions on the EA should be held outside of normal office hours, particularly in areas of environmental justice concern.

## **V. Conclusion**

The full extent of environmental impacts from the Portland Metro Area Value Pricing Project (or the first phase of the Oregon Toll Program) needs to be evaluated. We must understand the combined impacts of tolling on I-205 and the RMPP to enable the development of appropriate mitigation and informed decision making. The County cannot afford to invest in mitigation projects only to find out that the RMPP makes them stranded investments, or simply the wrong investments. The County has raised this and other key issues throughout the process, yet these concerns remain ignored.

At this time, it is essential that a FONSI is NOT issued, and that ODOT/FHWA be required to complete an EIS. The EIS should include the information that has been identified as missing or needed to supplement the current analysis. Substantial new technical information and analysis is needed to truly understand the impacts of the Project and required mitigation – this includes, but is not limited to:

- Modeling the impacts of implementing the RMPP at the same time as I-205 tolling
- Modeling the impacts of pre-completion tolling (with and without the RMPP)
- Fully evaluating and modeling an alternative with a completed six-lane facility and no tolling

We look forward to receiving your response to our comments and would welcome an opportunity to discuss our concerns further with key ODOT representatives. Our goal is to partner with ODOT to provide for the safe travel of all of our residents, businesses, visitors, and the movement of freight, regardless of the facility that people use to move within and to/from the County and our local cities.



**ODOT I-205 Toll EA - RECORD #2843 DETAIL**

**Submission Date :** 4/20/2023  
**First Name :** Kristin  
**Last Name :** Phillips  
**Affiliation :** Clark County  
**Submission Method :** Letter  
**Q3. Comments :** Good Afternoon,  
Please submit the attached as comments for the I-205 Toll Project  
Environmental Assessment.  
**Attachments :** 2023\_0420\_I-205\_EA\_Clark\_County.pdf (289 kb)



April 20, 2023

I-205 Toll Project Environmental Assessment Comments

We thank you for the opportunity to provide comments to the I-205 Toll Project. On April 19, 2023, the majority of the Clark County Council approved the following white paper and resolution to submit as response to the I-205 Toll Project. The majority of the Council is not in support of tolling on I-205. There needs to be a strategic focus on other corridors, and light rail is a separate discussion from tolling. If there is a desire to have further consideration of light rail, that should happen at a future time. Another concern is that it has been inaccurately stated that all stakeholders agree on the proposed project.

Please see the following resolution and white paper that further expresses concern. Again, we thank you for the opportunity to provide feedback.

Sincerely,

Karen Dill Bowerman, Chair

Michelle Belkot, Councilor

Gary Medvigy, Councilor



# **RESPONSE TO ODOT & FHA INVITATION FOR TOLLING FEEDBACK**

**April 11, 2023**

**Clark County Council, Washington**

---

This is an outline and starting point for Clark County Washington Council discussion in April 2023 regarding an updated Resolution in opposition to tolling that impacts Clark County residents. We send our thanks to the I-205 Toll Project Environmental Assessment to share feedback through April 21, 2023. They are seeking feedback to improve travel on I-205, knowing that the plan is to toll Abernethy and Tualatin River bridges to pay for improvements that they feel will reduce congestion and improve safety. This White Paper and the ensuing resolution provide the feedback as requested. When there are questions relative to the points raised, please be in touch. Full contact information is at the end of this document.

## **Prior Precepts of Clark County Council relative to tolling and light rail**

This paper is an update of the White Paper adopted by Clark County Washington Council on November 1, 2022 in opposition to the Oregon Legislature proposing to toll I-205 and to initiate Mobility Pricing on the two corridors of the I-5 and the I-205. At that time, we outlined seven locally-based points that should stand in order to justify tolling. But they don't. Because the seven points did not support the recommendations for tolling, they were identified as concerns relative to tolling the White Paper ultimately recommended against the tolling option. Those seven points were: toll roads save time and money, tolls fund critical maintenance and improvement, tolling will be an economic growth engine, tolling is beneficial to the environment, double tolling on I-5, concerns with mobility pricing and cost of collection.

In addition to the points made above that were not supported, certain basic precepts of the Clark County Council still stand, such as the fact that the tolling system places unreasonable burden on Washington residents, particularly low

income residents, who cannot modify their work schedule and overall who can least afford the toll.

In the prior 2022 White Paper, we made the point that tolling is an inefficient means of raising taxpayer money for transportation. For example, the “cost of collection “on Seattle’s I-405 was reported by WSDOT to be 43% of tolling revenues and that the state legislature has had to use General Funds to help them break even because tolling revenues did not cover the cost of collection.

Clark County Council now follows in the footsteps of the Board of Councilors’ RESOLUTION 2015-12-23 in adopting a policy of opposing every Light Rail project in Clark County unless it is first supported by a majority of the voters in a county-wide advisory vote of the people. If we examine Clark County’s positions in ten-year intervals, we would find that in 2013 there was an advisory measure on the ballot approved with 68.39 percent of the vote on whether the (then) Clark County Commissioners should oppose light rail if there was not a supportive countywide vote.<sup>i</sup>

Furthermore, Clark County Council supports C-Tran’s bus rapid transit as the best alternative for rapid transit on the I-5 bridge because of its cost effectiveness compared to the MAX light rail option, its effectiveness in serving riders throughout the area and its agility in responding to transportation needs of the area.<sup>ii</sup>

Vehicle diversions are another concern that Clark County residents have as we try to resolve how families will deal with this regressive toll tax. Of the 75,000 Clark County residents who work in Oregon (and therefore pay Oregon state income tax) thousands of those residents are predicted to divert to side roads in order to avoid tolls. ODOT has estimated a total of 130,000 vehicle diversions when all Portland area freeways are tolled. This may be a means for Washingtonians to cope, but we do not find it to be healthy for straight-forward road maintenance of Oregon’s side roads that would be placed in high demand.

### **Why Oregonians may have concerns on ODOT tolling**

The last paragraph above comes from Washingtonians with concern for Oregon's road maintenance. That is not just an altruistic stance. Perhaps it should not have come as a surprise when at ODOT's April 2023 request for feedback on tolling the I-205 leaders from Oregon City, West Linn, Canby, Gladstone and Tualatin came forward with their residents – some angry<sup>iii</sup> – that they are not being heard regarding their concerns that no ODOT plan has been shared for how they intend to stop drivers from clogging up local roads before getting to the toll points.<sup>iv</sup> When ODOT attempts to assure them that this is a regional issue, residents respond clearly that it is a local issue on which there has been inadequate communication, particularly when it's thought that eventually all of I-205 will be tolled. The West Linn mayor has voiced particular concerns that stem from ODOT's response to him that 'we're just going to monitor what happens and then we'll mitigate as we go.' Such a posture does not communicate the existence of a plan or advance consideration given to dealing effectively with the issue.

Oregonians are also aware that there may be negative impact to commerce because tolls increase the overhead of doing business. It is doubtful that truck traffic will be relieved from tolls, and in fact probable that trucks will have higher tolls than automobiles unless they limit their hours for commerce.

In addition, some Oregonians who are familiar with the price differential charged to drivers based on their income, have concerns that those – particularly seniors – on fixed income but not necessarily considered "low income" will experience disparate impact in traveling as needed along the I-205 to sites such as to OHSU or other area hospitals.

In conclusion, it is not just those commuting from Clark County who have concerns about ODOT's tolling; it is those who live throughout the region.

### **Expanded arguments for tolling**

While some take a strong stance that tolling will not allow communities surrounding the I-205 to fare well as they are ill-prepared to absorb tolling impact, others take a strong stance favoring tolls. For example, given that the costs of the bridge have grown so astronomically, many contend that just federal

and two-state monies along with limited local funds could not cover the total without inclusion of tolling. At the end of February, the program released new cost estimates of \$5 billion to \$7.5 billion.<sup>v</sup> Most residents maintain that a \$2.5 billion spread is a momentous spread that we are ill-prepared to deal with. From \$1.6 billion to \$2.45 billion is budgeted for actual replacement of the bridge itself, with the remaining funds budgeted on transit investments up to \$2 billion, plus Oregon – Washington interchanges, roadways and another billion in both Oregon and Washington for work in each state.

While the prior precepts in this section still stand, additional arguments are now being made by ODOT for tolling I-205. They include: “Funds seismic improvements to 8 bridges on I-205 from Stafford Road to OR 213. ...Abernethy Bridge [will be] the first earthquake-ready high bridge across the Willamette River in the Portland MSA. Adds the missing third travel lane in a 7-mile stretch from Stafford Road to the Amernethy Bridge. Upgrading this section to 3 lanes, similar to the rest of I-205, will increase safety and reduce bottlenecks.”<sup>vi</sup>“

Note that such decisions are being made without a vote of the people, or even the 16 legislators of the Bi-State Bridge Committee. ODOT decided that light rail will be in the plan for the I-5 bridge replacement! Today’s extension of light rail from Portland to Vancouver travels on an elevated structure adjacent to I-5 in Vancouver, rather than track along city streets, also includes three new station locations. TriMet, however, has stated that they will not cover Vancouver’s O&M costs of MAX in Washington State; it is doubtful that those additional costs have been factored in. The State of Washington has given \$1 billion and presumably Oregon will pledge \$1 billion, knowing that ten years ago the Columbia River Crossing, then totaling “only” \$3.4 billion, died because of the very inclusion of light rail. If both states come through with their commitment, and tolls are included in the total revenue, the program will also receive about \$2.7 billion in federal funds which is now about 41% of the estimated total cost; most identify this level of federal funding as an essential component of the total and therefore include tolling to appease government demand.

The design of the bridge is still an unknown, and there are significant cost elements included in the unknown. Therefore, some claim that whereas state and federal money may be static, tolls can be variable, and therefore they must be included so that by project's end, the funds needed can be brought to bear. One of the greatest design elements that is still unknown is the bridge's height, which the U.S. Coast Guard says requires a minimum 178-foot clearance. A moveable span with either vertical lift or bascule method are the options that have greatest appeal because schedule would be least impacted according to the project director.

### **How much will it cost drivers?**

In April 2023 the Washington State Senate passed a bill by 32-16 authorizing tolling on the I-5 Bridge.<sup>vii</sup> If approved by the House, the bill will go to Governor Inslee for signature, but tolls may be not charged on Washington's portion of I-205. Exactly how much the tolls that can be set will cost drivers has not been established. However, the total impact of tolling is expected to generate about \$1.2 billion of the program's total cost. The *City Observatory*<sup>viii</sup> estimates that under the new toll plans, driving from Wilsonville to Vancouver, WA may cost as much as \$15 each way at the peak hour. Estimates vary greatly and some are speculative until the day when official hard data are released. The tolls are driven not just by the need to space traffic but also by the need to finance ODOT's highway spending, including the Interstate Bridge replacement project. Tolls on the I-205 Abernethy and Tualatin River Bridges may be \$2.20 each at the peak hour. Toll on the I-5 Interstate Bridge may be as high as \$5.69, and drivers on either Interstate highway would pay tolls of \$.17 upwards to \$.38 per mile during peak hours, adding to a twenty mile trip on either Interstate highway to somewhere between \$3.40 and \$7.60. Furthermore there is incentive to purchase a transponder in order to avoid a \$1.77 processing fee per transaction.

"Pre-completion" tolling is confirmed by the Interstate Bridge Replacement Program office<sup>ix</sup> and adds in a negative aura to the project in our opinion. Tolling on the Abernethy and Tualatin Bridges reportedly could begin on the I-205 as early as December 2024. What that means is that tolls for the replacement I-5

bridge could be collected while the replacement is being conceived and before the replacement opens.

It is disconcerting to many that in examining the I-205 Toll Project website there are two alternatives shown that are as disparate as imaginable: no build alternative and build alternative. The no build alternative is clear; tolls are not collected, seismic improvements are not made, widening would not be constructed. The build alternative brings in every design feature that has been discussed over time, all of which can be seen in the technical memoranda presented at [Oregon.gov/odot/tolling/Pages/I-205-Tolling-Project-Documents.aspx](https://www.oregon.gov/odot/tolling/Pages/I-205-Tolling-Project-Documents.aspx). Given this widely varying information on two alternatives, one is left questioning whether there is an accurate answer available for the question of how much it will cost drivers.

In conclusion, for the reasons noted above that are “all over the map,” the Clark County Council is opposed to tolling the I-205 corridor now as proposed. What exactly is the program and what exactly is its cost? Setting up to collect millions in tolls, for which we do not have a precise spending plan, may or may not be necessary but at this time is fundamentally unfair to the people. The Council understands that if specific tolls were set for a finite period of time, to accomplish some specific limited objective, they should be proposed at that time and considered then.

---

<sup>i</sup> Will Campbell “I-5 Bridge project lands on light rail for replacement bridge” April 21, 2022

<sup>ii</sup> “Clark County Council – June 29, 2022 Refocusing the I-5 Bridge Replacement” pp. 1-3

<sup>iii</sup> Raymond Rendleman, Newsbreak “ODOT gets an earful from residents against Interstate 205 tolling” April 4, 2023

<sup>iv</sup> M. Bourgeois, E. Burris, K. Boddie KOIN 6 “Oregon City mayor blasts ODOT amid strong opposition to proposed I-205 toll” April 3, 2023

<sup>v</sup> William Seekamp “Up to \$2.45 billion of I-5 bridge project budget will go to actual replacement” *The Columbian* February 27, 2023

<sup>vi</sup> I-205 Toll Report comment period extended two weeks March 2023  
<https://www.youtube.com/watch?v=qC7U6lve4Yo>

<sup>vii</sup> William Seekamp “Washington Senate authorizes tolling on I-5 bridge” *The Columbian* April 6, 2003

<sup>viii</sup> Joe Cortright *City Observatory* February 25, 2023 [theurbanist.org/2023/02/25/how-to-finance-a-highway-spending-spree-records-reveal-oregons-plans-for-toll-hikes/](https://theurbanist.org/2023/02/25/how-to-finance-a-highway-spending-spree-records-reveal-oregons-plans-for-toll-hikes/)



---

<sup>ix</sup> Anthony Macuk *KGW8* January 6, 2023 <https://www.kgw.com/new/local/tolls-new-i5-bridge-on-existing-bridges/283-d6afac73-6920-48a8-a6d3-6b7603edc201>

For further information contact:

Karen Dill Bowerman  
Chair, Clark County Council  
(360)798 5474  
1300 Franklin Street  
Vancouver, WA 98666-5000

1  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23

**RESOLUTION NO. 2023-04-11**

A RESOLUTION relating to Clark County Council opposition to tolling of the I-5 Bridge replacement, and the I-5 and I-205 corridors in the Portland metropolitan area.

WHEREAS, the Clark County Council approved Resolution No. 2022-11-06 opposing tolling of the I-5 Bridge Replacement, and the I-5 and I-205 corridors in the Portland metropolitan areas; and

WHEREAS, the I-205 Toll Project Environmental Assessment is soliciting feedback through April 21, 2023; and

WHEREAS, the seven (7) concerns outlined in the Tolling and Mobility Pricing paper still stands; and

WHEREAS, tolling system places unreasonable burden on Washington residents; and

WHEREAS, the public narrative erroneously states that there is no opposition to tolling from Washington state; and

WHEREAS, the residents in Clark County provided valuable feedback through an advisory vote where 68.39 percent opposed light rail; and

WHEREAS, additional decisions are being made without the opportunity for the residents in Clark County to provided feedback, such as additional advisory votes; and

WHEREAS, ODOT decided that light rail will be used for the I-5 bridge replacement and TriMet has stated that they will not cover Vancouver’s operations and and maintenance costs; and

WHEREAS, the Clark County Council supports C-Tran’s bus rapid transit

24 as being the best option for rapid transit; and

25 WHEREAS, more than 75,000 Clark County residents work in Oregon and  
26 therefore pay Oregon income tax; and

27 WHEREAS, ODOT has not provided a plan on how they intend to address the  
28 thousands of residents who are predicted to divert to side roads in order to avoid tolls; and

29 WHEREAS, the estimated cost of the Interstate Bridge Replacement has increased  
30 from about \$3.2 billion in 2020 up to \$7.5 billion in 2023; and

31 WHEREAS, there will be negative impacts to commerce because of tolls;  
32 increasing costs of goods; thereby, adding additional financial strain on residents; and

33 WHEREAS, tolling provides additional financial burden on residents with low or  
34 or fixed income; resulting in disparate treatment for the most vulnerable population; and

35 WHEREAS, estimated costs have fluctuated by more than \$2 billion dollars with no  
36 specific plan, leaving an abundance financial uncertainty; and,

37 WHEREAS, the bridge design elements have not been solidified, again creating  
38 financial uncertainty; and

39 WHEREAS, mobility pricing, or congestion pricing, would charge a higher tolls  
40 during peak travel periods. While the intent is to encourage drivers and truckers to drive at  
41 alternate times or use carpools or transit, the anticipated result of increased tolls on I-5 and  
42 I-205 is major diversion to side streets giving innocent children playing ball in the streets  
43 higher doses of greenhouse gases. Mobility pricing is the equivalent of a toll or fee on top  
44 of the existing toll; and

45 WHEREAS, transportation and mobility is vital in Southwest Washington for both  
46 residence and commerce; and

47 WHEREAS, there is insufficient planning and analysis, including, but not limited  
48 to, infrastructure, design, economic impacts, neighborhood and side street impacts,  
49 maintenance and operations, all of which are vital in ensuring a transportation system  
50 that effectively supports the residents and commerce in our region; and

51 WHEREAS, the implementation of a tolling system will not achieve the purported  
52 beneficial outcomes.

53 NOW, THEREFORE,

54 BE IT ORDERED AND RESOLVED BY THE CLARK COUNTY  
55 COUNCIL, STATE OF WASHINGTON, AS FOLLOWS:

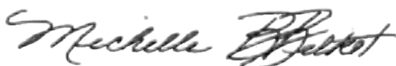
56 On behalf of the residents in Clark County, the Clark County Council continues to  
57 oppose to tolling the I-5 and I-205 corridors as proposed. The Council understands that tolls  
58 may be necessary to build large infrastructure projects like the I-5 Bridge. If specific tolls  
59 related to the initial construction of the I-5 Bridge only, that sunset after a predetermined  
60 period of time, can be proposed, they could be considered.

ADOPTED on this 19<sup>th</sup> day of April, 2023.

CLARK COUNTY COUNCIL  
CLARK COUNTY, WASHINGTON



Karen Dill Bowerman



Michelle Belkot, Councilor



Gary Medvigy, Councilor

**ODOT I-205 Toll EA - RECORD #2844 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Jessica  
**Last Name :** Stanton  
**Affiliation :** Equity and Mobility Advisory Committee  
**Submission Method :** Letter  
**Q3. Comments :** Hello Mandy,  
On behalf of the Equity and Mobility Advisory Committee members, I would like to submit a formal comment on the I-205 Toll Project Draft Environmental Assessment during the public comment period.  
Please see the text of EMAC's comment below and a PDF version attached. Also, please see attached PDF with answers to EMAC's specific questions regarding the content of the I-205 Draft EA.  
Thank you for your ongoing commitment to valuing and amplifying EMAC's voice and advancing equity in the Toll Projects.

**Attachments :** 2023\_0421\_I-205\_EA\_EMAC.pdf (235 kb)

<b>Date</b>	April 21, 2023
<b>To</b>	Mandy Putney, ODOT Urban Mobility Office
<b>From</b>	Members of the Equity and Mobility Advisory Committee (EMAC)
<b>Subject</b>	EMAC's Comment on the I-205 Toll Project Draft Environmental Assessment

# 1 Purpose

The purpose of this document is for the Equity and Mobility Advisory Committee (EMAC) to submit a formal comment for the Draft I-205 Environmental Assessment (EA) during the public comment period in spring 2023. As a tolling advisory committee, EMAC has provided input towards developing the EA. This document articulates EMAC's position on how the EA aligns with or may require further consideration in support of advancing equity.

Upon receiving a briefing on the I-205 Toll Project Draft EA, EMAC members expressed the following:

- Tolling on I-205 must be affordable for those with the least ability to pay.
- Tolling could limit access to community resources on impacted corridors.
- Expanding access to transit and improving multimodal infrastructure must be integral to the I-205 Toll Project.

These reflections relate directly to EMAC's previous contributions to the Oregon Toll Program. Relating to affordability, EMAC recommended in the 2020 Equity Framework that the toll projects "explore how to improve the affordability of the transportation system for affected populations and communities". Additionally, in EMAC's 2022 Recommendations to the OTC for Shaping an Equitable Toll Program, EMAC suggested that the Oregon Department of Transportation (ODOT) and the Oregon Transportation Commission (OTC) "prioritize providing a substantial contribution to the low-income toll program to address affordability impacts for those with the least ability to pay."

Relating to accessibility and providing multimodal transportation options, EMAC recommended in the 2020 Equity Framework that the toll projects "focus on improving multimodal access to the region's many opportunities for historically excluded and underserved communities." Furthermore, in EMAC's 2022 Recommendations to the OTC for Shaping an Equitable Toll Program, EMAC suggested that ODOT and the OTC "provide enough investment to ensure that reliable, emissions-reducing, and a competitive range of transportation options (bike, walk, bus, carpool, vanpool, etc.) are provided to advance climate, safety, and mobility goals, and prioritize benefits to Equity Framework communities."

As a general note, EMAC emphasizes that "investments that are necessary to advance equity must be delivered at the same time as highway investments and be in place on day one of tolling or before." The following comments and recommendations on the I-205 Toll Project Draft EA reflect EMAC's previous contributions by applying their equity principles to the Toll Project.

## 2 EMAC's Comment

**To ensure that a low-income toll discount is available on day one of tolling, EMAC recommends that ODOT include the provision of a toll discount or benefit for individuals and households up to 400% of the Federal Poverty Line (FPL) as an integral part of the I-205 Toll Project scope.**

The Draft EA currently states that ODOT is considering options for a Low-Income Toll Program that include providing a sizable benefit at 200% of the federal poverty line (FPL) and a smaller benefit above 200% and up to 400% of the FPL (page 3-98 of the EA). Toll programs across the country provide benefits and discounts to toll users whose incomes fall below 200% of the FPL. Yet with this sole threshold, it's possible that an individual who works full-time at minimum wage would exceed the annual income cap (\$29,160, according to the [U.S. Health and Human Services Poverty Guidelines for 2023](#)) for a 200% FPL discount. Additionally, with rising costs of living and ongoing inflation impacting the project area, the 200% FPL estimates may not fully reflect the cost of living once tolls are implemented. Therefore, to ensure affordability remains a priority, EMAC requests that ODOT formalize its commitment to providing a 400% benefit to persons experiencing low-income by including the provision in the scope of the I-205 Toll Project, or at minimum as a legally binding mitigation in the Draft EA.

Furthermore, net revenue estimates do not include an investment in a low-income toll program, thereby presenting inflated revenue amounts and excluding equity from the analysis. To ensure the analysis is robust and accurate, EMAC requests that a Low-Income Toll Program with a 400% threshold be included as an integral component of the I-205 Toll Project.

**EMAC recommends that ODOT include additional details about how tolling could impact access to community resources on affected corridors.**

The Draft EA provides detailed discussions of how access to resources for historically and currently excluded and underserved communities may be positively or negatively impacted by tolling. However, the document does not include a specific qualitative analysis of access to social and community resources on corridors that are negatively impacted by tolling. Once tolling is implemented, key diversion routes may experience increased vehicle volumes, which could have implications for safety and access along specific corridors. EMAC requests that ODOT adopt a hyper-local approach to analyze impacts to access on these corridors.

**EMAC recommends that ODOT include an expanded discussion about existing barriers and projected impacts to transit and multimodal infrastructure for persons experiencing low-income, BIPOC communities, and historically and currently excluded and underserved communities.**

The Draft EA includes a discussion about existing transit services in section 4.5 of [Appendix C: Transportation Technical Report](#). However, the [Social Resources and Communities](#) and [Environmental Justice](#) Technical Reports do not include a discussion of existing barriers to transit access for persons experiencing low-income, BIPOC communities, and historically and currently excluded and underserved communities. Specifically, there is little discussion about the disproportional impact of tolling on populations relying solely on transit and the lack of transit resources within and through the corridor. Moreover, the lack of complete bikeways through the corridor limits fare-free options for people who do

not drive. As a result, the analyses in these technical reports do not fully capture the affected environment that will be impacted by tolling. EMAC requests that the Draft EA include critical discussion about how tolling would impact access to transit for equity communities.

**Additionally, EMAC recommends that ODOT expand mitigations to broaden access to transit, pedestrian, and cycling infrastructure.**

Currently, the Transportation Technical Report presents details on transit mitigations to alleviate transit operations at specific intersections and corridor segments that will be impacted by tolling. However, proposed mitigations in the Transportation, Social Resources and Communities, and Environmental Justice Technical Reports would not adequately expand access to transit for individuals who do not drive or for households with no vehicle access. Therefore, EMAC requests that the Draft EA include additional mitigation measures that commit to expanded access to transit and multimodal infrastructure. The Draft EA must include a plan to improve the quality of transit and multimodal mitigations, both before tolling begins and continuously while tolling is underway.

**Finally, the long-term affordability and accessibility impacts identified in the Draft EA may be experienced in the short term. Therefore, EMAC recommends that these impacts are considered as short-term effects and mitigated as such.**

The I-205 Toll Project anticipates a number of long-term effects related to affordability and accessibility. These effects may be felt during construction, as tolling begins, and throughout the life of the project. It is important that these effects are recognized as both long-term and short-term so they can be appropriately mitigated.



<b>Date</b>	April 21, 2023
<b>To</b>	EMAC
<b>From</b>	Oregon Toll Program Project Team
<b>Subject</b>	EMAC's Answered Questions on the I-205 Toll Project Draft EA

1. How does the EA define air pollution?
  - a. A detailed discussion of effects of the I-205 Toll Project on air pollution begins on page 3-45 of the [Draft Environmental Assessment](#).
2. What is the effect of tolling on crash rates on local roads and diversion routes?
  - a. A detailed discussion of effects of the I-205 Toll Project on transportation safety can be found on pages 3-28 to 3-29. A deeper discussion can be found in section 5.3.7 of [Appendix C: Transportation Technical Report](#).
  - b. Additional discussion of impacts to traffic operations and travel times can be found on pages 3-18 to 3-25.
3. What is the range of travel time estimates?
  - a. A detailed discussion of effects of the I-205 Toll Project on travel times can be found on pages 3-9 to 3-19, with a helpful graphic on page 3-20.
4. Are the projected savings for freight net savings that consider the cost of paying toll fees?
  - a. A detailed discussion of effects of the I-205 Toll Project on savings from freight as a result of fewer congestion delays can be found on page 3-63.
5. Will tolling on I-205 have an impact on I-5?
  - a. Portions of I-5 are included in the Transportation Area of Potential Impact (API). The API on I-5 is between OR-217 and the Boone Bridge. More info is in section 3.1.2 of the EA and in Appendix C, section 5.3.6.
6. Will tolling prevent access to opportunities for residents who live south of Wilsonville and commute north to the Portland metro area?
  - a. The I-205 Toll Project analysis found that households within the project area would experience the same or improved access to jobs, community places, and medical facilities, due to travel time savings on I-205. A detailed discussion of accessibility can be found on pages 3-76 to 3-84 of section 3.7, Social Resources and Communities, in the Draft EA, as well as in [Appendix I: Social Resources and Communities Technical Report](#).
  - b. Furthermore, the analysis did not find significant impacts in Wilsonville or south of Aurora. This is an area in which the analysis did not find greater than 10% volume increases, greater than 100 vehicles increase total, or a volume-to-capacity (v/c) ratio greater than 0.7 in the

## *Regional Mobility Pricing Project*

EMAC's Answered Questions on the I-205 Toll Project Draft EA / April 21, 2023

Build Alternative model. A detailed discussion of how the area of potential impact was determined can be found on pages 9-13 of the Transportation Technical Report.

7. Will tolling cause diversion in Southwest Washington, particularly at the start of I-205 at Salmon Creek?
  - a. The analysis did not find significant impacts in Southwest Washington. This is an area in which the analysis did not find greater than 10% volume increases, greater than 100 vehicles increase total, or a volume-to-capacity (v/c) ratio greater than 0.7 in the Build Alternative model. A detailed discussion of how the area of potential impact was determined can be found on pages 9-13 of the Transportation Technical Report.
8. Is housing being considered as a mitigation strategy?
  - a. Housing is not included in the Draft Environmental Assessment as a mitigation strategy.
9. Analysis predicts that OR 99 will increase congestion. What transit mitigations are planned for OR 99?
  - a. A detailed discussion of proposed transit mitigations can be found on pages 3-31 to 3-43 of the Draft Environmental Assessment, with two helpful tables (Tables 3-12 and 3-13) starting on page 3-33.
10. Is the toll discount or benefit for individuals and households up to 400% of the Federal Poverty Line (FPL) going to be tiered within the 400%?
  - a. It is also important to note the NEPA (National Environmental Policy Act, of which this EA is a part of) process assumes everyone will pay a toll rate. Comments related to discount or benefit may fit better if directed at the Low-Income Toll Program, as opposed to this EA process. Additionally, STRAC will go into trade-offs regarding discounts for people experiencing lower incomes.
11. Where is community engagement occurring?
  - a. Engagement is occurring in affected areas such as Gladstone, West Linn, Happy Valley, Tualatin. The on-the-ground outreach is based on the Environmental Justice API layer and where people live.
12. How are comments from environmental justice communities captured/heard?
  - a. The project team notes if people request materials in a different language or are hearing impaired. We also work with Community Engagement Liaisons to do focus groups and keep track of the number of people from specific communities who attend these focus groups.

**ODOT I-205 Toll EA - RECORD #2845 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Ramona  
**Last Name :** Perrault  
**Affiliation :** Metro Council  
**Submission Method :** Letter  
**Q3. Comments :** Thank you  
**Attachments :** 2023\_0421\_I-205\_EA\_Metro\_Council.pdf (168 kb)



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

April 21, 2023

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

Subject: I-205 Toll Project Public Comments

Dear Ms. Putney:

The Metro Council appreciates the opportunity to review and comment on the I-205 Toll Project Environmental Assessment (EA). Our Regional Congestion Pricing Study found that tolling, when done right, can manage congestion while helping to meet our region's goals on climate, equity, and safety. However, both Metro Council and staff have concerns about whether the I-205 project can be successful in achieving these goals as it is described in the EA.

In April 2022, as part of the Regional Transportation Plan amendment for the I-205 Toll Project, ODOT made a series of commitments relating to both the I-205 Toll Project and the Regional Mobility Pricing Project (RMPP), as outlined in a Letter of Agreement dated April 25, 2022. Metro Council has reviewed these commitments in light of the draft Environmental Assessment for the project and found several disparities between the promises made and current direction of the I-205 Toll Project.

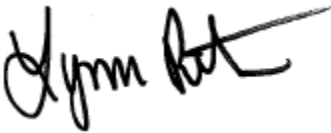
1. **Center equity in our process and outcomes.** The draft EA does not meaningfully address or include low-income toll strategies, despite adoption by the OTC of the Low-Income Toll Report. Given these commitments that a Low Income Toll Report will inform the NEPA process and that ODOT would implement equitable income-based toll strategies prior to assessing a toll, Metro Council needs to see the project's EA reflect such strategies in its analysis of the build alternative.
2. **Monitor diversion and fund projects that address diversion impacts.** It is not clear in the draft EA that ODOT is committed to fully funding projects that will manage diversion impacts from the I-205 Toll Project, as specified in the amendments made to the 2018 Regional Transportation Plan. The Metro Council would like to see specific commitments to funding diversion management projects.
3. **Local input on the direction of tolling revenue.** Allocation of tolling revenue, both for the I-205 toll project and the RMPP, continues to be of concern to Metro Council. ODOT has not been transparent about the allocation of revenue throughout the RTP update process. While they did create the Regional Tolling Advisory Committee (RTAC) to involve local stakeholders, they also created a separate committee, the Statewide Tolling Rulemaking Advisory Committee (STRAC), to make decisions on rule making and rate setting policies, including a low-income program. The

Metro Council does not see this as a good-faith effort to put local elected leaders at the helm of decision-making for revenue allocation.

4. ***I-205 integration into RMPP.*** While the Metro Council appreciates efforts by ODOT staff to incorporate regional input into the adopted OHP amendment and the 2023 RTP update, the Council is disappointed that current proposals shared with the Regional Toll Advisory Committee (RTAC) do not meaningfully narrow the implementation gap between the two projects.

ODOT continues to make empty promises. This draft EA reflects ODOT's continued disregard for commitments made throughout the process. We will continue to work in good faith with ODOT; however, if ODOT does not honor the agreement, Metro may need to reconsider its approach to this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn Peterson".

Lynn Peterson  
Metro Council President

A handwritten signature in black ink, appearing to read "Christine Lewis".

Christine Lewis  
Metro Councilor District 2

cc: Kris Strickler, ODOT  
Bob Van Brocklin, OTC Chair  
Brendan Finn, ODOT  
Margi Bradway, Metro

**ODOT I-205 Toll EA - RECORD #2846 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Alex

**Last Name :** Oreschak

**Affiliation :** Metro Staff

**Submission Method :** Letter

**Q3. Comments :** Good afternoon.

Attached, please find Metro staff comments on the I-205 Toll Project EA.

Thank you.

**Attachments :** 2023\_0421\_I-205\_EA\_Metro\_Staff.pdf (1 mb)



April 21, 2023

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

Subject: I-205 Toll Project Public Comments

Dear Ms. Putney:

Thank you for the opportunity to review and comment on the I-205 Toll Project Environmental Assessment (EA). In general, Metro supports the concept of tolling, and we wish to see the I-205 toll project succeed. Metro's Regional Congestion Pricing Study found that tolling, when done right, can manage congestion while helping to meet our region's goals on climate, equity, and safety. However, both Metro Council and staff have concerns about whether this project can be successful as it is described in the EA.

This letter summarizes Metro staff's technical review of the EA and related appendices. Some of these concerns have been shared previously. But because Metro staff was not provided the opportunity to comprehensively review the EA prior to the public comment period, including the identified impacts and proposed mitigations, many of the comments provided in this letter reflect new concerns identified through our review of the public comment document.

In addition to detailed comments beginning on page three, below are general comments on the EA:

- The project's purpose, need, and goals do not adequately address state law<sup>1</sup> and state policy<sup>2</sup> that tolling projects should manage congestion on and address impacts to adjacent, connected or parallel highways to the tollways, in addition to the tollways themselves.
- The EA fails to describe the impacts of the project, particularly those related to transportation, in a clear, consistent, and easily understood format.
- The EA provides for insufficient mitigation to address the impacts caused by the project.
- The EA does not consider the implications of the likely implementation of the Regional Mobility Pricing Project (RMPP). While the RMPP was not identified in the 2018 Regional Transportation Plan (RTP), that project is now undergoing its own Environmental Review, has been submitted into the 2023 RTP Call for Projects, and tolling is expected to begin in 2025. For these reasons, we believe the RMPP is a reasonably foreseeable project, and should be incorporated into the I-205 Toll Project EA.
- The project as described in the EA and the analysis in the EA is not in alignment with commitments made by ODOT to Metro and the Joint Policy Advisory Committee on Transportation (JPACT) in the attached Letter of Agreement, dated April 25, 2022. Specific to issues relevant to the EA:

---

<sup>1</sup> ORS 383.150

<sup>2</sup> Oregon Highway Plan, Goal 6

- ODOT committed that its Low-Income Toll Report would inform the NEPA process; however, the analysis within the EA does not include any consideration of equitable income-based toll strategies as part of the build alternative. Rather, the findings from the Low-Income Toll Report are identified only as potential mitigation measures for Environmental Justice impacts. The project should include assumptions around the low-income toll report as part of the build alternative; this would likely result in a reduction in diversion to local roadways as discounts or exemptions could encourage low-income drivers to remain on I-205.
- ODOT also committed to fund projects that address diversion impacts. In addition to not identifying sufficient mitigation for diversion impacts as noted above, the EA is unclear as to whether the diversion mitigations identified would be funded by ODOT. In particular, we are concerned about language such as "coordinate with" and "contribute to" in the mitigations section of the EA.

Given the scale of identified changes that are needed in this analysis and the likelihood of changes to identified impacts and mitigations, we request additional outreach with participating agencies, as well as additional public engagement, prior to publication of a revised or final EA and Finding of No Significant Impact. We welcome the opportunity to work closely with ODOT staff and leadership to address these concerns to ensure the success of this project and of tolling in our region.

If you have any questions or would like to discuss our comments in more detail, please contact Alex Oreschak at [alex.oreschak@oregonmetro.gov](mailto:alex.oreschak@oregonmetro.gov).

Sincerely,



Margi Bradway  
Deputy Director  
Planning, Research, and Development

cc: Metro Councilors



Below are Metro staff's detailed comments on the I-205 Toll Project Draft Environmental Assessment.

**Chapter 1:**

Page 1-1: It is unclear what the project is defining as an "urban area" in figures throughout the document (beginning with Figure 1-1). The areas shown are not consistent with the Urban Growth Boundary. The figures should be updated to reflect the Urban Growth Boundary or more information should be provided on how "urban areas" are defined.

Page 1-2: Discussion of HB 3055 in the second paragraph should identify that HB 3055 included language allowing for tolls to address traffic congestion and safety "not only on the tollway but also on adjacent, connected or parallel highways to the tollways, regardless of ownership," as well as to reduce impacts of diversion as a result of a tollway project.

Page 1-2: This section should also include context around the OHP amendments to Goal 6, passed by the OTC in January 2023.

Page 1-4: Does ODOT have more recent traffic data to share on congestion (i.e. post-COVID data)? Changes from 2015 to 2017, and traffic counts from 2018, seem outdated and not the most useful in this context.

Page 1-7: Amend to read: Goal: Support safe travel regardless of mode of transportation, ***not only on the tollway but also on adjacent, connected or parallel highways to the tollways.***

Page 1-7: Amend to read: Goal: Support management of congestion and travel demand, ***not only on the tollway but also on adjacent, connected or parallel highways to the tollways.***

**Chapter 2:**

Page 2-2: Figure 2-1 appears to show a different lane configuration for the Abernethy Bridge in the build alternative compared to the no-build alternative, with an additional auxiliary lane between OR-43 and OR-99E. However, this is not identified in blue as part of the build alternative lane configuration and is inconsistent with the description of the no-build alternative in Section 2.1.1. Please clarify if this auxiliary lane is part of the no build alternative or the build alternative.

Page 2-5: The EA includes a sensitivity analysis examining the effects of a higher toll rate for medium and heavy trucks. Given the likelihood of a low-income toll program being implemented in Oregon, and previous commitments from ODOT in the Letter of Agreement Clarifying Commitments between Metro and the Oregon Department of Transportation dated April 25, 2022, to establish and implement equitable income-based toll strategies before a toll is assessed, ODOT should include low-income toll program assumptions as part of the EA, or at the very least provide a similar sensitivity analysis regarding the effects of low-income discounts or exemptions on diversion and traffic volumes.

- From the Letter of Agreement: ***Center Equity in our Process and Outcomes.*** ODOT will continue to use the Oregon Toll Program's Equity Framework and support the recommendations from the Equity Mobility Advisory Committee (EMAC) to guide the I-205 Toll Project. Before a toll is assessed, the Project will establish and implement equitable income-based toll strategies as described in HB 3055 Section 162 (2021). A Low Income Toll Report will inform the NEPA process and be submitted to the Oregon legislature in Fall 2022.

- The I-205 Toll Project’s Level 2 Toll Traffic and Revenue Study Report did identify such a scenario as a “sensitivity test” though very minimal information was provided in that report. That report identified potentially substantial changes in traffic volumes resulting from testing different scenarios such as a low-income toll program, but the findings shared in Table 2-6 of that report only focus on I-205 volumes, not on impacts to local streets. For example, it showed that a low toll rate could result in a 16% increase in I-205 traffic volumes, while a high toll rate could result in a 15% decrease in I-205 traffic volumes. But it is not clear how these and the other tested scenarios would impact the local roads most impacted by projected diversion. If a low toll increased I-205 traffic volumes by 16%, it would stand to reason that diversion on local streets would fall, at least to some extent, as traffic returns to I-205. The environmental assessment should include analysis of both a lower toll for all drivers and of a low-income toll program to assess the changes to impacts from diversion on local streets.

**General Comments on Chapter 3, Section 3.1 Transportation and Appendix C:**

- Overall, the transportation analysis in Chapter 3 and Appendix C includes traffic analysis that is presented in an inconsistent and/or confusing manner from one table or figure to the next, making a comprehensive review of the analysis and its findings challenging.
- The threshold at which an impact is significant and must be mitigated should be clarified. There appear to be several impacts that involve substantial increases in traffic volumes on local streets where no mitigation is proposed, or proposed mitigations may be insufficient. For example, daily traffic volumes on the Oregon City Arch Bridge are expected to increase by 40% to 50%, yet no mitigation is proposed to address these volume increases. It is difficult to understand how the project could have a Finding of No Significant Impact given the inconsistent and incomplete analysis of impacts and the fact that there are so many unmitigated impacts in multiple locations within the API.
- Additionally, given the many identified impacts that include no identified mitigation, or insufficient mitigations, it appears that the project may not successfully be meeting its stated purpose of managing congestion or its goals of limiting traffic diversion, supporting safe travel, and supporting management of congestion and travel demand, particularly when it comes to minimizing impacts to adjacent local roadways. As noted above, the project should analyze the effects of lower toll rates in the project area to determine how or if lower toll rates would affect traffic volumes and diversion and better meet the project’s stated purpose and need.
- VMT or daily volumes should be used on adjacent, parallel or nearby roadways (as defined by HB 3055) for identifying impacts requiring mitigation. There are a number of locations where daily or peak volumes are expected to increase by over 20% (and in some cases up to or beyond 100%), yet no traffic mitigation is proposed at these locations. Examples include SW Borland Rd east of Stafford Road, Willamette Falls Drive, and the Downtown Oregon City screenline.
- Some of these trip increases seem like they could fully overload the identified street segments and cause further diversion into neighborhood streets or other areas. Examples include the 90% to 100% increase in traffic on Willamette Falls Drive or 100%+ increase at the 19th St / Ostman Rd. screenline shown in Figure 5-9, or the 40% to 50% increase on the Oregon City Arch Bridge in Appendix C Figure 5-11.

- The amendments to Goal 6 of the Oregon Highway Plan that were approved by the OTC in January 2023 identified a threshold for mitigation analysis of a volume to capacity ratio (V/C) increase of 0.05 and an overall V/C greater than 0.7 in the build scenario. The analysis in Appendix C does not appear to be using these thresholds. Instead a mobility standard has been identified for each intersection that differs on a case-by-case basis. Thus, for example, while the 10<sup>th</sup> Street and Willamette Falls drive intersection sees a V/C increase of 0.15, from a 0.67 V/C to a 0.82 V/C, it does not appear to be identified as an impact that needs to be mitigated.
- We also recommend that ODOT apply the regional mobility policy within the defined corridor to identify where congestion needs to be managed.
- The EA fails to fully describe the impacts of the project on safety, especially regarding fatal and life changing injuries on streets within the project area.
- The EA provides for insufficient mitigation to rectify the increase in fatal and serious crashes on streets within the project area. To reduce risk, a systemic approach to safety for all users (as opposed to the hotspot approach used in the EA) should be applied throughout the area. Lighting, medians, pedestrian crossings, leading pedestrian intervals, separated bikeways, traffic calming, and other proven countermeasures should be implemented systemically throughout the area as part of the project.
- While the EA mentions health a few times, the EA does not provide specifics related to health impacts, including those that may result from an increase in serious traffic crashes within the project area. Due to the issues related to diversion analysis noted above, the EA likely underestimates the health impacts from increased diversion. The EA should include a Health Impact Assessment (HIA) to accurately demonstrate the health impacts of the different scenarios and identify appropriate mitigation using an upstream public health approach.
- In cases where monitoring of impacts is proposed, it is unclear what the process or outcomes of that monitoring will be, or who will review the data. How will data be shared with local partners? How will it be used to identify impacts requiring mitigation, and who will make those decisions? Who will pay for that mitigation? Will it be ODOT, or will local partners be asked to pay for it? The monitoring process needs to be more clearly defined to ensure that future unanticipated impacts will be mitigated and that local agencies will have a substantive role in the process.

### **Chapter 3:**

Page 3-45: Please include information regarding the Portland metropolitan region's non-attainment designation for the ozone standard and the subsequent revocation of the standard. The Portland region has obligations to an ozone State Implementation Plan (SIP), which includes transportation strategies the region is committed to in the SIP to address ozone pollution.

Page 3-47: HB 2007 included provisions which require transportation projects over a certain cost threshold to include clean construction equipment as part of the construction activity (OAR 731-005-0800). These requirements should be noted in Section 3.2 Air Quality and Appendix D.

Page 3-54: Table 3-28 Annual VMT figure seems to be inconsistent with traffic analysis elsewhere in the report. Table 3-28 shows an annual VMT reduction between 2045 No Build and 2045 Build of 5%. However, Table 5-4 in Appendix C shows a daily regional VMT reduction between 2045 No Build

and 2045 Build of only 0.2%. The inconsistency between the two analyses should be corrected or clarified.

Page 3-91: The Travel Time Scenarios analysis does not indicate that any of the analyzed trips would see an increase in travel times on toll-free routes with the Build Alternative. However, in Section 3.1 and Appendix C, trips on many toll-free routes are anticipated to see increased travel times in the Build Alternative compared to the No-Build Alternative. Additionally, in reviewing Tables E-4 to E-19 in Appendix J, Attachment E, travel times for toll-free trips are expected to increase in 3 of the 16 scenarios in the build alternative in 2045. Some of the other trips are shown to use the Oregon City Arch Bridge, which is anticipated to see traffic volume increases of 40% to 50% in the Build Alternative as well as travel time increases of up to 3.2 minutes in the PM peak period. It also seems unlikely that transit trips traversing downtown Oregon City and McLoughlin Boulevard would not see increases in travel times given the analysis in Section 3.1 and Appendix C.

Page 3-98 to 3-100: The proposed mitigation for increased transportation costs for low-income drivers does not commit to any specific discounts or exemptions for low-income drivers or identify the extent to which the proposed mitigation would address the identified impact. It only commits to the Oregon Transportation Commission considering options for a low-income toll program. The lack of specific committed mitigations for this impact means that the EA should not make a determination that the build alternative would not result in disproportionately high and adverse effects on any low-income populations or minority populations in accordance with the provisions of EO 12898 and the FHWA guidance memorandum on Environmental Justice and NEPA.

Page 3-98: Table 3-41 identifies impacts to the I-5 southbound ramps and Nyberg Street intersection in Tualatin and the OR 99E and Ivy Street intersection in Canby as disproportionately impacting areas with a greater percentage of environmental justice populations than the county as a whole. However, the proposed traffic mitigation for I-5 southbound ramps and Nyberg Street intersection only identifies monitoring traffic volumes to determine if mitigation is warranted, and the proposed traffic mitigation for OR 99E and Ivy Street intersection only says to “consider” operational improvements at OR 99E and Pine St to facilitate more traffic use of that intersection to reach downtown Canby, thereby alleviating some traffic impact at Ivy St. Neither of these identified mitigations is sufficient for the impacts identified, therefore it is not reasonable to conclude that “these effects would be addressed through proposed transportation mitigation measures listed in Table 3-41.”

Page 3-99: Table 3-41 identifies impacts to pedestrian conditions on OR 99E between 11th Street and Main Street as disproportionately impacting social resources that serve environmental justice populations. However, there do not appear to be any proposed pedestrian mitigations for OR 99E between 11<sup>th</sup> Street and 10<sup>th</sup> Street, only from 10<sup>th</sup> Street to Railroad Avenue, and only on the west side of the street. Similarly, proposed mitigations are insufficient for impacts to the six intersections in Oregon City that would experience worse traffic operations under the build alternative and affect how environmental justice populations access social services in the downtown area of Oregon City.

Page 3-99: It is unclear in Table 3-41 or Section 3.8 in general which three intersections in areas with higher environmental justice concentrations in Canby, Gladstone, and Tualatin would experience safety impacts in 2027 and/or 2045. Therefore, the claim that “Impacts would be mitigated as specified in Section 3.1.4.” cannot be verified. Additionally, the impacts described for OR 99E, which has segments that cross through areas in Canby and Gladstone with higher concentrations of

environmental justice populations (would have more crashes under the Build Alternative in 2027 and 2045) are not adequately mitigated.

Page 3-120: We are concerned with the exclusion of the Regional Mobility Pricing Project (RMPP) from the analysis in this EA, as we believe the project is a reasonably foreseeable future action. While the RMPP was not identified in the 2018 Regional Transportation Plan (RTP), that project is now undergoing its own Environmental Review, has been submitted into the 2023 RTP Call for Projects, and is expected to begin tolling in 2025. Additionally, while key details about the RMPP may not have been known at the time of publication of this project's Draft EA, those details are now being shared with project partners and should be incorporated into the analysis in any revised or final EA.

#### **Appendix C:**

Page 64-65: Table 5-4 indicates an increase of approximately 100,000 non-highway trips in the 2045 Build compared to the 2045 No Build. While some information on where these trips go is provided in Figures 5-7 to 5-12, and in Table 5-3, it does not appear to be comprehensively documented in the EA. For example, Table 5-3, in total, identifies an increase of 26,980 trips on local streets in 2027; it would be helpful to know what the total increase in non-highway trips in 2027 will be, and where the remaining substantial increases in trips on local streets are occurring. It would also be helpful to have a table similar to Table 5-3 that identifies change in daily volumes in 2045, including additional local streets where substantial increases in trips are occurring. The inconsistency in what is being reported in the EA for 2027 vs 2045 does not allow a proper assessment of both the near term and long term diversion impacts.

Page 67: Figure 5-3 identifies hourly changes to local (arterial) roadways in the 2045 Build Alternative. With the goal of minimizing diversion to local roadways in mind, it would seem prudent to conduct sensitivity testing or analyze an alternative that decreases tolls during the periods where local street volumes are increasing (such as 4am-6am and 9am-3pm), to see if reducing the tolls during these times will reduce the diversion impacts.

Page 73: Figure 5-7 shows 15,600 fewer trips on I-205 just east of the I-5 interchange. It needs to be clarified how many of those trips are diverting to I-5 itself to/through downtown Portland, and how many are diverting to OR 99-E, Stafford Rd, or other points south of the interchange.

Page 73: Percent change in Figure 5-7 appears to be calculated incorrectly, using:

- $(2045 \text{ Build volume} - 2045 \text{ No Build Volume}) / 2045 \text{ Build volume}$

The correct calculation would divide by the 2045 No Build volume. For example, on Borland Road, the change from 11,600 vehicles per day in the No Build to 16,800 vehicles per day in the Build is an increase of 5,200 vehicles per day, or 44%, rather than the 31% identified. This is causing volume increases to appear smaller and volume decreases to appear greater throughout the figure than they are.

Additionally, Figure 5-7, even using the correct figures, appears to be inconsistent with the following Figures 5-8 to 5-12. Again, using Borland Road as an example, the increase in Figure 5-7, whether it is 44% or 31%, differs from the 50% to 60% increase identified in Figure 5-9. These inconsistencies should be reviewed for accuracy and corrected where appropriate; an explanation for the inconsistencies should also be provided.

Page 77: Table 5-7 indicates that approximately 5,000 regional trips each direction are no longer entering/exiting the API. Where are those trips going? Are these all the trips that are diverting to I-5 or elsewhere outside the API? Does that mean 10,000 daily trips diverting to I-5 or elsewhere?

Page 98: Figures 5-23 to 5-29 show peak hour travel time changes along corridors that seem inconsistent with volume increases shown earlier in the report. For example, how can Borland Rd/Willamette Falls Drive show 50% to 100% increases in traffic volumes, but travel time reductions up to 8.7 minutes in the PM peak? Also confusing: Main St southbound sees a 12 minute improvement in the morning, but an 8 minute increase in PM travel time? This in an area where daily volumes were shown to increase by 30% to 40%.

Page 123: Table 5-20 again shows confusing results when compared with earlier findings in Appendix C. How can Willamette Falls Drive between 16th and 10th see a travel time reduction of 6.4 minutes in the PM peak when a segment of that same corridor is showing a daily volume increase of 90% to 100% in Figure 5-9? Additionally, the findings in Table 5-20 do not seem to add up in a way that is consistent with Figures 5-23 to 5-29.

Page 125: The results in Table 5-21 also seem inconsistent with volume changes shown in Tables 5-7 to 5-12. Table 5-21 should also highlight in red where Transit MMLOS is shown to worsen in the Build scenario (for example, W Arlington St to Dunes Dr on OR 99E). The way it is currently shown is inconsistent with how changes are displayed elsewhere in Appendix C and makes it less clear where worsening changes are happening.

Page 128: The LOTS results in section 5.3.5 seem surprising given some of the volume increases shown earlier in the report.

Page 138: ODOT or Clackamas County should identify standards for which an increase in predictive crashes requires mitigation. The Oregon Highway Plan as amended in January 2023 says only that "the analysis must show a meaningful and measurable increase in risk."

Page 139: Tables 5-37 to 5-40 should use red highlighting to identify where predictive crashes increase in the build scenario. Without this, it is not easy to identify where these increases occur.

Page 168 and 177: What is meant when the EA includes the terms "coordinate with" and "contribute to" in terms of identified mitigations? Would this require that local jurisdictions pay for some portion of the cost of the mitigation? If so, what percentage of these mitigations would ODOT expect to pay for as mitigation and what percentage would a local jurisdiction be expected to pay for? The Letter of Agreement Clarifying Commitments between Metro and the Oregon Department of Transportation, dated April 25, 2022, includes as a commitment from ODOT to fund projects that will help manage local diversion impacts, not to *partially* fund such projects; the EA does not make clear whether ODOT will meet this commitment as part of the project.

- ***Monitor diversion and fund projects that address diversion impacts.*** As indicated in the amendments made to the 2018 Regional Transportation Plan, ODOT will fund projects to help manage local diversion impacts from the I-205 Tolling project.

Page 161: Below are additional specific comments on where proposed mitigations for identified impacts appear insufficient, or where no mitigations are proposed for identified impacts. This is not a comprehensive list. Given the issues identified above on the analysis of impacts, it is likely that there are additional impacts that would require mitigations not yet identified in this EA. Mitigations

for these and any additional identified impacts should be developed in coordination with local agencies and should be scaled to the level of impact anticipated.

- Southwest Borland Road east of Stafford Road is shown to have volume increases of up to 112% in 2027, and up to 60% in 2045; however, the only identified mitigation is to “contribute to” adding paved shoulders and to potentially install an all-way stop or roundabout at SW Elk Road “pending further analysis.”
- Willamette Falls Drive between 12<sup>th</sup> Street and Dollar Street is shown to have volume increase of up to 100% in 2045, but the only identified mitigation is solar panel stop signs.
- The 19<sup>th</sup> / Ostmann screenline north of Willamette Falls Drive is shown to have volume increases of 100%+ in 2045, but no mitigation is identified.
- SW Johnson Road west of Woodline Road is shown to have volume increases of up to 40% in 2045, but no mitigation is identified.
- The Oregon City Arch Bridge is shown to have volume increases of up to 40% in 2045, but no mitigations are proposed.
- SW Ehlen Road east of I-5 is shown to have volume increases of up to 60% in 2045, but no mitigations are proposed.

Page 164: Given the identified diversion impacts to Southwest Borland Road, Active Transportation mitigations could include funds for planning and/or construction of the parallel Tualatin River Greenway Trail. Metro has identified the Tualatin River Greenway Trail in both the 2018 Regional Transportation Plan and the 2018 Regional Trails System Plan Map. It is important that, regardless of whether this trail is identified as mitigation, the I-205 bridges over the Tualatin River should be designed and constructed in a method that accommodates passage of a regional AASHTO-compliant trail beneath the bridge.



April 25, 2022

**Re: I-205 Toll Project Regional Transportation Plan Amendment Letter of Agreement Clarifying Commitments between Metro and the Oregon Department of Transportation**

This letter outlines the commitments of the Oregon Department of Transportation (ODOT) as it works closely with Metro and regional partners to develop the I-205 Toll Project, which is currently being evaluated under the National Environmental Policy Act (NEPA) process. The I-205 Toll Project would add a variable rate toll on all lanes of Interstate 205 (I-205) between Stafford Road and Oregon Route 213 (OR 213), and the tolls would raise revenue to complete financing for the planned I-205 Improvements Project and manage congestion on this section of I-205.

The commitments below reflect considerable input received over the past several months from regional partners, including Metro Council, Joint Policy Advisory Committee on Transportation (JPACT), Transportation Policy Alternatives Committee (TPAC), Metro Technical Advisory Committee (MTAC), and Metro Policy Advisory Committee (MPAC).

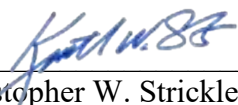
- **ODOT will submit the Regional Mobility Pricing Project into the federal Value Pricing Pilot Program (VPPP).** This program provides more flexibility and innovation to manage demand. While the I-205 Tolling project is not going through the VPPP process, it does include demand management and ODOT acknowledges that any tolling project in the region must include funding for diversion mitigation and integrate demand management.
- **Integration of I-205 Tolling with the Regional Mobility Pricing Project (RMPP).** As I-205 tolling proceeds in order to finance critical shared priorities, ODOT will design this project to align with the RMPP. Metro Council, JPACT and MPAC will create congestion pricing policies to include in the 2023 RTP. Concurrently, the Oregon Transportation Commission will be seeking public input on the Oregon Highway Plan (OHP) and Oregon Transportation Plan (OTP), which will incorporate statewide tolling policies. ODOT, Metro Council, JPACT, and MPAC will work collaboratively to align the RTP, OHP, and OTP documents. This will provide a comprehensive framework to incorporate the I-205 tolling project and the RMPP in the context of the larger regional and statewide transportation system. In addition to not starting collection of tolls on I-205 until after the RMPP application has been submitted to FHWA/USDOT under VPPP, ODOT and Metro will work to keep the RMPP application submittal on schedule and will



make reasonable effort to narrow this window even further when opportunities become available.

- **Center Equity in our Process and Outcomes.** ODOT will continue to use the Oregon Toll Program’s Equity Framework and support the recommendations from the Equity Mobility Advisory Committee (EMAC) to guide the I-205 Toll Project. Before a toll is assessed, the Project will establish and implement equitable income-based toll strategies as described in HB 3055 Section 162 (2021). A Low Income Toll Report will inform the NEPA process and be submitted to the Oregon legislature in Fall 2022.
- **Monitor diversion and fund projects that address diversion impacts.** As indicated in the amendments made to the 2018 Regional Transportation Plan, ODOT will fund projects to help manage local diversion impacts from the I-205 Tolling project.
- **Local input on the direction of tolling revenue.** While toll policies will be developed for statewide applicability, the only place that ODOT currently plans to toll is in the Portland region. Regional representatives must have a significant, majority voice in any advisory body consulted on tolling revenue allocation. ODOT commits to ensuring a strong local voice in decisions around the allocation of tolling revenue and when and how local projects that address diversion impacts are funded. ODOT will work collaboratively with Metro and JPACT to determine how the regional input is incorporated.
- **ODOT will terminate the collection of tolls upon retirement of bonds associated with the initial tolling of I-205 and costs associated with construction of the I-205 South Corridor Widening and Seismic Improvements Project, if the Regional Mobility Pricing Project, or other regional tolling project, is not implemented.** The Oregon Transportation Commission (OTC), as the tolling authority for state-owned roads in Oregon, will set a rate structure and determine the duration of tolling. However, local governments represented at JPACT, MPAC and the local coordinating committees have expressed their concern about isolated tolling for the I-205 South Corridor Widening and Seismic Improvements Project continuing in perpetuity if the Regional Mobility Pricing Project (RMPP), or other regional tolling project, does not come to fruition.

Given that the shared understanding of the congestion pricing projects can result in transportation, climate, equity and financial benefits, ODOT and Metro agree to support ongoing and timely development of the I-205 Toll Project, incorporating continued local input throughout the process.

  
\_\_\_\_\_  
Kristopher W. Strickler      4/25/2022  
Director, Oregon Dept. of Transportation      Date

\_\_\_\_\_  
Lynn Peterson      4/27/2022  
President, Metro Council      Date

**ODOT I-205 Toll EA - RECORD #2847 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Sarah

**Last Name :** Iannarone

**Affiliation :** The Street Trust

**Submission Method :** Letter

**Q3. Comments :** Dear Mandy and Keith,  
Attached please find The Street Trust's comments on the draft EA for the I-205 Toll Project. We look forward to working with your agencies to bring equitable pricing to the greater Portland metro region which helps reduce congestion while meeting our climate and community mobility goals.

On behalf of our members, thank you for your hard work,  
Sarah

**Attachments :** 2023\_0421\_I-205\_EA\_The\_Street\_Trust.pdf (149 kb)



April 21, 2023

To: Mandy Putney  
ODOT Urban Mobility Office  
18277 SW Boones Ferry Rd  
Tualatin, OR 97224

Keith Lynch  
Division Administrator  
Federal Highway Administration  
530 Center St NE Suite 420  
Salem, OR 9730

Re: I-205 Toll Project EA Comment

To Whom it May Concern:

The Street Trust is a membership advocacy organization representing street users from across Greater Portland regardless of mode. We work to break political gridlock and win policy and investments that save lives, reduce barriers, and expand mobility and opportunities to the people and neighborhoods our current system neglects. We promote public infrastructure investments which result in a complete, safe, low-carbon, multimodal transportation system that contributes to equity in access, opportunity, health, and prosperity for people and communities across the Portland Metro Region and beyond.

At present, the I-205 Toll Project as proposed fails to meet our minimum standards for minimizing negative impacts, providing adequate alternatives, and effectively mitigating harms of this project on the community.

1. A primary concern The Street Trust has about the I-205 toll project is the **competing purposes** stated by the project, which on the one hand is to "generate sufficient revenue to pay for the project costs and maintain the facility" (generate money for the road) and on the other is to "maintain a minimum level of free-flow conditions" (manage traffic on the road). In our opinion, **the I-205 Toll Project should be designed with the single purpose of managing traffic demand to reduce congestion on the road, also known as congestion pricing.**
  - a. It is our recommendation that pricing to manage congestion and improved transit investments be implemented prior to highway

construction so that the highway project can be right-sized to a more accurate level of SOV demand.

2. Regarding the **potential for increased vehicle miles traveled (VMT) and greenhouse gas (GHG) pollution**, the I-205 toll project must be designed to reduce the amount people drive (VMT) and eliminate potential for induced demand (people driving more because congestion is relieved).
  - a. It is our recommendation that seismic upgrades be undertaken which do not increase capacity for SOV trips but do increase capacity for high capacity transit and active transportation trips.
  - b. It is not clear to us that the potential for induced demand and its negative impacts on the environment and community have been fully and accurately accounted for in ODOT's EA.
3. We do not believe that ODOT's EA has accurately evaluated **health and safety performance measures** for this project. Here are elements which merit further scrutiny:
  - a. The document notes that the project's safety performance will be evaluated based on the number of crashes and the severity of those crashes. However, it's important to ensure that the analysis also considers potential safety impacts apart from the tolled lanes themselves, such as changes in traffic patterns or driver behavior, especially as the result of diversion to neighborhood streets, the mitigation of which should be fully funded through tolling revenue.
  - b. The project's mobility performance will be evaluated based on travel time, speed, and reliability measures. However, it's important to consider the potential impact of tolling on transit ridership and accessibility, as well as any unintended consequences related to traffic diversion or induced demand.
  - c. The report identifies potential benefits for active transportation, including improved bicycle and pedestrian access, but it also notes that the project may result in increased diversion on local streets, and may require additional off-highway infrastructure to support active transportation modes. It's important to ensure that the analysis considers the potential safety impacts both on and off the tolled lanes on bicycle and pedestrian traffic and that appropriate measures are put in place to mitigate any negative impacts.
  - d. The project's environmental performance measures are related to air quality, GHG emissions, and stormwater management. However, it's important to ensure that the analysis considers the full life cycle

impacts of the project, including the potential impact of construction and maintenance activities as well as impacts on rivers and streams.

4. Another concern we have is **how we spend the revenue generated from tolling**. On the one hand, ODOT claims that I-205 toll revenue will be used to pay for the highway project costs. However, they also claim that if toll revenue falls short of the project costs, the remaining funds will be provided from other sources. These two statements appear to be contradictory, as the second statement implies that toll revenue may not be sufficient to pay for the project costs. We are concerned that the latter outcome comes at the expense of community health and safety.
  - a. **The Street Trust recommends that to most effectively manage congestion in the corridor, tolling revenue be allocated to improve and expand public transit and active transportation options**, such as expanding bus and light rail services and providing new transit options to areas that are not currently well-served by public transit.
5. **Limits to ODOT's community engagement mean that historically disadvantaged communities might not be represented in the process.**
  - a. The report notes that there was limited outreach to low-income and communities of color.
  - b. The report notes that there was limited outreach to non-English speakers.
  - c. The report notes that there were limited opportunities for engagement due to the COVID-19 pandemic, which limited in-person meetings and events.
  - d. The report notes that there was a limited understanding of tolling among some members of the public, which may have impacted engagement and input.
6. To better achieve equitable pricing and mobility, The Street Trust recommends that the I-205 toll program be rolled out in accordance with recommendations made by [ODOT's Equitable Mobility Advisory Committee](#). (EMAC's "Shaping an Equitable Toll Program" [report](#) was adopted by the Oregon Transportation Commission in July 2022.) **We need clear policies, oversight, and accountability metrics to ensure that tolls do not disproportionately impact communities of color or low-income communities.** It is also important that toll revenue be invested to create and fund programs to address disparities in transportation access and affordability, including access to jobs and anti-displacement of vulnerable populations.

- a. To mitigate the potential negative impacts of the project, The Street Trust supports targeted outreach to low-income and vulnerable populations, development of affordable housing, and investment in community services and programs.
- b. We recommend ongoing monitoring and evaluation of the project's social impacts to ensure that any negative impacts are minimized and that the benefits of the project are maximized for all members of the community.
- c. We think that toll revenue should be used to fund affordable, accessible transportation projects, such as improved infrastructure for people walking, rolling, and bicycling to provide alternative options and reduce economically regressive reliance on private vehicle ownership.
- d. We recommend that tolling revenues be used to fund community improvement projects or transit options that benefit affected communities. Additionally, we recommend measures to ensure that tolling does not disproportionately affect minority or low-income populations, such as conducting equity analyses and tracking demographic data to ensure that tolling is not creating unintended disparities.

Thank you for accepting our comments. We look forward to equitably pricing of the right of way in the Greater Portland metro region to reduce congestion and achieve our climate and community mobility goals.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sarah", with a long horizontal flourish extending to the right.

Sarah Iannarone  
Executive Director

<b>ODOT I-205 Toll EA - RECORD #2848 DETAIL</b>
---

**Submission Date :** 4/21/2023

**First Name :** Tara

**Last Name :** O'Brien

**Affiliation :** TriMet

**Submission Method :** Letter

**Q3. Comments :** Dear Ms. Putney and the I-205 Tolling Project Team,

Please find attached TriMet's comments on the I-205 Toll Project Environmental Assessment.

Thank you for the opportunity to comment.

**Attachments :** 2023\_0421\_I-205\_EA\_TriMet.pdf (288 kb)

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

April 21, 2023

Dear Ms Putney:

TriMet believes that the I-205 Toll Project will be a transformational project that will better manage limited highway resources and improve regional infrastructure for the future. While TriMet is supportive of the project, the diversion of freeway traffic to local streets resulting from pricing will negatively impact regional transit services that operate on surface roads near the toll project, particularly along OR43, Main Street in Oregon City, and OR 99E.

As TriMet works to increase and improve transit service in Clackamas County and the I-205 project area, transit reliability and travel time will be key considerations for riders to choose transit. Transit priority roadway and signal treatments, as well as transit service improvements will be essential to ensure that transit is a competitive and viable alternative to traveling on a priced highway facility. Additionally, any impacts of the toll project to transit travel time must be mitigated through this project. Please consider our more specific comments for mitigations below.

### **Transit Travel Time Impacts**

TriMet views any increase in travel time as an adverse effect on transit operations, particularly as the state and region work to decrease VMT and increase transit mode share to reduce greenhouse gas emissions and minimize the effects of human-caused climate change. The following is a summary of the expected negative transit travel time impacts resulting from implementation of the I-205 Toll Project that are stated in the Environmental Analysis (EA).

- Increase of approximately 3 minutes in travel time on OR 43 in the southbound AM, which would impact TriMet Bus Line 35.
- Increase of approximately 8 minutes in travel time on Main Street for 9 regional transit routes serving the Oregon City Transit Center.
- Increase of approximately 3 minutes in travel time for 5 transit routes operating on OR 99E.

TriMet considers any increases in transit travel times of 25% or more for over a ½ mile or more as significant if not mitigated. Given the potential impacts and uncertainty in estimating the diversion impacts of I-205 tolling on TriMet operations in the area, TriMet requests that for the first three years following the start of toll operations these impacts should be re-evaluated on an annual basis to consider additional or adjusted mitigation measures. To better evaluate transit travel time impacts, we suggest the following metric to be used: **Any actual increases in transit travel times of 25% or more for over a ½ mile or more are significant if not mitigated.**



## Required Mitigation Measures

TriMet agrees with the transit-related mitigation measures outlined in the I-205 Toll Project Environmental Assessment at the locations listed below, and seeks to ensure that these mitigation measures will be funded as part of the I-205 Toll Project:

- OR 99E/North of Dunes Dr. – Widen to provide SB queue lane for buses. We support this mitigation if the advance green light for transit is added.
- OR 99E/Dunes Dr. – Implement Next Generation Transit Signal Priority (TSP) for transit. Next-generation TSP will enable traffic signals to prioritize transit travel, improving on time performance for transit vehicles and riders.
- OR 99E/I-205 Southbound Ramps – Implement TSP for transit and provide NB bus pocket and advance green light.
- OR 99E/14<sup>th</sup> St (in Oregon City) – Implement TSP for transit
- OR 99E/12<sup>th</sup> St (in Oregon City) – Implement TSP for transit
- Main St/10<sup>th</sup> St (in Oregon City) – Implement TSP for SB left turn transit. We support this if a traffic signal is added at this intersection. If a traffic signal is not added, ODOT should advance an alternate mitigation that adds a southbound bus lane on Main St between 12<sup>th</sup> and 11<sup>th</sup> St to mitigate delays to multiple transit routes accessing the Oregon City Transit Center.

In addition to the above, the I-205 Toll Project should incorporate and commit to funding as part of the project the following additional transit-related street mitigation measures:

- OR 99E/I-205 Northbound Ramps – Add a southbound bus lane from the I-205 southbound ramp to 14<sup>th</sup> St to mitigate OR 99E delays for multiple TriMet routes. This solution was previously discussed with ODOT engineer Andrew Bastasch in January 2023 – shown by dashed red line:



- I-205 ramps at 10<sup>th</sup> St – In coordination with TriMet, add new concrete bus pads and sidewalks to allow an extension of Line 76 on I-205 to serve local stops on on/off-ramps.
- OR 43 between A Ave and McVey Ave – Add transit signal priority at intersections where there is a projected impact to the Multimodal Level of Service (MMLoS) to mitigate impacts of delays on Line 35 or consider alternative mitigation to improve transit performance at any time of day or direction of travel exceeding TriMet’s aforementioned consideration of a significant impact.

**Additional comments and questions:**

- Table 3-11 of the EA asserts that overall transit MMLOS would be better under the Build Alternative than the No Build Alternative. We don't understand this finding because negative impacts on transit travel time have been identified on OR43, Main Street, and OR 99E highlighted above. Does this analysis consider the number of buses per hour for TriMet's planned transit network and estimated travel time delays/savings on each transit line? We request to see the analysis and justification for this rating.
- TriMet and ODOT are in discussions regarding an extension of Line 76 service between Tualatin and Oregon City to help mitigate the diversion impacts of the I-205 Toll Project. TriMet has also identified the following additional service improvements that may be needed to further mitigate the diversion impacts of the I-205 Toll Project, should additional ODOT funding be available in the future to support transit improvements beyond TriMet's planned and budgeted service. TriMet suggests the I-205 Toll Project consider additional travel forecasting modeling to identify the mitigating benefits of these additional transit service improvements impacting the I-205 Toll Project area.

<b>Transit Service</b>	<b>Improvement</b>
Line 33-McLoughlin/King Rd.	Upgrade to 12-minute headways
Line 35-Macadam/Greeley (OR43)	Upgrade to 15-minute headways between Oregon City & Portland
Line 79-Clackamas/Oregon City (82 <sup>nd</sup> Dr.)	Upgrade to 15-minute headways
Line 145: Jennings Rd (future line)	Provide new service at 30-minute headways

Thank you for your consideration of these comments.

Sincerely,



JC Vannatta  
TriMet Executive Director of Public Affairs

**ODOT I-205 Toll EA - RECORD #2849 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Victoria  
**Last Name :** Frankeny  
**Affiliation :** Tualatin Riverkeepers  
**Submission Method :** Letter  
**Q3. Comments :** Good afternoon,  
See attached comment regarding the I-205 Tolling Project Environmental Assessment. Please feel free to contact me directly if there are any questions or concerns regarding this comment.  
**Attachments :** 2023\_0421\_I-205\_EA\_Tualatin\_Riverkeepers.pdf (171 kb)



April 21, 2023

Oregon Department of Transportation  
ODOT Urban Mobility Office  
18277 SW Boones Ferry Road  
Tualatin, OR 97224

Federal Highway Administration  
530 Center Street NE, Suite 420  
Salem, OR 97301

*Submitted via email*

**Re: Public Comment on the I-205 Toll Project Environmental Assessment**

Tualatin Riverkeepers is a community-based organization that protects and restores the Tualatin River watershed. We build watershed stewardship through engagement, advocacy, restoration, access, and education. We write to comment on the Oregon Department of Transportation and Federal Highway Administration’s (henceforth “the agencies”) environmental assessment (henceforth “EA”) for the proposed I-205 toll project.

We recognize the agencies’ work on writing the EA and commend staff’s efforts in identifying a wide range of impacts this project could have on the human and natural environment. However, this comment is meant to further fulfill the agencies’ requirements under the National Environmental Policy Act (henceforth “NEPA”) by providing additional information needed to identify a wide range of significant impacts and thereby determining that an Environmental Impact Statement (henceforth “EIS”) is required.

**I. The EA fails to consider a full range of alternatives.**

NEPA requires agencies to “study, develop, and describe appropriate alternatives to recommended courses of action.”<sup>1</sup> Failure to do so goes against the statute’s purpose to “promote efforts which will prevent or eliminate damage to the environment” and undermines agencies’ ability to make an informed decision.<sup>2</sup> Tualatin Riverkeepers raises two concerns with the EA’s

---

<sup>1</sup> 42 U.S.C. § 4332(2)(E); 40 C.F.R. § 1501.5(c)(2).

<sup>2</sup> 42 U.S.C. § 4321; 40 C.F.R. § 1500.1(a).

alternatives analysis: (1) the No Build Alternative does not fall under the requisite no action alternative mandated by NEPA; and (2) EA does not consider a Seismic Upgrade Only Alternative.

A. The No Build Alternative does not equate to a No Action Alternative.

The No Build Alternative greatly misleads public involvement and whether the agency has met the requirement to consider a No Action Alternative. The No Build Alternative includes “reconstruction of the Abernethy Bridge with added auxiliary lanes and improvements to the adjacent interchanges at OR 43 and OR 99E,” which has already begun under Phase 1A of the project.<sup>3</sup> While Tualatin Riverkeepers understands that this is a project pre-approved for completion, ODOT’s identification of this alternative as “no build” severely misleads public participation for the EA. In fact, Phase 1A did require a preliminary determination under NEPA in order to determine that this phase of the project fell under a Categorical Exclusion. Segmenting these analyses creates a piecemeal assessment of a much larger freeway project and undermines the holistic environmental assessment needed to identify impacts for a project of this scale.

B. The EA fails to consider a Seismic Upgrade Only Alternative.

Infrastructure throughout the Metro area is in desperate need of seismic upgrades. Tualatin Riverkeepers does not contest the need to seismically upgrade the I-205 bridge. In fact, the Tualatin River will benefit greatly with a bridge able to withstand seismic events. However, the EA fails to consider a Seismic Upgrade Only Alternative amidst its other alternatives. This alternative would consider seismic upgrades without widening nor tolling. Even the No Build Alternative includes adding additional lanes to the I-205 bridge (See Section I.A.), but does not include seismic upgrades as part of this alternative.<sup>4</sup> Failing to include a Seismic Upgrade Only Alternative greatly limits the agencies’ capacity to evaluate all reasonable alternatives and promote efforts to eliminate damage to the environment, as required under NEPA.

**II. The EA fails to identify a full range of impacts.**

NEPA requires agencies to prepare an EIS regarding major federal actions significantly affecting the quality of the human environment.<sup>5</sup> Therefore, in order to adequately determine whether an EIS is required, an EA must include a sufficient amount of evidence and analysis.<sup>6</sup> Identification of environmental impacts is the driver behind a NEPA analysis. Therefore, Tualatin Riverkeepers offers up several impacts that were not thoroughly assessed within the EA.

---

<sup>3</sup> EA at 2-1.

<sup>4</sup> EA at 2-1.

<sup>5</sup> 42 U.S.C. § 4332(2)(c).

<sup>6</sup> 40 C.F.R. § 1501.5(c)(1).

### A. Environmental Justice

Have the agencies used the Environmental Protection Agency's EJScreen Tool to cross reference environmental justice indexes with the information provided to them by the U.S. Census Bureau? The EPA's EJScreen Tool combines socioeconomic indicators with a single environmental indicator to help identify populations that are more vulnerable to a variety of environmental issues.<sup>7</sup> This tool would help the agencies further identify impacts to surrounding communities, especially low-income and BIPOC communities.

For example, the agencies have identified a high environmental justice population within Tualatin. However, when cross referenced to the EJScreen Tool, the agencies would find that a larger population of the City falls within the 80-90th percentile for exposure to diesel particulate matter. This community, nestled directly where I-5 and I-205 join, will be directly affected by existing and predicted traffic forecasts. What research or modeling do the agencies have to identify commercial traffic (such as semi-trucks) re-routing? How do the impacts of redirected commercial traffic play into the agencies' impacts analysis for communities adjacent to the project area?

Lastly, the Draft EA incorrectly states that there will be no adverse air quality impacts to Environmental Justice areas within the Area of Potential Impact.<sup>8</sup> This statement seems counterintuitive since the Build Alternative proposes additional lanes along I-205, anticipating increased traffic along these routes.

### B. Land Use

To mitigate impacts to the Tualatin National Water Trail, the agencies should consider a portage point for recreationalists. Assuming that instream work will primarily be conducted during the summer months,<sup>9</sup> the Build Alternative would restrict recreation during its peak season. Though generally slow-moving during the summer, construction could narrow waterways, thereby increasing flows. To ensure the safety of any paddlers on this stretch of the river, ODOT should provide a temporary portage location.

---

<sup>7</sup> Environmental Protection Agency, EJScreen: Environmental Justice Screening and Mapping Tool, <https://www.epa.gov/ejscreen>.

<sup>8</sup> EA at 3-88.

<sup>9</sup> ODFW recommends that instream water work for any dredge and fill project should be done from July to September in order to minimize impacts to migratory fish. See Oregon Guidelines for Timing of In-Water Work to Protect Fish and Wildlife Resources.

We further encourage ODOT to include this temporary portage as a permanent launch site along the Tualatin River. Bridges are logical locations for boat launches. Since this would be along a public right-of-way, a minimalist access point would go a long way to promoting water access.

Lastly, the agencies must confer with Metro on how the Build Alternative impacts Metro's proposed trail system along the Tualatin River and I-205.<sup>10</sup> The Tualatin River Greenway Trail is one such trail proposed to increase access to Tualatin River beyond in-water recreation. These conversations must be held now to properly identify foreseeable impacts to Metro's proposed trail system, not only how it may limit trail placement in the future, but also how it may restrict communities from accessing these trails.

### C. Vegetation and Wildlife

Long-term impacts to vegetation and wildlife must include additional pollutant load as a result of change in traffic levels. Tree removal, wetland fill, and additional traffic will all degrade water quality of the Tualatin River. Uprooting trees and filling in wetlands greatly reduce air and water quality pollutant filters. While the EA insists that traffic will be greatly reduced due to tolling, they are still planning to add additional lanes to accommodate increased traffic volume. How will this impact air and water quality for the Tualatin River?

As stated previously, the Build Alternative recommends additional lanes be added. While the toll project is proposed to manage traffic congestion, the additional lanes suggest accommodating for additional traffic (possibly in response to the significant growth within the immediate area, especially Washington County). Providing those additional lanes, accommodates heavier commercial traffic. Diesel fuel emissions contain pollutants detrimental to environmental and human health, including particulate matter, nitrous oxides, hydrocarbons, carbon monoxides, and other hazardous air pollutants.<sup>11</sup> Not only does this have drastic effects on air quality, but air pollutants also pose serious threats to water quality, by settling and contaminating surface and groundwater, which can severely impact fish and wildlife mortality and reproduction.

Lastly, the agencies must assess the impacts of tire leachate on aquatic life. Emerging studies have identified lethal effects of tire leachate on salmonids.<sup>12</sup> The Build Alternative intends to increase impervious surface area and a decrease in natural pollutant filters (i.e., wetlands), which could increase leachate entering the Tualatin and Willamette River via runoff. Steelhead, coho,

---

<sup>10</sup> Metro, Regional Trails Prioritization Tool Report (2022), [https://www.oregonmetro.gov/sites/default/files/2022/06/15/Metro%20Trails%20Prioritization\\_22020531\\_final.pdf](https://www.oregonmetro.gov/sites/default/files/2022/06/15/Metro%20Trails%20Prioritization_22020531_final.pdf).

<sup>11</sup> <https://www.epa.gov/diesel-fuel-standards/about-diesel-fuels>

<sup>12</sup> McIntyre, et al. "Treading Water: Tire Wear Particle Leachate Recreates an Urban Runoff Mortality Syndrome in Coho but Not Chum Salmon," American Chemical Society (Aug. 19, 2021), <https://pubs.acs.org/doi/full/10.1021/acs.est.1c03569>; French, et al. "Urban Roadway Runoff Is Lethal to Juvenile Coho, Steelhead, and Chinook Salmonids, But Not Congeneric Sockeye," American Chemical Society (Aug. 24, 2022), <https://pubs.acs.org/doi/full/10.1021/acs.estlett.2c00467>.

and Chinook are all identified species within these waterways, and all of which have high mortality rates when exposed to urban runoff. These impacts must be accounted for in the EA.

#### D. Wetlands and Water Resources

The EA specifies that ODOT will mitigate existing and future runoff by developing facilities that retain and filter stormwater.<sup>13</sup> This operation is predicted to account for 80 acres of impervious surface runoff. However, natural wetlands hold a higher biophysical value over man-made stormwater management.<sup>14</sup> How do these studies play into the effectiveness of filtering stormwater through man-made retention systems versus natural wetlands? To the point mentioned above (See Section II.C.), wildlife habitat will be significantly altered due to the project. Once displaced, birds and other wildlife have a higher mortality rate and reproduction levels are significantly decreased. These dredge and fill projects will greatly reduce the biological and recreational value of the area, especially in close proximity to the Tualatin River.

#### E. Cumulative Impacts

Cumulative impacts must include any impact that is reasonably foreseeable. The Draft EA acknowledges that traffic will be redirected on several local streets throughout the project area.<sup>15</sup> Concerns previously raised in this comment letter, including air and water quality pollutants, apply to traffic redirected through local streets, especially those in close proximity to the Tualatin River and its tributaries.<sup>16</sup> Since rerouting has been identified as a high likelihood to avoid tolling, it is reasonably foreseeable that those issues will translate to local areas. Therefore, a project of this magnitude and impact would require a more in depth analysis required under an EIS.

### **III. Conclusion**

Tualatin Riverkeepers appreciates an opportunity to comment on the I-205 Tolling Project Environmental Assessment. We appreciate the agencies' efforts in identifying a wide range of impacts within the confines of this EA. However, due to the limited alternatives analysis, wide range of impacts, and the large scope of the project, an EIS would be best suited to fully meet the requirements under NEPA.

---

<sup>13</sup> EA at 3-118.

<sup>14</sup> Rooney, et al. "Replacing natural wetlands with stormwater management facilities: Biophysical and perceived social values," *Water Research* (Apr. 15, 2015), <https://www.sciencedirect.com/science/article/abs/pii/S0043135414008677>.

<sup>15</sup> EA at 3-123.

<sup>16</sup> For example, Willamette Falls Drive runs adjacent to the Tualatin River and has been experiencing high volumes of pollutant load from increased rain events that have washed sediment from nearby construction sites. Due to the terrain, this creates a clear route of stormwater across Willamette Falls Drive directly into the Tualatin River. Additional traffic would only increase the level of pollutants washed into the river.



Thank you for your time and consideration on these issues. Please feel free to contact me if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Victoria Frankeny". The signature is fluid and cursive, with the first name "Victoria" written in a larger, more prominent script than the last name "Frankeny".

Victoria Frankeny [she/her]  
Riverkeeper & Staff Attorney  
Tualatin Riverkeepers  
[victoria@tualatinriverkeepers.org](mailto:victoria@tualatinriverkeepers.org)

**ODOT I-205 Toll EA - RECORD #2851 DETAIL**

**Submission Date :** 4/18/2023  
**First Name :** Rick  
**Last Name :** Cook  
**Affiliation :** Stafford Hamlet  
**Submission Method :** Letter

**Q3. Comments :**

April 21, 2023

To: ODOT and the Federal Highway Administration  
From: The Stafford Hamlet Board of Directors and Residents

We would like to place in the public record the following comments and recommendations concerning the I-205 Project.

1. Local residents and members of the Clackamas County staff, Advisory Boards and neighboring cities are struggling to get through this huge document. We request the comment period for citizen, county and city input be extended another 30 days. Now, the Public Comment Period is to end on April 21st. It's not feasible for the general public to examine this extensive document in that amount of time.
2. An Environmental Impact Statement (EIS) is needed. The Environmental Assessment (EA) does not provide the evidence that this project's benefits outweigh the negative impacts. For example, regarding environmental impacts there is no data, analysis or mitigation for the top five greenhouse emitters around this area—Lake Oswego, Oregon City, West Linn, Tualatin and Wilsonville. The traffic diversion of I-205 through local streets, neighborhoods and communities has not been fully addressed. ODOT has offered little to no support for mitigation.
3. The safety of residents on local, city and county roadways has not been adequately studied. Mitigation proposals for crosswalks, bike pathways and striping are not sustainable solutions to diverted traffic. Quoting from the Concept Evaluation and Recommendations Technical Memorandum: "The rerouting of traffic away from I-205 would bring a percentage of traffic through commercial districts along alternative routes." Why were Lake Oswego and West Linn not projected to experience increases in traffic volumes? Why were those cities not studied? What impacts on the Stafford Hamlet area will diversion traffic have on air quality and climate? An EIS would insure a broader evaluation of potential impacts both positive and negative.
4. Tolling before mitigation solutions are in place will have lasting impacts on the livability and character of local and regional communities. Negative impacts outweigh benefits by far. "Build it then fix it" creates more problems than it solves. Again, we request an EIS.
5. An in-depth study of actual business impacts needs to be conducted and solutions analyzed before this program is approved. Diversion and financial impacts need to be further analyzed.
6. An EIS would address the total impacts of ODOT's Tolling and Regional Mobility Pricing Project. The total regional impact needs to be considered. "An analysis would determine whether the effect of combining multiple Round 2 concepts would be positive or negative". (From the Concept Evaluation and Recommendations Technical Memorandum.) If tolling of I-5 and I-205 does in fact happen, the impacts need to be analyzed together. An EIS is appropriate to address both tolling projects, not an EA.
7. There is no approved "long range" funding plan for future mitigation of traffic issues. Transit in the area is "limited" at best. There is no funding plan projected to adequately address this.
8. The actions of ODOT will set the precedent for tolling not just I-205, but throughout the entire state of Oregon. It is imperative that this is done right. Therefore, we again request that an EIS be completed before approval or denial of tolling I-205 and Regional Mobility Pricing Project. This project currently has very little support in the region and possibly even statewide.

The Stafford Hamlet with more than 2,000 residents requests that an in-depth EIS be required for this project that will have everlasting consequences on the region. It deserves a fully vetted document that has community backing with approval for the outcomes.

Sincerely,

Stafford Hamlet Board of Directors

**Attachments :**

2023\_0418\_I-205\_EA\_Stafford\_Hamlet.pdf (203 kb)



April 21, 2023

To: ODOT and the Federal Highway Administration

From: The Stafford Hamlet Board of Directors and Residents

We would like to place in the public record the following comments and recommendations concerning the I-205 Project.

1. Local residents and members of the Clackamas County staff, Advisory Boards and neighboring cities are struggling to get through this huge document. We request the comment period for citizen, county and city input be extended another 30 days. Now, the Public Comment Period is to end on April 21st. It's not feasible for the general public to examine this extensive document in that amount of time.

2. An Environmental Impact Statement (EIS) is needed. The Environmental Assessment (EA) does not provide the evidence that this project's benefits outweigh the negative impacts. For example, regarding environmental impacts there is no data, analysis or mitigation for the top five greenhouse emitters around this area—Lake Oswego, Oregon City, West Linn, Tualatin and Wilsonville. The traffic diversion of I-205 through local streets, neighborhoods and communities has not been fully addressed. ODOT has offered little to no support for mitigation.

3. The safety of residents on local, city and county roadways has not been adequately studied. Mitigation proposals for crosswalks, bike pathways and striping are not sustainable solutions to diverted traffic. Quoting from the Concept Evaluation and Recommendations Technical Memorandum: "The rerouting of traffic away from I-205 would bring a percentage of traffic through commercial districts along alternative routes." Why were Lake Oswego and West Linn not projected to experience increases in traffic volumes? Why were those cities not studied? What impacts on the Stafford Hamlet area will diversion traffic have on air quality and climate? An EIS would insure a broader evaluation of potential impacts both positive and negative.



4. Tolling before mitigation solutions are in place will have lasting impacts on the livability and character of local and regional communities. Negative impacts outweigh benefits by far. “Build it then fix it” creates more problems than it solves. Again, we request an EIS.

5. An in-depth study of actual business impacts needs to be conducted and solutions analyzed before this program is approved. Diversion and financial impacts need to be further analyzed.

6. An EIS would address the total impacts of ODOT’s Tolling and Regional Mobility Pricing Project. The total regional impact needs to be considered. “An analysis would determine whether the effect of combining multiple Round 2 concepts would be positive or negative”. (From the Concept Evaluation and Recommendations Technical Memorandum.) If tolling of I-5 and I-205 does in fact happen, the impacts need to be analyzed together. An EIS is appropriate to address both tolling projects, not an EA.

7. There is no approved “long range” funding plan for future mitigation of traffic issues. Transit in the area is “limited” at best. There is no funding plan projected to adequately address this.

8. The actions of ODOT will set the precedent for tolling not just I-205, but throughout the entire state of Oregon. It is imperative that this is done right. Therefore, we again request that an EIS be completed before approval or denial of tolling I-205 and Regional Mobility Pricing Project. This project currently has very little support in the region and possibly even statewide.

The Stafford Hamlet with more than 2,000 residents requests that an in-depth EIS be required for this project that will have everlasting consequences on the region. It deserves a fully vetted document that has community backing with approval for the outcomes.

Sincerely,

*Stafford Hamlet Board of Directors*

Stafford Hamlet Board of Directors

Bill Markt – Chair / Rich Fiala Vice- Chair



**ODOT I-205 Toll EA - RECORD #2855 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Marcy

**Last Name :** Holmes

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Please don't do this. We need better roads, more pedestrian infrastructure, seismic retrofits of existing bridges, red light cameras, and so many other things that would make us and future generations safer. I want my kid to be able to walk safely to our school 1 mile away and clean air to breathe way more than anyone needs more lanes on a freeway. The science of induced demand is VERY clear. This will make thing worse for drivers and everyone else who lives here and uses these roads. Please invest in safer streets instead.



**ODOT I-205 Toll EA - RECORD #2856 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Josh

**Last Name :** McCarty

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
This project is a wasteful and unnecessary use of funds that will increase greenhouse gas emissions and facilitate suburban sprawl. It should be cancelled. At the very least many more years of study are needed to ensure that it does not get built. DOT does not have enough money to repair what it has. Therefore, it should not be adding new liabilities to pay for. That is a bad idea. This project is such a bad idea that those responsible should be replaced with folks who understand the concept of induced capacity.

**ODOT I-205 Toll EA - RECORD #2857 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Josh

**Last Name :** Schwartz

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** We live in Oregon City & work in Tualatin + Hillsboro. We cannot afford the additional costs of tolling to go to work for a The end result is that we will likely contribute to plugging up alternative routes. Please reconsider & potentially add an HOV lane in the future as an alternative. Thank you

**Attachments :** image001.jpg (4 kb)

**ODOT I-205 Toll EA - RECORD #2858 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** John

**Last Name :** Bosserman

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Amazing 217 being reconstructed no toll , why i Clackamas County being singled out ! No further work on 212 been waiting since 1999 for that project! Why are we treated as the stepchild county because of power and politics by the extreme democrat deep state out to hurt the working peoples county you tell us to shutup and shove a toll down us , well it won't happen we will prevail.

<b>ODOT I-205 Toll EA - RECORD #2859 DETAIL</b>
---

<b>Submission Date :</b>	4/19/2023
<b>First Name :</b>	Lyle
<b>Last Name :</b>	Funderburk
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email
<b>Q3. Comments :</b>	No more freeways for cars. More biking and walking paths.

**ODOT I-205 Toll EA - RECORD #2860 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Matthew

**Last Name :** Barnett

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I am opposed to I-205 freeway expansion. Freeway lane expansion is expensive, incentives more car use, has a low impact on traffic, and an inefficient use of city land. Funds should be used to expand bus and train routes. This is much better way to remove cars from the road and provide transit.

**ODOT I-205 Toll EA - RECORD #2861 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Anna

**Last Name :** Fritz

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I'm writing regarding the proposed I-205 Freeway Expansion. ODOT owes Oregon citizens an Environmental Impact Statement at the very least. But honestly, I just can't believe we are considering freeway expansion as a conscionable option for solving transportation needs. We know that expanding freeways does not reduce congestion, but increases carbon emissions - something we absolutely cannot afford if we want life on this planet to continue. We need to be radically changing the way we get around - investing in fast, ubiquitous, and affordable public transit and greatly reducing our reliance on private automobiles. Please stop taking us backward, forcing us down a road that leads to more heat domes, more catastrophic storms and climate catastrophe. Stop expanding the freeways!!

**ODOT I-205 Toll EA - RECORD #2863 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Cliff

**Last Name :** Heaberlin

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I oppose this I-205 freeway expansion without further study of congestion pricing in an Environmental Impact Statement. I have a lot of questions about the cost/benefit to the state and think that the money would be best allocated on other transportation projects.

**ODOT I-205 Toll EA - RECORD #2864 DETAIL**

**Submission Date :** 4/19/2023  
**First Name :** Stephanie  
**Last Name :** Byrd  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** I am writing to ask that you conduct an Environmental Impact Statement that studies congestion pricing before planning any freeway expansion. Congestion pricing has been proven to solve congestion and create a new source of funding for the maintenance needs that we are already so far behind on. Going into debt to incur ongoing maintenance obligations when we are already so far from meeting our infrastructure maintenance needs makes no sense, especially when we have such a powerful proven solution. We never have the money in the budget for safer transit, biking, and walking infrastructure, yet we continue to waste billions on projects that solve nothing and leave us deeper in debt. Congestion pricing could help us fund positive, pleasant, sustainable changes in the ways we get around and live our lives.



**ODOT I-205 Toll EA - RECORD #2865 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Sunny

**Last Name :** Vigna

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Make cities have safer public transportation options. No more gas cars.  
Faster trains! More bike blocks and lanes, etc. thanks.

<b>ODOT I-205 Toll EA - RECORD #2866 DETAIL</b>
---

**Submission Date :** 4/19/2023

**First Name :** Derrick

**Last Name :** Davis

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Because freeway expansion is not the answer. Infrastructure is temporary the environment is forever. Safer and cleaner public transit is where the investment should go. So many other projects could be done with this money.

**ODOT I-205 Toll EA - RECORD #2867 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Nick

**Last Name :** Fox

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I think it's important to conduct an EIS before moving this project forward for a number of reasons. First, this is a beautiful area of Oregon on the border of the metro! Why are we widening the roads in it! Second, I am generally skeptical that widening freeways is a good course in 2023, at least until all alternatives (tolling, increased transit) are fully operational. I hope you ODOT will engage in the work of EIS and consider the harmful impacts of increased cars and trucks in this lovely neck of the metro.

**ODOT I-205 Toll EA - RECORD #2868 DETAIL****Submission Date :** 4/19/2023**First Name :** Barbara**Last Name :** Singh**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** I live in Washington and commute to Oregon for my work as a birth/postpartum doula. In this time of price increases in every aspect of life, tolling is a horrible idea. People are hurting financially and this will have a negative effect for families, employers, employees, businesses. The state of Oregon is always trying to find new ways to make money, but this is just detrimental to people just trying to get by and pay their bills. Hope you make the right choice for the people.

**ODOT I-205 Toll EA - RECORD #2870 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Eric

**Last Name :** Wilhelm

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** ODOT should just cancel all freeway widening plans until they've fixed our crumbling infrastructure and deadly orphan urban highways, but certainly should not widen this section of i-205 without a full EIS.

**ODOT I-205 Toll EA - RECORD #2871 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Diana

**Last Name :** Oxley

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I am concerned that the expansion will encourage car travel and defeat climate fighting objectives.

**ODOT I-205 Toll EA - RECORD #2872 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Carissa

**Last Name :** Albin

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Oregon is focused on reducing emissions! With that vision, why would you not do an Environmental Assessment?

**ODOT I-205 Toll EA - RECORD #2874 DETAIL**

**Submission Date :** 4/19/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** WHY DON'T YOU LISTEN TO THE PEOPLE? NO ONE WANTS THESE TOLLS, EXCEPT THE PEOPLE WHO DID THE STUDY AND THE PRIVATE CORPORATION WHO WILL INSTALL AND BE PAID FOR THEIR WORK ... MAYBE FOREVER. ODOT DOES NOT NEED TOLLS ON THESE ROADS. I BELIEVE THE SURFACE ROADS WILL INCUR A LOT MORE TRAFFIC IF TOLLS ARE PUT INTO OPERATION AND HOW DOES THAT SOUND TO A HOMEOWNER WHO HAS PROPERTY NEXT TO ONE OF THESE SURFACE STREETS THAT WILL BEGIN TO SEE A LOT MORE TRAFFIC. IT DOESN'T CUT CO 2 LEVELS BY HAVING MORE TRAFFIC ON SURFACE STREETS. I DON'T KNOW WHY ODOT IS PUSHING THIS ONTO DRIVERS AND LOCALS DO NOT SEE ANY BENEFIT TO HAVING A TOLL ROAD. IT'S SHAMEFUL THE WAY ODOT IS RAILROADING THE PEOPLE IN THE GUIZE OF BEING COMMUTER FRIENDLY OR LOWER TRAFFIC DURING PEAK HOURS OR GETTING PEOPLE TO CHANGE HOW THEY COMMUTE. PLEASE, ODOT, THINK AGAIN ON THIS ONE. THERE'S A BETTER WAY FORWARD.



**ODOT I-205 Toll EA - RECORD #2875 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Tina

**Last Name :** Ricks

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Where is the Environmental Impact Statement of the I-205 expansion? Has ODOT actually considered alternatives to more freeways? Expanding the lanes of I-205 assumes the foregone conclusion that we will have more and more cars. What if a generous slice of that budget went to fund TriMet and local road agencies in Clackamas County instead? What if we were actively adding bus lines, bus frequency, and more bus stops? What if all the existing bus stops had a safe place to wait and safe crossings, many of them on ODOT orphan highways? What if taking the bus and train was a serious alternative to driving that didn't take half a day to get to the destination? What if? Have the courage to think outside the car, ODOT.

**ODOT I-205 Toll EA - RECORD #2876 DETAIL****Submission Date :** 4/19/2023**First Name :** Jerry**Last Name :** Ritter**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** Ladies & Gentlemen: \$5+ billion from the 2017 transportation package passed by the Oregon Legislature. Another \$5 Billion from President Biden's infrastructure bill. Oregonians have already PAID ENOUGH for our roads! This project needs to be shelved!

**ODOT I-205 Toll EA - RECORD #2877 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Heather

**Last Name :** Buletti

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** We need to be investing in active and sustainable transportation systems and highway expansions are the absolute wrong solution to our traffic issues. We are facing a climate crisis and need to invest in future generations by building bike and pedestrian infrastructure, not widening freeways. At the VERY least and EIS needs to be conducted, going through without that is irresponsible and damaging. No more freeways!!!!!!

---

Time: April 20, 2023 at 7:08 am

IP Address: 73.25.216.158

Contact Form URL: <https://nomorefreewayspx.com/i205expansion/>

Sent by an unverified visitor to your site.

**ODOT I-205 Toll EA - RECORD #2879 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Mike

**Last Name :** Westling

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** ODOT absolutely needs to conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion. It is irresponsible to move forward with any freeway project that will add road capacity without first conducting an analysis of the impacts that congestion pricing would have on demand for that roadway. In plans for infrastructure projects and congestion pricing, ODOT should also prioritize congestion reduction and funding for alternative transportation options in any plans for congestion pricing, rather than generating revenue for freeway expansion. It is beyond frustrating that ODOT continues to make plans for projects that, in the long term (and very likely the short term) will only make traffic congestion and climate change worse, while further encouraging poor land use decisions and sprawl. Get it together, ODOT!

**ODOT I-205 Toll EA - RECORD #2880 DETAIL****Submission Date :** 4/19/2023**First Name :** Chris**Last Name :** Chaplin**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Hello, I am writing to ask ODOT to conduct an Environmental Impact Statement that studies congestion pricing before freeway expansion. I previously lived right next to I-205, and the air and noise pollution were big factors in my family's decision to move. (Sadly, the air quality where we are now, about a mile west of I-205, is still routinely unsafe.) We the citizens of the greater Portland metro area and of this country do not need more room to fit more cars, which is exactly what happens anytime a freeway is expanded - the number of cars expands to fit the new freeway. Expanding this freeway without an Environmental Impact Statement, while we are in the beginning stages of a worsening and increasingly frightening climate catastrophe, strikes me as reckless and quite likely another tragic indication of the level of subservience to the demands of the oil and gas industry that our ostensibly public institutions routinely display.

**ODOT I-205 Toll EA - RECORD #2881 DETAIL**

**Submission Date :** 4/19/2023  
**First Name :** Megan  
**Last Name :** Leatherman  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** Hello, I am writing to ask ODOT to conduct an Environmental Impact Statement that studies congestion pricing before freeway expansion. I previously lived right next to I-205, and the air and noise pollution were big factors in my family's decision to move. (Sadly, the air quality where we are now, about a mile west of I-205, is still routinely unsafe.) We the citizens of the greater Portland metro area and of this country do not need more room to fit more cars, which is exactly what happens anytime a freeway is expanded - the number of cars expands to fit the new freeway. Expanding this freeway without an Environmental Impact Statement, while we are in the beginning stages of a worsening and increasingly frightening climate catastrophe, strikes me as reckless and quite likely another tragic indication of the level of subservience to the demands of the oil and gas industry that our ostensibly public institutions routinely display. Please take the necessary step of \*at least\* conducting an Environmental Impact Statement before embarking on the costly project of expanding I-205.

**ODOT I-205 Toll EA - RECORD #2882 DETAIL**

**Submission Date :** 4/19/2023

**First Name :** Alexander

**Last Name :** Parker

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I'm saddened to learn of the I-205 expansion project. We do not need more freeways in our state. I live near the I-205 in SE Portland and it does not need to be expanded. We do not need more single drivers polluting our air in congested traffic or the noise that comes with it. Adding more lanes does not solve congestion, it makes it worse. We do not need to make it worse when we are at the edge of climate catastrophe.  
Conduct an EIS to study freeway congestion pricing. It is my hope that ODOT abandon this plan and use the money where it could really improve our lives and this state. Use it on better public transportation, bike infrastructure and walkable spaces! Please! That's what could actually make people happy in this city and state, not more lanes!

**ODOT I-205 Toll EA - RECORD #2883 DETAIL**

**Submission Date :** 4/19/2023  
**First Name :** Linda  
**Last Name :** Bright  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :**

Please consider the following:

1. I am particularly concerned about tolls on I205 and I5 impacting low income and vulnerable people; and about the complicated process they may need to go through trying to get discounts on these tolls-- much of the time, the process to get discounts or reduced charges for various services or charges is so cumbersome that people do not have the time, energy, or understanding to utilize the benefit.
  2. I am also concerned about the "surface" street congestion that will likely occur around the interstate toll corridors. These streets are already extremely congested and dangerous for pedestrians and bikes.
  3. My husband used to commute via bike along the I205 Multi Use Path from I205 and Johnson Cr. to Airport way. He stopped the bike commute due to unsafe conditions on this path, temporary structures (with debris/trash) being put up along the path by homeless citizens that blocked or narrowed the path, and some of these citizens aggressively begging/pan-handling. Until the bike paths in the Portland-metro area are cleaned up and safe, it is extremely unrealistic (and unviable) to expect that creating toll roads will encourage citizens to use this alternative form of commuting.
  4. Creating a system of taxing electric vehicles seems like an additional way to create revenue (versus placing more burden on users of gasoline vehicles-- who are likely, on average, of lower income levels than e-vehicle operators-- where there is already a gas tax being paid). I propose that a new e-vehicle tax be added in addition to the new toll fees that will be paid by all road users; the burden of paying transportation taxes will be more evenly shared (and hopefully less regressive).
  5. The Portland metro area has a very large percentage of vehicles using the road system from the state of Washington. These out of state vehicles are on the area roads for multiple reasons: avoidance of paying sales tax, avoidance of paying income tax, to access activities in our metro area such as entertainment, and many more. Capturing tolls from these out of state users, who add significantly to congestion in the Portland metro, is imperative to reaching the goal of 45 MPH or better travel; and it is a fair "usage tax" for the benefit of shopping, recreating, and working in Oregon while getting the benefits of living in Washington.
  6. Clackamas County residents are at a greater disadvantage regarding the options for traveling by public transportation. There are little to no public transportation options along the I205 corridor in Clackamas County and unfortunately, the addition of light rail in this part of the metro area is not very likely for at least 10 years. Clackamas County residents are unduly penalized as compared to residents of Washington and Multnomah Counties due to the lack of public transportation options; because of this disparity, Clackamas County residents should be eligible for reduced toll charges.
  7. Sadly, the Urban Growth Boundary has created some of this intense traffic congestion. Packing the population into such a small area may preserve some of the natural beauty outside of the area but creates issues leading to decreased livability within the boundary for some residents. I believe the plan for implementing tolls is part of this decreased livability by making the cost of living go up. The Portland metro already has a very high cost of living that prices many people out of the market of home ownership or affordable rent. There is an out-of-control homeless population that is evidence of this factor. Adding the burden of tolls to low and middle income families seems cruel and out of touch on the part of policy makers.
- Thank you,



**ODOT I-205 Toll EA - RECORD #2884 DETAIL**

**Submission Date :** 4/20/2023  
**First Name :** Kristine and Lonny  
**Last Name :** Webb

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** We have a psychotherapy business, and our people already struggle to get to our location, and if there are tolls, we are going to lose our Portland business because they're not gonna want to deal with spending five or 10 extra dollars each visit— this is horrible for our properties, and this will cause so much traffic on Willamette Falls Drive... This is definitely not something we support! Besides that, my son goes to school in Tigard, and will have to go back-and-forth several times in a day to work, so many events to go to, as we take our children places, it feels very unfair!!

<b>ODOT I-205 Toll EA - RECORD #2885 DETAIL</b>
---

**Submission Date :** 4/20/2023

**First Name :** Taylor

**Last Name :** Boudreau

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
The volume of auto traffic will always meet capacity of the infrastructure built. We don't need to widen 205, we need to better support communities and alternative transportation models that are sustainable without freeway expansion. As a lifelong oregonian, and one day hoping to see my kids grow up in this state, lets look at the real cost of freeway expansions, and make decisions based on those studies to make better choices for our future and invest in alternatives to larger freeways. We only have so much money and time, we can do better.

**ODOT I-205 Toll EA - RECORD #2886 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Leah

**Last Name :** Duda

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :**

To whom it may concern -

I have to register my strong opposition to tolling on ANY Oregon road/highway/freeway/bridge.

We pay our taxes so that, our elected officials, can run Oregon in a responsible manner. ODOT employees are not elected officials - but yet you are trying to create rules and bypass the way rules/laws are supposed to get made.

If your reasoning is that there isn't enough money to fix the roads: In the last number of years, instead of doing the maintenance and repairs that need to be done, you have let our road and bridges become neglected until they need more than a little fix. When roads need work, we have already paid, through our gas taxes for that to be taken care of. Do your job, don't try and be rule makers to cover up your incompetence.

If your reasoning is that the roads are too crowded: Trying to price us, the owners of the road, off the roads is not the way to do it. Your job is to maintain the roads, not decide who you want to be able to afford to use the roads. This is a policy that hurts the most vulnerable people in our society. This WILL cause those who can no longer afford to use the toll roads to use side streets which will just shift the traffic issues and make neighborhoods more unlivable. People need to get to work.

**NO TO TOLLING.**

Stay in your lane and maintain the roads. Leave 'legislating' to the people whose job it is to do that, our elected officials.

<b>ODOT I-205 Toll EA - RECORD #2887 DETAIL</b>
---

<b>Submission Date :</b>	4/20/2023
<b>First Name :</b>	Paul
<b>Last Name :</b>	Edgar
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email

**Q3. Comments :**

Please replace any previous comments or documents submitted by Paul O. Edgar on the I-205 Toll Project, Environmental Assessment. This was laid out and formatted for printing. Please confirm, receipt of this document, as I am having problems with exporting this document, that has gone many editing efforts.

<https://1drv.ms/w/s!AoaSFxTT9NQogTyGv3wn-WsbDZAn?e=g8FU7B>

[Text from attachment]

The Environmental Assessment prepared by ODOT on the I-205 Toll Project was completely inadequate and did not do a deep enough analysis on the diversion effects of tolling. Therefore, it is imperative that a more detailed Environmental Impact Statement (EIS) is prepared and completed. The potential effects of tolling are set forth in the following pages, to justify this critical need for an EIS process. Oregon House Bill 3055 created and provided financing options that allowed the first phase of the I-205 Improvements Project to proceed without toll revenue and/or Federal Funding. This first phase, referred to as the I-205 Project, Phase 1A, includes reconstruction of the Abernethy Bridge with added auxiliary lanes and improvements to the adjacent interchanges at OR 43 and OR 99E.

**Section 1.4 Need:**

An in-depth review on diversion impacts, to meet federal standards "are not required", within FHWA and NEPA, when Federal Funding is not being used within this I-205 Corridor Improvement Project. If tolling gains FHWA approval meeting limited and lesser standards upon completion of Environmental Assessment and limited review of Diversion Impacts the I-205 Toll Project, toll revenues could be used to pay back any loans for Phase 1A. However, if the I-205 Abernethy Bridge is tolled, along with the rest of the I-205 Improvement Corridor, this changes multiple elements of this stated need for funding from Tolling. The EA, however, omits that there are far less egregious abilities to create revenue needed to complete the I-205 Improvement Project in Phase II out to the Stafford interchange. There are alternative methods available for this lesser amount, for the funding of the remainder of Phase II of the project. Continuing the course of fuel/gas tax increases that were put into place with HB 2017 where annual two cents per gallon in fuel/gas tax occur are now scheduled to end in 2024. Just continuing these fuel/gas tax on from year 2025 to year 2030 as an example what should be considered, for many reasons. There is this need to just keep up with inflation and systemwide capacity and safety needs. This would create an additional approximately 500 million dollars per year in revenue with virtually no additional administrative cost, when compared to the administrative costs of tolling.

This also eliminates the highly negative impact of diversion on the neighboring communities that would be impacted by significant and foreseeable diversions of vehicular traffic on to side-streets, roads, highways, and bridges. This diversion would also create foreseeable negative social, economic, and diversion impacts, that are harmful to public safety within Clackamas County's regional area, cities, communities, people, and businesses. The historic prohibitive cost of Tolling Administration creates lesser value to net tolling fees collected, to net revenue generated and it makes the use of tolling to gain revenue far too expensive. Creating new abilities to generate revenues, which eliminate the projected need of tolling by increasing the Fuel/Gas Tax, and vehicle miles driven tax on electric vehicles, importantly adds the positive effects of greater collection of revenues that can be directed to transportation needs. An additional benefit is derived from fuel/gas taxes where it is shared with the counties and cities of that equally need these revenues for transportation investment. This also has the effect of reducing vehicle miles driven (just on cost alone) and reducing vehicle carbon emissions. This becomes another reason for vehicles owners to choose to move to more high efficiency electric and hybrid vehicles. The comparative consequences of tolling or not tolling the I-205 Abernethy Bridge, which has an estimated-on average of 107,000 daily vehicles crossings, needs to be assessed in detail. The FHWA has an implicit requirement to analyze the combined system wide cumulative effects, within this EA and/or within a full Environmental Impact Statement (EIS) all the foreseeable system wide impacts of diversion and re-routing of vehicular traffic. The justification of the impact of the proposed 24 hours, 7 days per week of tolling, with suggests Peak Period Tolls of \$2.20 and \$1.00, or \$0.55 for off Peak Periods per tolling sector, and what its effect will be. How far out diversion and re-route of trips

will begin and how it will affect all regional area traffic, needs to be compared within a benefit analysis of "Build Without Tolls, and NO Diversion against that of "Build with Tolling," and assessing in detail the impact of massive regional re-routing of trips. The importance of and long-term ramifications of diversion and re-routing are not being responsibly assessed as to the harm that will result, that would be revealed within an Environmental Impact Statement (EIS) process. What is being done, appears to be a purposeful attempt on the part of ODOT and some in the legislature and it is more than an error in judgement, in the harm that will come about in Clackamas County and to its cities, people and businesses.

This should not be allowed, there is reasonable justification of need for an EIS within the natural environment in accordance with the National Environmental Policy Act (NEPA), which eliminates financial hardships and burdens on individuals, families, and businesses, which cannot afford those burdens. The First City of the Oregon Territory, Oregon City, and its Historic Downtown could become impassible with foreseeable diversion. To omit this from this EA and not discuss the options to fund the lessor amount need to complete the I-205 Corridor Improvement Project, within a "Build without Tolling", is more than an error in judgement, it's an omission that is required with the natural environment in accordance with the National Environmental Policy Act (NEPA), to ask and require that a "Full, Environmental Impacts Statement" is made.

It is when this proposed tolling is combining the additional tolling sectors and this added cost in traveling in the rest of the proposed I-205 Corridor tolled area increases the total cost, and that this accumulative effect could easily result in greater than 50% of the 107,000 vehicles choosing to be re-routing these trips to alternative routes, because they cannot afford to pay this accumulative tolling costs. This routing of these vehicles will most often put high numbers of vehicles on infrastructure routes, that by design do not have the built-in capacity or safety considerations to manage this additional vehicle traffic, as there are limited to NO multi-Mode alternatives in this transit wasteland. Historically, the I-205 Abernethy Bridge may currently manage close to 98% of all the vehicles that cross the Willamette River in this geographic area within the fifty miles between the other options, other than the limited capacity narrow Arch Oregon City – West Linn Bridge. Therefore, it is foreseeable, that this limited capacity Arch Oregon City – West Linn Bridge will become a focal point of re-routing and diversion because it would be the singular and only other way to get across the Willamette River without paying a toll for approximately fifty miles. It is therefore foreseeable that it is reasonable to expect estimates of quadrupling -plus the vehicle usage and congestion on this bridge and all the roads, arterial, and highways that lead to it or feed it or are coming from it. 1.4.2 Traffic Congestion Results in Unreliable Travel, with System Wide Implications In 2018, on average, more than 100,000 vehicles used the section of I-205 Corridor between Stafford Road and OR 213 each day (ODOT 2019). And for most of its 26.5-mile length of the I-205 Corridor it has three through lanes in each direction, but in this bottleneck area of the I-205 improvement Area, it has only two lanes in each direction. Expanding the I-205 with "Build with Tolling", expanding its capacity by adding one additional lane and tolling all lanes of this section of I-205 Corridor will achieve all of the needs of eliminating congestion in the I-205 Corridor, but the diversion that currently exists with re-routing will get much worse with more diversion to the I-5 Corridor and to all of the side-streets, roads, highways, and bridges. Let's hypothesize, that some of the most effected diversion routes will start with traffic coming from Portland and Multnomah County, south bound, and significant numbers will make choices to choose to use the Sellwood Bridge to get across the Willamette River and route themselves to highway 43 on the west side of the Willamette River and highway 99E/McLoughlin Blvd. on the east side of the Willamette River depending on where they need to end up. Within this hypothesizing, the tolling of the I-205 Abernethy Bridge, already difficult with congestion and safety problems on Hwy 43 and Hwy 99E will surely become much worse and see increases in incidents of travel of 10% to 20%, 20,000 additional daily trips, slowing the commute times of all traffic and buses. This makes first and last mile congestion and the added time that it takes much greater and eliminates any suggested advantage of the time reduction that it takes to travel through the I-205 Corridor Improvement area. As we get closer to the

focal point of the I-205 Abernethy Bridge and the diversion effect of tolling and where re-routing will take these vehicles, let us look at Downtown Oregon City and its maze of narrow streets, starting with 7th Street and Main Street at the east end of the Arch Bridge. This is a major choking point for traffic going east or west on the Arch Bridge. East bound traffic going across the Arch Bridge but heading in a general north bound direction will flow straight toward the Oregon City Municipal Elevator and turn on to a very narrow one-way Railroad Street that abuts the UP-Railroad Tracts and a 150-Foot-Tall Rock Wall that separates the upper and lower parts of Historic Oregon City. This traffic Railroad Avenue goes up a couple blocks and turns left on 9th St., with the majority crossing Main St. at a stop sign where they go to Hwy 99E. This route is currently at capacity, in all peak-period hours. The elevated levels of incidents of travel and limited capacity that exists limits its use. East bound traffic heading south into Oregon City on the Arch Bridge, will turn onto Main St. and flow to the major intersection of Main St. and Hwy 99E/McLoughlin Blvd. On average an estimated 80% of all the east bound traffic that crosses the Willamette River on the Arch Bridge flows to a managed traffic control stop light at 99E and Main St. This is a critical choke point, and it has few opportunities to correct its problems and no way to mitigate the conditions that exist. This intersection has the additional problem of becoming a major pedestrian crossing point as the result of a re-development of the site of a long-closed Paper Mill. Dealing with the timing of the pedestrian crosswalk lights and the timing needed to eliminate or reduce the queue of vehicles coming east bound across the Arch Bridge is dependent and problematic in how it affects the flow of traffic on Hwy 99E. The future and the dream of the Willamette Falls Legacy Project and the River Walk in conjunction with the re-development plans of Confederate Tribes of the Grand Ronde, owners of the properties their re-development are at stake. Hwy 99E/McLoughlin Blvd. at this point/location carries a designation of a strategic Urban Freight Route, in level of importance. It can become critical "Choke Point" within how it can affect the regional economic activity. The dynamics of this singular intersection with its constrained abilities to make possible most any mitigation, because of topology and this 150 Ft. Tall Rock Wall, RR Tracks, and a sharp 90 degree turning tunnel, less than one hundred feet east of the intersection on Hwy 99E. Big trucks are forced to use both lanes to traverse and navigate through the tunnel, and this makes for a very difficult, restrictive, and dangerous place in this north/south strategic Urban Freight Route. Additionally, there are these projections where in the future there can be many thousands of additional daily pedestrian crossings with the Willamette Falls Legacy Project and its River Walk and the re-development and the coming and going with the Grand Ronde Native Developments all of which compounds all considerations at this Hwy 99E and Main St. intersection. Foreseeable diversion and re-routing of this east to west and west to east traffic, just to get across the Willamette River and not use a Tolled I-205 Abernethy could put 10,000, 15,000 or 20,000 additional vehicles daily on this Arch Bridge route, and this too critical to fail intersection of Hwy 99E and Main St., and the consequences are so great. The movement of vehicle traffic east to west bound on the Arch Bridge gets an equal flow from Main St. turning left and right with the traffic going north from Canby on Hwy 99E flowing to Railroad St. immediately after going through the Hwy 99E tunnel. This is the primary route most vehicles travel going north from south of Canby but needing to go across Willamette River that the majority will take except big trucks and trailers. The foreseeable impacts of tolling the I-205 Abernethy Bridge, and the subsequent re-routing and diversion could lead to and force much of the north bound Hwy 99E traffic to choose to re-route away from using Hwy 99E from far away. The large, successful, and industrial and distribution complex of the Canby's Industrial area will have to adjust to different times of the day to travel and routes to attempt to not be caught up in the regional congestion, brought on by I-205 Tolling Project and the subsequent diversion to not pay tolls. All the citizens who live south of the Arch Bridge but need to go north and must go across the Willamette River will scramble to create alternative routes, and this will impact route management that lead east to Hwy 213 and west to I-5 and it will be subsequently costly, in time lost and payroll and equipment costs with greater miles driven. 1.4.3 Traffic Congestion Affects Freight Movement With tolling of all I-205 Corridor lanes in the improvement area and an additional travel lane should

experience less congestion with the capacity gain and result in improvements in freight movement within the I-205 Toll Project area only. However, all gains in the time it takes will be lost or reduced in all other areas in Clackamas, Marion, and Washington Counties. With a projected potential of 50% of the average daily trip in the I-205 Corridor Improvement Area, experiencing re-routing through diversion, anywhere and everywhere else, which will reduce overall Freight Mobility and increase regional Freight Mobility Costs. However, with a "Build without Tolling" option, it eliminates all diversion and reduces diversion of big trucks and commuters into the I-5 corridor and intercity Portland. 1.4.4 Traffic Congestion Affects Safety "Build with Tolling", pushes high numbers (50%) of vehicles into choosing to re-route their trips just to not pay a toll, from safer conditions in the I-205 Corridor, to less safe side-streets, roads highway and bridges than what would be available in the I-205 Corridor to fewer less safe areas, including school cross walks. "Build without Tolling" eliminates most all unnecessary diversion and the reduction in Public Safety. 1.4.5 Traffic Congestion Contributes to Climate Change The I-205 Build Option with Tolling adds to and increases Climate Change Congestion, by making it worse overall, with high rates of diversion into more dense Urban Setting. This creates a greater level of Green House Gas Emissions, away from the I-205 Corridor in the neighborhoods, side-streets, secondary roads, highways, and bridges which will experience higher levels congestion coming from re-routing and congestion. 1.4.6 Oregon's Highway System is Not Seismically Resilient The I-205 Abernethy Bridge Seismic Improvements are under construction and will become Seismically Resilient with or without Tolling of the I-205 Abernethy Bridge. This part of I-205 Improvement Project, Phase 1A, was authorized, within the HB-3055 and this 495-million-dollar project is in construction, and the money to complete the project will be secured, with or without Tolling. Phase 1A is a committed, State of Oregon STIP listed project. Making the whole I-205 Corridor Seismically Resilient will take time, but Oregon will have the I-205 Abernethy Bridge over the Willamette River complete for east, west, and north and south vehicle movement. 1.5 Goals and Objectives The past Portland area I-5 Corridor land use and transportation investments have resulted in negative cultural, health, and economic effects on local communities and populations, and have disproportionately affected historically and currently excluded and underserved communities. These Clackamas County communities are again, being left out of transportation planning and decision-making processes. However, in the I-205 Corridor none of what was done in the I-5 Corridor, happened in Clackamas County. However, with I-205 Corridor Tolling it is foreseeable that significant diversion into neighborhoods and communities reverse "Equity and its Goals and Objectives" and go against what is right and safe for these communities in Clackamas County, and its cities, people, businesses, and some are going to be again sacrificed, even when it is not necessary, as one size does not fit all.

- This Goal: Provide benefits for historically and currently excluded and underserved communities, has limited application in Clackamas County and the immediate area of the I-205 Toll Project. Tolling, however, could harm Clackamas County, its cities people, and businesses to a degree, where it will be necessary to have an account set up for compensation, for those harmed by this unnecessary I-205 Toll Project.

- This Goal: Limit additional traffic diversion from tolls on I-205 to adjacent roads and neighborhoods, it just cannot be achieved. There are no practical ways to mitigate foreseeable massive diversion, on to side-streets, roads, highways, and bridges because of Tolling, and topology restraints and the existing wasteland of viable transit options, and abilities. Any diversion and re-routing will effectively paralyze the area.

- This Goal: Support safe travel regardless of mode of transportation. In a transit wasteland, with massive topology restraints, there are no practical options and opportunities to make transit work. Many of the regional incidents of travel come from low to moderate density and transit has never been justified. In less dense urban settings, the use of passenger vehicles and trucks is the only workable option available.

- This Goal: Contribute to regional improvements in air quality and support the State's climate change efforts. This proposed Build with Tolling will accomplish the opposite of this stated goal. It will increase re-routing and diversion into the highly congested intercity I-5 Corridor of Portland and will



make congestion worse and cause greater carbon emissions. Diversion into neighborhoods and side-streets, and minor arterials that feed these neighborhoods has consequences. These neighborhoods will experience significantly greater incidents of travel and it will make safety conditions worse. Highways like 43 on the west side of the Willamette River and Hwy 99E/McLoughlin Blvd. on the east side of the Willamette River will surely experience significant diversion and loss of Public Safety. "Building Without Tolls," however, would eliminate all this foreseeable diversion, brought about by people who just cannot afford to pay tolls, or accept the imposition of tolls.

- This Goal: Support multimodal transportation choices.

This I-205 Corridor Improvement is in a transit wasteland with major topology restraints, of the Willamette River, limited walking paths and bike trails linked together. There has not the necessary densities of population and with little flat lands, and with difficult impediments to making most multi-mode transportation options, not viable for TriMet or anyone.

- This Goal: Support regional economic growth

"Build with Tolling" creates foreseeable negative impacts of massive diversion will make local freight mobility impossible into Clackamas County on Hwy 43, Hwy 99E/McLoughlin Blvd. This will result in reducing economic output and jobs in Clackamas County. Tolling the I-205 Abernethy Bridge put all this re-routing and diversion into places where it should not be. The Cost of Tolling will have a major effect on increasing regional inflation and the cost goods and make conditions even worse for those who live and work in Clackamas County. It will reduce economic output and place a burden on the rest of the I-205 Corridor with added costs together with the total impact of tolling diversion, making it a worse case.

- This Goal: Support management of congestion and travel demand.

When massive traffic diverts away from the I-205 Corridor creating congestion in non-monitored areas and travel demand management does not reach into, there are limited solutions, other than to eliminate Tolling and stop unnecessary diversion in all areas other than the I-205 Corridor.

- This Goal: Maximize integration with future toll systems is flawed when it becomes more problematic

The need of tolling within intercity I-5 Corridor in Portland is completely different than the need to have a free-flowing beltway/freeway designed to move traffic away from congestion. Where you have population densities, to support transit with the necessary infrastructure to where it can operate with a ROI is not what exists in this I-205 Toll Project Corridor and Improvement Area.

- This Idealistic Goal: Maximize interoperability with other transportation systems

Uber, Lyft and TriMet Lift can work in this Clackamas County topology of the I-205 Improvement Area, which is otherwise a transit wasteland with NO practical and justifiable TriMet transit options. New thinking, stepping away from the old transit model, with or without TriMet needs to be considered. Small, all electric "Jitney Passenger Vehicle" and/or cars that can be ordered out and pick up a person as part of automated routes, where with accounts setup to where a person can order from their phone, and it becomes much like a Taxi, or an Uber pickup. That model could be expanded, but everything currently in existence in the regional Portland area has little or no applicability in Clackamas County, I-205 Improvement Area.

#### 1.6 Next Steps

- FHWA should not already arrived at a determination on if this project, as it would have significant adverse effects on the human and natural environment and whether additional environmental analysis in an Environmental Impact Statement is needed in being compliance to NEPA understanding guidelines; or the Project's effects (considering mitigation commitments) warrant a Finding of No Significant Impact (FONSI).

If a FONSI is issued, it would include FHWA's conclusion that the Project would not create significant adverse effects and would identify ODOT's mitigation commitments. I would not want to be that person making that ruling without having complete discovery of the foreseeable impacts of diversion and re-routing.

The FHWA, in this case of proposing the Tolling of the I-205 Corridor and I-205 Abernethy Bridge, must conclude that significant adverse effects would occur. They must mandate that an Environmental Impact Statement process

occur, if tolling is permitted as proposed, with only an Environmental Assessment which provides limited review of System Wide diversion implications, and the accumulative effects diversion and re-routing would result in a major "Error in Judgement."

## 2 Project Alternatives

### 2.1 Alternatives Assessed in this Environmental Assessment

This NO Build or Build alternative with Tolling is not in compliance with what is reasonable FHWA and NEPA Environmental Assessments, as there are more options available. The I-205 Improvement Project has started, and Phase (1A), of the project has an approved and contracted for 495 million dollars and it is secured with ODOT funds enabled with HB-3055 legislation and additional short-term financing, when needed.

2.1.1 No Build is not an option, as this project has started.

Additional Funding Options exist, and this is all about priorities.

2.1.1.1 Build without Tolling, Option.

The net revenue potentialities with significant levels of diversion, mean lower revenue and it increases the cost/overhead of Tolling Administration (which has been historically greater than 40% of gross tolling revenue collected), reducing the Net Value of Tolling Revenue Collected. When compared to out-of-pocket costs to the people and businesses with the option of extending the HB 2017 Fuel/Gas Tax increases for another five years (2025 to 2030). This would result in greater net revenue for ODOT (estimated to be greater than five hundred million annually).

This would also eliminate the draconian implications of "Build with Tolling" and the harmful impacts that result of foreseeable diversion, which can kill the viability of City's like Oregon City and its historic Downtown, just from diversion and re-routing of trips and making normal movement impossible. The accumulative effects, of foreseeable System Wide Diversion, has not been responsibly analyzed, and this requires an Environment Impact Statement process as the Next Step.

2.1.2 Build Alternative with Tolling

This "Build with Tolling," as the only build option, is again an error in judgement, on the part of ODOT, OTC, Metro, and the Legislature, as the I-205 Improvement has started, and funding was created under HB-3055 and they also cannot mandate tolling without FHWA, and NEPA compliance and acceptance.

The foreseeable implications that are available in alternative funding choices/opportunities that do not reduce public safety, hurt the economy, and eliminate diversion, and all the negative things that it brings on, should be enough to reverse any consideration to continue the proposed tolling of the I-205 Corridor and I-205 Abernethy Bridge. This is just a "Critical Thinking" process of comparing multiple choices of build with tolling, or build without tolling, and it just comes down to a Value Structure, and eliminating the least favorable choice.

There is this need to review what we know!

1. What exists is known conditions with topology restraints, inability to create reasonable multi-Mode options.,
2. System Wide adverse and crippling effects of diversion and re-routing on Clackamas County, its cities, people, businesses, and economy.
3. The current diversion that now exists, is something that ODOT and Metro have known about for decades. The failure to address a critical choke point created conditions where vehicles divert from using the I-205 Corridor because of the lack of capacity and the congestion it creates.
4. These vehicles diverted everywhere, and this should not have happened. That was known 25 years ago, and at that time Federal Funding made improvements from the I-5 Corridor to the Stafford I-205 Interchange.
5. The funding priorities of funding non-essential experimental transit projects, and TriMet's Light Rail Transit (LRT) reduced and eliminated critical funding needed for our strategic Interstate Highway System. This prevented acting on what we now know and categorize as essential.
6. The capacity restraints of the I-205 Corridor that causes vehicles to divert to the I-5 Corridor and side-street, roads, highways, and bridges, makes greater System Wide Conditions much, much worse.
7. This decision to fund non-essential projects over essential projects will only continue with Tolling the I-205 Corridor and the I-205 Abernethy Bridge and if allowed it will continue to push more vehicles on to side-streets, roads,

highways, and bridges where they should not be, but because of the cost of tolling.

8. The hardships and loss of safety that will occur by causing people to choose to find alternative less safe routes that are not tolled.

9. The tolling of the I-205 Corridor and I-205 Abernethy just must not be allowed as this is about greater good compared to greater harm from the effects of higher number of vehicles diverting to non-tolled routes that result in reducing public safety across the whole of roads and highways, harming higher number of people, and becoming more and more intolerable.

## 2.2 Alternatives Considered but Not Advanced

### 2.2.1 Alternative 1: Abernethy Bridge Toll

Exploring this statement about the logic and having a “Single Gantry or Not,” is a look into what is important as a single gantry or not might have allowed someone to find their way across the bridge without being charged a toll and this decision, is all about gaining more revenue not managing congestion. With the proposed I-205 Corridor Improvements, adding additional lanes, and eliminating the choke points, there is effectively no congestion left to manage, as it has moved the traffic and congestion from the I-205 Corridor to non-tolled side-streets, roads, highways, and bridges.

However, the most important option about tolling all lanes of the I-205 Abernethy Bridge is that 98% of the people for fifty miles will have to choose to re-route their trips to get across the Willamette River or to pay a toll. What that will create is un-charted decision making. How all people and businesses will respond will be made based on their Value Structure, and the cost of money and time. How it will affect and directly cause diversion and re-routing to alternative routes will be much higher with a total lack of multi-Mode choices and alternative methods.

This immediate area around the I-205 Corridor Improvement area and the I-205 Abernethy Bridge is a “Transit Wasteland”. The practicality of all transit options over the years with its degree of difficulty of creating the necessary ridership to justify their existence has led the transit providers to never consider expansion as being justified and to now suggest in this EA that it is, is irresponsible and reflects a lack of integrity.

There are few if any multi-Mode options, therefore most of the people and businesses do not see any effective multi-Mode options as viable in the regional marketplace. Cloud based and smart phone accessed public transit, with route management, could emulate Uber and Lyft, and pickup shuttle people at less cost to provide those services than today’s transit offering.

The un-charted problems or inability to be able to afford paying a toll to cross the Willamette River, in this 50-mile section between bridges is to re-route to the alternative, the narrow and restricted capacity Arch Oregon City–West Linn Bridge. This is foreseeable and with proposed toll rates of \$2.20 in Peak Hours and \$1.00 in just off-Peak Hours, this could result in 50% of the 107,000 average daily crossing choosing to find alternative routes to get to destinations on the east and west sides of the Willamette River. This will put people and businesses on to alternative routes long before getting to Oregon City or West Linn.

This proposed tolling of the I-205 Abernethy Bridge will surely make up to 50% of the 107,000 estimated average daily crossing of the Abernethy Bridge to consider choice that are less safe, more problematic, and even if it is 15 miles out of the way, they will take it, just to not pay this toll. It is foreseeable that far too many will choose to cross the Willamette River on the narrow Arch Oregon City-West Linn Bridge, and in doing so create very - very harmful conditions and System Wide chaos.

### 2.2.3 Alternative 4: Segment-Based Tolls – Between Stafford Road and OR 213

This possible alternative was ruled out by the fine print of what is eligible for funding approval, under the federal tolling authorization program codified in 23 U.S. Code Section 129 (Section 129). The problem is the tolling of the existing 2 lanes in each direction, and this needs to split the hairs because the Federal Code does not want to allow ODOT the tolling of paid for existing lanes. It is how they can get around the intent to not expose themselves to only being able to offer a Tolled Express Lane, and where it becomes an option to choose or not choose a faster toll lane.

Gaining more tolling revenue, become more important than the more costly

scarifies that will have to be made in Clackamas County and the greater System Wide implications of the negative effects of diversion and harm to the economy, property values, livelihoods, economic development, family's ability to pay rent-home payment- food on the table.

The failure to reasonably explore all options other than tolling, and prioritize the use of all existing funds available, and an assortment of options to gain additional funding, and it comes down to priorities of funding essential projects or continuing to fund the many non-essential projects, which continue to solve, little or nothing.

### 3 Affected Environment, Environmental Consequences, and Mitigation

This chapter describes the environmental features and resources that would be affected by the Build Alternative with Tolling. Sections 3.1 through 3.14 include descriptions of the area of potential impact (API) for each resource topic, and existing environmental conditions.

What this chapter does not tell you or us is that there is and has been this need to accomplish the positive potentialities of the I-205 Corridor Improvement Project with the adding lanes and creating a seismically upgraded I-205 Abernethy Bridge, and that has been a recognized, as an essential need and that should have been part of existing priority funding, over the last 25 years. This a reflection of "Errors in Judgement."

The consequences of not having these I-205 Improvements and not having one seismically upgraded bridge that crosses the Willamette River is unacceptable within National Security parameters of need. The fact that there are no other seismically enhanced bridges in Greater Portland area makes this already started improvements to the I-205 Abernethy Bridge a foregone critical need.

However, the only way/ability to mitigate the crippling effects and problems of diversion and re-routing that are a foreseeable result of this project is to just eliminate the Tolling of the I-205 Abernethy Bridge as it potentially is the only effect way to mitigate the harm that would arise from Tolling Diversion and re-routing.

The "Benefit Analysis" of the positives as compared to the negative of "Build with Tolling" where with all the negatives, consequences, and side-effects, that tolling brings on, compared to "Build without Tolling" and virtually eliminating diversion, will lesson area wide congestion and enhance overall safety and the value gain with all the positives without the negatives, and it is the only true win-win.

#### 3.1.1 Affected Environment

Transportation, Area of Potential Impact in Figure 3-1. Maps are one third or less of the true impact area that would have significant tolling diversion impacts. What is in Figure 3-1 is an attempt to minimize the scope of the System Wide Impact Area, from what it truly is. Where diversion will start and stop and how this will permanently alter economic viability in the greater Portland Area have been understated, in its System Wide, Greater Portland Implications.

The Tolling Costs cannot be absorbed by those who use the I-205 Corridor and I-205 Abernethy Bridge, and it will add to all costs and create greater Inflation. This will negatively affect most everything and everyone, adding to the cost of doing business, and the cost to live and work in this area. Those increases in costs will ripple across Oregon and SW Washington and make this area less attractive to live in and invest in. The financial resources necessary to be above the poverty level within the regional "Self-Sufficiency Standards" to be able to live in the Greater Portland Area and Oregon will become worse.

#### 3.1.1 Existing Travel Patterns

It is necessary to put this into context, using the following EA descriptions: "Most I-205 travelers in the API currently originate from the nearby areas of Gladstone (12%), West Linn (10%), Oregon City (8%), and Clackamas (8%). Fewer travelers come from areas farther away, including approximately 3% from Clark County in Washington. About 25% of I-205 trips in the API are through trips, and about 75% are local trips, meaning they enter and/or exit I-205 at one of the five interchanges in the API."

1. 75% of the trips are local, as there are no multi-Mode options or virtually anything that can enable these users to get around other than the I-205 Corridor and I-205 Abernethy Bridge, and with a new 3rd lane and NO tolls, with the bottleneck is effectively removed, there will be limited to no reason or

justification for congestion management.

2. Yes, a Free-Flowing I-205 Corridor will induce diversion from the I-5 Corridor and that is not a bad thing. Yes, it will also induce traveling from and on less safe, slower in travel time use of side-streets and secondary roads that lessor capacity.

3. However, with fewer than 25% are those traveling in the I-205 Improvement area identified as through trips, the added foreseeable cost of tolls will be enough inducement for the many, who would have been previously identified as those who would choose to move away from the I-5 Corridor and intercity Portland Congestion.

4. The burden of the proposed tolling is therefore disproportionately targeting the local users, the cities, people, and businesses who have virtually had no other choice but one.

5. This will create therefore be a foreseeable, diversion and re-routing where the 75% who originate locally will identify side-streets, Hwy 43, Hwy 99E, Willamette Falls Drive.

6. A major focal point will become the narrow Arch Oregon City -West Linn Bridge of which there is NO Way, to Mitigate what this limited capacity structure will mean, when vehicles stack up and congest all streets going to and from this Arch Bridge.

System Wide Diversion impacts, start just north of Salem, with determinations made diversion choices chosen within determining what routes that will be considered and taken going north, and with the knowledge of the limited capacity of the I-5 Corridor and its 2 lanes in each direction choke point on the east-bank of the Willamette River. Those who cannot afford I-205 Tolling and "Last Mile Congestion" of all side-streets, roads, highways, and bridges makes possible options to choose to use, Hwy 99E or more east to Hwy 213 and those choices will be evaluated long before going through Woodburn, on I-5, this EA provided map. The System Wide implication of diversion are purposely understated, as there are few of any abilities to effectively mitigate their negative impacts.

System Wide Diversion Impacts of vehicle coming from areas Immediately south of Portland, equally will have determinations made before leaving the City of Portland or Multnomah County and if their destination is east or west of the Willamette River and how Tolling will affect what happens with I-205 tolling and diversion. For many the foreseeable added cost of Tolling and their inability to be able justify that cost will turn many away from employment in Portland, and employers from having facilities in Portland.

The Tolling of the I-205 Corridor and I-205 Abernethy Bridge Improvement Area and if users fall within the income area, that are affected by the minimums of the Self Sufficiency Standards with families and children, or just single or a couple, but those who struggle to have the necessary the money available for basic subsistence of being able to afford to keep a roof over their heads and food on the table and to pay for everything else that allows that to happen. These people and employment-oriented trips, they will divert to a non-tolled route. That can represent greater than 50% of the motoring public and businesses that are part of the 107,000 estimated average daily trips that go across the Willamette Rive daily, and those will choosing alternative routes.

These are tolling consequences cannot be mitigated and to most part. The harm that this will cause to the social fiber that holds these communities together should not be tested, when there are multiple other options other than tolling, which can be considered. Again, within re-stating, the options of extending the 2 cents a gallon of fuel/gas tax from year 2025 to 2030, would result in gaining and estimated 500 million Dollars annually in new fuel/Gas Tax oriented revenue that would come to ODOT for distribution. The cost of collection of this fuel/gas tax revenue is negligible as a percentage of the revenue gained. When it is compared, to the "Historic Cost of Administration of Tolling and Collection," like what is currently happening in the State of Washington where with the Big Tunnel Project, where it exceeds 40% of gross tolling revenue using the same proposed methods and out of State Tolling Administrative Companies. The State of Washington is also experiencing with the Big Tunnel Project, high rates of diversion, just to not pay the toll.

There are many additional tolling consequences, and staffing with an increase in ODOT administrative overhead is a given. Adding staff that do

not add to projects and do not create deliverables themselves, in making our transportation system better become a political negative. The comparison between what exists today in revenue collection, with weight mile taxes and fuel/gas tax, registration and licensing Fees & Taxes and all others is minor to what it could be or will be or is now. Adding Staff to make tolling happen and to sustain its operation, including their PERS obligations, needs to be compared side by side with the current revenue methods that are in place. This is all about being intelligent in making sure within Critical Thinking and Weighted Values as to what derives the best net result, ROI/Return on Investment, for the taxpayers, the people that fund Transportation Investments.

#### 3.1.1 Traffic Volumes

Making the I-205 Abernethy Bridge a bi-directional Tolling Point, creates conditions and complications in that it disproportionately is used by 98% of 107,000 and 75% being local trips of those who need to get back and forth across the Willamette River for fifty miles. It surely is going to put 50% of those who use this bridge in a place where diversion and re-routing just to not pay this toll into their daily consideration. This need, to get back and forth across the Willamette River without paying a toll, has the side effects and the most prominent is that of re-routing to the narrow Arch Oregon City-West Linn Bridge as an alternative. It is foreseeable that far too many will choose to divert to this alternative route and cause massive diversion and congestion to come about to the Arch bridge, Willamette Falls Dr., Hwy 43, and Hwy 99E/McLoughlin Blvd. 30,000 to 50,000 vehicles daily will be making determinations of what routes to take, creating System Wide congestion making many routes to become impassable for hours and hours, in Peak Periods.

#### 3.1.1 Traffic Operations, I-205 Operations

It is necessary to put this into context, using the following EA descriptions: Analysts evaluated existing traffic operations using metrics such as volume-to-capacity (v/c) ratios, 13 level of service (LOS), 14 travel times, and reliability. Although all segments 15 on northbound and southbound I-205 in the API meet the ODOT v/c mobility standard during the AM peak hour and PM peak hour under existing year (2021) conditions, the following I-205 segments operate at LOS E or F (meaning highest congestion levels and delays):

This I-205 Corridor Choke Point/Bottleneck has been identified and known for multiple decades for its negative impacts, diversion it causes, increases in cost of doing business and it was not prioritized as important or essential over these last 3 decades. ODOT and Federal Transportation Funding that has existed has gone to experiments with non-essential transit, and other multi-Mode options that have delivered little or NO Gain in solving congestion and diversion, by creating offering that attracted incidents of travel to use those investments.

Adding the 3rd lanes of travel to the I-205 Corridor will eliminate the I-205 Corridor Congestion, but Tolling this I-205 Improvement Area, will just make diversion much, much worse and move it indiscriminately to side-streets, roads, highways, and bridge that are not designed nor have the safety consideration to safely handle these massive increases in incidents of travel. This will push significant diversion into the highly congested I-5 intercity Portland Corridor, thus increasing congestion related Carbon Emissions. Average weekday travel times in all side-streets, roads, highways, and bridges, in the API could become too difficult to impossible with some at a complete dead stop for most of the day, making first and last mile after speeding along on an empty I-205 Corridor and attempting to get off and find that nothing is moving.

The multi-Mode availability of Transit in this API area of a "Transit Wasteland" is limited and not practical. All attempts to this point, to provide transit have proven to be very costly failures.

#### 3.1.1 Active Transportation – multi-Mode Options

Topology restraints, the Willamette River and nothing being flat and conducive to Bike and PED used, makes it impractical to be considered as a viable multi-Mode option that could be considered as a way that people can get around and not exposed themselves to choosing alternative non-Tolled Routes.

There are few, connecting Bike and Pedestrian Trails, because of topology.

### 3.1.1 Truck Freight Mobility

Having high numbers of Incidents of Travel diverting and no longer using I-205 Corridor, Freight Mobility will improve, just in the I-205 Corridor. However, all Freight Mobility, not on I-205 Corridor will be much worse than LOS F, as it is foreseeable that Highways like 43, and 99E and all the feeder roads and arterials that take traffic to and from the I-205 Corridor will come to a dead stop. This will kill local commerce and distribution.

### 3.1.1 Transportation Safety

The comparison of Traffic Safety of people and commerce traveling in a well-designed Interstate Corridor like I-205 as compared to all the side-streets, roads, highways, and bridges that are not designed nor have the safety consideration built into them, is the difference between day and night. This will make these alternate routes taken to avoid paying tolls nightmares, and will increase accidents rates, and result in killing more people who are just attempting to avoid paying tolls. The analogy of people going to Starbucks and getting a cup of their favorite drink, can become the difference in paying a toll or having their favorite drink.

### 3.1.2 Environmental Consequences

This section should summarize the short-term and long-term transportation effects of the No Build, Build with Tolling and Build without Tolling, as Alternatives.

The current funding for I-205, Phase 1A of the Abernethy Bridge Improvement Project, was enabled by HB-3055 and is not obligated to be funded by Tolling Bonds at this time. One of the purposes of this EA, is to gain FHWA approval that it does not violate NEPA guidelines in determining that Tolling would become highly detrimental to Clackamas County and its property owners, economy, cities, people, and businesses, because of diversion and re-routing. The only alternative of Build without Tolling should rise to become the number one choice.

This I-205 Improvement Project has started and there is no turning back, so the No Build Alternative, truly is no longer applicable or in consideration. The choice now is how do we pay and fund this I-205 Corridor Improvement Project. Build with Tolls or Build without Tolls and this then becomes this Critical Thinking exercise of Weight Values and comparisons of what is more important and provides the most benefits and Return on Investment/ROI.

### 3.1.2 Short- & Long-Term Effects

1. In West Linn, the Long-Term effects with Tolling and ramifications that this brings on with all three travel lanes on I-205 in each direction tolled creates these conditions. The travel speeds of traffic would be free-flowing on I-205 Corridor with no congestion and at the speed limit.

2. However, diversion will have very adverse effects on SW Borland Road, and Woodbine Road, Willamette Falls Drive, will experience an extremely elevated levels of diverted traffic. Sunset Avenue, and Broadway Street will equally experience elevated level of diverted traffic, with never ever level experienced, of new incidents of travel. Willamette Falls Drive could become exceedingly difficult to use as it becomes the alternative route to the non-Tolled Arch Bridge over the Willamette River. Elevated levels of diversion will occur on all side-streets and arterials in West Linn and on Hwy 43 to get to or from the Arch Oregon City-West Linn Bridge. The Hwy 43 and 99E/McLoughlin Blvd. will experience significant re-routing starting or ending with those coming from or going to Multnomah County and Portland. Those crossing the Willamette River on the non-Tolled Arch Oregon City-West Linn Bridge to avoid a toll will by habit chose this route even accidentally. Additionally, I-5, I-84, Hwy 213, and Milwaukie Expressway OR 212-224 will be heavily impacted.

3. Build without Tolling will have major positive effects, of eliminating all diversion to the I-5 Corridor. This also reduces critical mass in its highly restricted bottle neck areas like with and where I-5 and I-84 intersect on the east bank sections I-5, which is 2 lanes in each direction area. This section of the intercity I-5 Corridor is considered some of the most dangerous areas, and it is subject to high rates of accidents starting with the Terwilliger Curves going into this significant I-5, 2 lane Choke Point/Bottleneck, that includes between the Freemont Bridge and the I-5 Marquam Bridge with its very narrow lanes, all of which are too expensive to fix.

4. Diverting traffic away from I-5 Corridor and intercity Portland even suggests the need and consideration of adding a fourth through lanes on the I-205

Corridor as the most cost-effective approach to solving the System Wide capacity needs of north – south capacity into 2040 in the Greater Portland ODOT Region One. Having a “Free-Flowing” I-205 Corridor as a Route and Beltway that bypasses intercity Portland with adequate capacity is a financial win-win.

### 3.1.2 Traffic Volumes and Potential Rerouting Daily Traffic Volumes

This EA is inadequate in its depiction of diversion and re-routing and its foreseeable effect. The System Wide impacts with Tolling are very understated and it is alarming. They, ODOT’s Urban Mobility Office and Metro should know that, and if they do not know that they need to get another job or declare that their bias opinions within representing incomplete information and un-truths!

This EA, should only be about Build with Tolling and Build without Tolling and no build is no longer part of any consideration. To make that determination there is this imperative need to have the process and discovery that occurs within an Environmental Impacts Statement. A Greater Portland System Wide Review could suggest that at this time in the I-205 Improvement Project there should be the considerations of adding a fourth through lane, as part of re-directing more traffic away from and out of the I-5 Corridor. A fourth through lane of travel in the I-205 Corridor and it could become a Tolloed Express Lane or a Truck Specific Lane, within redirecting more truck traffic out of intercity I-5 Portland.

- Adding a third lane to I-205 between Stafford Road and OR 213 would be a “lane continuity” project. The Build Alternative without Tolling with a widen the 7-mile section of I-205 from two through lanes to three through lanes to match the number of through lanes on the adjacent portions of I-205, would eliminate the need for all congestion management. This, however, would induce incidents of travel that had previously diverted and re-routed to the I-5 Corridor to use the I-205 Corridor. Having a Free-Flowing non-Tolloed I-205 Corridor would induce greater incidents of Travel on itself from other less safe alternatives.

Creating a Free-Flowing, non-Tolloed I-205 Corridor will attract - induced demand and it would likely be more than just localized trips in the widened area and those who are currently diverting away from I-205 due to congestion, but would now return to I-205 because conditions under the Build Alternative without Tolling would be more attractive than using the I-5 Corridor and side-streets, roads like Willamette Falls Drive and Highways like 43 and 99E/McLoughlin Blvd.

- Adding a third lane to I-205 between Stafford Road and OR 213 with the “Build Alternative with Tolling” eliminates a significant capacity gain from creating the desired result. Build with Tolling, just shifts congestion out of the I-205 Corridor onto the I-5 Corridor and to all the local side-streets, roads, highways, and bridges that are non-Tolloed Alternatives. Historically, the motoring Public will drive fifteen miles out of their way on average, just to not pay a Toll.

This foreseeable diversion and re-routing of trips to non-Tolloed routes reduces public safety but it also restricts movement on all these alternative routes, not designed with the needed safety considerations and having adequate capacity. This will create great hardships in these effected communities.

#### **Attachments :**

I-205 Environmental Assesment 4.2.docx (86 kb)



**ODOT I-205 Toll EA - RECORD #2888 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** David

**Last Name :** Snell

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I am writing in opposition to the proposed tolling on our State and Federal highways here in the metro area. This proposed tolling will cause a hardship on the elderly population who live on retirement income and the most vulnerable. It is simply taxation without representation and needs to be voted on by the citizens of our State and the counties affected. Please stop this overreach by our government!

**ODOT I-205 Toll EA - RECORD #2889 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Matt

**Last Name :**

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
ODOT should always conduct an Environmental Impact Statement that studies congestion pricing before any freeway expansion. The earth is going to die unless mankind quits the poisoning for the sake of speed.

**ODOT I-205 Toll EA - RECORD #2890 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Alison

**Last Name :** Lucas

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion because an EIS should be part of EVERY freeway expansion proposal. ODOT can't keep building and expanding highways reflexively, just because that's how they've always done it. They need to think more strategically about how to improve transportation as our populations grow, and that strategic thinking needs to prioritize impacts to local air quality, adjacent communities, other modes of transportation, and global warming.

**ODOT I-205 Toll EA - RECORD #2891 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Laney

**Last Name :** Ellisor

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I am adding my voice to demand that the Oregon Department of Transportation conduct an Environmental Impact Statement that studies congestion pricing for the proposed I-205 Freeway Expansion. It is preposterous that ODOT has conducted only an Environmental Assessment on a \$515 million project that will significantly increase carbon emissions while not necessarily even reducing traffic. Moreover, money spent on this boondoggle is money not spent upgrading Oregon's more than 700 bridges vulnerable to earthquakes, increasing alternative modes of transportation, or making other necessary improvements to transportation infrastructure in this state. Once again, ODOT is proving itself to be reckless, wasteful, and unaccountable to the people. We deserve better.

**ODOT I-205 Toll EA - RECORD #2892 DETAIL**

**Submission Date :** 4/20/2023  
**First Name :** Daniel and Christine  
**Last Name :** Cook  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** Good Day to whom it may concern,  
My husband and I wish to comment on the voting of the up-coming impact of ODOT's tolling plan for Highway I-205. Clackamas County residents in large part, have moved out to the suburbs because they could not find a reasonably priced home to purchase in Washington or Multnomah counties. These people do not live on tri-met lines, so they would have to drive close to 20-30 minutes prior to getting to a bus stop where they could leave their vehicle and get on a bus. Since Clackamas county does not have a lot of industry in the area in which to find employment, residents must travel into Washington, Multnomah and Clark County, Wash to work. If they dropped off their vehicle at a bus depot, then they are more than likely traveling for another hour on public transportation. This was the case with myself personally, and I knew multiple people in my office that lived close to me in the same situation. We tried carpooling, but our schedules were so wildly different that this was not do-able. So I tried to take the Tri-met bus/Max system instead. Traveling this way would have taken upwards of 1 hour and 45 minutes: travel/max and bus transport/ bus transfer and wait time, then walking to my office on city streets after drop off. Oh, and did I mention that I also have a progressive neurological disease that makes walking very difficult. And did I also mention that this time for travel was ONE WAY, to get to work just for myself. For myself and thousands of other drivers, public transportation is not feasible. My husband and I are living a sparse and very frugal life and we are not alone! Paying an additional tax to drive on I-205 is not an additional tax I am willing to pay. So I personally will drive back streets. This will increase congestion off the freeways as I am certain that there are tens of thousands of other drivers who will also not be willing to decrease their paychecks further to pay yet another tax. What is this going to do for neighborhoods, and wear and tear on those streets not equipped to handle this volume? What about people deciding to use other freeways instead. What kind of congestion impact do you think this will cause on other freeways people will take instead, that are completely overburdened already? What a mess you are going to create! And I am sure we are already paying millions of dollars just for someone to look into this debacle in the first place! This seems like another wild grab at more free money from lazy bureaucrats who do not know how to balance a check book and are looking for an easy way out. I see how out of touch you all are for even considering this extra money windfall, especially in this time when a recession is biting at our heels, gas prices are continuing to go up, rent and housing is unaffordable, food prices that come up do not come back down, and wages are getting smaller. It doesn't matter how much you raise minimum wage, you force owners to go out of business because they can't pay the workers and no one has money to pay to shop or eat. And you keep adding in more taxes (LIKE A NEW TOLL ON ROADS) ! Are you purposely trying to collapse the economy in this state? Just about everyone in Oregon knows that no one is collecting fees for expired tags (tickets that should be written and collected) and purchase of the tags that are expired (DMV fees). We have also heard about tickets that are not being billed and collected on! What other revenue jobs are being ignored? When you shut down this state for COVID you created this mess. Get people back to work on job functions we already have in place and collect the revenue already due and learn to balance the books! Do not overburden taxpayers with more taxes! Do not cause your citizens to pay additional money on gas, electricity, time, and frustration in neighborhoods from thousands of additional drivers flooding their streets to avoid an additional tax (TOLL). Do not increase the burden on our city and county finances due to increased deterioration of roads on side streets and neighborhoods, including more signage and crosswalks and traffic lights to mitigate the thousands of drivers causing new traffic flows from avoidance of the tolls. Thank you for considering my voice in this matter

**ODOT I-205 Toll EA - RECORD #2895 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Kevin

**Last Name :** Teater

**Affiliation :** City of Beaverton

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I am a Beaverton City Councilor. I am writing here in my personal capacity as a resident of the Portland metro area, a small business owner, and an urban planner.  
Before continuing forward with adding more freeway miles, please conduct an Environmental Impact Statement (EIS).  
We have known for decades that induced demand is a scientifically-proven fact. Adding freeway miles \*does not\* address our core transportation problems. It is \*not\* a real solution, because it only results in more driving, more congestion, more pollution, and greater time sitting in traffic. Given that ODOT is facing a \$500M annual budget deficit, I ask that you not only do what is environmentally sustainable, but what is fiscally sustainable as well. We cannot afford to do this. Your decisions (ODOT and the Oregon Transportation Commission) do, in fact, change the ways people move and connect in our cities. And these repeated decisions to expand highways without trying any other alternative first will continue to suffocate the younger generations, like me, who will be living with the consequences for the rest of our lives.

**ODOT I-205 Toll EA - RECORD #2896 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Alida

**Last Name :** Cantor

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
We need forward-thinking transportation policy that will incentivize people to use sustainable options, not more cars.

**ODOT I-205 Toll EA - RECORD #2897 DETAIL**

**Submission Date :** 4/20/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** This is a terribly mis-guided idea by someone(s) who aren't looking at the bigger picture. This will cause soo much more traffic in west linn, Oregon city, Gladstone, and Milwaukee. I work construction and I have asked everyone I know and some that live in Salem and work here. My southern brothers and sisters said they would go up 213 through silverton and Oregon city. Silverton is a two lane road the whole way and goes right through the downtown! It would ruin all that is quaint and beautiful outside of the metro area.



**ODOT I-205 Toll EA - RECORD #2898 DETAIL****Submission Date :** 4/20/2023**First Name :** Don**Last Name :** Hardy**Affiliation :** City of Canby**Submission Method :** Letter**Q3. Comments :** Dear I-205 Toll Project EA review team,  
Attached is the City of Canby comment letter for the I-205 Toll Project EA.  
Thank you for your consideration of our comments.**Attachments :** I-205 Toll Project EA Response City of Canby 4-20-2023.pdf (1 mb)



# City of Canby

PO Box 930 Phone: 503.266.4021  
222 NE 2nd Ave Fax: 503.266.7961  
Canby, OR 97013 www.canbyoregon.gov

April 20, 2023

Mandy Putney  
Oregon Department of Transportation  
Via email  
CC: Keith Lynch, FHWA, Kris Strickler, ODOT

## **RE: I-205 Toll Project Draft Environmental Assessment (EA)**

Dear Ms. Putney:

The City of Canby appreciates this opportunity to provide comments addressing the EA for the I-205 Toll Project.

Although Canby is not located directly along either the I-5 or I-205 freeway corridors, our community is strategically located at a point in the regional transportation network that is directly affected by regional commute patterns. State Highway 99E traverses and bisects the heart of Canby and serves as the only major through-route surface highway between population centers along I-5 (i.e., Aurora, Hubbard, Woodburn, Salem, and points south) and the eastern metro area (i.e., Oregon City and beyond). As more and more commuters choose to work in the Portland area but live outside the metro area, Canby and its neighbors have experienced increased pressure from growth and congestion on Highway 99E. Additional congestion on 99E through Canby is both an economic and quality of life issue for our community: peak hour traffic volumes on 99E affect how our local businesses conduct their day-to-day operations and also affect the safety of residents walking and biking between neighborhoods.

Canby has a number of concerns with impacts from anticipated I-205 tolling diversion and this letter addresses them at a high level and is supported by the April 14, 2023 I-205 Toll Project Technical Report– Canby Review prepared by DKS Associates, attached and incorporated by reference. We request that EA comment responses address both this letter and the analysis gaps and lack of mitigation identified by DKS Associates memorandum.

Canby has many planning studies underway, Housing Needs Analysis, Housing Production Strategy, Housing Code Efficiency Measure Development, Economic Opportunity Analysis and 20-year Comprehensive Plan and Transportation System Plan Updates. Substantial work has been completed on the Housing Needs Analysis, Housing Production Strategy,

and Economic Opportunity Analysis (EOA) all supported by Department of Land Conversation and Development Grants. The EOA was approved by city council on April 19, 2023. We understand that the EA did not assess this body of work as it was not adopted when the EA was prepared and is not an existing condition; however, we provide this information for context of Canby's overall concern which is that traffic diversion is likely to limit needed housing and employment growth due to significant increase traffic volumes on 99E and on city streets. This is further elaborated in the DKS Associates --April 14, 2023 I-205 Toll Project Technical – Canby Review memorandum.

Our draft housing needs analysis and economic opportunity analysis work has been completed consistent with state buildable lands assessments standards and both a housing and employment urban growth boundary expansion will be needed to accommodate roughly 6,000 residents over the next 20-years along with associated employment lands. Urban growth boundary expansion for residential development is currently forecasted to be between 50 and 150 acres and roughly 450 acres of employment lands.

We realize that the EA baseline of environmental assessment was based on current adopted plans; however, we provide this information to support our request that an Environmental Impact Statement be completed for the I-205 Toll Project in place of an EA. We believe that future road capacity on city streets is directly tied to the I-205 Toll project and is foreseeable and should be considered as part of an Environmental Impact Statement. The magnitude of traffic increase from anticipated tolling diversion in the EA is significant.

We also understand that the use of an EA implies that all environmental impacts have been addressed and mitigated to the point of non-significance. There are a number of impacts that we believe have not been mitigated. We also believe that the EA does not provide analysis of diversion impacts onto city streets and this is further identified by DKS Associates. Canby, like many Oregon cities, has adopted its own level of service standards as documented in the Canby 2010 Transportation System Plan. Acknowledging impacts caused from tolling diversion onto city streets is especially important for those intersections leading to the heart of downtown Canby, including the Elm Street, Grant Street, Ivy Street, and 4<sup>th</sup> Avenue intersections with 99E.

The Ivy Street/99E intersection is predicted to fail in 2027 and with the tolling diversion impacts will almost double in intersection delay. We understand that the right-of-way constraints to this intersection restrict intersection improvements but we believe to substantiate an EA other corridor improvements to off-set this impact need to be analyzed and documented, including those at the Pine Street/99E intersection. We believe additional 99E corridor analysis should be completed to provide off-setting mitigation to substantiate approval of and EA and Record of Decision, including but not limited to analysis at additional intersections, providing queuing analysis, and presenting mitigated operations.

Canby also has concerns with the data referenced by DKS Associates and cited in their memorandum for the Redwood Street/Sequoia Parkway/99E intersection as the forecasted 2027 the intersection is expected to operate within 1 percent of the mobility target during the p.m. peak hour (0.89 v/c versus the 0.90 v/c mobility target). The City provided feedback through DKS Associates to the ODOT EA team that incorrect signal timing data and other inputs were utilized for the evaluation at both signalized intersections in Canby. Once these discrepancies are corrected, the Redwood Street/Sequoia Parkway/99E intersection may require additional mitigation. In our opinion this analysis is needed to determine the full project impacts in the EA.

We believe consequential intersection failure from tolling diversion will substantially increase queuing at the Ivy Street/99E intersection and an evaluation of those impacts should be addressed and mitigated as part of the EA or preferably in an environmental impact statement. This issue was raised during the two ODOT mitigation meeting discussions but has not been addressed. We understood from those mitigation meetings that impacts from lengthened queues onto city streets were addressed but have never seen this analysis. Our overall concern is that when development review occurs for proposed development and development trips distribute to the Ivy Street/99E intersection that this may result in the need for project denial based on adopted city level of service. The City of Canby is also aware of other intersections along 99E through development review, including 4<sup>th</sup> Avenue-Pine Street and Elm Street, that are operating near their mobility target during peak periods without layering on the additional traffic from the tolling diversion.

As Ivy Street and these other noted intersections are in the center of town, most development projects will result in trips impacts. Consequential decreases in the level of service at these intersections should be fully addressed and mitigated in EA, including the impacts to nearby intersections as drivers divert around this congested segment of 99E. Resulting development project denials from tolling diversion causing city street levels of service failure is a substantial impact on both current anticipated city growth and anticipated future growth. We don't see how the EA mitigates these impacts to a point of non-significance, nor is this clearly explained in the EA.

More broadly Canby also believes that overall diversion onto the city street system needs to be evaluated to determine impact on city adopted levels of services for vehicles, and pedestrian and bicycle travel. The city streets included in the diversion assessment should include the following and others where the analyses shows that there will be significant impacts:

- Ivy Street/Canby-Marquam Highway (north-south route with an intersection at 99E that is approaching a failure of mobility standards)
- Knights Bridge/S Arndt Road/S Barlow Road (network of related east-west streets connecting Canby and Barlow to I-5)
- NE Territorial Road (east-west road increasingly used as alternative to 99E)
- Haines Road (roughly parallel to 99E, with existing safety issues where it connects to 99E)

- 13<sup>th</sup> Avenue (east-west route paralleling 99E to the south)
- Birch Street
- Holly Street
- SW Berg Parkway

We also believe that bike and pedestrian mobility impacts are understated in the EA as noted by DKS Associates and request that more analysis be provided for:

- Local pedestrian routes and safety
- Local bicycle routes and safety
- Equity impacts from creating or exacerbating physical barriers
- Impacts related to installation of intersection improvements that widen or otherwise enlarge portions of the local transportation network

Canby also requests that impact to Canby Area Transit operations be assessed for ridership and operational impacts as noted by DKS Associates—transit travel time increases by over 3 minutes during the peak hours between Canby and Oregon City.

In closing we request that further analysis be completed along with associated mitigation to truly address long term tolling impacts. Canby along with other Clackamas County jurisdictions will be living with the consequential impacts from tolling for decades and more analysis of impacts is critical to Canby's future.

Thank you for your consideration and we look forward to continuing our role as a participating agency and to engaging in future steps of this project.

Sincerely,



Mayor Brian Hodson  
City of Canby

Attachment: April 14, 2023 I-205 Toll Project Technical – Canby Review prepared by DKS Associates

cc: Clackamas County Coordinating Committee (C4)  
Canby City Council, ATTN Council President Traci Hensley  
Canby Traffic Safety Commission, ATTN Robert Cambra, Chair  
Oregon State Representative, James Hieb  
Oregon State Senator, Daniel Bonham  
Don Hardy, Planning Director  
Ryan Potter, AICP, Planning Manager



## I-205 TOLL PROJECT TECHNICAL REPORT - CANBY REVIEW

DATE: April 14th, 2023

TO: Don Hardy | City of Canby

FROM: Kevin Chewuk, Dock Rosenthal | DKS Associates

SUBJECT: Canby Regional Mobility Pricing Project Support  
205 Tolling Project Environmental Assessment Review Memorandum

---

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

### INTERSECTIONS ANALYZED IN CANBY

The I-205 Tolling EA included 2 intersections within Canby and another just to the north of the City (at Haines Road) as part of its transportation area of potential impact (API) analysis (see Figure 1). The intersections are noted below:

- OR 99E and S New Era Road/S Haines Road (ID #47)
- OR 99E and Ivy Street (ID #48)
- OR 99E and N Redwood Street/Sequoia Parkway (ID #50)

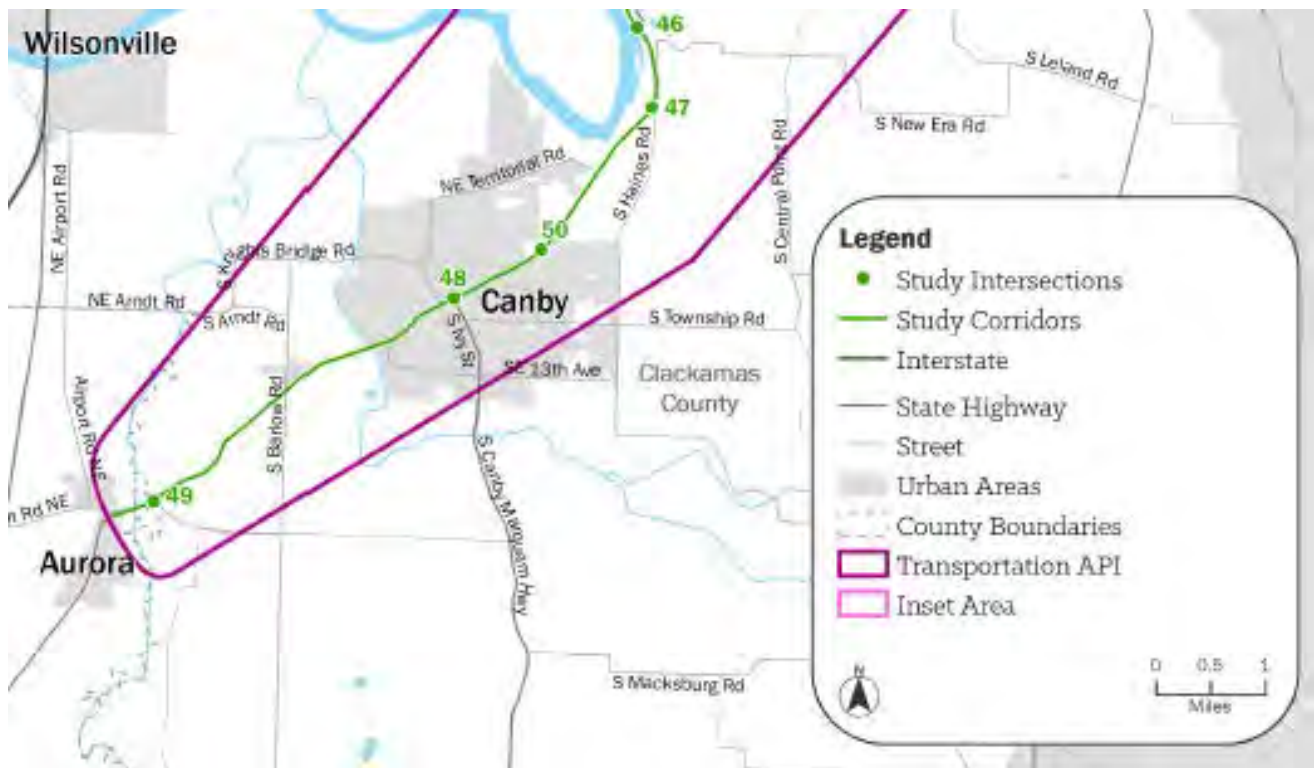
---

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

### Findings for Canby:

While 3 intersections were analyzed in or near Canby, many were not included, especially along OR 99E through Downtown Canby. These intersections will likely be impacted by the added traffic in the Build scenario, and particularly those through Downtown Canby impacted by queuing and the potential spill back from the adjacent intersections. The I-205 Tolling EA states that "Implementation of mitigation strategies may cause secondary impacts at adjacent intersections or roadways. Secondary impacts from implementing mitigation measures may require additional avoidance, minimization, or mitigation measures. An assessment of the effects associated with mitigation will be included in the Revised EA." Additional intersections that were not analyzed in the I-205 Tolling EA that may see impacts include: OR 99E & SW Berg Parkway, OR 99E & Elm Street, OR 99E & Grant Street, OR 99E & S Pine Street/NE 4<sup>th</sup> Avenue and OR 99E & Territorial.

FIGURE 1. CANBY STUDY INTERSECTIONS INCLUDED IN THE I-205 TOLLING TRANSPORTATION API



## TRAFFIC DIVERSION WITH I-205 TOLLING

Tolling on I-205 will cause many highway users to shift their trips to OR 99E and other roadways in Canby to avoid tolling. Significant increases in traffic volumes are forecasted from highway user diversion in Canby in the I-205 Tolling EA Transportation Technical Report, most notably along OR 99E and streets connecting to it, and other major streets connecting Canby to areas outside of the City, such as Knights Bridge Road and SE 13<sup>th</sup> Avenue.

## TRAFFIC DIVERSION IN 2027 WITH I-205 TOLLING

---

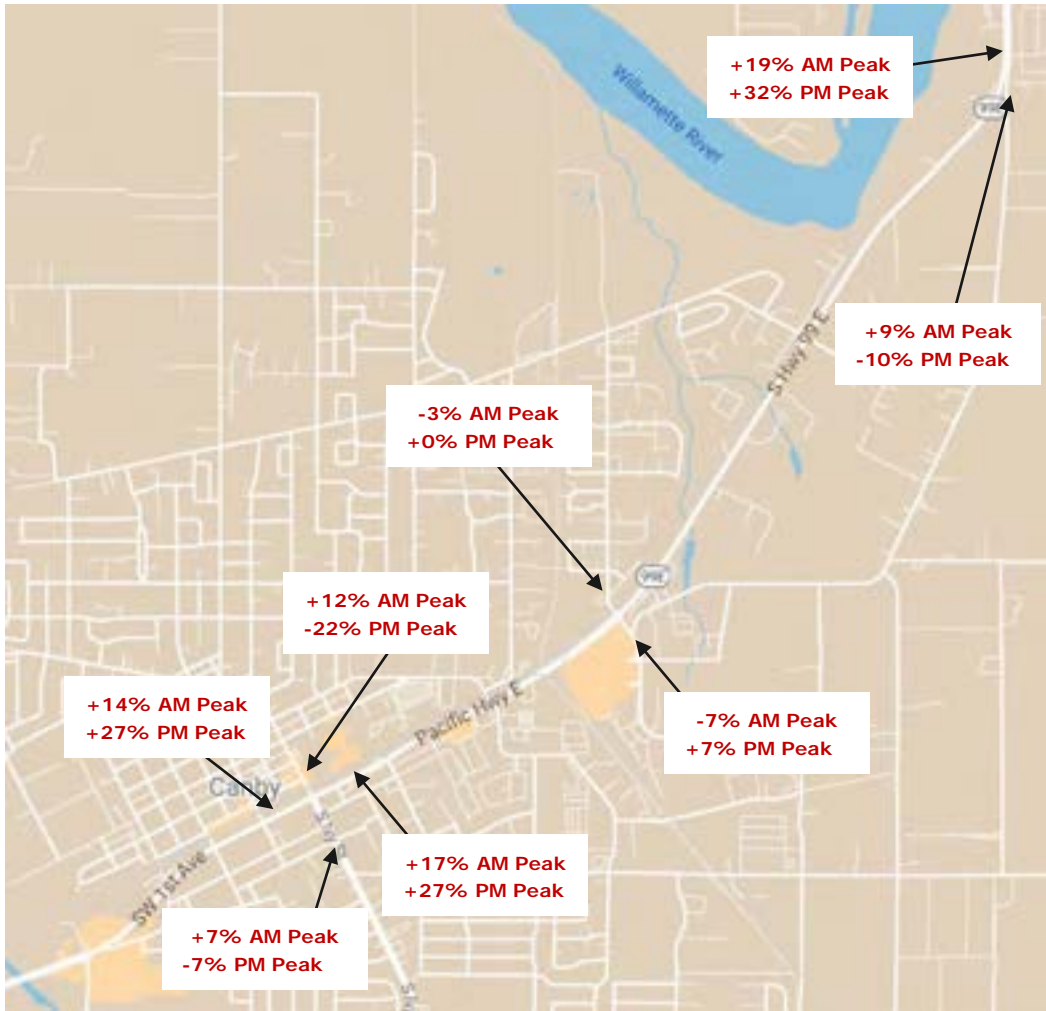
The I-205 Tolling EA Transportation Technical Report provides projected daily traffic volume changes for segments of OR 99E surrounding Canby, although it excludes the segment through downtown Canby, comparing the average weekday volumes in the 2027 Pre-Tolling and Build Scenarios to those in the 2027 No-Build Scenario. It estimates daily volume increases in 2027 from tolling diversion along OR 99E up to 24 percent in the northbound direction and up to 21 percent in the southbound direction east of Sequoia Parkway/Redwood Street, and daily volume increases along OR 99E near Lone Elder Road (between Canby and Aurora) up to 110 percent in the northbound direction and up to 93 percent in the southbound direction.

Figure 2 shows projected 2027 peak hour volume increases along studied roadway segments in Canby with I-205 tolling. As shown, increases of up to 19 percent are expected during the a.m. peak along OR 99E at the northeast part of the City, and up to 17 percent along OR 99E through Downtown Canby. On side streets approaching OR 99E, increases of up to 12 percent are expected during the a.m. peak hour.

During the p.m. peak hour, significant volume increases are projected along OR 99E in Canby (see Figure 2) when compared to 2027 conditions without I-205 tolling, most notably increasing 32 percent and 27 percent near Haines Road and Ivy Street respectively. On side streets approaching OR 99E, increased volumes are expected along Sequoia Parkway with decreasing volumes expected along Haines Road and Ivy Street.



**FIGURE 2. PROJECTED PEAK HOUR VOLUME CHANGES IN 2027 WITH I-205 TOLLING COMPARED TO WITHOUT**



**TRAFFIC DIVERSION IN 2045 WITH I-205 TOLLING**

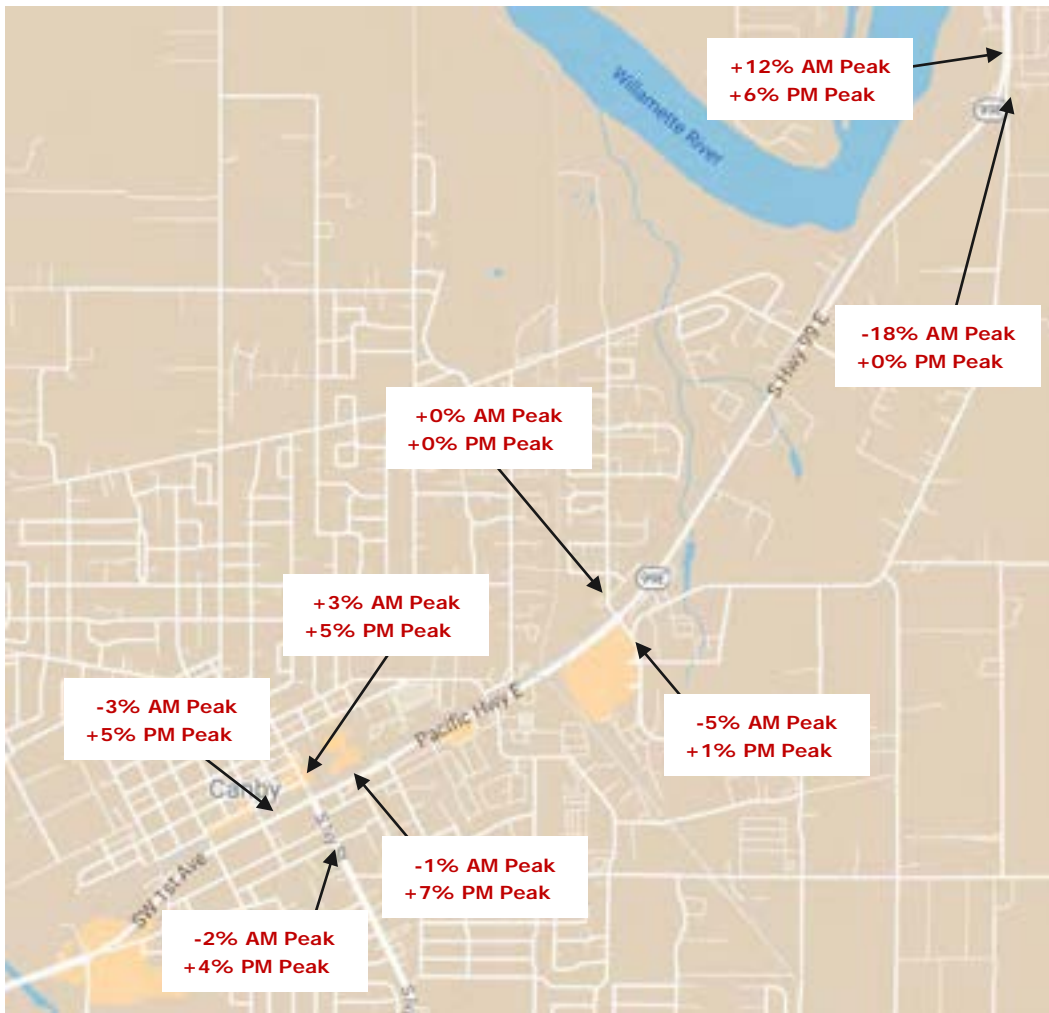
Figure 3 shows projected changes in daily volumes between the 2045 Build Scenario and the 2045 No-build Scenario for roadway segments in Canby. As shown, daily volumes are expected to increase in 2045 from tolling diversion up to 20 percent along OR 99E at the northeast part of the City and through Downtown Canby and up to 30 percent along OR 99E at the southwest part of the City.

**FIGURE 3. PROJECTED DAILY VOLUME CHANGES IN 2045 WITH I-205 TOLLING COMPARED TO WITHOUT**



Figure 4 shows the projected 2045 peak hour volume changes along studied roadway segments in Canby with I-205 tolling. As shown, volume increases during the a.m. peak hour are projected along OR 99E at the northeast part of Canby near Haines Road, while slight decreases are projected through Downtown Canby when compared to 2045 conditions without I-205 tolling. During the p.m. peak hour, volume increases are projected along OR 99E up to 7 percent through Downtown Canby and 6 percent at the northeast part of Canby near Haines Road.

FIGURE 4. PROJECTED PEAK HOUR VOLUME CHANGES IN 2045 WITH I-205 TOLLING COMPARED TO WITHOUT



### Findings for Canby:

While the roadway segments and intersections included in the I-205 Tolling EA Report do not reflect the complete picture, they do provide some insight into the projected highway user diversion impact to surface streets in Canby, indicating that I-205 tolling will increase daily and peak hour traffic along OR 99E, and along Ivy Street, Sequoia Parkway and Haines Road. This includes adding more peak hour traffic on critically congested links along OR 99E through Downtown Canby, up to 27 percent more in 2027 and up to 7 percent more in 2045.

Tolling will also significantly increase traffic along connecting streets to OR 99E in Downtown Canby, with up to 12 percent more peak hour traffic in 2027 and up to 5 percent more in 2045. It is difficult to assess the impact of these peak hour volume increases at adjacent intersections along OR 99E and other Downtown streets since the I-205 Tolling EA Report only included analysis at the Ivy Street intersection.

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

The forecasted analysis results from the I-205 Tolling EA for the 3 study intersections in Canby indicate that two intersections are impacted by the 2027 Build Alternative when compared to the 2027 No-Build Alternative, including the following:

- OR 99E and S New Era Road/S Haines Road (ID #47)
- OR 99E and Ivy Street (ID #48)

The reported results at the OR 99E/ N Redwood Street/Sequoia Parkway (ID #50) for 2027 also indicate that the intersection is expected to operate within 1 percent of the mobility target during the p.m. peak hour (0.89 v/c versus the 0.90 v/c mobility target). The City provided feedback to the I-205 Tolling EA project team that incorrect signal timing data and other inputs were utilized for the evaluation at both signalized intersections in Canby. Once these discrepancies are corrected, the OR 99E/ N Redwood Street/Sequoia Parkway may also be identified as a roadway impact under the Build alternative.

The 2045 results indicate that the same two intersections that were also impacted in 2027 analysis are impacted by the 2045 Build Alternative when compared to the 2045 No-Build Alternative.

Queuing results were not provided for intersections in Canby.

### Findings for Canby:

Impacts were identified at two of the 3 Canby area intersections analyzed in the I-205 Tolling EA, including the OR 99E intersections with Ivy Street and Haines Road.

In addition, several noted modifications to the analysis may change the resulting volume-capacity ratios at the study intersections in Canby in the Revised I-205 Tolling EA. The reported results at the OR 99E/ N Redwood Street/Sequoia Parkway for 2027 also indicate that the intersection is expected to operate within 1 percent of the mobility target during the p.m. peak hour. The City provided feedback to the I-205 Tolling EA project team that incorrect signal timing data and other inputs were utilized for the evaluation at both signalized intersections in Canby. These changes include cycle length and coordination settings at both intersections and the split phasing at Redwood/Sequoia Parkway intersections. Additionally, the truck percentages seem to have discrepancies, with no trucks included at OR 99E & Redwood/Sequoia Parkway intersection in the existing and 2045 PM reports. In the AM existing and 2045 reports truck percentages over 100 percent are used.

Another issue is when the volume data was collected, as the volume data in Canby used for the operations analysis was not seasonally adjusted according to ODOT analysis procedures. While most of the study area and study intersections are within the Metro boundary (where seasonal fluctuations are assumed to be minor and no adjustments are assumed), those near the City of Canby are not and volumes for traffic analysis are typically seasonally adjusted to reflect the 30 HV hour. The expected seasonal adjustment from October to the peak month (typically July/August) is approximately 7 percent.

Tolling I-205 will cause many highway users to shift their trips to roadways in the City. These trips would result in significant new congestion along roadways and at intersections, and increased delay and travel times for people in the City, particularly along OR 99E and its connecting side streets through the City. Additionally, queue spill back from OR 99E intersections to the adjacent intersections are major concerns. The I-205 Tolling EA does not provide queuing analysis for intersections studied in Canby and these potential impacts to other nearby streets and intersections in Downtown Canby were not assessed.

Travel times were estimated for the 2045 No-Build and Build Alternatives along various segments of OR 99E, including the segment from Grant Street in Canby and S 2<sup>nd</sup> Street in Oregon City as shown in Figure 5. A typical trip taken today along this 8-mile OR 99E segment during the peak hour takes around 10 to 14 minutes in either direction. The 2045 Build scenario is estimated to add up to 20 seconds to the travel time along this segment when compared to the 2045 No-Build scenario, with the travel times in the southbound direction estimated to decrease during the a.m. peak hour. It is unclear why the travel times would improve in the a.m. peak under the build alternative with increased traffic volume. While the total estimated corridor travel time reported in the I-205 Tolling EA along OR 99E is reported beyond Canby, the overall increase in travel time along the segment is likely estimated to occur within the segment through Canby.

FIGURE 5: 2045 NO BUILD AND BUILD PEAK HOUR TRAVEL TIMES ALONG OR 99E



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

Transit travel times were estimated for the 2045 No-Build and Build Alternatives along OR 99E through Canby. The results indicate that transit travel times along OR 99E through Canby are expected to increase up to 20 seconds during the peak hours, and by over 3 minutes during the peak hours between Canby and Oregon City. The increased transit travel times along these OR 99E segments correlate to the decline in the estimated transit multimodal level of service along the segments between 11<sup>th</sup> Street and Main Street, and Railroad Avenue and S 2<sup>nd</sup> Street in Oregon City utilized by the CAT 99X route, with the former declining from C to D and the later declining from D to E. While the reported transit multimodal level of service along OR 99E through Canby did not show a decline in the I-205 Tolling EA between the No-Build and Build scenarios, these segments still operate with a transit level of service of D or E.

### Findings for Canby:

Transit impacts were identified along two Oregon City roadway segments analyzed in the I-205 Tolling EA utilized by the Canby Area Transit 99X route, including along OR 99E from 11th Street to Main Street (southbound) and OR 99E from Railroad Avenue to MP 12.74 (northbound). This impact was not identified in the I-205 Tolling EA.

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

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

Bicycle level of traffic stress was estimated for the 2045 No-Build and Build Alternatives along OR 99E through Canby. The results indicate moderate to high stress (Bike Level of Traffic Stress 3 or 4) for bicyclists along OR 99E. The results also indicate no change in the expected level of stress for bicyclists along this segment between the 2045 No-Build and Build scenarios. Bicycle level of traffic stress was not analyzed along any other streets or intersections in Canby in the I-205 Tolling EA, although bicyclist will likely experience increased stress levels along it given the significant increase in traffic expected in Downtown Canby in the Build scenarios when compared to the No-Build.

A pedestrian corridor multimodal level of service analysis was also completed for the 2045 No-Build and Build Alternatives along the same OR 99E segments in Canby as the bicycle level of stress analysis. The results indicate a pedestrian level of service ranging from C to E along OR 99E. Again, the results indicate no change in the expected pedestrian level of service along these segments between the 2045 No-Build and Build scenarios. Again, pedestrian analysis was not analyzed along any other streets or intersections in Canby in the I-205 Tolling EA, although pedestrians will likely experience increased stress levels, particularly at intersections, given the significant increase in traffic expected in Downtown Canby in the Build scenarios when compared to the No-Build.

### Findings for Canby:

No bicycle impacts were identified in Canby in the I-205 Tolling EA, although several of the analyzed roadway segments include high levels of traffic stress for bicyclists in both the 2045 No-Build and Build scenarios. OR 99E lacks bike facilities through much of Canby. The bikeway gap along OR 99E is one of the most critical in the City, with high levels of traffic stress experienced by these users. The increased traffic along OR 99E with the Build scenario will further exacerbate the high bicycle level of traffic stress along this corridor and could deter people from biking.

No pedestrian impacts were identified in the I-205 Tolling EA, although several of the analyzed roadway segments include a high pedestrian level of service. Existing sidewalks along OR 99E are narrow and often directly adjacent to the travel lane with no buffer provided. Additionally, segments of OR 99E exist with no sidewalk coverage. Adding additional traffic with the Build scenario to these already heavily traveled lanes, coupled with the high travel speeds, will negatively impact those walking along OR 99E and between the nearby neighborhoods. This will lead to uncomfortable walking conditions and a high level of stress, and difficult street crossings for some of the most vulnerable users in the City.

Although not analyzed in the I-205 Tolling EA, additional streets in the City could see increases in the level of traffic stress experienced for bicyclists and worsening pedestrian level of service as the level of traffic increases in the Build scenario, especially along streets approaching OR 99E and other streets in Downtown Canby.

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

The I-205 Tolling EA does not include a metric for identifying an impact to truck freight. Freight corridor travel times were estimated for the 2045 No-Build and Build Alternatives along OR 99E between Canby and Oregon City. The results indicate that freight corridor travel times along OR 99E during the peak period are expected to increase up to 34 percent (over 3 minutes) between Grant Street in Canby and Arlington Street just north of Oregon City.

### Findings for Canby:

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



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

A transportation safety impact was identified along the OR 99E segment from Redwood Street-Sequoia Parkway to Ivy Street through Canby. This segment is estimated in the I-205 Tolling EA to see an increase in the predicted number of fatality/severe injury crashes per year in the Build scenario when compared to the No-Build scenario. A safety impact was also identified at the OR 99E/Ivy Street intersection.

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

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

### Findings for Canby:

A transportation safety impact was identified along the OR 99E segment from Redwood Street-Sequoia Parkway to Ivy Street and at the OR 99E/Ivy Street intersection.

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

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

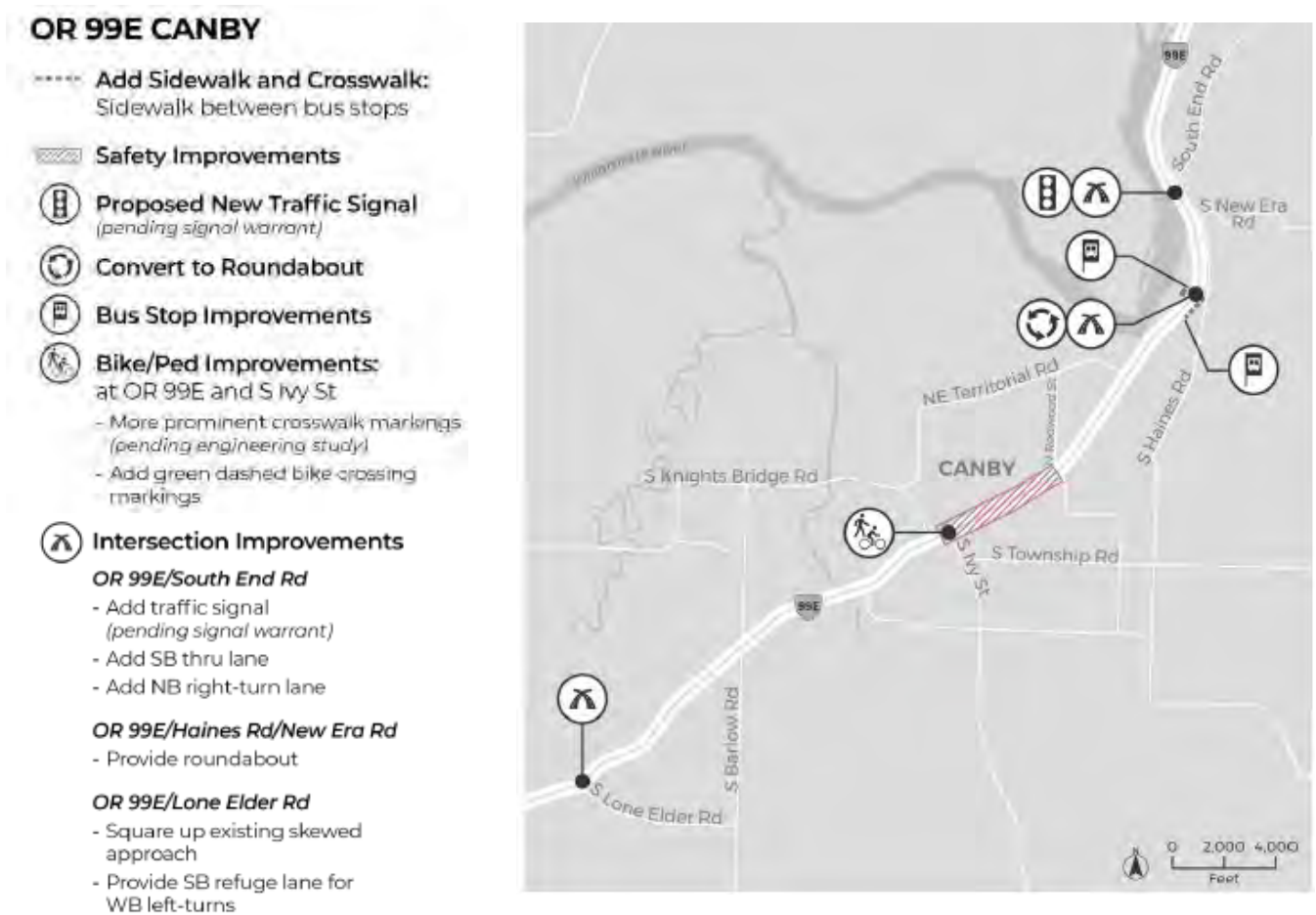
The following sections provide a summary of the mitigations recommended in the I-205 Tolling EA to address the Build scenario impacts identified in Canby. These identified impacts are summarized below:

- Roadway impacts were identified at six intersections, including:
  - OR 99E and S New Era Road/S Haines Road (ID #47)
  - OR 99E and Ivy Street (ID #48)
- Transit impacts were identified along roadway segments utilized by Canby Area Transit Route 99X in Oregon City, including:

- OR 99E from 11th Street to Main Street (southbound)
- OR 99E from Railroad Avenue to MP 12.74 (northbound)
- A transportation safety impact was identified along the OR 99E segment from Redwood Street-Sequoia Parkway to Ivy Street and at the OR 99E/Ivy Street intersection.

Figure 6 summarizes the proposed mitigations in Canby for these identified impacts.

**FIGURE 6: PROPOSED MITIGATIONS IN CANBY FOR IMPACTS IDENTIFIED IN THE I-205 TOLLING EA**



**OR 99E AND IVT ST (ID #48)**

The OR 99E/ Ivy Street intersection is projected to see significant increases in daily and peak hour traffic in the 2027 Build Scenario compared to the No-Build scenario. The increased traffic causes the intersection to exceed the mobility standard in the peak hour of the 2027 Build scenario. Additionally, this segment of OR 99E is estimated to see an increase in the predicted number of fatality/severe injury crashes per year due to the increased traffic. No mitigation is recommended

in the I-205 Tolling EA at this intersection (see Table 1) for the roadway impact, outside of a note to consider improvements at the OR 99E/Pine Street intersection.

**TABLE 1: PROPOSED MITIGATIONS AT OR 99E/ IVY ST INTERSECTION IN THE I-205 TOLLING EA**

MITIGATION TYPE	IMPACTS IDENTIFIED IN THE I-205 TOLLING EA	PROPOSED MITIGATION IN THE I-205 TOLLING EA
ROADWAY	Intersection operations exceed the mobility standard	Consider operational improvements at OR 99E and Pine St to facilitate more traffic use of that intersection to reach downtown Canby, thereby alleviating some traffic impact at Ivy St.
TRANSIT	None	None
PEDESTRIAN	None	Provide more prominent crosswalk markings; Add green dashed bike crossing markings across OR 99E.
BICYCLE	None	
TRANSPORTATION SAFETY	Increase in predicted number of fatality/severe injury crashes per year	Add 3-inch yellow reflective sheeting to signal backplates and a hardened centerline.

**OR 99E AND HAINES ROAD (ID #47)**

The OR 99E/ Haines Road intersection is projected to exceed the mobility standard in the peak hours of both the 2027 and 2045 No-Build scenarios and this mobility standard exceedance is expected to worsen under the Build scenarios. Recommended mitigations are shown in Table 2 and include installing a roundabout, in addition some transit enhancements.

**TABLE 2: PROPOSED MITIGATIONS AT OR 99E/ HAINES ROAD INTERSECTION IN THE I-205 TOLLING EA**

MITIGATION TYPE	IMPACTS IDENTIFIED IN THE I-205 TOLLING EA	PROPOSED MITIGATION IN THE I-205 TOLLING EA
ROADWAY	Intersection operations exceed the mobility standard	Install a roundabout.
TRANSIT	None	Install landing pads at bus stops (i.e., paved area at the bus stop where passengers board or exit the bus), crosswalks with RRFB to facilitate crossing of OR 99E and extend sidewalks to New Era Rd.
PEDESTRIAN	None	Install crosswalks and RRFBs to improve pedestrian access to bus stops and safety for crossing/
BICYCLE	None	
TRANSPORTATION SAFETY	None	None

### Findings for Canby:

While improvements at the OR 99E/Pine Street intersections are supported by Canby to help mitigate some of the identified Build scenario impacts along OR 99E in Canby, it does not adequately address the impacts at OR 99E & Ivy Street. Given the intersection is over capacity it is reasonable to expect some local diversion through City streets parallel to OR 99E. The distribution of the added Build scenario traffic through Downtown Canby streets is unclear given the lack of intersection analysis in the I-205 Tolling EA. Peak hour volume data from the study intersections indicate significant increases are expected with the Build scenarios and the impact that it is projected to have along adjacent roadway segments and at intersections is not documented in the I-205 Tolling EA.

Additionally, the note to “Consider operational improvements at OR 99E and Pine St” is unclear, and any process recommended in the I-205 Tolling EA for identifying and implementing an unknown mitigation should be clarified.

It is also unclear how the significant levels of congestion reported at the OR 99E/ Ivy Street impacts adjacent intersections since queuing analysis was not provided for intersections in Canby. The mitigated operational results were also not reported in the I-205 Tolling EA or provided in the appendices, so it is unclear how the proposed mitigations impact operations.

There are some changes needed in the analysis to ensure results reflect accurate impacts of the project. Even with the analysis included in the I-205 Tolling EA the missing intersections in Downtown Canby that were not studied could be omitting potential impacts of the Build alternative. For example, field observations in July 2022 showed that even with the updated signal timing, segments of OR 99E from Elm to Ivy were at capacity in the peak periods and queues were regularly filling the available storage. While the analysis at the OR 99E/ Ivy Street intersection shows that traffic operations will exceed mobility targets in the future alternatives there are other impacts to the system, such as queue spillback and local diversion, that are not captured by Highway Capacity Manual methodology alone.

**ODOT I-205 Toll EA - RECORD #2899 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Wendy

**Last Name :** Young

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :**

Honestly, tolling is one of the most unfair things we could do right now!

1. Oregon claims to care so much about helping the working class, yet the working class is one major group of people who will get hurt by these tolls! For many, driving to work is not an option, if they want their families to have food on the table!

It is basically a pay cut for the working class, each and every day!

2. These tolls are also going to hurt families who drive up and down those corridors to keep their children active in sports! So many families already pay a large amount of money just to have their kids involved in a sports program, since schools no longer offer many of these programs, especially in elementary and middle school. I know of one grandmother of color who is trying to keep her grandson in positive team activities and she drives him to practice and to games, with the hope that these kinds of activities will keep him focused on the right things. She now wonders what to do if there's a toll every time she drives him to a practice or game. She is already really stretching her money to keep him in the sports program. How many more people are out there, like her, wondering if it might be best to just drop their child or grandchild's sports entirely to save money? They are pushed to their limit.

3. Grandparents, extended families, and friends are also going to think twice before visiting with each other. So that continues to keep us further unconnected.

4. Neighborhoods near the freeways are going to feel the brunt of the traffic, as drivers try to find alternative routes, to avoid the tolls. This increases noise levels and congestion in their own neighborhoods and impacts safety for their children and families. This also impacts their home values.

These are just some of the reasons tolling makes no sense! And frankly, the Oregon government has not been upfront and specific about how these funds would even be used. Aren't there better ways to find money? Like cut spending or redirect funds!? In other words, work within the budget.... just like every sensible family is trying to do themselves.

**ODOT I-205 Toll EA - RECORD #2900 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Trask Owen

**Last Name :** Colby

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
If Oregon is serious about tackling pollution and climate change, expanding freeways to accommodate more cars, and loads more concrete can't be a part of the solution. An EIS will show the negative environmental impacts. Moreover, the opportunity cost of the decision would be huge, we are missing a real opportunity to invest in walking, biking, and commuting to meet our economic and environmental needs.

**ODOT I-205 Toll EA - RECORD #2902 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** H

**Last Name :** Nunley

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
It is extremely short-sighted, foolhardy and disrespectful of the next and future generations to undertake such a huge project without knowing how it will impact the environment.

**ODOT I-205 Toll EA - RECORD #2903 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Erik

**Last Name :** Bertram

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** This message was sent from outside the organization. Treat attachments, links and requests with caution. Be conscious of the information you share if you respond.

Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

ODOT needs to halt this proposed expansion as it is in direct conflict with our regions carbon reduction goals. Its just another climate crisis burden that we are kicking down the road to my child's generation to deal with. As a starting point, ODOT must conduct an Environmental Impact Statement that studies congestion pricing before freeway expansion.



**ODOT I-205 Toll EA - RECORD #2904 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Trevor

**Last Name :** Marlar

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I work in Clackamas county and commute on I-205 through the proposed route.  
This expansion is completely unnecessary, not to mention the fact that time and time again, adding lanes does not reduce congestion. In fact it increases congestion.  
Increased congestion, increased pollution (for a state that has climate goals) for a half million dollar project is absurd.  
I demand that ODOT conduct an Environmental Impact Statement that studies congestion pricing before freeway expansion.  
Alternative solutions to reduce congestion are far cheaper and better for the environment. This should be the states goal.

**ODOT I-205 Toll EA - RECORD #2905 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Anne  
**Last Name :** Cunningham  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** As a homeowner in West Linn, I am absolutely against the tolling. I understand there needs to be a way to pay for our roads, but this is not it.

I walk daily in the neighborhood, as do hundreds of other people (if not more) and the traffic already is bad enough on our side streets. I have worried more than once about my life with people ignoring crosswalks. With tolling...more people will use our side streets to avoid the toll and I fear for people's lives (my own included).

Of course the cost to commuters is another huge issue. I know you're doing some things to help with that...but right now...I really have no trust in you...and I'm usually a person that supports the government as I understand the need for it.

I am very disappointed in the powers that be for not listening to all of us that are expressing our concerns. This is not the first time I've written. I'm also one of the many people who have signed a petition. It does not seem like anyone cares. Hopefully something will be done before someone gets hurt or killed.

**ODOT I-205 Toll EA - RECORD #2908 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Jeff

**Last Name :** Frost

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I live in Westland and I use the 10th St., on-ramp offramp to go either direction and have to pay a toll just to go down the street. It's gonna be ridiculous.  
I will live at the top of Slomo in Westland and the amount of traffic that's going to be diverted through sidestreets to go through Westland. It's going to be unsafe and unmanageable  
Not everybody travels. Our freeways is going to have a means to have a device on their car to manage tolls and you can be assured that their mailing address isn't even going to be accurate so you're never gonna be able to send them a bill for their toll .  
This is absurd to put a toll where there's no other option to cross the river. You're basically holding the river to force individuals to pay you money it's wrong and it should be illegal if it isn't already.

**ODOT I-205 Toll EA - RECORD #2909 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Jerry

**Last Name :** fugere

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
This project is not needed and is way too expensive. Let's give the taxpayers a break for a change. I adamantly oppose this multi million dollar project.

**ODOT I-205 Toll EA - RECORD #2910 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** David

**Last Name :** Lewis

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
To pretend that the proposed I-205 freeway expansion does not require an EIS flies in the face of seventy years of research into induced demand. To not look at alternatives makes a mockery of Oregon's and Washington's climate goals. It is, frankly, insane in this day and age to pretend that moving cars and trucks is ODOT's only job. Please, at least study the effect of tolling on the traffic, and look at alternatives to mindlessly expanding freeways in a way that we know does no good.

**ODOT I-205 Toll EA - RECORD #2911 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Stephanie

**Last Name :** Brown

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** My family follows the tolling project news, and we talk about it with family and neighbors but very few of them are aware of the Tolling project and its impacts.

We are extremely concerned about projections that traffic on some local roads will increase 50%. There are at least 4 schools nearby, and small children who need to cross the street at the same time that rushed drivers are bailing out from I-205 and rushing past these crosswalks.

I would like to see additional mitigation measures taken at:  
the intersection of Rosemont Rd & Bay Meadows Rd (Trillium Creek Primary School)

Rosemont Road, at the West Linn Adult Community Center  
the intersection of Rosemont Rd & Salamo Rd (at Rosemont Ridge Middle School)

the intersection of I-205 & Highway 43 (near West Linn High School)

All of the above are schools that my daughter has attended. We know these roads and streets well, and can easily predict the damage that unmitigated massive traffic increases will create there. I would also like to see additional mitigation at the I-205 & 10th Street interchange

Paying multiple tolls each day will be a huge impact on household and business finances, even for people not considered low income. I would like to see a cap on what any driver needs to pay.

I don't want you to begin toll collection on I-205 until the Regional Mobility Pricing (Toll) Project is completed, so a full view of regional tolling in Oregon can be assessed.

I would like to see an Environmental Impact Statement (EIS) for the tolling project, which would require additional analysis and more public outreach and community involvement.

Finally, I was unable to attend the only West Linn tabling session since it was during a work day, and we were given only 6 day's public notice. Please extend the public comment period for an additional 30 days and conduct another public hearing in West Linn, this one needs to be during non-working hours so people like me who work a standard work schedule are able to participate.

Tolling is an East Coast solution that will not work in Oregon, and will bring severe personal and economic pain due to the way this is being pushed through against our will.

**ODOT I-205 Toll EA - RECORD #2913 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Tony

**Last Name :** Ortiz

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Please. No more freeways. Spend the money on public transportation.

**ODOT I-205 Toll EA - RECORD #2914 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Tracy

**Last Name :** Hanning

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** So the plan is to toll both bridges and also any road leading up to the I-5 and 205 Bridges,  
This is insanity, and why are the Washington Residence being penalized by paying for this  
In working and then again paying for it in tolls?? So you are panalizing those that work  
In Oregon,  
And what other freeway is not tolled that would alleviate paying any tolls?  
NONE~  
So the citizens are forced to pay these tolls regardless, We don't want to drive through  
Portland any more then the next person, its cluttered with homeless, garbage, and unsafe  
Freeways. But we will be forced to pay for it~  
The average person is not going to be able to afford to pay tolls, the average Washington  
Shopper will think twice about driving and spending their money in Oregon, they will shop  
In Washington~  
This is not going to be good idea in the long run~ Commuters will look for other work  
In Washington to avoid the traffic and tolls ~or work from home~ Who will then pay for  
Tolls??



**ODOT I-205 Toll EA - RECORD #2915 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Melissa

**Last Name :** Beavers

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

Please stop expanding freeways! We've known about induced demand for a while now. Adding additional lanes does not alleviate traffic in the long term. It just encourages more cars to fill up the additional space. Our ever-expanding highway infrastructure has been disastrous to the climate, and we cannot keep making investments in outdated forms of traffic engineering that have already been proven time and time again to NOT solve the problem.

What \*does\* alleviate traffic congestion is reliable, multimodal public transit! Let's stop living in the 1970's, remaining decades behind other developed nations, and bring the Portland metro into the 21st century. Build more rail, rapid bus transit, high-speed rail. It's honestly embarrassing that ODOT and the DOT's across the US continue, pouring our tax dollars MORE highway expansion after years of watching it destroy our communities, the planet, and our options for alternative, more efficient modes of transportation. The only plausible explanation for this is that our DOT is ran by a bunch of 80-year-old traffic engineers who base all their decisions on a termite-infested Robert Moses textbook written in 1973.

<b>ODOT I-205 Toll EA - RECORD #2916 DETAIL</b>	
---	--

**Submission Date :** 4/21/2023

**First Name :** Jenifer

**Last Name :** Schramm

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Once tolls are imposed to pay for the expansion, will the expansion be needed? Please do your job of due diligence and conduct a thorough environmental impact statement for the proposed I-205 freeway expansion. It is an absolutely essential requirement for this high impact project.

**ODOT I-205 Toll EA - RECORD #2917 DETAIL****Submission Date :** 4/21/2023**First Name :** Chris**Last Name :** Kosinski**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** I vote absolutely NO tolling on any of our roads in Oregon, for the following reasons:

Oregonians are leaving Oregon. The cost of living is outrageous here. The State once again will not return the people's kicker checks, taxation is high here and getting worse. Not only are the people faced with sky high inflation, but a poor economy as well. Corporations are still laying off many people. And now you want to add high tolls onto our roads. Oregon is giving the people every reason why they should leave and go to a different State where jobs are available, where they can afford the price of a home to own or to rent, where the people can have better government and less homelessness.

If our roads are tolled, it will be the truckers that will pay huge costs in tolls, this will only throw the cost for foods and all other retail that the truckers are bringing into the State, the people get hit again with high costs for living in a State that can't seem to get it's act together, and a State that is always reaching into the pockets of the people.

Much of the road problem is that ODOT has put much of their transportation money into the West side with the East side getting very little help. On the east side, we do not have enough residential streets, and we certainly have very few streets that are safe for the people. The huge amount of development in the past 10 years particularly has added an enormous amount of new homes, but local governments have been building homes, but no roads to support this huge build out. Many of us are now living in "fire traps". In the last huge wildfire of 2020, our family had to evacuate. It took us close to an hour just to get out of our driveway because the roads were completely gridlocked and the signals were not working. Once out of our driveway, it took almost 3 hours just to get out of Oregon City and drive 6 miles to our Daughter's home. On the street where we live, there are NO parallel roads that would allow the drivers to get off the main road and take a different route, we have Hwy 213 on one side and a huge valley of landslides on the other side, leaving us only with a two lane road for thousands of people to try to get out of City if an emergency arises. If we have a large earthquake here, where we have 4 quake faults in this area, there is NO way out, we are all trapped and pretty much DOA.

If you want to lose tens of thousands of Oregonians, go ahead and Toll, the people will leave and they already are. NO to toll roads or ODOT may be stuck with a very large bill they can't pay and the taxpayers will be long gone to a State that will listen to the people.

**ODOT I-205 Toll EA - RECORD #2918 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Jim

**Last Name :** Karlock

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** 1---Tolling works by forcing low income people off the roads so richer people can travel whenever they want.

-----  
2--Cars provide access to more jobs than transit, but tolling tries to make it more expensive to get to a better job: A 2011 report by the Brookings Institute studied transit in our 100 largest cities and found that transit can only get people to 30 percent of the jobs in 90 minutes. Further only 25% of low and middle-skill jobs are reachable within 90 minutes.

For comparison the average automobile commute is 25.2 minutes

Here is the data for the Portland region from Appendix 5:

Portland-Vancouver-Beaverton, OR-WA

7.85 percent of jobs are reachable in 45 minutes

16.9 percent of jobs are reachable in 60 minutes

39.9 percent of jobs are reachable in 90 minutes

For comparison the average automobile commute in Portland is 22.4 minutes

[http://www.debunkingportland.com/transit\\_and\\_jobs.html](http://www.debunkingportland.com/transit_and_jobs.html)

-----  
3--Policies intended to force people out of their cars to transit will cost BILLIONS of dollars in additional transit subsidies. (a few years ago Tri-met fares only met 22% of operating costs - the OTHER 78% was paid by taxpayers. <http://www.debunkingportland.com/Top10Bus.html>

Is ODOT prepared to write a check to Trimet for the costs of those people forced off the roads on transit in the Portland region?

-----  
4--Tolls will increase CO2 emissions since many people forced out of cars out of their cars will take transit and buses use 29% more energy than cars. This causes about 29% MORE CO2 emissions.: The Transportation Energy Data Book shows cars use 3,144 BTU per- passenger-mile and "Transit Buses" use 4,071, 29% more. Data from

[http://cta.ornl.gov/data/tedb34/Edition34\\_Chapter02.pdf](http://cta.ornl.gov/data/tedb34/Edition34_Chapter02.pdf)  
(NOTE THAT THIS IS A GOVERNMENT PUBLICATION)

-----  
5----Since most of the people who will be forced off the roads by tolls will be low income and since low minorities average lower income, TOLLS ARE RACIST.

-----  
6-- And, as many people mention tolls will cause increased deaths and injury on neighborhood streets because of traffic forced off the safer freeways.

-----  
If you care about racial justice, CO2 emissions, road deaths, discrimination against low income people, and costs, YOU WILL STOP TOLLS.

Thank You

**ODOT I-205 Toll EA - RECORD #2919 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Brendan

**Last Name :** Casey

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?: Those rich in Lake Oswego West Lynn elite just want a paywall around their upper middle class community. Just like the max dose not go into Lake Oswego and West Lynn this is another example of Portland geographical classism. Its about money and the rich can afford it while most of us have food costs

<b>ODOT I-205 Toll EA - RECORD #2920 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Rick
<b>Last Name :</b>	Cook
<b>Affiliation :</b>	
<b>Submission Method :</b>	Letter

**Q3. Comments :**

Dear Ms. Putney:

Here our comments from just one ordinary, local resident of the Stafford Hamlet expressing concerns, feelings and comments that our area is being targeted with overwhelming consequences do to I-205 Tolling project. Our rural character and livability will be destroyed if the current plans move forward as presented.

Respectfully attached are my comments,  
Please confirm receipt of email.

[Text from attachment]

Mandy Putney  
ODOT Urban Mobility Office  
18277 SW Boones Ferry Road  
Tualatin, OR 97224  
Email submit:  
I205TollEA@odot.oregon.gov

The Oregon Department of Transportation's I-205 Tolling Environmental Assessment has not addressed the significant cumulative effects and lacks corrective mitigations that leads to a finding of "significant environmental impacts". I am requesting that the Federal Highway Administration require a full Environmental Impact Study for the I 205 Toll Project. A project that should be evaluated along with the Regional Mobility Pricing Program. The Federal Highway Administration should not issue a Finding of No Significant Impact (FONSI) for ODOT's I-205 Tolling Project.

Stafford neighborhoods and region will be the most highly impacted communities from this project.

Most of the surrounding municipalities concur that the EA's deficiencies, including ignoring unmitigated impacts and misrepresented challenges that will have ever lasting economic and social consequences have not been addressed.

Regional localities will be submitting substantial technical evaluations, so, I would like to provide a simple perspective from an ordinary local resident that lives on Stafford Road and how my life will be changed forever with this project. Its goals and resulting impacts on our livability and rural character in Stafford will be everlasting.

I live on our small family farm that is on the National Register of Historic Places, State of Oregon designated Century Farm, with a State and County Heritage Tree Grove and a stop along the Hazelia Agri-Cultural Heritage Trail. June 12th, we will start our 123rd year of family "Stewardship" of this property, right on Stafford Road. A cherished local treasure that will be impacted by tolling.

There are three scenarios I would like to bring to your attention to show how it will impact the rural livability for those ordinary residents who call Stafford home. I will keep my comments to just three of the numerous impacts and let the others technical responses cover the numerous unanswered concerns. I will be as concise as possible and have provided visuals with slides below.

1. Diverted Traffic Volume- Gantries placed just before Tualatin River bridge just east of Stafford Road off ramp will cause huge numbers to exit at Stafford Rd. and start their back-road travel. Simply put, diversion off I 205 before Tualatin River bridge will all be traveling on Local Stafford Hamlet and CPO roads, Stafford, Borland, Ek, Mountain, Johnson, Childs, Rosemont. All with minimal, poorly designed mitigation before or even well after project is completed. ODOT's EA has no concrete planning for funding of future mitigation. The proposed

mitigation for "Diverted Traffic Volume" is highly questionable and clearly will not solve diversion issues. Improving crosswalks, striping, signaling, reflective tape, bike paths will not mitigate travel diversion in the Stafford area, lack of taking into account the rural make-up and topography of this area leads to "SIGNIFICANT ENVIRONMENTAL IMPACTS". The projected 30%-100% increase in travel impacts on some local road need extensive study and proven solutions accepted by "local" jurisdictions and those that live in the area. "All roads may lead to Rome", But all Divert Traffic Volume off I 205 at Stafford Rd will divert onto Stafford Hamlet and CPO roads. Better Mitigation is needed and has not been addressed in ODOT's EA leaving significant environmental impacts.

(Exhibit #1)

2. The second scenario- Transit- There is NO LOCAL TRANSIT in this area of the project. Here is a trip scenario using current transit option. As a 68-year-old resident, with mobility issues, to take transit to visit Clackamas County Offices for a meeting starting at 6 pm.- (a goal one objective)

- will walk (slowly) a quarter of a mile to catch a bus to downtown Lake Oswego,
- transfer to a bus to go to Oregon City Transfer station,
- change buses again, arrive close and then
- walk a quarter of a mile to County Offices
- time for one way is 2 hours and 57 mins- adjust for mobility issue will be well over 3 hours one way,
- then return in the evening after meeting ending at 8 pm •
- Arrive home around 11 PM, hopefully in good weather-
- (six hours travel time for a 2 hour meeting) Could fly to NY in that amount of time.

Just one Consequence of "economics" that forcing people out of their normal transportation options. Increase in travel time not taken into account when tracking "hours" saved by tolling.

FOR WHOM THE ROAD TOLLS?

A once a week snapshot of a Tolling issue and its impacts !

Exhibit 2

3. Climate - Lack of plan for increased Greenhouse Gas in area. Diversion traffic will actually increase production on local roads that already has 5 of the top highest GHG producers in the region. (exhibit 3) Our State and Clackamas county Heritage Tree Grove with numerous trees well over 150 years old will be put to additional environmental stress and hope we can mitigate for their survival. A treasure we cannot afford to lose.

Air Quality Technical Reports identify miles traveled (VMT) under the Build Alternative. Air Quality Technical Report identifies a 12% increase in annual benzene EA shows average daily traffic on specific non-highway roadways could increase by up to 31% under the Build Alternative. Sensitive receptors- Schools with possibilities of impacts do to diversion. (e.g., residences, Willamette Primary School) are in close proximity to affected non-highway roadways and would be exposed to increased MSAT



concentrations. Not mentioned are numerous others, Stafford elementary, Riverside High School-(formerly Athey Middle School) Arbor Charter, Three Rivers Charter, Church of the Resurrection School, Stafford Academy and Stafford Montessori School all located on projected diversion heavy "local non-highway roadways".

"Air Quality Technical Report is limited to aggregate emissions and does not address concentrations at affected non-highway locations. Raises significant human health concerns without resolving them. The magnitude of potential MSAT concentrations is critical for understanding potential health impact on residents. This information is necessary for the decision-makers as well as the affected communities. Borland Rd currently does not allow truck traffic; therefore, there would effectively be no change in truck traffic on this roadway, but the volume of passenger cars would increase dramatically, along with associated emissions of MSAT. A health risk assessment should be conducted to evaluate impacts from the increase in MSAT along Borland Road and other affected roadways. ODOTs EA completely ignores MSAT concentrations on local roadways from increased truck diversion from variable rate tolling." The cumulative MSAT analysis should address affected non-highway roadways that will experience increase traffic and intersections where the level of service will decline. There is also no discussion of noise thresholds for significance or local policies related to noise. Mitigation is identified for I-205 segments only. The increases in local roadway noise appear to be a significant, unmitigated impact."

( C.C. I-205 Toll Project Environmental Assessment Findings)  
STAFFORD TRANSIT TO CLACKAMAS COUNTY OFFICES

- There are currently NO GOOD Transit Options in the Stafford Region
- 2 HOURS 59 MIN. using Current Bus Transit

Five top Greenhouse gas producers are home to I 205 tolling projects, yet minimal mitigation has been appropriately made to address the increased diversion traffic volume impacts that will add to this growing concern.

Exhibit #3 2018 Estimate of Stafford Region GHG emissions 1,384,867

Exhibit #4

Stafford Hamlet and CPO held a joint meeting with 4 neighboring cities to discuss a

Regional Carbon Sequestration Zone to assist in reaching County and State Climate

goals. Waiting on Clackamas County to complete its Climate Action Plan.

Currently, 4 of the top 5 GHG producers in the region.

Diversion is already a major concern for the region. Stafford

Hamlet has started the conversation with our surrounding neighbors about a Stafford Area Regional Carbon Sequestration Zone to handle our current 28% GHG impacts.

There is NO consideration of solutions in the NEA that will add to improvements to State climate standards only increasing them.

I have tried to relay the story of just one regular, ordinary citizen that will be impacted severely if the I 205 tolling projects if allowed to move forward without an Environmental Impact Study. Drastic change along this corridor will be impacting thousands of "Locals" and mitigation offered to this point will not "fix" those issues.

Looking forward to working with ODOT on the EIS, so we all can be on board

with “fixing” our challenging transportation issues the correct way. Will not be able to put the “Transportation Genie” back in the bottle if we do not get this “Right” before it is implemented.

A full Environmental Impact Study is needed. Do your due diligence and make the correct decision!

Again, I respectfully request the Federal Highway Administration (FHWA) not issue a Finding of No Significant Impact (FONSI) for ODOT’s I-205 Tolling Project.

Sincerely,  
Stafford, OR

**Attachments :**

ODOT EA public Comments 4:21:23 R. Cook.pdf (5 mb)

Mandy Putney  
ODOT Urban Mobility Office  
18277 SW Boones Ferry Road  
Tualatin, OR 97224  
Email submit:  
[I205TollEA@odot.oregon.gov](mailto:I205TollEA@odot.oregon.gov)

The Oregon Department of Transportation's I-205 Tolling Environmental Assessment has not addressed the significant cumulative effects and lacks corrective mitigations that leads to a finding of "significant environmental impacts". I am requesting that the Federal Highway Administration require a full Environmental Impact Study for the I 205 Toll Project. A project that should be evaluated along with the Regional Mobility Pricing Program. The Federal Highway Administration should not issue a Finding of No Significant Impact (FONSI) for ODOT's I-205 Tolling Project.

Stafford neighborhoods and region will be the most highly impacted communities from this project. Most of the surrounding municipalities concur that the EA's deficiencies, including ignoring unmitigated impacts and misrepresented challenges that will have ever lasting economic and social consequences have not been addressed.

Regional localities will be submitting substantial technical evaluations, so, I would like to provide a simple perspective from an ordinary local resident that lives on Stafford Road and how my life will be changed forever with this project. Its goals and resulting impacts on our livability and rural character in Stafford will be everlasting.

I live on our small family farm that is on the National Register of Historic Places, State of Oregon designated Century Farm, with a State and County Heritage Tree Grove and a stop along the Hazelia Agri-Cultural Heritage Trail. June 12<sup>th</sup> we will start our 123rd year of family "Stewardship" of this property, right on Stafford Road. A cherished local treasure that will be impacted by tolling.

There are three scenarios I would like to bring to your attention to show how it will impact the rural livability for those ordinary residents who call Stafford home. I will keep my comments to just three of the numerous impacts and let the others technical responses cover the numerous unanswered concerns. I will be as concise as possible and have provided visuals with slides below.

1. **Diverted Traffic Volume-** Gantries placed just before Tualatin River bridge just east of Stafford Road off-ramp will cause huge numbers to exit at Stafford Rd. and start their back-road travel. Simply put, diversion off I-205 before Tualatin River bridge will all be traveling on Local Stafford Hamlet and CPO roads, Stafford, Borland, Ek, Mountain, Johnson, Childs, Rosemont. All with minimal, poorly designed mitigation before or even well after project is completed. ODOT's EA has no concrete planning for funding of future mitigation. The proposed mitigation for "Diverted Traffic Volume" is highly questionable and clearly will not solve diversion issues. Improving crosswalks, striping, signaling, reflective tape, bike paths will not mitigate travel diversion in the Stafford area, lack of taking into account the rural make-up and topography of this area leads to "SIGNIFICATE ENVIRONMENTAL IMPACTS". The projected 30%-100% increase in travel impacts on some local road need extensive study and proven solutions accepted by "local" jurisdictions and those that live in the area.

“All roads may lead to Rome”, But all Divert Traffic Volume off I 205 at Stafford Rd will divert onto Stafford Hamlet and CPO roads. Better Mitigation is needed and has not been addressed in ODOT’s EA leaving significant environmental impacts.

**4 Options for Truck Deliveries headed to Safeway on Salamo Rd.**

1. Pay toll stay on I-205 Exit at Stafford then-
2. Borland to Salamo
3. Johnson to Salamo
4. Stafford/Rosemont to Salamo. Increase diversion on local street by industrial transport and automobiles will have huge environmental impacts and add to the highest Greenhouse Gas emissions in the region!

**FOR WHOM THE ROAD TOLLS?**

**A once a week snapshot of a Tolling issue and its impacts !**

Stafford Hamlet  
Established 2006

(Exhibit #1)

2. The second scenario- Transit- There is NO LOCAL TRANSIT in this area of the project. Here is a trip scenario using current transit option. As a 68-year-old resident, with mobility issues, to take transit to visit Clackamas County Offices for a meeting starting a 6 pm.- (a goal one objective)

- will walk (slowly) a quarter of a mile to catch a bus to downtown Lake Oswego,
- transfer to a bus to go to Oregon City Transfer station,
- change buses again, arrive close and then
- walk a quarter of a mile to County Offices
- time for one way is 2 hours and 57 mins- adjust for mobility issue will be well over 3 hours one way,
- then return in the evening after meeting ending a 8 pm •
- Arrive home around 11 PM, hopefully in good weather-
- (six hours travel time for a 2 hour meeting) Could fly to NY in that amount of time.

Just one Consequence of “economics” that forcing people out of their normal transportation options. Increase in travel time not taken into account when tracking “hours” saved by tolling.

## STAFFORD TRANSIT TO CLACKAMAS COUNTY OFFICES

- There are currently NO GOOD Transit Options in the Stafford Region
- 2 HOURS 59 MIN. using Current Bus Transit



Exhibit 2

3. Climate - Lack of plan for increased Greenhouse Gas in area. Diversion traffic will actually increase production on local roads that already has 5 of the top highest GHG producers in the region. (exhibit 3) Our State and Clackamas county Heritage Tree Grove with numerous trees well over 150 years old will be put to additional environmental stress and hope we can mitigate for their survival. A treasure we cannot afford to lose.

Air Quality Technical Reports identify miles traveled (VMT) under the Build Alternative. Air Quality Technical Report identifies a 12% increase in annual benzene EA shows average daily traffic on specific non-highway roadways could increase by up to 31% under the Build Alternative.

Sensitive receptors- Schools with possibilities of impacts do to diversion. (e.g., residences, Willamette Primary School) are in close proximity to affected non-highway roadways and would be exposed to increased MSAT concentrations. Not mentioned are numerous others, Stafford elementary, Riverside High School-(formerly Athey Middle School) Arbor Charter, Three Rivers Charter, Church of the Resurrection School, Stafford Academy and Stafford Montessori School all located on projected diversion heavy “local non-highway roadways”.

“Air Quality Technical Report is limited to aggregate emissions and does not address concentrations at affected non-highway locations. Raises significant human health concerns without resolving them. The magnitude of potential MSAT concentrations is critical for understanding potential health impact on residents. This information is necessary for the decision-makers as well as the affected communities. Borland Rd currently does not allow truck traffic; therefore, there would effectively be no change in truck traffic on this roadway, but the volume of passenger cars would increase dramatically, along with associated emissions of MSAT. A health risk assessment should be conducted to evaluate impacts from the increase in MSAT along Borland Road and other affected roadways. ODOTs EA completely ignores MSAT concentrations on local roadways from increased truck diversion from variable rate tolling.” The cumulative MSAT analysis should address affected non-highway roadways that will experience increase traffic and intersections where the level of service will decline. There is also no discussion of noise thresholds for significance or local policies related to noise. Mitigation is identified for I-205 segments only. The increases in local roadway noise appear to be a significant, unmitigated impact.”  
( C.C. I-205 Toll Project Environmental Assessment Findings)

Five top Greenhouse gas producers are home to I 205 tolling projects, yet minimal mitigation has been appropriately made to address the increased diversion traffic volume impacts that will add to this growing concern.

# Environmental Impacts of I-205 Tolling in Stafford Region

**Table 3: Summary Table of Clackamas County 2018 Estimated GHG Emissions by City.**

City	2018 Population	2018 GHG Emissions (estimated)
Barlow	135	1,231
Canby	16,800	153,237
Estacada	3,400	31,012
Gladstone	11,880	108,360
Happy Valley	20,945	191,044
Johnson City	615	5,610
1. Lake Oswego	38,215	348,567
Milwaukie	20,525	187,213
Molalla	9,625	87,792
2. Oregon City	34,860	317,966
Rivergrove	372	3,393
Sandy	10,990	100,242
3. Tualatin	27,602	251,764
4. West Linn	25,830	235,601
5. Wilsonville	25,250	230,311
Unincorporated	169,031	1,541,769
County-Wide Totals		3,795,112
County-Wide Average per Capita GHGs		9.1

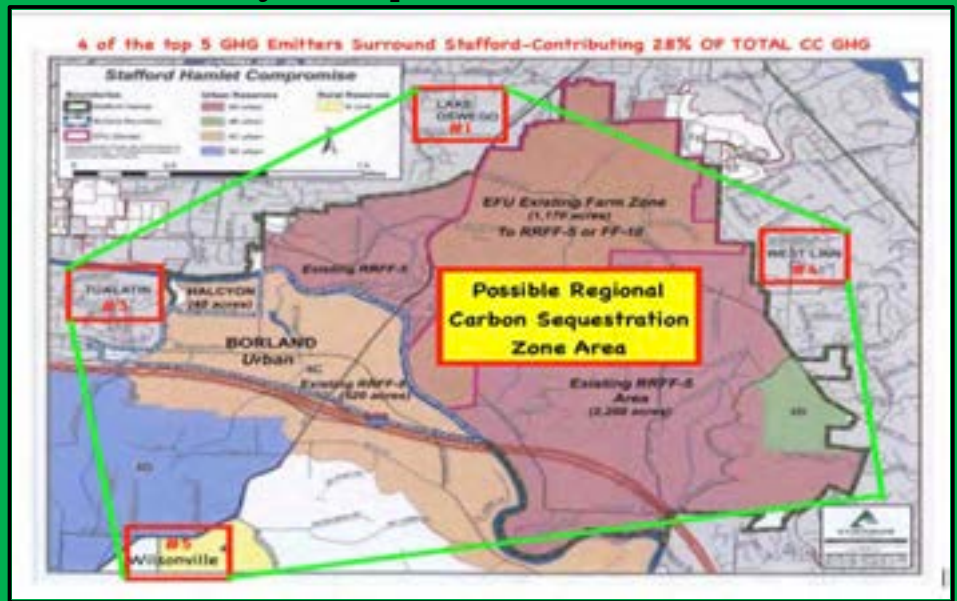
The 5 top Greenhouse gas emitters in the region will be added to by diversion traffic with little or no mitigation to offset increase levels of GHG .

## Exhibit #3 2018 Estimate of Stafford Region GHG emissions 1,384,867

### Stafford Hamlet and CPO held a joint meeting with 4 neighboring cities to discuss a Regional Carbon Sequestration Zone to assist in reaching County and State Climate goals. Waiting on Clackamas County to complete its Climate Action Plan.

Currently, 4 of the top 5 GHG producers in the region. Diversion is already a major concern for the region. Stafford Hamlet has started the conversation with our surrounding neighbors about a Stafford Area Regional Carbon Sequestration Zone to handle our current 28% GHG impacts.

There is NO consideration of solutions in the NEA that will add to improvements to State climate standards only increasing them.



I have tried to relay the story of just one regular, ordinary citizen that will be impacted severely if the I 205 tolling projects if allowed to move forward without an Environmental Impact Study. Drastic change along this corridor will be impacting thousands of “Locals” and mitigation offered to this point will not “fix” those issues.

Looking forward to working with ODOT on the EIS, so we all can be on board with “fixing” our challenging transportation issues the correct way. Will not be able to put the “Transportation Genie” back in the bottle if we do not get this “Right” before it is implemented.

A full Environmental Impact Study is needed. Do your due diligence and make the correct decision!

Again, I respectfully request the Federal Highway Administration (FHWA) not issue a Finding of No Significant Impact (FONSI) for ODOT’s I-205 Tolling Project.

Sincerely,

*Rick Cook*

Rick Cook  
Stafford, OR

**ODOT I-205 Toll EA - RECORD #2921 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Christopher

**Last Name :** Dreger

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
How will this impact wildlife and people living around the expansion area? Without conducting an Environmental Impact Statement there is no way to tell. This is unconscionable. I commute on i205 every day to and from work and this expansion is unnecessary. Put a light rail in across the river. On hot days in Portland it's unhealthy to go outside and exercise because of the particulate matter. This will make things worse. Tire sediment gets washed into the rivers and destroys the salmon, and more. Enough already. At the very least conduct an Environmental Impact Statement.



**ODOT I-205 Toll EA - RECORD #2922 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Pat

**Last Name :** Stelter

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :**

Dear Many Putney,  
Thank you and ODOT for allowing me the opportunity to express concerns regarding Clackamas County I-205 Freeway Tolling.  
I am in opposition to the proposed tolling over all lanes.  
This will undoubtedly send more vehicle congestion onto neighboring side roads, neighborhoods, etc. that are already often overcrowded and safety stressed.  
Obviously there are not other transportation alternative options in these locations, so driving is it.  
And if drivers want/need to avoid paying tolls, they will use devices/GPS to divert to local roads.  
Please consider tolling only the new 3rd lanes for expedited travel as an option for all who choose.  
And please add buses, exempt from tolls, on those lanes as well an alternative form of needed transportation.  
Thank you for listening,

Clackamas County resident

**ODOT I-205 Toll EA - RECORD #2923 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Teresa

**Last Name :** Hill

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

We need solutions that improve transportation safety for all modes of travel, help meet our states climate goals, and our failing bridges repaired. Our communities need help adjusting traffic flow to prevent deaths. More crosswalks, better last mile solutions, mass transit options extended into more suburban neighborhoods and extended out to rural communities.

We need to end our reliance on freeways. ODOT should be leading the charge. Instead you're chaining us to a broken system that imperils lives. At the very least there needs to be an environmental impact assessment done. Best case you look for alternatives that will reduce traffic on the freeway and help people travel safely as they go about their lives.

**ODOT I-205 Toll EA - RECORD #2924 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Luay

**Last Name :** Aljamal

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
As an engineer and a registered PE in the state of Oregon, every project must be subjected to the EIS, because it is the basis for building any project, it is like a building footprint, you need to stand ALL elements of the project and its impacts.

**ODOT I-205 Toll EA - RECORD #2925 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Sky

**Last Name :** Cruz

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Failing to conduct an environmental impact statement on the I-205 Freeway expansion is not only morally reprehensible, it's also incredibly shallow. We know that ODOT has the resources to fully assess the situation but refuse to do so because their findings will support what we already know. This freeway expansion will further increase emissions and worsen the effects of climate. For the sake of young people today and future generations I demand ODOT conduct an environmental impact statement.

**ODOT I-205 Toll EA - RECORD #2926 DETAIL**

**Submission Date :** 4/20/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** With all of the Democratic policies sending most of us to the poor house, the endless crime and metastasizing homeless problem, you really want to start charging me money to go from Clackamas to Hillsboro to see my sister?

Where are your heads and common sense? I'd ask about your hearts, but I don't think any of you came with one.

NO,NO,NO to this idiotic, greedy, brainless plan.

**ODOT I-205 Toll EA - RECORD #2927 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Ryan

**Last Name :**

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I demand ODOT conduct an environmental impact statement because the I-205 freeway expansion go completely against Oregon's climate reduction goals.

<b>ODOT I-205 Toll EA - RECORD #2928 DETAIL</b>
---

**Submission Date :** 4/20/2023

**First Name :** Yolanda

**Last Name :** H.

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :**

There should not be a toll on the I-5 or I-205 crossings. This toll mainly effects low income families who live in Washington and work in Oregon, like myself. Residents who travel back and forth between the states daily, this toll would contribute to the already existing financial hardships Washingtonians face. The cost of living, food, and gas is higher than its ever been and wages not being able to keep up; Adding this toll could possibly bankrupt residents and contribute to the homeless issues both states face.

Making this toll will put strains on families mental health, with members who live in either state. We should not have to choose between not seeing a loved one because we can't afford the toll. The pandemic has already put similar strains on families.

This toll is NOT good for Washingtonans.

Thank you,

<b>ODOT I-205 Toll EA - RECORD #2929 DETAIL</b>
---

<b>Submission Date :</b>	4/20/2023
<b>First Name :</b>	Matt
<b>Last Name :</b>	Brown
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email



**Q3. Comments :**

My family lives in West Linn, about 2 miles from Abernethy bridge. We frequently drive Borland Road on our commutes, and for our errands and school trips we take Rosemont Rd, Stafford Rd, and State Highway 43.

When I've mentioned 205 tolling to my family & neighbors, most of them are hearing about it for the first time. We have been following the tolling project closely, and have some serious concerns.

ODOT likes to point to its tolling engagement opportunities for the public, but these were all prior to issuance of the draft Environmental Assessment! Now that this critical document has been released, an extended period of time to review and an extended public comment period is sorely needed.

Having forgotten to include West Linn in the list of affected communities, ODOT belatedly scheduled a tabling session here on April 12 after the City complained. I was fortunate to have flexibility to attend that tabling session during a workday, with less than a week's notice. Several of my neighbors did not have the flexibility in their work schedules to attend, so their voices will not be heard unless time is added to the Public Comment period.

I ask that you extend the public comment period for an additional 30 days.

We support highway and bridge improvements, reduced traffic congestion, and seismic upgrades, and hope these will result from the I-205 upgrades. And we realize that transportation improvements are expensive. New funding sources are necessary, and the entire region's drivers must step up and contribute to paying for this funding. Having multi-modal transportation is also important to us, so that we don't feel we need to drive everywhere. West Linn & Oregon City are woefully underserved by public transportation.

I ask ODOT to partner with Transit Districts to improve mass transit options and create bus service between West Linn's 4 separate commercial areas.

I request that ODOT conducts an Environmental Impact Statement (EIS) for the tolling project, for additional environmental analysis and more public hearings during non-working hours so people who work a standard work schedule are able to participate.

I ask ODOT to more thoroughly address questions of Equity. Both toll gantries were placed within West Linn's city limits. The 3 of us in my family cross the toll gantries sites at least 8-10 times per week. When tolling begins under ODOT's plan, citizens of the entire West Coast will see positive impacts and better transportation outcomes, but ALL the negative impacts will affect just our local communities. Besides the financial hit from tolls, the negative impacts of I-205 tolling will not be shared by anyone else in the region. I worry that with the current inflationary state, some citizens who won't be able to afford the toll will be unable to drive from their homes to get necessities.

I ask that you delay toll collection on I-205 until the Regional Mobility Pricing (Toll) Project is completed.

I ask ODOT to commit to keep the dollars collected at the West Linn toll gantries in our community, by spending them on mitigation measures in West Linn and Oregon City.

I request that you cap at \$100 the maximum toll that any single vehicle or driver can be charged in a month.

Our family is very concerned about safety on our roadways. The West Linn Oregon City bridge already experiences extensive back ups at least 3 hours a day, which backs up and blocks other local streets. Denyse McGriff, the Mayor of Oregon City, said "What's not being acknowledged is the increased burden that diversion will cause on our jurisdictions. We have local streets; they're not designed to take that type of traffic, and we've been told that the proposal only deals with the regional system. It's not concerned about the

local streets.” My own city’s Mayor has echoed that, saying repeatedly that our cities have been sounding the alarms for years to ODOT, but no one appears to be listening.

Local traffic will definitely get much worse because of bailout traffic from 205. This means clogging up arterial roads such as Highway 43, Stafford Road, Rosemont Road, and Willamette Falls Drive, all of which our family drives regularly. Most are already bottlenecks from drivers diverting from congestion on 205.

ODOT has proposed a new crosswalk and flashing beacon for pedestrians near Willamette Primary School, but what about the other schools located on local roads where I-205 traffic will be diverted, such as Stafford Primary School, Trillium Creek Primary School, Bolton Primary School, and Rosemont Ridge Middle School? What about the crowds of high school students who must cross Highway 43 within blocks of its intersection with I-205? Our child attended 4 of these schools in past years. In the years that we walked her to school, we witnessed numerous incidents where children walked into these busy roadways without looking.

ODOT has inadequate plans to reduce negative impacts of the project (mitigation), and has repeatedly failed to identify other measures. I request that you take additional time to develop the following concrete measures:

Please add traffic mitigation at the intersection of Stafford Rd & Borland Rd (Stafford Primary School, Trillium Creek Primary School, and Rosemont Ridge Middle School)

Please add traffic mitigation at the intersection of Rosemont Rd & Bay Meadows Rd (Trillium Creek Primary School)

Please add traffic mitigation at Rosemont Road, at the West Linn Adult Community Center

Please add traffic mitigation at the intersection of Rosemont Rd & Salamo Rd (at Rosemont Ridge Middle School)

Please add traffic mitigation at the intersection of I-205 & Highway 43 (near West Linn High School)

Please add traffic mitigation at the I-205 & 10th Street interchange.

I ask ODOT to specify which specific mitigation projects will be implemented, and the funding sources for each. Thank you,

<b>ODOT I-205 Toll EA - RECORD #2930 DETAIL</b>
---

<b>Submission Date :</b>	4/20/2023
<b>First Name :</b>	Mary
<b>Last Name :</b>	McKnight
<b>Affiliation :</b>	
<b>Submission Method :</b>	Letter

**Q3. Comments :**

Dear I205 Toll EA Comment Manager -

I am attaching a letter which summarizes my concerns about the proposal to toll a segment of Interstate 205 and about the inadequacies of the EA itself. In brief:

- \* The proposed tolling places unfair economic burdens on local residents for a project on one of the busiest highways in the state.
- \* It will decrease the quality of life of those living in the project area more than it will improve it.
- \* It will not result in better access to alternate modes of transportation.
- \* The entire regional tolling scheme that ODOT is apparently planning needs to be analyzed in an Environmental Impact Statement, not a series of disjointed Environmental Assessments which will not give an adequate analysis of the cumulative effects of all of the proposed tolling.
- \* In short, this tolling proposal sucks and should not be implemented.

My specific comments and concerns are attached to this email in a PDF document.

Sincerely,

[Text from attachment]

April 20, 2023

Thank you for the opportunity to provide comments on the I-205 Toll Project Environmental Assessment (EA). After reviewing the EA, I have concerns I will summarize in this letter.

1) There will be significant impacts of traffic diverting off of I-205 to local communities. I think the potential impacts are not only underestimated, ODOT is purposefully minimizing the estimated impacts. From a review of the EA, it will worsen in far more areas than improve, yet ODOT's Project Overview contains the vague statement that "traffic congestion improves some locations and worsens in others".

- The EA states that as much as 50% of the current afternoon peak commute traffic could divert off of I-205 and I-5 causing increased traffic on local roads like Nyberg Street, SW 65th Ave, SW Borland Road, SW Stafford Road, SW Ek Road, SW Johnson Road, SW Childs Road, Rosemont Road, Summit Street, Cornwall Street, Sunset Avenue, SW Mountain Road, SW Schaeffer Road, SW Petes Mountain Road, Willamette Falls Road, Hidden Springs Road, Highway 43 through Lake Oswego & West Linn & the Arch Bridge, Highway 99/McLoughlin Boulevard through Milwaukie & Gladstone & Oregon City & Canby & Aurora, Highway 213 through Oregon City & Mulino & Molalla & Woodburn, 82nd Drive, Oatfield Road and Webster Road. This isn't even an exhaustive list of the roads people will divert to in order to avoid paying tolls. I have driven every single one of these roads at various times to avoid traffic jams on I-205. Each one of them already experience high traffic volumes during commuting hours. For years I have felt sorry for some of the people who currently live along these routes during the afternoon and evening commute. I can't imagine how hard it will be for these people to even leave their driveways in some places once tolling is in place.

Toll diversion traffic will most certainly decrease quality of life for people living along these routes, for people who will seek to use them to avoid paying tolls and will have even longer commute times as a result, and for people who want to

patronize businesses along these routes.

- We live between Canby and Oregon City and commute often on both Highway

99E through Canby and Oregon City and on Highway 213. Highway 99E through

Canby is consistently in terrible shape with potholes and during commuting hours feels over capacity. Even without additional toll diversion traffic, there is already continuation of increased traffic on the way for the stretch of Highway 99E between Aurora and Canby and Oregon City with the build-out of the Canby Industrial Park. For example, the relocation of the Oregon Liquor and Cannabis Commission's warehouse to Canby will mean all state liquor distribution trucks will be travelling on some portion of 99E in the Canby/Oregon

City/Aurora area. A new steel fabrication factory just being completed will add commuter and truck traffic to 99E. There were plans, currently on hold, for a giant Amazon warehouse in the Canby Industrial Park which would add major commuter and truck traffic to 99E in the Canby/Oregon City/Aurora area.

Those

projects are all cause of concern for us before even adding the increased traffic

from toll diversion, and I feel all that increased traffic from the industrial park is

probably not being adequately factored into this EA analysis.

- Increased toll diversion traffic to Highway 213 southbound through Oregon City, which is already in failure during peak times and which will certainly be made worse by toll diversion, isn't even mentioned in this document!

- On pages 3-21 and 3-22 there are lists which in my opinion don't cover all of the

roads and intersections that will experience increased travel due to toll diversion.

Many of them do not currently meet standards at peak commuting hours and under the Build Alternative (toll alternative), several of them will be made even

worse. Pages 3-78 through 3-82 list many major intersections in Canby, Gladstone, Lake Oswego, Oregon City, Milwaukie, Tualatin, West Linn, the Stafford Hamlet, and unincorporated Clackamas County that will become more

congested under the Build Alternative. It is clear from these incomplete and inadequate descriptions of diversion traffic effects that the Build Alternative (toll alternative) will exacerbate already bad peak commuting hours traffic on most main local roads in the project analysis area.

- The Project Overview Summary states that on local streets, traffic congestion

improves in some locations and worsens in others, a misleading and incomplete statement when in fact the EA predicts that traffic congestion will worsen on a majority of the local roads analyzed.

2) The document lacks descriptions of clear or adequate mitigation plans/projects.

- There are some potential mitigation actions listed for some of these local road

congestion problem spots, but I gather that most of the mitigation projects will not be in place prior to tolling. There is vague reference to further analysis of mitigation in some revised EA after discussion with local jurisdictions and monitoring these areas for future mitigation, but no discussion of costs, a timeline, or funding sources for these projects.

- This is wholly inadequate as the increased traffic will make life a living hell on

these roads for both residents and drivers for probably years before mitigation is implemented, and my feeling is that any mitigation options are limited and will

not adequately mitigate the significant negative of toll diversion congestion in local communities.

3) There will be negative and inequitable impacts of the cost of tolling to local citizens,

especially those with low and fixed incomes and those who do not have the ability to

change commuting times.

- People are already struggling to make ends meet with the current inflation and ever-widening income gap economic environment. I find the flippant references to people choosing to commute at off-peak times offensive as many working people do not have the flexibility to commute at off-peak times. People who have the flexibility to avoid driving on I-205 during peak times are probably already doing it. For people who cannot avoid driving five days per week during peak times, it could cost an additional approximately \$2,000+ per year for the necessary two trips per day through this toll area. That is a wholly unacceptably high cost.

- Tolling will result in higher transportation costs as a percent of household expenses for everyone who must drive this section of I-205, which is negative for all and exceptionally burdensome for people with low incomes. Although there is mention of variable rate tolling or some kind of tolling discounts based on income, a nebulous plan to mitigate negative toll cost effects to low income people is not adequately described or analyzed in this document. How difficult will those programs be to access (ie how much red tape will people have to wade through to get reduced toll fees)?

- This analysis does not include any information about the potential additional tolling expenses of the larger Regional Mobility Pricing Project and the even larger Urban Mobility Strategy. There will probably be additional tolls on all of I-5 and I-205 in the Portland area, on both the I-5 and I-205 interstate bridges, and

I've even heard mention of potential tolling on other major roads like I-84, Highway 26, Highway 217, and Highway 30. These additional costs could be devastating for lower income people and for those who must drive long distances in and around the Portland metropolitan area either to get to work or for their work.

4) More alternatives to pay for the seismic improvements and third lane addition on this section of I-205 should have been developed and analyzed.

- Analyzing only one foregone conclusion that tolling is the only way to fund these projects is a misuse of the National Environmental Policy Act (NEPA) process which resulted in a far too narrow range of alternatives and analysis in this document.

- NEPA is not meant to analyze the impacts of a decision that has already been made to do a certain project in a certain way. It is meant to analyze the impacts of different ways to achieve the purpose and need of a project so the responsible official can make an informed decision about which alternative to pursue. In this case it seems this is simply a rubber stamp for a decision that has already been made to do the project one way and pay for it through tolling.

- Why were there no alternative ways to raise this revenue proposed? If the problem really is, as presented on page 1-4 of the EA, that the traditional ways of funding large transportation improvement projects in the state are no longer adequate to pay for necessary improvements, that issue is far bigger than just these I-205 projects. It is a statewide issue concerning how to fund expensive transportation projects on our interstate and state highway system. There could be increased vehicle registration fees across the state. There could be a .25 or .5 percent increase of the income tax rate in Oregon. There could be an allocation from excess income tax revenue (the kicker) for highway improvements related to seismic upgrades and congestion relief.

- Tolling is one of the more expensive ways to raise this revenue, yet I saw little mention of this. Implementing a tolling program when none already exists, including construction of the gantries, the cost of the electronic devices for each vehicle, the collection of tolls, the enforcement action on people who do not pay, etc is a pretty expensive way to raise the revenue to pay for these I-205 improvements in comparison to some other alternatives where tax collection methods and infrastructure is already in place.

5) Tolling departs significantly from our traditional/historical funding mechanisms for similar projects in Oregon and raises the question of why this is only being proposed in the Portland Metro region.

- The EA describes the wider benefits of the seismic upgrades and lane widening on this section of I-205 to not only the regional economy, but to the whole state in terms of the movement of goods and services as well as mitigating negative impacts to the environment like greenhouse gas emission. It also talks about the needs for seismic upgrades throughout the state. Typically in the past these types of highway projects have been funded through allocation of state income tax revenue, federal tax revenue, gas taxes, weight-mile taxes, and driver and motor vehicle fees. Historically, tolling has only been used on a limited basis to pay for bridges crossing the Columbia River. I feel tolling has not been implemented widely in Oregon because in our state culture, we don't saddle each region with covering their own transportation improvement costs. If that were the case, projects in eastern and southern Oregon would probably have to cease for a lack of adequate funding. The economy in the Portland metropolitan area probably funds a significant portion of these types of projects throughout the rest of the state already. I hear of no plans to put a toll on for example Highway 97 between Redmond and Bend which needs \$2 million in safety improvements, or tolls to pay for the \$25 million Southern Oregon Seismic Triage and Resiliency Project on I-5, Highway 140, and Del Rio Road that is currently underway. Where did the funds come from for the recent massive lighting and other roadway improvements to the notorious Cabbage Hill stretch of I-84 east of Pendleton? Certainly not from the residents of Pendleton and La Grande via tolling.

- By the same logic that ODOT staff and some Oregon legislators are advocating about how there should be user fees borne by local residents in the form of these types of tolls, shouldn't every expensive transportation project in Oregon from here on out be tolled? Why are Portland metropolitan area residents, beginning specifically with the residents of Clackamas County, being saddled with tolling to pay for these projects on one of the most heavily used highways in the state?

6) The EA has inadequate evaluation of the potential for development of alternative modes of transportation, yet uses that as a justification for tolling to begin with.

- One justification of tolling is that it would encourage some people to seek alternate methods of transportation. I see little discussion of this in the document. There are few existing options for mass transportation like TriMet bus routes or light rail or even bicycling routes or walkable communities in this

area and not really any discussion in this document of making these alternate methods of transportation more widely available in the analysis area.

7) ODOT emphasizes project benefits in the Project Overview and misrepresents, minimizes, or omits accurate descriptions of project negatives. This is misleading and disingenuous.

- The project overview generally touts improvements to I-205 while ignoring or minimizing negative impacts to local communities while expecting the residents of those communities to bear the brunt of project costs.

- The project overview claims a reduction of congestion on I-205 but does not adequately describe the significant major increases in congestion on many local roads. It just says congestion will get better on some streets and worse on others, failing to accurately state that it will get worse on the majority of local alternate routes.

- The project overview claims 26 percent fewer crashes on I-205, but fails to mention the decreased safety on many local roads.

- The project overview claims 25 to 50 percent faster commute times on I-205, but fails to discuss or quantify the additional congestion and longer commute times on local roads that will result.

- The project overview claims transit, pedestrian, bicycle, and safety investments in local cities and Clackamas County, but I struggled to find them in the Project Overview or in the EA itself.

- There is a claim that there will be benefits to local businesses in Canby, West Linn, and Oregon City with increased local traffic, but these areas already have inadequate parking for popular times of the day. Have you tried to find parking in downtown Oregon City most days or evenings? It's not easy.

- I just find the whole premise that the benefits outweigh the costs of tolling to preposterous. Stating that better travel times on I-205 benefits everyone is a hard sell to someone looking at paying an additional \$2,000 bucks when they only make \$40,000 a year to begin with and their neighborhood main travel route becomes even more clogged and congested than it already is. If the benefits are so widespread to so many Oregonians, why is such a small group of Clackamas County residents being expected to bear the brunt of the cost.

8) ODOT should really have done an Environmental Impact Statement to address cumulative impacts of all of their tolling plans instead of doing several disjointed Environmental Assessments.

- As a former National Environmental Policy Act (NEPA) document author for projects on the Mt. Hood National Forest, I would first like to comment that I find ODOT's strategy of piecemealing these project-by-project tolling Environmental Assessments rather than producing a more appropriate Environmental Impact Statement to be in violation of the requirements of NEPA. ODOT has established some sort of Urban Mobility Strategy under which they intend to implement a Regional Mobility Pricing Project of which the I-205 Toll Project is the first step.

They know they plan to add tolls to locations all along I-205 and I-5 in the Portland Metro area, probably on both interstate bridges in the Portland Metro area, and I have even heard rumors of expanding tolling to other major highways in the Metro area like I-84, Highway 26, Highway 217, maybe additional highways



such as Highway 30 and Highway 213. What will be the impact of all of these tolls on people who live and work here? Will Portland become one of the most expensive cities in America in which to drive? When will it stop? And why is tolling only being implemented in the Portland Metro area if it is the only way to pay for major projects?

- My point is that ODOT should not be doing one EA here and one EA there to analyze the impacts of what seems to be a much larger tolling program they are planning to implement. Since ODOT seems to have already developed a Regional Mobility Pricing Program, they should be doing an EIS to assess the cumulative effects of the whole tolling program. The USDA Forest Service has lost several times in court over doing several EA analyses of individual timber sale projects instead of doing one larger Environmental Impact Statement to analyze the cumulative effect of say a 10-year forest management plan to harvest timber over a large area. It seems to me that ODOT is going down the same path and risking litigation by choosing to do these piecemeal individual Environmental Assessments.

These are my main concerns. Thank you again for the opportunity to comment. A massive tolling program for the Portland region is a terrible idea. Go ahead and toll the interstate bridges, but find other ways to fund expensive highway projects. The negatives far outweigh the positives here.  
Sincerely,

**Attachments :**

M.McKnight I-205Toll EA Comments 4-20-23.pdf (199 kb)

April 20, 2023

From: Mary McKnight  
23350 S. Ward Ct.  
Oregon City, OR 97045  
Email: [mollymck.mm@gmail.com](mailto:mollymck.mm@gmail.com)

To: Mandy Putney  
Oregon Department of Transportation  
Via Email [I205TollEA@odot.gov](mailto:I205TollEA@odot.gov)

Dear Ms. Putney,

Thank you for the opportunity to provide comments on the I-205 Toll Project Environmental Assessment (EA). After reviewing the EA, I have concerns I will summarize in this letter.

- 1) **There will be significant impacts of traffic diverting off of I-205 to local communities. I think the potential impacts are not only underestimated, ODOT is purposefully minimizing the estimated impacts. From a review of the EA, it will worsen in far more areas than improve, yet ODOT's Project Overview contains the vague statement that "traffic congestion improves some locations and worsens in others".**
  - The EA states that as much as 50% of the current afternoon peak commute traffic could divert off of I-205 and I-5 causing increased traffic on local roads like Nyberg Street, SW 65<sup>th</sup> Ave, SW Borland Road, SW Stafford Road, SW Ek Road, SW Johnson Road, SW Childs Road, Rosemont Road, Summit Street, Cornwall Street, Sunset Avenue, SW Mountain Road, SW Schaeffer Road, SW Petes Mountain Road, Willamette Falls Road, Hidden Springs Road, Highway 43 through Lake Oswego & West Linn & the Arch Bridge, Highway 99/McLoughlin Boulevard through Milwaukie & Gladstone & Oregon City & Canby & Aurora, Highway 213 through Oregon City & Mulino & Molalla & Woodburn, 82<sup>nd</sup> Drive, Oatfield Road and Webster Road. This isn't even an exhaustive list of the roads people will divert to in order to avoid paying tolls. I have driven every single one of these roads at various times to avoid traffic jams on I-205. Each one of them already experience high traffic volumes during commuting hours. For years I have felt sorry for some of the people who currently live along these routes during the afternoon and evening commute. I can't imagine how hard it will be for these people to even leave their driveways in some places once tolling is in place. **Toll diversion traffic will most certainly decrease quality of life** for people living along these routes, for people who will seek to use them to avoid paying tolls and will have even longer commute times as a result, and for people who want to patronize businesses along these routes.
  - We live between Canby and Oregon City and commute often on both Highway 99E through Canby and Oregon City and on Highway 213. Highway 99E through Canby is consistently in terrible shape with potholes and during commuting

hours feels over capacity. **Even without additional toll diversion traffic, there is already continuation of increased traffic on the way for the stretch of Highway 99E between Aurora and Canby and Oregon City with the build-out of the Canby Industrial Park.** For example, the relocation of the Oregon Liquor and Cannabis Commission's warehouse to Canby will mean all state liquor distribution trucks will be travelling on some portion of 99E in the Canby/Oregon City/Aurora area. A new steel fabrication factory just being completed will add commuter and truck traffic to 99E. There were plans, currently on hold, for a giant Amazon warehouse in the Canby Industrial Park which would add major commuter and truck traffic to 99E in the Canby/Oregon City/Aurora area. **Those projects are all cause of concern for us before even adding the increased traffic from toll diversion, and I feel all that increased traffic from the industrial park is probably not being adequately factored into this EA analysis.**

- **Increased toll diversion traffic to Highway 213 southbound through Oregon City, which is already in failure during peak times and which will certainly be made worse by toll diversion, isn't even mentioned in this document!**
- On pages 3-21 and 3-22 there are lists which in my opinion don't cover all of the roads and intersections that will experience increased travel due to toll diversion. **Many of them do not currently meet standards at peak commuting hours and under the Build Alternative (toll alternative), several of them will be made even worse.** Pages 3-78 through 3-82 list many major intersections in Canby, Gladstone, Lake Oswego, Oregon City, Milwaukie, Tualatin, West Linn, the Stafford Hamlet, and unincorporated Clackamas County that will become more congested under the Build Alternative. **It is clear from these incomplete and inadequate descriptions of diversion traffic effects that the Build Alternative (toll alternative) will exacerbate already bad peak commuting hours traffic on most main local roads in the project analysis area.**
- **The Project Overview Summary states that on local streets, traffic congestion improves in some locations and worsens in others, a misleading and incomplete statement when in fact the EA predicts that traffic congestion will worsen on a majority of the local roads analyzed.**

**2) The document lacks descriptions of clear or adequate mitigation plans/projects.**

- There are some potential mitigation actions listed for some of these local road congestion problem spots, but I gather that **most of the mitigation projects will not be in place prior to tolling.** There is vague reference to further analysis of mitigation in some revised EA after discussion with local jurisdictions and monitoring these areas for future mitigation, but no discussion of costs, a timeline, or funding sources for these projects.
- **This is wholly inadequate as the increased traffic will make life a living hell on these roads for both residents and drivers for probably years before mitigation is implemented,** and my feeling is that any mitigation options are limited and will not adequately mitigate the significant negative of toll diversion congestion in local communities.

**3) There will be negative and inequitable impacts of the cost of tolling to local citizens, especially those with low and fixed incomes and those who do not have the ability to change commuting times.**

- People are already struggling to make ends meet with the current inflation and ever-widening income gap economic environment. I find the flippant references to people choosing to commute at off-peak times offensive as many working people do not have the flexibility to commute at off-peak times. **People who have the flexibility to avoid driving on I-205 during peak times are probably already doing it.** For people who cannot avoid driving five days per week during peak times, **it could cost an additional approximately \$2,000+ per year for the necessary two trips per day through this toll area. That is a wholly unacceptably high cost.**
- Tolling will result in higher transportation costs as a percent of household expenses for everyone who must drive this section of I-205, which is negative for all and **exceptionally burdensome for people with low incomes.** Although there is mention of variable rate tolling or some kind of tolling discounts based on income, **a nebulous plan to mitigate negative toll cost effects to low income people is not adequately described or analyzed in this document. How difficult will those programs be to access (ie how much red tape will people have to wade through to get reduced toll fees)?**
- **This analysis does not include any information about the potential additional tolling expenses of the larger Regional Mobility Pricing Project and the even larger Urban Mobility Strategy.** There will probably be additional tolls on all of I-5 and I-205 in the Portland area, on both the I-5 and I-205 interstate bridges, and I've even heard mention of potential tolling on other major roads like I-84, Highway 26, Highway 217, and Highway 30. **These additional costs could be devastating for lower income people and for those who must drive long distances in and around the Portland metropolitan area either to get to work or for their work.**

**4) More alternatives to pay for the seismic improvements and third lane addition on this section of I-205 should have been developed and analyzed.**

- Analyzing only one foregone conclusion that tolling is the only way to fund these projects is a misuse of the National Environmental Policy Act (NEPA) process which resulted in **a far too narrow range of alternatives and analysis in this document.**
- **NEPA is not meant to analyze the impacts of a decision that has already been made to do a certain project in a certain way.** It is meant to analyze the impacts of different ways to achieve the purpose and need of a project so the responsible official can make an informed decision about which alternative to pursue. In this case it seems this is simply a rubber stamp for a decision that has already been made to do the project one way and pay for it through tolling.

- **Why were there no alternative ways to raise this revenue proposed? If the problem really is, as presented on page 1-4 of the EA, that the traditional ways of funding large transportation improvement projects in the state are no longer adequate to pay for necessary improvements, that issue is far bigger than just these I-205 projects. It is a statewide issue concerning how to fund expensive transportation projects on our interstate and state highway system.** There could be increased vehicle registration fees across the state. There could be a .25 or .5 percent increase of the income tax rate in Oregon. There could be an allocation from excess income tax revenue (the kicker) for highway improvements related to seismic upgrades and congestion relief.
- **Tolling is one of the more expensive ways to raise this revenue, yet I saw little mention of this.** Implementing a tolling program when none already exists, including construction of the gantries, the cost of the electronic devices for each vehicle, the collection of tolls, the enforcement action on people who do not pay, etc is a pretty expensive way to raise the revenue to pay for these I-205 improvements in comparison to some other alternatives where tax collection methods and infrastructure is already in place.

**5) Tolling departs significantly from our traditional/historical funding mechanisms for similar projects in Oregon and raises the question of why this is only being proposed in the Portland Metro region.**

- The EA describes the wider benefits of the seismic upgrades and lane widening on this section of I-205 to not only the regional economy, but to the whole state in terms of the movement of goods and services as well as mitigating negative impacts to the environment like greenhouse gas emission. It also talks about the needs for seismic upgrades throughout the state. Typically in the past these types of highway projects have been funded through allocation of state income tax revenue, federal tax revenue, gas taxes, weight-mile taxes, and driver and motor vehicle fees. Historically, tolling has only been used on a limited basis to pay for bridges crossing the Columbia River. **I feel tolling has not been implemented widely in Oregon because in our state culture, we don't saddle each region with covering their own transportation improvement costs. If that were the case, projects in eastern and southern Oregon would probably have to cease for a lack of adequate funding. The economy in the Portland metropolitan area probably funds a significant portion of these types of projects throughout the rest of the state already.** I hear of no plans to put a toll on for example Highway 97 between Redmond and Bend which needs \$2 million in safety improvements, or tolls to pay for the \$25 million Southern Oregon Seismic Triage and Resiliency Project on I-5, Highway 140, and Del Rio Road that is currently underway. Where did the funds come from for the recent massive lighting and other roadway improvements to the notorious Cabbage Hill stretch of I-84 east of Pendleton? Certainly not from the residents of Pendleton and La Grande via tolling.

- **By the same logic that ODOT staff and some Oregon legislators are advocating about how there should be user fees borne by local residents in the form of these types of tolls, shouldn't every expensive transportation project in Oregon from here on out be tolled? Why are Portland metropolitan area residents, beginning specifically with the residents of Clackamas County, being saddled with tolling to pay for these projects on one of the most heavily used highways in the state?**

**6) The EA has inadequate evaluation of the potential for development of alternative modes of transportation, yet uses that as a justification for tolling to begin with.**

- One justification of tolling is that it would encourage some people to seek alternate methods of transportation. **I see little discussion of this in the document.** There are few existing options for mass transportation like TriMet bus routes or light rail or even bicycling routes or walkable communities in this area and not really any discussion in this document of making these alternate methods of transportation more widely available in the analysis area.

**7) ODOT emphasizes project benefits in the Project Overview and misrepresents, minimizes, or omits accurate descriptions of project negatives. This is misleading and disingenuous.**

- The project overview generally touts improvements to I-205 while ignoring or minimizing negative impacts to local communities while expecting the residents of those communities to bear the brunt of project costs.
- The project overview claims a reduction of congestion on I-205 but does not adequately describe the significant major increases in congestion on many local roads. It just says congestion will get better on some streets and worse on others, failing to accurately state that it will get worse on the majority of local alternate routes.
- The project overview claims 26 percent fewer crashes on I-205, but fails to mention the decreased safety on many local roads.
- The project overview claims 25 to 50 percent faster commute times on I-205, but fails to discuss or quantify the additional congestion and longer commute times on local roads that will result.
- The project overview claims transit, pedestrian, bicycle, and safety investments in local cities and Clackamas County, but I struggled to find them in the Project Overview or in the EA itself.
- There is a claim that there will be benefits to local businesses in Canby, West Linn, and Oregon City with increased local traffic, but these areas already have inadequate parking for popular times of the day. Have you tried to find parking in downtown Oregon City most days or evenings? It's not easy.
- I just find the whole premise that the benefits outweigh the costs of tolling to preposterous. Stating that better travel times on I-205 benefits everyone is a hard sell to someone looking at paying an additional \$2,000 bucks when they

only make \$40,000 a year to begin with and their neighborhood main travel route becomes even more clogged and congested than it already is. If the benefits are so widespread to so many Oregonians, why is such a small group of Clackamas County residents being expected to bear the brunt of the cost.

**8) ODOT should really have done an Environmental Impact Statement to address cumulative impacts of all of their tolling plans instead of doing several disjointed Environmental Assessments.**

- As a former National Environmental Policy Act (NEPA) document author for projects on the Mt. Hood National Forest, I would first like to comment that I find ODOT's strategy of piecemealing these project-by-project tolling Environmental Assessments rather than producing a more appropriate Environmental Impact Statement to be in violation of the requirements of NEPA. ODOT has established some sort of Urban Mobility Strategy under which they intend to implement a Regional Mobility Pricing Project of which the I-205 Toll Project is the first step. They know they plan to add tolls to locations all along I-205 and I-5 in the Portland Metro area, probably on both interstate bridges in the Portland Metro area, and I have even heard rumors of expanding tolling to other major highways in the Metro area like I-84, Highway 26, Highway 217, maybe additional highways such as Highway 30 and Highway 213. What will be the impact of all of these tolls on people who live and work here? Will Portland become one of the most expensive cities in America in which to drive? When will it stop? And why is tolling only being implemented in the Portland Metro area if it is the only way to pay for major projects?
- My point is that **ODOT should not be doing one EA here and one EA there to analyze the impacts of what seems to be a much larger tolling program they are planning to implement.** Since ODOT seems to have already developed a Regional Mobility Pricing Program, **they should be doing an EIS to assess the cumulative effects of the whole tolling program.** The USDA Forest Service has lost several times in court over doing several EA analyses of individual timber sale projects instead of doing one larger Environmental Impact Statement to analyze the cumulative effect of say a 10-year forest management plan to harvest timber over a large area. It seems to me that ODOT is going down the same path and risking litigation by choosing to do these piecemeal individual Environmental Assessments.

These are my main concerns. Thank you again for the opportunity to comment. A massive tolling program for the Portland region is a terrible idea. Go ahead and toll the interstate bridges, but find other ways to fund expensive highway projects. The negatives far outweigh the positives here.

Sincerely,

/s/ Mary McKnight

<b>ODOT I-205 Toll EA - RECORD #2931 DETAIL</b>	
---	--

**Submission Date :** 4/20/2023

**First Name :** John

**Last Name :** Staelens

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

Knowing the environmental problems that are becoming ever more obvious an Environmental Impact Statement should be done of a for a project of this size.



**ODOT I-205 Toll EA - RECORD #2933 DETAIL**

**Submission Date :** 4/20/2023  
**First Name :** Hugh & Joni  
**Last Name :** Black  
**Affiliation :**  
**Submission Method :** Paper form  
**Q3. Comments :** Good Afternoon Mandy:

Attached please find the assessment comment form turned in by [ ] and [ ]. I've cc'd them on this message as a sort of receipt. They came to our offices this morning at the Boones building to hand in their feedback before the 4/21/2023 deadline. Let me know if you would like me to forward the paper original to the UMO offices in downtown Portland, or if the PDF is suitable and I can shred the paper.

[ ] and [ ] conversed with not only me, but we also happened to see one of our management staff, [ ] who was familiar with the form and process. [ ] helped me determine how best to serve our customers and provide you with this scanned document.

Also, I committed to doing some brief online detective work for them (visa-vie Google). The [ ] family was interested in contact information for their congressional representative – here is what I found:

The Honorable Lori Chavez-DeRemer  
Local Office: Oregon City District Office<<https://chavez-deremer.house.gov/contact/offices/oregon-city-district-office>>  
621 High Street  
Oregon City, OR 97045  
Phone: (503) 387-8651  
Website: <https://chavez-deremer.house.gov/>  
Webmail: [https://chavez-deremer.house.gov/address\\_authentication?form=/contact](https://chavez-deremer.house.gov/address_authentication?form=/contact)  
(On this webpage, you have to fill in a series of pages, step by step, to send a “web mail” to Representative Chavez-DeRemer.  
OR Secretary of State: My random Google search also provided further public information here:  
<https://secure.sos.state.or.us/orestar/sooDetail.do?sooRsn=88345>.

Mr. & Mrs. [ ], it was fantastic to meet you today. It's a real pleasure to have customers come to our door “post-pandemic.” Thanks for stopping by and more importantly, we appreciate you for sharing information on the Toll Project. Your feedback is very welcome.

Thanks very much, [ ]

**Attachments :** image001.gif (31 kb)  
I-205 Toll Project feedback Black family.pdf (1 mb)

# I-205 Toll Project Environmental Assessment Comment Form

## Contact Information

First Name: Hugh & Joni Black

Last Name: Black

ZIP/Postal Code: 97068 Email: joni.south@yahoo.com  
hughblack41@gmail.com

Phone Number: 503 449 6543 Affiliation (leave blank if none): \_\_\_\_\_

Contact information will not be included in any comment summary. Contact information is subject to public records disclosure upon request.

The Environmental Assessment analyzed potential short- and long-term effects of the I-205 Toll Project on a variety of topics, including the transportation system, local communities, the economy and the environment, along with possible solutions to address negative effects. These topics are listed below.

Among the topics we analyzed, please select those that best represent the topic of your comment:

- Project Purpose, Need, Goals and Objectives
- Effects to the **transportation system** – including rerouting/diversion to local streets, congestion and traffic flow on I-5 and I-205, traffic safety, active transportation, biking, walking, transit and freight
- Effects to the local **natural environment** – including air quality, climate change, noise, geology and soils, hazardous materials, vegetation and wildlife and wetlands and water resources
- Effects to the local **built environment** – including land use, visual quality and historic and archeological resources
- Effects to local **communities** – including household finances, the regional economy, environmental justice and the combined effects of the improvements and tolling
- Proposed **mitigation** – or solutions developed to reduce adverse impacts identified in the environmental review process
- Another topic: \_\_\_\_\_

When considering the topics you selected above, what comments do you want to share with the project team about the analysis, effects and potential solutions to negative impacts (also called "mitigation") included in the I-205 Toll Project Environmental Assessment?

To help the project team understand your interests and concerns, we recommend using the following guidance for your comment:

**Be specific** about a project element, phrase, word, or text. (For example: "I would like to see additional mitigation at the intersection of X and Y.")

**Include a brief explanation** about an issue that should be evaluated further. (For example: "The transportation analysis needs to consider how cars using other roads to avoid tolls could slow down buses, particularly along X route in Z city/neighborhood.")

## I-205 Road construction and Tolling

From: Joni South (joni.south@yahoo.com)

To: joni.south@yahoo.com; hughblack414@gmail.com

Date: Thursday, April 20, 2023, 10:38 AM PDT

04/19/2023

We have attended 2 open houses about the I-205 road construction and proposed tolls. The people conducting the open house were courteous and knowledgeable.

Following are some questions and ideas for you.

1. What is the cost to implement tolling?
  - How many new employees will be hired?
  - Cost in salary per year?
  - Cost of office space per year?
  - Cost of tolling infrastructure?
2. What other revenue sources have you considered? If considered and discarded please explain.
  - Drivers license increase?
  - Automobile registration increase?
  - Real Estate tax increase?
  - Lottery funding?
  - Sales tax on automobiles
  - Gas and/or diesel increase?
3. What other revenue sources are being considered and evaluated in a visible public process?
4. Are you considering other tolls on roads, inform the public now.
5. I-205 is and interstate road which is in place before the legislature passed a law approving a toll.
6. Tolling requires approval by the people and goes on the ballot for a vote.
7. Corporate activity tax by the state of Oregon is now being generated. What are these funds used for?
8. Consider a tax reduction for all tolls.

Sincerely,

Hugh and Joni Black  
2582 Pimlico Ln  
West Linn, OH 97068

**ODOT I-205 Toll EA - RECORD #2934 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Brice

**Last Name :** Suprenant

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

I demand that ODOT conduct an Environmental Impact Statement that studies congestion pricing before freeway expansion.

**ODOT I-205 Toll EA - RECORD #2935 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Melissa

**Last Name :** Kostelecky

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

Induced demand is not a new concept, nor is the idea that tolling reduces demand. So an expansion of lanes is likely a waste of money and has the potential to increase emissions. Given the urgent state of the climate crisis, it would be negligent not to conduct an EIS.

**ODOT I-205 Toll EA - RECORD #2936 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Peter

**Last Name :** Seaman

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

We need an OBJECTIVE (not ODOT) analysis of the impact of this project - the carbon and pollution it will produce, the health impacts, and the harm it will visit upon future generations. We need to \*reduce\* VMT, not increase it. Thanks.

**ODOT I-205 Toll EA - RECORD #2937 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Christine

**Last Name :** Rose

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

There are enough cars on the road. Put that money toward better mass transit. We're in the middle of climate collapse, remember?

**ODOT I-205 Toll EA - RECORD #2939 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Kate

**Last Name :**

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

I demand that ODOT conduct an environmental impact statement for the proposed I – 205 freeway expansion because we are experiencing an environmental and biodiversity crisis. Expanding a freeway to allow more vehicles and therefore more pollution is unbelievably irresponsible, especially without investigating the environmental impact. I strongly oppose an expansion to I– 205 until it is proven that things like air, quality, climate change, wildlife, natural areas, and walkability will not be impacted at all by the expansion. Leaders prioritize the community and the environment by centering people, not cars.



**ODOT I-205 Toll EA - RECORD #2940 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Kimberly

**Last Name :** Brown

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

The public has the right to know the consequences of how this expansion will impact our health, climate, and wildlife. But more importantly, policy makers need to be informed about the consequences before going through with a very costly action that it's unlikely to actually relieve traffic woes. We need investment in public transit, not outdated fossil fuel infrastructure.

**ODOT I-205 Toll EA - RECORD #2941 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Courtney

**Last Name :** C

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

ODOT needs to conduct this EIS for the proposed 205 expansion simply because it's the right thing to do. Our neighbors must be confident that their community did everything to research and verify a need for something like this, and our environment must be taken care of as it is extremely delicate!

**ODOT I-205 Toll EA - RECORD #2942 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Gloria

**Last Name :** Bouchor Luzader

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Okay. I am in the minority. BUT I am in favor of the I5 Bridge toils.  
I lived in Oregon, went to college in Washington, paid the toil.  
It was my choice to attend a Washington College.  
And, , , , all my trips to Ocean Park, Washington, paid a toil on the Meglar  
Bridge.  
Part of life.

**ODOT I-205 Toll EA - RECORD #2943 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Joseph

**Last Name :** Vasicek

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

This project is not needed and is a massive waste of funding that could be put to better use funding changes to our transportation system that will actually have tangible benefits by reducing VMT and GHG emissions - improvements and better access to transit and active transportation.

The addition of new lanes to I-205 will have no tangible impact on congestion, regardless of how it is funded, either on the freeway itself or on nearby local roads. And local groups have argued that there are higher priority transportation projects in this corridor that would provide residents with a greater range of mobility options and reduce carbon emissions and air pollution, including investing in transit and train services, funding the electrification of the region's bus fleet and keeping existing roads in good repair.

Please divert this funding to things that will improve the quality of life for ALL citizens of Oregon, not just some people living in Washington State that want to commute easily by car to our state for work. That is not a valuable proposition for our citizens.

Regards,

**ODOT I-205 Toll EA - RECORD #2944 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Aaron

**Last Name :** Corsi

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

This is an absolute misuse of funds, I do not support widening this freeway and ODOT should be spending that money responsibly by maintaining the infrastructure that is already built. If you can't maintain what you already have you certainly don't need to be adding to the maintenance burden. NO FREEWAY EXPANSION!

**ODOT I-205 Toll EA - RECORD #2946 DETAIL****Submission Date :** 4/20/2023**First Name :** Evy**Last Name :** Bishop**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :** Please make note that I respectfully disagree with the tolling plan for I-205. At the very least this plan will put a heavy burden on commuters and travelers in general. Also this plan will create major traffic issues on surface streets in the general area.

Thank you

**ODOT I-205 Toll EA - RECORD #2949 DETAIL**

**Submission Date :** 4/20/2023

**First Name :** Alasdair

**Last Name :** Crawford

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

Believing that freeway expansions will solve congestion is a belief as scientific as the flat earth or the tooth fairy. We do not need to continue this wild government subsidy to make our traffic worse, our air less breathable, and our citizens dead and mangled to traffic violence. You should be ashamed of yourselves.

**ODOT I-205 Toll EA - RECORD #2952 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Von

**Last Name :** Taylor

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

This freeway expansion is an irresponsible waste of taxpayer money and an affront to those who will have to deal with the costs of a deteriorating climate caused in no small part by induced demand from constant freeway expansion. We need expanded public transit and not new & expanded roads.



**ODOT I-205 Toll EA - RECORD #2953 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** andrew

**Last Name :** kreider glick

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

Investing in wider freeways is both financially irresponsible and environmentally regressive. I support having an environmental impact statement as way to slow the project down and understand its full implications.

**ODOT I-205 Toll EA - RECORD #2954 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Phil

**Last Name :** Kulak

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

ODOT needs to conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion. Adding hundreds of millions of vehicle miles traveled per year is exactly the opposite of what we need to be doing during a climate catastrophe.

**ODOT I-205 Toll EA - RECORD #2955 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Nick

**Last Name :** Putnam

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I oppose any expansion to I-205. We know that adding more lanes only induces more driving and increases VMT. At the very least you must conduct an Environmental Impact Statement for a project of this magnitude. Any infrastructure investments should be solely focused on addressing seismic issues, not expanding freeways.  
Thank you.

**ODOT I-205 Toll EA - RECORD #2956 DETAIL****Submission Date :** 4/21/2023**First Name :** Thomas**Last Name :** Casey**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** ODOT is trying to strong arm the Coast Guard, Vancouver residents, WA state, and C-tran. I do not want their light rail bringing in more crime and homeless and have to pay for it as well. Tolls should be paid by every one crossing the bridge and put right back into federal budget, not state budget. There is no solid plans so the people in charge are going to shove a horrible design through and punish Vancouver and WA with a toll and nothing will be better. On par for how the last 3 years have been. Portland has lost more people then it gained last year so they are bleeding money. Dont let them steal from us.

Godspeed

**ODOT I-205 Toll EA - RECORD #2957 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Mark

**Last Name :** Ingalls

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
We've already mutilated Portland's urban core and several suburbs without a care in the world about the people or environment there. I want an environmental impact statement to be done because I don't believe we should destroy communities in favor of those who choose to live far away without having a clear idea of what the change will cause.

**ODOT I-205 Toll EA - RECORD #2959 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Finnigan

**Last Name :** Addams

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Freeway expansions don't solve traffic problems. They only introduce more waste and pollution, while consuming land and money. We are living in a dire climate crisis, and immediate action is needed. Do better.

**ODOT I-205 Toll EA - RECORD #2963 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Gloria

**Last Name :**

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** I am appalled at these decisions to further burden working families for \$ for infrastructure costs that has been PROMISED by The Federal Government! Right now in The Biden Admin! Where is all The Indian Casino \$ going??? That was promised to schools and roads ??? I paid tolls on The Interstate Bridge back in The 50's and now you want me to Pay to build the new one? In 2009? Oregon WASTED Millions of Federal \$\$\$ back then, just to DISCUSS the same subject now again! THEN they had to be strong armed into 'returning' the balance of the MONEY', after you spent MILLIONS ? Where did you spend THAT? On late night cocktail parties? It is disgusting. Oregon has been promising to fix our roads for decades! YET We have the worst in the nation? We now call our once beautiful city "POTLAND" Not Portland! You all and your leadership have RUINED Portland and you dont even care! You still march into your offices everyday, dressed in 2-Pc Suits; NEVER rolling up your sleeves to HELP THE PEOPLE! FIX THIS without purging and splurging OUR pocketbooks!

**ODOT I-205 Toll EA - RECORD #2964 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Darwin  
**Last Name :** Zimmerman  
**Affiliation :** Judge (retired)  
**Submission Method :** I-205 EA email

**Q3. Comments :** I think the light rail needs to be deleted for rapid bus transit, but that might not be in your wheelhouse. If tolls are put on I-5, Jantzen Beach is going to become a ghost town as no one from WA will pay a toll to go there. I read where the I-5 bridge is more like \$500 million. Just excessive over building that has nothing to do with the bridge. Govt. at it worst is what this project looks like. I see where Clark County Govt just did a white paper raising a number of valid issues.

I am a big no on the tolls, just major social engineering that will really hit the poorest of workers the hardest, but if they must be done they should be on I-5 only as that would be more of a user tax.



**ODOT I-205 Toll EA - RECORD #2965 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Steve

**Last Name :** Bozzone

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Expanding a freeway in Urban Portland is likely to have serious impacts on the land and environment. Conduct a full EIS, it's the right thing to do.

**ODOT I-205 Toll EA - RECORD #2966 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Frann

**Last Name :** Michel

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
We are in a climate emergency. Europe in some areas is already seeing temperatures up to 2.5°C above average (<https://climate.copernicus.eu/esotc/2022/temperature>). We must find less destructive ways to transport ourselves and our goods. Lives matter. PLEASE do not spend all this money on something so dangerous without even FINDING OUT just HOW DANGEROUS it is.

**ODOT I-205 Toll EA - RECORD #2967 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Andrea

**Last Name :** Post

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
In this day and age how could you possibly proceed with a highway project without an Environmental Impact Statement? That's ridiculous.

Did you happen to see the news about the bay area 101 expansion project? Even the project leaders concur that traffic is even worse now than it was before the decade-long project. Widening freeways doesn't work.

<https://sf.streetsblog.org/2023/04/12/not-a-surprise-101-freeway-widening-shows-negative-results/>

**ODOT I-205 Toll EA - RECORD #2968 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Joe  
**Last Name :** Cortright  
**Affiliation :** City Observatory  
**Submission Method :** Letter

**Q3. Comments :**

Please accept this document as comments on the I-205 EA.

The EA is replete with errors and misstatements. These are documented in the attached letter and supporting memorandum.

The false and incorrect information submitted here about the travel time benefits, safety benefits, relationship of benefits to costs and the distributional impact all constitute violations of the National Environmental Policy Act's requirement that the agency provide accurate and scientifically based information in its Environmental Assessment.

[Text from attachment]

I-205 Benefit Cost Study Critique / 1

March 20, 2023

TO: Federal Highway Administration

FROM: Joe Cortright, City Observatory

RE: Analysis of ODOT I-205 Benefit Cost Study

City Observatory has reviewed the ODOT Benefit Cost Study for the I-205 project submitted in connection with ODOT's application for Federal INFRA funding in the amount of \$120 million.

Our review shows that there are numerous errors, omissions and undocumented assumptions in this study, and that the true benefit cost ratio for this project is much less than one. This is important because the benefit cost analysis is used by FHWA to determine whether a project is cost-effective. ODOT's study claims that this project will have a benefit cost ratio of 2.5 to 1, therefore meeting the requirement that it demonstrate that this project is cost-effective.

USDOT may approve an Infra Grant request only if it is shown to be cost-effective:

As federal statute creating INFRA provides:

23 U.S.C. 117 (g) (2):

(g) Project Requirements.-The Secretary may select a project described under this section (other than subsection (e)) for funding under this section only if the Secretary determines that-

...  
(2) the project will be cost effective,  
As USDOT responded to GAO audit of the program,  
... DOT clarified that it would determine a project to be cost-effective if its benefit cost ratio was greater than or equal to one.  
GAO, DISCRETIONARY TRANSPORTATION GRANTS DOT Should Clarify Application Requirements and Oversight Activities, April 2022.  
<https://www.gao.gov/assets/gao-22-104532.pdf>, page 1  
This requirement is clearly laid out by USDOT in its public application materials explaining the INFRA program.

What are the requirements for large projects that receive INFRA grants? The Department may select a large project under the INFRA Grant Program only if the Department determines that:

I-205 Benefit Cost Study Critique / 2

...  
• the project will be cost effective,  
...

<https://www.transportation.gov/policy-initiatives/infra/infra-grants-faqs>  
The materials submitted by ODOT in support of this claim contain significant and material errors and omissions which exaggerate benefits and understate costs. After correcting ODOT's calculations for these errors, the proposed project has a benefit cost ratio of

less than one, meaning that it is not economically cost effective. This memorandum details the errors in ODOT's estimates of project benefits and costs, and also identifies other issues in the benefit cost analysis that fail to comply with USDOT guidance.

#### Benefits

ODOT has overstated the benefits of this project

Roughly 90 percent of the calculated benefits of this project are attributed by ODOT to two

sources: travel time, congestion reduction and reliability benefits and safety benefits. Travel

time and reliability benefits are estimated to have a present value of \$370 million, safety

benefits are estimated to have a present value of \$150 million. (As we explain below, the

\$370 million is a spreadsheet aggregation error, correcting for this error means ODOT is actually

asserting the project produces \$380 million in travel and reliability benefits).

#### Travel Time and Congestion Cost Benefits

ODOT claims that the I-205 project will reduce peak hour travel times by 2 to 8 minutes

between 7AM and 9AM and between 4PM and 6PM, and that these savings are valued at

almost \$30 per car. This leads them to claim that the present value of time savings in

congestion is \$185 million. (ODOT Benefit Cost Spreadsheet, TAB: '7% Discounting' CELLS

\$I65:\$AD65). This estimate also includes a purported "congestion reduction benefit" which is

supposedly in addition to travel time savings.

#### 1. Travel time benefits are miscalculated

ODOT uses a passenger vehicle occupancy estimate of 1.67 persons per passenger vehicle to

compute the number of hours of delay. The FHWA guidance directs that benefit cost analyses

use factors more narrowly appropriate for the time period of travel.

Specifically: for peak hour

travel, FHWA directs agencies to use a factor of 1.48 persons in peak hour travel (USDOT

Benefit cost Guidance, Table A-4). This factor alone would reduce benefits associated with

I-205 Benefit Cost Study Critique / 3

travel time reduction (and reliability) by 13 percent. This error also inflates the purported

reliability benefits (see below).

There is a math error in the ODOT spreadsheet. In TAB "PVSummary7%, Cell G26," the

spreadsheet mistakenly sums 18 years, rather than 20 years of present value estimated time

savings (the formula reads, in part "(SUM('7% Discounting'!\$I65:\$AB65))" when it should read

"(SUM('7% Discounting'!\$I65:\$AD65))." Correcting this error, means that ODOT is really

asserting that travel time savings (inclusive of the occupancy error cited above), are actually

186.8 million, not 176.4 million. The spreadsheet also includes an estimate of \$4 million in the

present value of time lost due to crashes.

#### 2. Additional Congestion reduction benefits are not documented.

ODOT also claims that travelers will also get "congestion reduction benefits" over and above

travel time savings and improved reliability on a per mile basis. The report claims that peak

hour travelers will save 12.4 cents per mile traveled in peak hours due to less congestion and

that trucks will save the 31 cents per mile. These benefits are asserted to have a present value of \$48 million. No basis is provided for these figures, nor is there an explanation of how these estimated benefits are somehow distinct from and purely additive to, travel time savings.

Consequently, these claimed benefits should be disregarded. This has the effect of reducing benefits by \$48 million.

#### Reliability

ODOT claims that the project will produce \$190 million in travel reliability improvements (present value). ODOT produces this estimate by arbitrarily assuming that reliability benefits are exactly equal to calculated travel time travel time benefits plus congestion reduction

benefits. This has the effect of essentially doubling the claimed value of travel time savings. No

citation is provided as a basis for this. (ODOT Benefit Cost Spreadsheet, TAB: '7% Discounting'

CELLS \$I67:\$AD67)

Improved peak hour reliability: Equivalent to the reduction in peak vehicle hours of

delay (VHD). Source: Estimates of the value of reliability have a wide range, vary

around values of VHD, and are highly correlated with congestion. Note that no

benefits are assumed for off-peak reliability or congestion improvements (excepting

off-peak crashes). While quantifying the value of the benefit is difficult, travel time

reliability studies from WSD[sic] USA showed significant reductions in travel time

variability relative to the No Build Alternative.

ODOT Benefit Cost Narrative, page 5

US DOT benefit cost guidance requires applicants to document their reliability estimates, and

specifically, to show how those estimates are distinct from travel time savings estimates.

I-205 Benefit Cost Study Critique / 4

At this time, USDOT does not have a specific recommended methodology for valuing

reliability benefits in BCA. If applicants should choose to present monetized values

for improvements in reliability in their analysis, they should carefully document the

methodology and tools used, and clearly explain how the parameters used to value reliability are separate and distinct from the value of travel time savings used in the analysis.

USDOT Benefit Cost Guidance, page 16 (Emphasis added).

ODOT has failed to provide any documentation for its valuation of reliability improvements. It

has simply taken its (inflated) value of travel time savings added in its undocumented claims

about additional per mile congestion reduction benefits, and then doubled this amount,

claiming this is a legitimate estimate of "reliability" benefits. These underlying estimates also

incorporate other errors (like an exaggerated occupancy factor) meaning this undocumented

procedure further multiplies the overstatement.

While ODOT claims that the WSP Report (which it incorrectly calls "WSD USA") showed

significant reductions in travel time variability, WSP's Economics Technical Report estimated

the value of those travel time reliability improvements as being worth an

average of \$3.9 million in annually, or about \$78 million over twenty years. Like ODOT, however, WSP did not provide any explanation of its basis for determining the value of travel time improvements, instead claiming it employed unspecified “industry standard practices.” Absent any clear documentation on providing a basis for determining the extent and value of improved reliability, these claimed benefits are invalid, and should be ignored.

#### Safety Benefits

ODOT claims that the I-205 project will produce \$150 million (present value) in safety benefits.

1. Safety benefits are miscalculated. ODOT asserts that the project will produce a 21 percent decline in crashes on I-205. There is a math error in its spreadsheet: instead of a 21 percent reduction in crashes, the spreadsheet calculates the effect of a 79 percent reduction in crashes. Cells H60:L60 on Sheet “Inputs\_Worksheet” of the ODOT spreadsheet “2022\_INFRA\_BCA\_I-205 FINAL.XLSX,” calculates the benefits of reduced crashes as equal to .79 multiplied by the total estimated crashes on I-205.
2. The source 21 percent crash reduction figure is not documented. The ODOT benefit cost spreadsheet attributes the reduction to an analysis by WSP that the project will reduce crashes 21 percent. According to the WSP produced Transportation Technical Report, this estimate is in turn based on the purported application of the ISATe methodology, but the attached report doesn’t document how the 21 percent crash reduction was calculated using ISATe. Appendix X of the Transportation Technical Report “Attachment X Future 2045 Enhanced Interchange Safety Analysis Tool (ISATe) Results simply contains the “results” of the ISATe calculation (with undefined terms), and provides no information on the inputs, assumptions or intermediate calculations

#### I-205 Benefit Cost Study Critique / 5

that supposedly generated these outputs. The narrative contains no analysis explaining which features of the I-205 project are supposed to generate this reduction in crash levels. In addition, the ISATe methodology does not apply to freeways with ramp-metering. The ISATe Manual (page 3) states: The predictive method for freeways does not account for the influence of the following conditions on freeway safety: . . .

- Ramp metering. . . .

The existing I-205 freeway has ramp-meters which mean that the ISATe methodology does not accurately predict the effect of safety improvements. Also, to be valid, the ISATe model has to be calibrated to the roadway in question: There is no evidence indicating that the ISATe model has been properly calibrated to predict future year crashes on I-205. The ISATe model was developed based on data from other locations and time periods. According to the ISATe documentation, the



model has to be adjusted or “calibrated” to reflect the level of crash risks when applied to other locations. The ISATe documentation says: Modifying Calibration Factors and Distributions

The predictive models in ISATe have each been developed with data from specific jurisdictions and time periods. Calibration to local conditions will account for any differences between these conditions and those present at the sites being evaluated. It ensures that the evaluation results are meaningful and accurate for the jurisdiction.

A calibration factor is applied to each predictive model. It is important that each model be calibrated for application in the jurisdiction in which the sites being evaluated are located. A procedure for calibrating these models is described in Appendix A. (ISATe User Manual, Page 14, emphasis added).

There is no indication in the traffic technical report that the ISATe values were calibrated to I-205. (The entirety of the description of application of the ISATe model is a single paragraph—page 144 of the Transportation Technical Report). It makes no mention of calibration, to the contrary, the number of crashes predicted for future years using the ISATe tool is about 5 times higher than the level of crashes reported in ODOT’s own current crash data. Table 5.41 says that ISATe predict 2,875 crashes and 20 fatal crashes on I-205 in the No Build in 2045. ODOT’s own data (Tables 4.11 and 4.12) says that I-205 averaged fewer than 350 crashes per year between 2015-19 and 2 fatal crashes over five years (0.4 crashes per year. Given that traffic levels are only expected to increase by about 10-20 percent above current traffic levels over the next 25 years, this suggests that the ISATe I-205 Benefit Cost Study Critique / 6 estimates may not have been calibrated to reflect conditions and crash rates observed on I 205. ODOT’s purported ISATe analysis predicts vastly more crashes on I-5 than have actually occurred which is a strong indication that the model has not been correctly calibrated.

3. The 21 percent crash reduction figure applies only to traffic traveling on I-205, and not to traffic on other roads in the corridor. Consequently, this doesn’t represent the net change in crashes. According to the project’s own traffic technical report, the effect of the project will be to shift traffic from the freeway to local and arterial streets, which have higher crash rates. The benefit cost analysis documents higher predicted numbers of crashes on other corridor roads in the build scenario, but omits any calculation of the number and value of losses due to increased crashes on other roads. The safety “benefit” of the project can only be established by including the effects of increased crashes elsewhere.

The project’s transportation technical report estimates that non-highway mileage will increase by about 100,000 miles per day or about 30 million miles per year (Table 5-4, page 66). Non-highway roads in the project area have higher crash rates that

I-205, so shifting traffic to these other roadways will increase crashes on these other roads. Crash rates on I-205 in project area average about .43 crashes per million miles. Crashes on the major segments of two main arterials in the area (Highway 43 between Lake Oswego and West Linn, and Highway 99 between Milwaukee and Oregon City) average about 1.8 to 2.8 crashes per million miles (respectively). (ODOT, 2019 Crash Rate Data). This suggests that shifting traffic from I-205 to these other roads increases crash likelihood by about 1.3 to 2.3 crashes per million miles. Because the project would increase traffic on these roads by about 30 million miles per year, it would likely result in about 40 to 70 more crashes per year than if those same miles were traveled on I-205. For reference, this is roughly the same order of magnitude as the estimated 21 percent reduction in crashes on I-205 attributed to the project (this section of I-205 averages about 350 crashes per year, a 21 percent reduction in crashes would be about 70 to 75 crashes annually). However, because non-freeway roads have both bike and pedestrian traffic, the probability of serious injuries or fatalities, particularly to vulnerable road users is likely greater than had those same trips been taken on I-205.

4. The ODOT estimate of the value of crash cost savings is directly contradicted by the estimates prepared for ODOT by its contractor WSP. In its economics technical report, WSP reports that it estimates the net economic value of crash reductions associated with the project are valued at \$346, 000 per year, which have a net present value of \$4.3 million. This is less than one-thirtieth of the value of crash losses included in ODOT's benefit cost analysis. Significantly, the ODOT crash reduction estimate cites WSP as its source for the 21 percent figure. But ODOT's report neither acknowledges that WSP found savings were vastly smaller than ODOT claims, nor does it explain this discrepancy.

I-205 Benefit Cost Study Critique / 7  
 Summary of Corrected Benefit Estimates (millions)

BENEFITS ODOT Corrected	
Travel Time Savings	139.0* 120.9
"Congestion Reduction Benefit"	47.8 0.0
Reliability Savings	190.0 0.0
Safety	150.0 4.3
All Other	48.9 48.9
Total Benefits	575.7* 174.1

See Text for Details

Note: ODOT estimated travel time savings and total benefits corrected for spreadsheet error.

Costs

ODOT has understated the actual cost of the project. ODOT's benefit cost analysis asserts that the present value cost of the project is \$224 million. A more correct and complete analysis, based on figures produced by ODOT, shows that the actual cost (on a present value basis) of

the project ranges between \$800 million (use-basis) and \$1.1 billion (sources-basis).

FHWA guidelines provide

- Cost data used in the BCA should reflect the full cost of the project(s) necessary to achieve the benefits described in the BCA. Applicants should include all costs regardless of who bears the burden of specific cost item (including costs paid for by State, local, and private partners, as well as the Federal government).

USDOT Guidance, page 27, (Emphasis added).

ODOT has failed to correctly state initial capital costs, has omitted operating and maintenance costs and periodic capital costs.

1. Capital costs of highway and bridge construction are understated. ODOT claims that the cost of Phase 2 capital construction is \$224 million in present value terms. ODOT claims that the cost of the project is \$224 million in present value terms based on total construction costs of \$384 million in year of expenditure dollars. This estimate is not accurate or complete and is inconsistent with other cost estimates presented by ODOT. For example, ODOT's INFRA Application says the cost of the project is \$531 million (year of expenditure), which is almost \$150 million or 40 percent higher than the figure used in the Benefit Cost Analysis.

I-205 Benefit Cost Study Critique / 8

ODOT INFRA Application

On a present value basis, this \$531 million initial capital expenditure for highway construction is equal to roughly \$300 million.

2. Capital costs of toll system construction are omitted

ODOT's project budget omits funding to construct the tolling system and purchase tolling equipment (gantries, cameras, transponder readers, computers, offices, etc). ODOT proposes to toll I-205 both as a way to raise funds to pay for this project and to manage traffic congestion (indeed, as we described above, all of the projects travel time savings stem from tolling). ODOT reported to the Oregon Legislature that the construction of the tolling system would require a \$200 million capital cost investment in year of expenditure dollars. Discounted at the same rate as other capital construction expenditures for the project, this cost would be equal to \$115 million in present value.

3. Operating and maintenance and periodic capital costs of toll system are omitted.

I-205 Benefit Cost Study Critique / 9

ODOT's "cost" estimate for the I-205 project includes only initial capital costs. This is contrary to USDOT guidance:

"The O&M costs of the new or improved facility throughout the entire analysis period should be included in the BCA, and should be directly related to the proposed service

plans for the project." (USDOT Benefit Cost Guidance)

ODOT's Level 2 Toll and Revenue Forecast reports that ODOT will spend between \$30 and \$60

million annually operating the toll collection system, including, including contracting for toll

assessment and collection, bank fees, and maintenance and staffing of the toll operation. The

present value of these costs is \$300 million.

In addition, over the next two decades, ODOT's Level 2 forecast includes expenditures for periodical capital improvements to the roadway and replacement of the capital invested in the toll collect infrastructure. (The computer equipment and other technology for tolling has a physical or practical life of 10-15 years). These expenditures have a present value of \$67 million.

4. Toll revenue collections in excess of paying capital and operating costs are omitted.

ODOT's Level 2 Revenue forecast indicates that the agency will collect more than \$2.5 billion in tolls over the next 20 years. While some of those funds will be used to repay capital costs, or pay operating and maintenance costs, some will also be used for financing costs, which are not included in ODOT's estimates. In addition, it is likely that ODOT will cross-pledge revenue from the I-205 project to other projects and may use surplus revenue from I-205 to subsidize other projects. In this case, I-205 users will have to pay additional costs to use this facility, over and above its construction and operating costs.

If the capital costs are accurately estimated, the present value of the project's costs are on the order of \$800 million on a "uses" basis.

Alternative Corrected Cost Estimates ("Uses" Basis)(Millions)

Use ODOT Corrected

Bridge & Roadway Capital Cost \$224 \$300

Toll Collection Capital Cost 117

Toll Collection O&M Cost 300

Periodic Capital Costs 67

Total Cost \$224 \$793

Source: See text for details

5. An alternative "sources" calculation of project costs. We can also estimate the project's true cost by recognizing that in the long-run the project's income will be equal to its

I-205 Benefit Cost Study Critique / 10

costs. In contrast to ODOT's estimate of costs based on the "uses" of funds, this is an

estimate based on ODOT's estimates of the sources of funds. ODOT has said that the

project will be paid for by a combination of three sources: state tax revenues, federal

grants and toll revenues paid by private citizens. All of these contributions count as

"costs" under the USDOT guidelines. If we add up all of the state and federal funds

spent on the project, and add to them the tolls charged to project users, we have an

estimate of the "full costs of the project" regardless of who has paid them (the USDOT

BCA standard).

In materials submitted to the Oregon Legislature, ODOT has indicated that it will use \$135

million in state funds for the project (\$109 million from HB 2017, and \$26 million from other

state funds for tolling). In its INFRA application, ODOT has indicated it will use \$120 million

from an INFRA grant and \$20 million from other federal funds allocated to Oregon by formula.

This is a total of \$275 million. (We include in this calculation only state funds from gas taxes,

not funds from borrowing, which are anticipated to be repaid by toll

revenues). Using the discount factor applied to other construction expenditures, this amount has a present value of \$160 million. Over the next 20 years, ODOT projects in its level 2 toll study that it will charge users \$2.46 billion in tolls with a present value of \$970 million. This means that collectively, federal and state governments will pay \$160 million, and private parties (via tolls) will pay \$970 million, for a total of \$1.13 billion in present value)

Alternative Cost Estimate ("Sources" Basis)(Millions)

Source Contribution (PV)

Federal \$81

State (Non-Toll) 79

Private (Tolls) 970

Total \$1,130

Source: See text for details

Corrected Benefit Cost Analysis

The following table summarizes our analysis of the errors in ODOT's benefit cost analysis. Data

are drawn from the preceding text. The ODOT analysis overstates the actual documented

benefits of the project by about \$400 million in present value. The ODOT analysis understates

the costs of the project by \$550 million to \$900 million in present value. As a result, the project

has a negative benefit cost outcome: The costs of the project exceed its benefits by \$620 to

\$960 million dollars in present value. The benefit cost ratio is well below one (the minimum for

meeting the statutory requirement of cost-effectiveness). Each dollar this project costs

produces only 15 to 22 cents in benefits for society. This is a value-destroying project that

makes us worse off.

Corrected Benefit cost Analysis (Millions)

I-205 Benefit Cost Study Critique / 11

ODOT Corrected

Benefits \$575.7 \$174.1

Costs (Low) 224.7 793.0

Costs (High) 224.7 1,130.0

Net Benefit 351.0 -618.9

351.0 -955.9

Benefit/Cost Ratio 2.56 0.22

2.56 0.15

Failure to separately analyze different project components.

The benefits are attributable only to the tolling portion of the project. ODOT has combined a

freeway expansion (which produces few if any benefits, and which accounts for most project

costs) with a tolling project (which accounts for nearly all of the benefits, and little of the

project's capital costs). Each of these components of the project have independent utility as

transportation investments, and should be assessed separately, rather than combined.

The USDOT rules governing the INFRA grant program call for separately reporting the eligibility,

including cost-effectiveness, of each of the independent parts of a proposed project.

VIII. Statutory Project Requirements

To select a project for award, the Department must determine that the project—as a

whole, as well as each independent component of the project— satisfies statutory

requirements relevant to the program from which it will receive an award. The

application should include sufficient information for the Department to make these determinations for both the project as a whole and for each independent component of the project. Applicants should use this section of the application to summarize how their project meets applicable statutory requirements and, if present, how each independent project component meets each of the following requirements. Federal Register/Vol. 87, No. 58/Friday, March 25, 2022/17108 at 17122. This requirement is echoed in the US DOT Benefit Cost Guidance.

1. USDOT discretionary grant programs often allow for a group of related projects to be included in a single grant application. In many cases, each of these projects may be related, but also have independent utility as individual projects. Where this is the case, each component of this package should be evaluated separately, with its own BCA.

Highlight the results of the benefit cost analysis, as well as the analyses of independent project components if applicable. The Department will base its I-205 Benefit Cost Study Critique / 12 determination on the ratio of project benefits to project costs as assessed by the Economic Analysis Team.

USDOT Benefit Cost Guidance, page 11: (Emphasis supplied)  
Congestion pricing has independent utility from the reconstruction and widening of the roadway. The Oregon Legislature directed that tolling be applied to this and other portions of I 205, irrespective of whether I-205 was widened. The Federal Highway Administration represented in its initial NEPA evaluation of the I-205 project that tolling was so unlikely as to be regarded as “not reasonably foreseeable.” Elsewhere in this region, ODOT has separately analyzed the implementation of road pricing and freeway widening. The tolling and highway widening/bridge reconstruction portions of the project have independent utility and therefore should be evaluated separately under FHWA guidelines.

ODOT has combined two distinct projects—road pricing and freeway widening—into a single project. Nearly all of the supposed benefits from the project stem from the congestion reducing aspects of road pricing. In its Benefit Cost Narrative, ODOT notes: Demand management through tolling significantly improves congestion outcomes . . . Value of Travel Time savings, or Vehicle Hours of Driving (VHD) benefits are calculated from traffic studies on pre-pandemic traffic levels and modeled traffic volumes under the addition of tolling. These traffic figures are provided by WSP USA and their Transportation Engineering team. Volume growth under the baseline is limited by congestion and lack of additional lanes, while volume growth under the Build scenario sees slower growth over time due to the ability of tolling to manage demand.

ODOT, Benefit Cost Analysis Narrative, 2022 (Emphasis supplied)  
Most of the costs are associated with the road widening. If ODOT were to correctly analyze these two project components, each of which has independent utility, it would show that tolling alone has a much more favorable cost-benefit ratio than tolling combined with

construction. What ODOT has done is to combine tolling (which produces the lion's share of benefits) with additional costs which produce few benefits. ODOT should re-submit its benefit cost analysis, showing separately the benefits and costs for the tolling component and the road-widening component. Based on the figures presented above, the tolling-only project would have a much more favorable benefit cost ratio than the Road expansion/bridge reconstruction portion of the project.

I-205 Benefit Cost Study Critique / 13  
 Failure to Analyze Distribution of Benefits and Costs  
 FHWA's Guidance on Benefit Cost Analyses recognizes that projects can impose undue costs on some groups and encourages applicants to submit an analysis of the distributional effects of any project:

Projects may even result in some parties being made worse off, even in cases where the proposed project would deliver positive net benefits in the aggregate. While these distributional impacts would not affect the overall evaluation of benefits and costs, applicants are encouraged to provide information (such as the demographics of the expected users or by distinguishing between public and private benefits) that would help USDOT better understand how the project can meet these other public policy goals. (USDOT, Benefit Cost Guidance Page 31).

ODOT's benefit cost analysis provides no information on the distributional effects of the I-205 project. ODOT's report contains no analysis of how the benefits and costs of the project inure to different demographic groups. According to the ODOT Benefit cost Analysis, all of supposed the travel time benefits of the project are received by peak hour travelers. Off-peak travelers have to pay tolls to finance the project, even though the bulk of benefits go to peak hour travelers. ODOT's own level 2 study shows that peak hour travelers will reap 100 percent of the travel time benefits of the project, but will pay only about 46 percent of the tolls charged to weekday users. Conversely, off-peak hour travelers will get zero travel time benefit (their travel times will remain unchanged from No-Build conditions), but they pay the majority (54 percent) of the tolls to finance the project. This imbalance would be even wider if we were to include tolls paid by weekend travelers who are also expected to get no travel time savings, but pay the same tolls as weekday travelers.

Distribution of Benefits & Costs, Weekday Travelers  
 Annual Weekday Traffic, Toll Collections and Travel Time Benefits, 2027  
 Daily Vehicles Annual Tolls Travel Time Benefits

Peak	54,000	\$ 29,800,000	\$ 18,400,000
Off-Peak	94,000	\$ 44,300,000	\$ -
Total	148,000	\$ 74,200,000	\$ 18,400,000

Vehicles include counts of numbers of vehicles crossing Tualatin and Abernethy Bridges. Source: ODOT I-205 Traffic & Revenue Study data.

I-205 Benefit Cost Study Critique / 14  
 Roughly 60 percent of all toll revenue will come from off-peak travelers (on weekdays). Off peak users are more numerous (about 64 percent of users).

Yet all of the travel time benefits of the project accrue to peak hour users. Notably: even peak hour users have to pay more in tolls (\$29.8 million) than they get in travel time benefits (\$18.4 million). These calculations omit tolls paid by weekend travelers, who would also pay according to the hourly toll schedule, but according to ODOT's analysis, would also get no travel time benefits. Census journey-to-work data indicate that higher income workers are much more likely to travel during the peak hour than lower income workers. Workers commuting to work by automobile who leave their homes during peak hours (6:30 AM to 8:30AM) have median household incomes that are about 9 percent higher than all commuter households. Those who leave for work during the off-peak hours (9:30 AM to 3:30 PM) have median household incomes that are about 21 percent below the average for all commuter households

Time Left for Work

Median Household Income, Difference from All Commuters  
Before 6.30 -3%  
630 to 830 9%  
830 to 930 4%  
930A to 330P -21%  
330 to 530 -13%  
530 to 630 -2%  
After 630 -12%

American Community Survey, IPUMS, 2015-19

In effect, the toll financing structure chosen for this project taxes lower income commuters

(who disproportionately travel during off-peak hours and get no travel time savings) to pay for time savings for higher income commuters.

Conclusion

ODOT's submitted benefit cost analysis is plagued with errors and mistakes that systematically overstate benefits and understate project costs. Calculated correctly, this project has a benefit cost ratio well below one, which means that it is not cost effective as required by 23 USC 117.

As a practical matter, this is a value destroying project: It costs more in economic resources than it provides in economic benefits. ODOT's cost benefit analysis fails to follow the guidance issued by USDOT for determining cost-effectiveness. USDOT cannot rely on this document as

I-205 Benefit Cost Study Critique / 15

an accurate assessment of compliance with federal law. Approving a grant for this project

relying on the ODOT Benefit Cost study would be arbitrary and capricious. Moreover, the systematic and consistent nature of the omissions and false assumptions

presented in the ODOT application serve to represent an unqualified project as qualified for

federal funding. These materially false statements constitute a fraudulent attempt to qualify a

project for federal funds for which it is not eligible.

I-205 Benefit Cost Study Critique / 16

References

FHWA, Notice of Funding Opportunity,

<https://www.federalregister.gov/documents/2022/03/25/2022-06350/notice-of->



funding opportunity-for-the-department-of-transportations-multimodal-project-discretionary  
ODOT, Benefit Cost Narrative, I-205 Corridor Widening: Stafford Road to OR43 Benefit Cost Analysis Description, Assumptions, and Factors.  
(<https://www.oregon.gov/odot/About/INFRAI205/I-205%20Narrative.pdf>)  
ODOT, Benefit Cost Spreadsheet, (electronic file). 2022\_INFRA\_BCA\_I-205\_FINAL.XLSX  
ODOT, Transportation Technical Report, I-205  
ODOT, Transportation Technical Report, I-205. Attachment X: Future 2045 Enhanced Interchange Safety Analysis Tool (ISATe) Results  
USDOT, 2022. Benefit Cost Guidance, "Benefit cost Analysis Guidance for Discretionary Grant Programs"  
WSP, I-205 Economics Technical Report  
Cortright\_I205BCA\_Critique.pdf (533 kb)

**Attachments :**

March 20, 2023

TO: Federal Highway Administration

FROM: Joe Cortright, City Observatory

RE: Analysis of ODOT I-205 Benefit Cost Study

City Observatory has reviewed the ODOT Benefit Cost Study for the I-205 project submitted in connection with ODOT's application for Federal INFRA funding in the amount of \$120 million.

Our review shows that there are numerous errors, omissions and undocumented assumptions in this study, and that the true benefit cost ratio for this project is much less than one. This is important because the benefit cost analysis is used by FHWA to determine whether a project is cost-effective. ODOT's study claims that this project will have a benefit cost ratio of 2.5 to 1, therefore meeting the requirement that it demonstrate that this project is cost-effective. USDOT may approve an Infra Grant request only if it is shown to be cost-effective:

As federal statute creating INFRA provides:

[23 U.S.C. 117](#) (g) (2):

(g) Project Requirements.-The Secretary may select a project described under this section (other than subsection (e)) for funding under this section only if the Secretary determines that-

...

(2) the project will be cost effective,

As USDOT responded to GAO audit of the program,

... DOT clarified that it would determine a project to be cost-effective if its benefit cost ratio was greater than or equal to one.

GAO, DISCRETIONARY TRANSPORTATION GRANTS DOT Should Clarify Application Requirements and Oversight Activities, April 2022.

<https://www.gao.gov/assets/gao-22-104532.pdf>, page 1

This requirement is clearly laid out by USDOT in its public application materials explaining the INFRA program.

### **What are the requirements for large projects that receive INFRA grants?**

The Department may select a large project under the INFRA Grant Program only if the Department determines that:

...

- the project will be cost effective,

...

<https://www.transportation.gov/policy-initiatives/infra/infra-grants-faqs>

The materials submitted by ODOT in support of this claim contain significant and material errors and omissions which exaggerate benefits and understate costs. After correcting ODOT's calculations for these errors, the proposed project has a benefit cost ratio of less than one, meaning that it is not economically cost effective.

This memorandum details the errors in ODOT's estimates of project benefits and costs, and also identifies other issues in the benefit cost analysis that fail to comply with USDOT guidance.

### **Benefits**

ODOT has overstated the benefits of this project

Roughly 90 percent of the calculated benefits of this project are attributed by ODOT to two sources: travel time, congestion reduction and reliability benefits and safety benefits. Travel time and reliability benefits are estimated to have a present value of \$370 million, safety benefits are estimated to have a present value of \$150 million. (As we explain below, the \$370 million is a spreadsheet aggregation error, correcting for this error means ODOT is actually asserting the project produces \$380 million in travel and reliability benefits).

### **Travel Time and Congestion Cost Benefits**

ODOT claims that the I-205 project will reduce peak hour travel times by 2 to 8 minutes between 7AM and 9AM and between 4PM and 6PM, and that these savings are valued at almost \$30 per car. This leads them to claim that the present value of time savings in congestion is \$185 million. (ODOT Benefit Cost Spreadsheet, TAB: '7% Discounting' CELLS \$I65:\$AD65). This estimate also includes a purported "congestion reduction benefit" which is supposedly in addition to travel time savings.

1. Travel time benefits are miscalculated

ODOT uses a passenger vehicle occupancy estimate of 1.67 persons per passenger vehicle to compute the number of hours of delay. The FHWA guidance directs that benefit cost analyses use factors more narrowly appropriate for the time period of travel. Specifically: for peak hour travel, FHWA directs agencies to use a factor of 1.48 persons in peak hour travel (USDOT Benefit cost Guidance, Table A-4). This factor alone would reduce benefits associated with

travel time reduction (and reliability) by 13 percent. This error also inflates the purported reliability benefits (see below).

There is a math error in the ODOT spreadsheet. In TAB “PVSummary7%, Cell G26,” the spreadsheet mistakenly sums 18 years, rather than 20 years of present value estimated time savings (the formula reads, in part “(SUM('7% Discounting'!\$I65:\$AB65))” when it should read “(SUM('7% Discounting'!\$I65:\$AD65)).” Correcting this error, means that ODOT is really asserting that travel time savings (inclusive of the occupancy error cited above), are actually 186.8 million, not 176.4 million. The spreadsheet also includes an estimate of \$4 million in the present value of time lost due to crashes.

## 2. Additional Congestion reduction benefits are not documented.

ODOT also claims that travelers will also get “congestion reduction benefits” over and above travel time savings and improved reliability on a per mile basis. The report claims that peak hour travelers will save 12.4 cents per mile traveled in peak hours due to less congestion and that trucks will save the 31 cents per mile. These benefits are asserted to have a present value of \$48 million. No basis is provided for these figures, nor is there an explanation of how these estimated benefits are somehow distinct from and purely additive to, travel time savings. Consequently, these claimed benefits should be disregarded. This has the effect of reducing benefits by \$48 million.

### **Reliability**

ODOT claims that the project will produce \$190 million in travel reliability improvements (present value). ODOT produces this estimate by arbitrarily assuming that reliability benefits are exactly equal to calculated travel time travel time benefits plus congestion reduction benefits. This has the effect of essentially doubling the claimed value of travel time savings. No citation is provided as a basis for this. (ODOT Benefit Cost Spreadsheet, TAB: '7% Discounting' CELLS \$I67:\$AD67)

Improved peak hour reliability: Equivalent to the reduction in peak vehicle hours of delay (VHD). Source: Estimates of the value of reliability have a wide range, vary around values of VHD, and are highly correlated with congestion. Note that no benefits are assumed for off-peak reliability or congestion improvements (excepting off-peak crashes). While quantifying the value of the benefit is difficult, travel time reliability studies from WSD[sic] USA showed significant reductions in travel time variability relative to the No Build Alternative.

ODOT Benefit Cost Narrative, page 5

US DOT benefit cost guidance requires applicants to document their reliability estimates, and specifically, to show how those estimates are distinct from travel time savings estimates.

At this time, USDOT does not have a specific recommended methodology for valuing reliability benefits in BCA. If applicants should choose to present monetized values for improvements in reliability in their analysis, **they should carefully document the methodology and tools used, and clearly explain how the parameters used to value reliability are separate and distinct from the value of travel time savings used in the analysis.**

USDOT Benefit Cost Guidance, page 16 (Emphasis added).

ODOT has failed to provide any documentation for its valuation of reliability improvements. It has simply taken its (inflated) value of travel time savings added in its undocumented claims about additional per mile congestion reduction benefits, and then doubled this amount, claiming this is a legitimate estimate of “reliability” benefits. These underlying estimates also incorporate other errors (like an exaggerated occupancy factor) meaning this undocumented procedure further multiplies the overstatement.

While ODOT claims that the WSP Report (which it incorrectly calls “WSD USA”) showed significant reductions in travel time variability, WSP’s Economics Technical Report estimated the value of those travel time reliability improvements as being worth an average of \$3.9 million in annually, or about \$78 million over twenty years. Like ODOT, however, WSP did not provide any explanation of its basis for determining the value of travel time improvements, instead claiming it employed unspecified “industry standard practices.” Absent any clear documentation on providing a basis for determining the extent and value of improved reliability, these claimed benefits are invalid, and should be ignored.

### **Safety Benefits**

ODOT claims that the I-205 project will produce \$150 million (present value) in safety benefits.

1. Safety benefits are miscalculated. ODOT asserts that the project will produce a 21 percent decline in crashes on I-205. There is a math error in its spreadsheet: instead of a 21 percent reduction in crashes, the spreadsheet calculates the effect of a 79 percent reduction in crashes. Cells H60:L60 on Sheet “Inputs\_Worksheet” of the ODOT spreadsheet “2022\_INFRA\_BCA\_I-205 FINAL.XLSX,” calculates the benefits of reduced crashes as equal to .79 multiplied by the total estimated crashes on I-205.
2. The source 21 percent crash reduction figure is not documented. The ODOT benefit cost spreadsheet attributes the reduction to an analysis by WSP that the project will reduce crashes 21 percent. According to the WSP produced Transportation Technical Report, this estimate is in turn based on the purported application of the ISATe methodology, but the attached report doesn’t document how the 21 percent crash reduction was calculated using ISATe. Appendix X of the Transportation Technical Report “**Attachment X Future 2045 Enhanced Interchange Safety Analysis Tool (ISATe) Results**” simply contains the “results” of the ISATe calculation (with undefined terms), and provides no information on the inputs, assumptions or intermediate calculations

that supposedly generated these outputs. The narrative contains no analysis explaining which features of the I-205 project are supposed to generate this reduction in crash levels.

In addition, the ISATe methodology does not apply to freeways with ramp-metering. The ISATe Manual (page 3) states:

The predictive method for freeways does not account for the influence of the following conditions on freeway safety: . . .

- Ramp metering. . . .

The existing I-205 freeway has ramp-meters which mean that the ISATe methodology does not accurately predict the effect of safety improvements.

Also, to be valid, the ISATe model has to be calibrated to the roadway in question: There is no evidence indicating that the ISATe model has been properly calibrated to predict future year crashes on I-205. The ISATe model was developed based on data from other locations and time periods. According to the ISATe documentation, the model has to be adjusted or “calibrated” to reflect the level of crash risks when applied to other locations. The ISATe documentation says:

#### **Modifying Calibration Factors and Distributions**

The predictive models in ISATe have each been developed with data from specific jurisdictions and time periods. **Calibration to local conditions** will account for any differences between these conditions and those present at the sites being evaluated. It **ensures that the evaluation results are meaningful and accurate** for the jurisdiction.

A calibration factor is applied to each predictive model. **It is important that each model be calibrated for application in the jurisdiction in which the sites being evaluated are located.** A procedure for calibrating these models is described in Appendix A.

(ISATe User Manual, Page 14, emphasis added).

There is no indication in the traffic technical report that the ISATe values were calibrated to I-205. (The entirety of the description of application of the ISATe model is a single paragraph—page 144 of the Transportation Technical Report). It makes no mention of calibration, to the contrary, the number of crashes predicted for future years using the ISATe tool is about 5 times higher than the level of crashes reported in ODOT’s own current crash data. Table 5.41 says that ISATe predict 2,875 crashes and 20 fatal crashes on I-205 in the No Build in 2045. ODOT’s own data (Tables 4.11 and 4.12) says that I-205 averaged fewer than 350 crashes per year between 2015-19 and 2 fatal crashes over five years (0.4 crashes per year). Given that traffic levels are only expected to increase by about 10-20 percent above current traffic levels over the next 25 years, this suggests that the ISATe

estimates may not have been calibrated to reflect conditions and crash rates observed on I-205. ODOT's purported ISATe analysis predicts vastly more crashes on I-5 than have actually occurred which is a strong indication that the model has not been correctly calibrated.

3. The 21 percent crash reduction figure applies only to traffic traveling on I-205, and not to traffic on other roads in the corridor. Consequently, this doesn't represent the net change in crashes. According to the project's own traffic technical report, the effect of the project will be to shift traffic from the freeway to local and arterial streets, which have higher crash rates. The benefit cost analysis documents higher predicted numbers of crashes on other corridor roads in the build scenario, but omits any calculation of the number and value of losses due to increased crashes on other roads. The safety "benefit" of the project can only be established by including the effects of increased crashes elsewhere.

The project's transportation technical report estimates that non-highway mileage will increase by about 100,000 miles per day or about 30 million miles per year (Table 5-4, page 66). Non-highway roads in the project area have higher crash rates than I-205, so shifting traffic to these other roadways will increase crashes on these other roads. Crash rates on I-205 in project area average about .43 crashes per million miles. Crashes on the major segments of two main arterials in the area (Highway 43 between Lake Oswego and West Linn, and Highway 99 between Milwaukee and Oregon City) average about 1.8 to 2.8 crashes per million miles (respectively). (ODOT, 2019 Crash Rate Data). This suggests that shifting traffic from I-205 to these other roads increases crash likelihood by about 1.3 to 2.3 crashes per million miles. Because the project would increase traffic on these roads by about 30 million miles per year, it would likely result in about 40 to 70 more crashes per year than if those same miles were traveled on I-205. For reference, this is roughly the same order of magnitude as the estimated 21 percent reduction in crashes on I-205 attributed to the project (this section of I-205 averages about 350 crashes per year, a 21 percent reduction in crashes would be about 70 to 75 crashes annually). However, because non-freeway roads have both bike and pedestrian traffic, the probability of serious injuries or fatalities, particularly to vulnerable road users is likely greater than had those same trips been taken on I-205.

4. The ODOT estimate of the value of crash cost savings is directly contradicted by the estimates prepared for ODOT by its contractor WSP. In its economics technical report, WSP reports that it estimates the net economic value of crash reductions associated with the project are valued at \$346,000 per year, which have a net present value of \$4.3 million. This is less than one-thirtieth of the value of crash losses included in ODOT's benefit cost analysis. Significantly, the ODOT crash reduction estimate cites WSP as its source for the 21 percent figure. But ODOT's report neither acknowledges that WSP found savings were vastly smaller than ODOT claims, nor does it explain this discrepancy.

## Summary of Corrected Benefit Estimates (millions)

BENEFITS	ODOT	Corrected
Travel Time Savings	139.0*	120.9
"Congestion Reduction Benefit"	47.8	0.0
Reliability Savings	190.0	0.0
Safety	150.0	4.3
All Other	48.9	48.9
Total Benefits	575.7*	174.1

See Text for Details

Note: ODOT estimated travel time savings and total benefits corrected for spreadsheet error.

### Costs

ODOT has understated the actual cost of the project. ODOT's benefit cost analysis asserts that the present value cost of the project is \$224 million. A more correct and complete analysis, based on figures produced by ODOT, shows that the actual cost (on a present value basis) of the project ranges between \$800 million (use-basis) and \$1.1 billion (sources-basis).

FHWA guidelines provide

- Cost data used in the BCA should reflect the **full cost** of the project(s) **necessary to achieve the benefits** described in the BCA. Applicants should include all costs **regardless of who bears** the burden of specific cost item (including costs paid for by State, local, and private partners, as well as the Federal government).  
USDOT Guidance, page 27, (Emphasis added).

ODOT has failed to correctly state initial capital costs, has omitted operating and maintenance costs and periodic capital costs.

1. Capital costs of highway and bridge construction are understated. ODOT claims that the cost of Phase 2 capital construction is \$224 million in present value terms.


ODOT claims that the cost of the project is \$224 million in present value terms based on total construction costs of \$384 million in year of expenditure dollars. This estimate is not accurate or complete and is inconsistent with other cost estimates presented by ODOT. For example, ODOT's INFRA Application says the cost of the project is \$531 million (year of expenditure), which is almost \$150 million or 40 percent higher than the figure used in the Benefit Cost Analysis.




**FY22 INFRA GRANT APPLICATION**

# I-205 Improvements Project Phase 2

**Solutions for Safety, Reliability, and Economic Vitality**

**Submitting Agency:**  
 Oregon Department of Transportation  
 355 Capitol St NE  
 Salem, OR 97301



**Was a INFRA application for this project submitted previously?** Yes: I-205 Improvements Project Phase 1  
*ODOT applied for INFRA funding for Phase 1 of the I-205 Improvements Project that has since been funded*

<b>PROJECT COSTS</b>	
<b>Request:</b>	\$120,000,000
<b>Other Federal Funding:</b>	\$20,000,000
<b>Total Federal Funding:</b>	\$140,000,000
<b>Non-Federal Funding</b>	\$293,000,000
<b>Future Eligible Project Cost:</b>	<b>\$433,000,000</b>
<b>Previously Incurred Project Cost:</b>	\$20,000,000
<b>Total Project Cost:</b>	<b>\$453,000,000</b>

**Are matching funds restricted to a specific project component:** No

<b>PROJECT ELIGIBILITY</b>	
<b>The I-205 Improvements Project Phase 2: \$453,000,000</b>	
<ul style="list-style-type: none"> <li>• A highway widening project on the National Highway Freight Network</li> <li>• A highway and bridge project carried out on the National Highway System (NHS)</li> <li>• Adds capacity to the Interstate System to improve mobility, enhance safety, and seismically retrofit the structure</li> </ul>	

## ODOT INFRA Application

On a present value basis, this \$531 million initial capital expenditure for highway construction is equal to roughly \$300 million.

### 2. Capital costs of toll system construction are omitted

ODOT's project budget omits funding to construct the tolling system and purchase tolling equipment (gantries, cameras, transponder readers, computers, offices, etc). ODOT proposes to toll I-205 both as a way to raise funds to pay for this project and to manage traffic congestion (indeed, as we described above, all of the projects travel time savings stem from tolling). ODOT reported to the Oregon Legislature that the construction of the tolling system would require a \$200 million capital cost investment in year of expenditure dollars. Discounted at the same rate as other capital construction expenditures for the project, this cost would be equal to \$115 million in present value.

### 3. Operating and maintenance and periodic capital costs of toll system are omitted.

ODOT’s “cost” estimate for the I-205 project includes only initial capital costs. This is contrary to USDOT guidance:

“The O&M costs of the new or improved facility throughout the entire analysis period should be included in the BCA, and should be directly related to the proposed service plans for the project.” (USDOT Benefit Cost Guidance)

ODOT’s Level 2 Toll and Revenue Forecast reports that ODOT will spend between \$30 and \$60 million annually operating the toll collection system, including, including contracting for toll assessment and collection, bank fees, and maintenance and staffing of the toll operation. The present value of these costs is \$300 million.

In addition, over the next two decades, ODOT’s Level 2 forecast includes expenditures for periodical capital improvements to the roadway and replacement of the capital invested in the toll collect infrastructure. (The computer equipment and other technology for tolling has a physical or practical life of 10-15 years). These expenditures have a present value of \$67 million.

- 4. Toll revenue collections in excess of paying capital and operating costs are omitted.

ODOT’s Level 2 Revenue forecast indicates that the agency will collect more than \$2.5 billion in tolls over the next 20 years. While some of those funds will be used to repay capital costs, or pay operating and maintenance costs, some will also be used for financing costs, which are not included in ODOTs estimates. In addition, it is likely that ODOT will cross-pledge revenue from the I-205 project to other projects and may use surplus revenue from I-205 to subsidize other projects. In this case, I-205 users will have to pay additional costs to use this facility, over and above its construction and operating costs.

If the capital costs are accurately estimated, the present value of the project’s costs are on the order of \$800 million on a “uses” basis.

Alternative Corrected Cost Estimates (“Uses” Basis)(Millions)

Use	ODOT	Corrected
Bridge & Roadway Capital Cost	\$224	\$300
Toll Collection Capital Cost		117
Toll Collection O&M Cost		300
Periodic Capital Costs		67
Total Cost	\$224	\$793

Source: See text for details

- 5. An alternative “sources” calculation of project costs. We can also estimate the project’s true cost by recognizing that in the long-run the project’s income will be equal to its

costs. In contrast to ODOT’s estimate of costs based on the “uses” of funds, this is an estimate based on ODOT’s estimates of the sources of funds. ODOT has said that the project will be paid for by a combination of three sources: state tax revenues, federal grants and toll revenues paid by private citizens. All of these contributions count as “costs” under the USDOT guidelines. If we add up all of the state and federal funds spent on the project, and add to them the tolls charged to project users, we have an estimate of the “full costs of the project” regardless of who has paid them (the USDOT BCA standard).

In materials submitted to the Oregon Legislature, ODOT has indicated that it will use \$135 million in state funds for the project (\$109 million from HB 2017, and \$26 million from other state funds for tolling). In its INFRA application, ODOT has indicated it will use \$120 million from an INFRA grant and \$20 million from other federal funds allocated to Oregon by formula. This is a total of \$275 million. (We include in this calculation only state funds from gas taxes, not funds from borrowing, which are anticipated to be repaid by toll revenues). Using the discount factor applied to other construction expenditures, this amount has a present value of \$160 million. Over the next 20 years, ODOT projects in its level 2 toll study that it will charge users \$2.46 billion in tolls with a present value of \$970 million. This means that collectively, federal and state governments will pay \$160 million, and private parties (via tolls) will pay \$970 million, for a total of \$1.13 billion in present value)

Alternative Cost Estimate (“Sources” Basis)(Millions)

Source	Contribution (PV)
Federal	\$81
State (Non-Toll)	79
Private (Tolls)	970
Total	\$1,130

Source: See text for details

**Corrected Benefit Cost Analysis**

The following table summarizes our analysis of the errors in ODOT’s benefit cost analysis. Data are drawn from the preceding text. The ODOT analysis overstates the actual documented benefits of the project by about \$400 million in present value. The ODOT analysis understates the costs of the project by \$550 million to \$900 million in present value. As a result, the project has a negative benefit cost outcome: The costs of the project exceed its benefits by \$620 to \$960 million dollars in present value. The benefit cost ratio is well below one (the minimum for meeting the statutory requirement of cost-effectiveness). Each dollar this project costs produces only 15 to 22 cents in benefits for society. This is a value-destroying project that makes us worse off.

Corrected Benefit cost Analysis (Millions)

	ODOT	Corrected
Benefits	\$575.7	\$174.1
Costs (Low)	224.7	793.0
Costs (High)	224.7	1,130.0
Net Benefit	351.0	-618.9
	351.0	-955.9
Benefit/Cost Ratio	2.56	0.22
	2.56	0.15

### **Failure to separately analyze different project components.**

The benefits are attributable only to the tolling portion of the project. ODOT has combined a freeway expansion (which produces few if any benefits, and which accounts for most project costs) with a tolling project (which accounts for nearly all of the benefits, and little of the project's capital costs). Each of these components of the project have independent utility as transportation investments, and should be assessed separately, rather than combined.

The USDOT rules governing the INFRA grant program call for separately reporting the eligibility, including cost-effectiveness, of each of the independent parts of a proposed project.

#### VIII. Statutory Project Requirements

To select a project for award, the Department must determine that the project—as a whole, as well as each independent component of the project— satisfies statutory requirements relevant to the program from which it will receive an award. The application should include sufficient information for the Department to make these determinations for both the project as a whole and for each independent component of the project. Applicants should use this section of the application to summarize how their project meets applicable statutory requirements and, if present, how each independent project component meets each of the following requirements.

Federal Register/Vol. 87, No. 58/Friday, March 25, 2022/17108 at 17122.

This requirement is echoed in the US DOT Benefit Cost Guidance.

1. USDOT discretionary grant programs often allow for a group of related projects to be included in a single grant application. In many cases, each of these projects may be related, but also have independent utility as individual projects. Where this is the case, each component of this package should be evaluated separately, with its own BCA.

Highlight the results of the benefit cost analysis, as well as the analyses of independent project components if applicable. The Department will base its

determination on the ratio of project benefits to project costs as assessed by the Economic Analysis Team.

USDOT Benefit Cost Guidance, page 11: (Emphasis supplied)

Congestion pricing has independent utility from the reconstruction and widening of the roadway. The Oregon Legislature directed that tolling be applied to this and other portions of I-205, irrespective of whether I-205 was widened. The Federal Highway Administration represented in its initial NEPA evaluation of the I-205 project that tolling was so unlikely as to be regarded as “not reasonably foreseeable.” Elsewhere in this region, ODOT has separately analyzed the implementation of road pricing and freeway widening. The tolling and highway widening/bridge reconstruction portions of the project have independent utility and therefore should be evaluated separately under FHWA guidelines.

ODOT has combined two distinct projects—road pricing and freeway widening—into a single project. Nearly all of the supposed benefits from the project stem from the congestion reducing aspects of road pricing. In its Benefit Cost Narrative, ODOT notes:

Demand management through **tolling significantly improves congestion outcomes . . .**

Value of Travel Time savings, or Vehicle Hours of Driving (VHD) benefits are calculated from traffic studies on pre-pandemic traffic levels and modeled traffic volumes **under the addition of tolling**. These traffic figures are provided by WSP USA and their Transportation Engineering team. Volume growth under the baseline is limited by congestion and lack of additional lanes, while **volume growth under the Build scenario sees slower growth over time due to the ability of tolling to manage demand**.

ODOT, Benefit Cost Analysis Narrative, 2022 (Emphasis supplied)

Most of the costs are associated with the road widening. If ODOT were to correctly analyze these two project components, each of which has independent utility, it would show that tolling alone has a much more favorable cost-benefit ratio than tolling combined with construction. What ODOT has done is to combine tolling (which produces the lion’s share of benefits) with additional costs which produce few benefits.

ODOT should re-submit its benefit cost analysis, showing separately the benefits and costs for the tolling component and the road-widening component. Based on the figures presented above, the tolling-only project would have a much more favorable benefit cost ratio than the Road expansion/bridge reconstruction portion of the project.

**Failure to Analyze Distribution of Benefits and Costs**

FHWA’s Guidance on Benefit Cost Analyses recognizes that projects can impose undue costs on some groups and encourages applicants to submit an analysis of the distributional effects of any project:

Projects may even result in some parties being made worse off, even in cases where the proposed project would deliver positive net benefits in the aggregate. While these distributional impacts would not affect the overall evaluation of benefits and costs, applicants are encouraged to provide information (such as the demographics of the expected users or by distinguishing between public and private benefits) that would help USDOT better understand how the project can meet these other public policy goals. (USDOT, Benefit Cost Guidance Page 31).

ODOT’s benefit cost analysis provides no information on the distributional effects of the I-205 project.

ODOT’s report contains no analysis of how the benefits and costs of the project inure to different demographic groups. According to the ODOT Benefit cost Analysis, all of supposed the travel time benefits of the project are received by peak hour travelers. Off-peak travelers have to pay tolls to finance the project, even though the bulk of benefits go to peak hour travelers.

ODOT’s own level 2 study shows that peak hour travelers will reap 100 percent of the travel time benefits of the project, but will pay only about 46 percent of the tolls charged to weekday users. Conversely, off-peak hour travelers will get zero travel time benefit (their travel times will remain unchanged from No-Build conditions), but they pay the majority (54 percent) of the tolls to finance the project. This imbalance would be even wider if we were to include tolls paid by weekend travelers who are also expected to get no travel time savings, but pay the same tolls as weekday travelers.

Distribution of Benefits & Costs, Weekday Travelers

Annual Weekday Traffic, Toll Collections and Travel Time Benefits, 2027			
	Daily Vehicles	Annual Tolls	Travel Time Benefits
Peak	54,000	\$ 29,800,000	\$ 18,400,000
Off-Peak	94,000	\$ 44,300,000	\$ -
Total	148,000	\$ 74,200,000	\$ 18,400,000
Vehicles include counts of numbers of vehicles crossing Tualatin and Abernethy Bridges. Source: ODOT I-205 Traffic & Revenue Study data.			

Roughly 60 percent of all toll revenue will come from off-peak travelers (on weekdays). Off-peak users are more numerous (about 64 percent of users). Yet all of the travel time benefits of the project accrue to peak hour users. Notably: even peak hour users have to pay more in tolls (\$29.8 million) than they get in travel time benefits (\$18.4 million). These calculations omit tolls paid by weekend travelers, who would also pay according to the hourly toll schedule, but according to ODOT’s analysis, would also get no travel time benefits.

Census journey-to-work data indicate that higher income workers are much more likely to travel during the peak hour than lower income workers. Workers commuting to work by automobile who leave their homes during peak hours (6:30 AM to 8:30AM) have median household incomes that are about 9 percent higher than all commuter households. Those who leave for work during the off-peak hours (9:30 AM to 3:30 PM) have median household incomes that are about 21 percent below the average for all commuter households

Time Left for Work	Median Household Income, Difference from All Commuters
Before 6.30	-3%
630 to 830	9%
830 to 930	4%
930A to 330P	-21%
330 to 530	-13%
530 to 630	-2%
After 630	-12%
American Community Survey, IPUMS, 2015-19	

In effect, the toll financing structure chosen for this project taxes lower income commuters (who disproportionately travel during off-peak hours and get no travel time savings) to pay for time savings for higher income commuters.

**Conclusion**

ODOT’s submitted benefit cost analysis is plagued with errors and mistakes that systematically overstate benefits and understate project costs. Calculated correctly, this project has a benefit cost ratio well below one, which means that it is not cost effective as required by 23 USC 117. As a practical matter, this is a value destroying project: It costs more in economic resources than it provides in economic benefits. ODOT’s cost benefit analysis fails to follow the guidance issued by USDOT for determining cost-effectiveness. USDOT cannot rely on this document as

an accurate assessment of compliance with federal law. Approving a grant for this project relying on the ODOT Benefit Cost study would be arbitrary and capricious.

Moreover, the systematic and consistent nature of the omissions and false assumptions presented in the ODOT application serve to represent an unqualified project as qualified for federal funding. These materially false statements constitute a fraudulent attempt to qualify a project for federal funds for which it is not eligible.



## References

FHWA, Notice of Funding Opportunity,  
<https://www.federalregister.gov/documents/2022/03/25/2022-06350/notice-of-funding-opportunity-for-the-department-of-transportations-multimodal-project-discretionary>

ODOT, Benefit Cost Narrative, I-205 Corridor Widening: Stafford Road to OR43 Benefit Cost Analysis Description, Assumptions, and Factors.  
(<https://www.oregon.gov/odot/About/INFRAI205/I-205%20Narrative.pdf>)

ODOT, Benefit Cost Spreadsheet, (electronic file). 2022\_INFRA\_BCA\_I-205 FINAL.XLSX

ODOT, Transportation Technical Report, I-205

ODOT, Transportation Technical Report, I-205. Attachment X: Future 2045 Enhanced Interchange Safety Analysis Tool (ISATe) Results

USDOT, 2022. Benefit Cost Guidance, "Benefit cost Analysis Guidance for Discretionary Grant Programs"

WSP, I-205 Economics Technical Report

<b>ODOT I-205 Toll EA - RECORD #2969 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Steve
<b>Last Name :</b>	koch
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email

### Q3. Comments :

Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

First of all, shouldn't a survey of this nature have been done before engineering and construction was started? What is up with that? And didn't it have a toll at the bridge between Washington and Oregon? And is it there anymore? Why? Because people didn't like it for all the reason they will not like this one!

Effects of the transportation system: rerouting and diversion. This one factor alone should have been enough of a deterrent to keep the project from going forward beyond planning. Diversion. That is the first thing that comes to mind when I think of a "toll" bridge is saving money. We pay income taxes, gas taxes, property taxes, etc. Big rigs pay use taxes. I'm sure there are other taxes businesses and individuals pay to help maintain the local government as a whole. And now you folks want to add another tax? Which, I would think is constitutionally illegal. Because those taxes levied are without representation. Seems to me an increase could be enacted without a vote of the public. So, when the ODOT creates another cash cow, the first thing that comes to mind is finding a way around the system to save me money. Which will impact all major side-street traffic. AND...local business. It will be a mess. And, btw, what is "active transportation"? Does that mean buses? I would wager that the percentage of population using buses that use the Abernathy bridge is less than 5%. And are the riders going to pay more for riding those buses to cover the toll? Talk about financial impact!

Bikes and walking? Isn't there a sign on the on-ramps to the freeway that states "non-motorized vehicles prohibited"? Why in the world are bikes and walking even mentioned. And, if the signs weren't there, one would have to be in dire straights before taking their life in their hands by biking on a 6 lane freeway. In my estimation.

How in the world will adding another lane to I205 impact I5? Traffic is traffic. If the state tourism department advertises to draw people to the state to play, work and live, they darn well should have talked to the state DOT to make sure they can accommodate the "traffic". Add to that the impact of asking visitors to pay a fee to use "our wonderful, beautiful state hwy's!"

Freight - What? Our capitalistic economy, and "interstate" freeway system invites companies doing interstate and international business to "use" the system. Why is this even a question? These trucks will always be using the system. And thank God for them. We couldn't survive as a society without them! And if ODOT wants to charge them for use, they will only pass the cost onto the consumer. (another tax, yay!)

Effects to local environment: smh - What!? Someone should have thought about these issues 50 years ago. People cause environmental impact. Lewis and Clark impacted the environment. If you don't want people to impact the environment, then ask them to leave the state. Or stop driving. I suggest the first ones to stop driving are the governor, the mayor(s) and all legislators, state, county and city employees. And can we please stop talking about climate change? If we were really concerned about this and "global warming" (snicker)...someone should have sued the federal government for spewing aluminum particulates into the atmosphere a long time ago! And we should enact a law disbanding ALL drive thrus and cars with AC and heaters. Has anyone ever done an environmental impact study on the amount of CO2 spewed into the air from all the cars waiting in drive thru lines with their heaters and AC going?

Effects to built environments - Of course this will have an impact on ALL the items on the list. But the only thing to do is NOT do it.

Effects to local communities - #1 diversion of traffic (see comments above).

Of course this will impact local economies. How could it not? Diverted hwy traffic will clog intersections. Increase waiting times all along Willamette Drive, as if it's not already out of control. Now you want to add more traffic? #2 - household economies: how could this NOT impact family budgets? No brainer.

#3 - what the heck is environmental justice? I may be showing my ignorance, but really, what kind of Orwellian terminology is this? Google definition: Fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. This goal

will be achieved when everyone enjoys: 1 the same degree of protection from environmental and health hazards, and 2 Equal access to the decision-making process to have a healthy environment in which to live, learn and work. (they forgot "play"). Okay, who are we trying to kid? The first injustice was that this whole project was shoved up our "rear-..." without prior authorization by the people who are going to pay for it! AND boy did ODOT miss the mark all along the way regarding this line item! It would take a whole document all it's own to address every single aspect of EJ and how this project has missed the mark. (and I dare say, broken the law, if indeed, it exists as a ORS!) Let's take race for example. How in the world can anyone judge the impact an addition to a interstate road will have on ANY ethnic group with reliability or change to outcome? Are there going to be cameras specifically setup to snap photos of all occupants in every car? Will ODOT send out surveys asking every driver how their trip across the Abernathy Bridge impacted their visit to a family reunion? The addition of Environmental Justice to the list of concerns is absurd! Sounds nice, but really, in all seriousness, it is time to apply some common sense when the state considers projects that will impact the financial and livability outcomes of its citizens.

And finally,

Proposed mitigations - How about, after some initial thoughts about a project of such nature, that being the "toll" aspect, we "Just Say No".

Thanks

**ODOT I-205 Toll EA - RECORD #2970 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** James

**Last Name :** Howell

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
ODOT needs to conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion because they have failed to consider not adding lanes by reducing traffic demand with an operational solution. Effective bus service on the freeway is an operational solution that could significantly reduce vehicle demand.  
Currently there is no bus service on this segment of freeway. In fact ODOT does not provide any effective bus service on any of its urban freeways. For example: If ODOT provided daily frequent bus service on a circumferential freeway route connected to MAX at Clackamas Town Center and Beaverton Transit Center with intermediate stops at TriMet's bus hubs in Oregon City and Tualatin P&R, a significant number of peak hour commuters would leave their cars at home.  
I suspect the cost of the bus operation would be significantly less than widening freeway lanes.

**ODOT I-205 Toll EA - RECORD #2971 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Karen

**Last Name :** Brown

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I feel it is unconscionable to proceed with the I-205 freeway expansion without an environmental impact statement. Increased emissions from an expansion do not align with Oregon's targets for reducing carbon emissions and I think taxpayers have a right to fully understand the full environmental impact prior to footing the bill.

**ODOT I-205 Toll EA - RECORD #2973 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Dan

**Last Name :** Keeley

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Because the money is needed for seismic retrofits and other maintenance.

**ODOT I-205 Toll EA - RECORD #2974 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Bill  
**Last Name :** Merchant  
**Affiliation :** Hamlet of Beavercreek  
**Submission Method :** I-205 EA email

**Q3. Comments :** This response and opposition is filed pursuant to motion passed by the The Hamlet of Beavercreek board after public notice and extensive discussion.

The Hamlet of Beavercreek is a community group recognized by Clackamas County to represent the almost 10,000 people living in our area. Both OR 213 and Beavercreek Road traverse the Hamlet and the implementation of tolling on I-205 will adversely affect both our residents and those people south of us who use the arterials mentioned. We join the Clackamas County Board of Commissioners in opposition to the Environmental Assessment and model used by ODOT in producing the EA and ODOT's assessment of diversion effects. Their analysis and arguments are incorporated in The Hamlet of Beavercreek's opposition by reference.

Like the Redland CPO, The Hamlet Of Beavercreek further objects to tolling being implemented beyond the strict repayment of the costs of current widening and bridge construction. The EA does not establish sufficient grounds for the federal Department of Transportation's approval, as the EA fails to demonstrate sufficient grounds to allow for permanent tolling under Section 1216(a) of TEA-21 continued as part of SAFETEA-LU the Value Pricing Pilot Program (VPPP) (Congestion Pricing).

ODOT states without proving that both congestion will decrease, and air quality will increase, without explaining where the current traffic, and anticipated increases in traffic over the next 20 years, will go in lieu of I-205. Major portions of Clackamas County roads and highways have been constructed by the County and ODOT itself, to utilize I-205; alternatives to I-205 do not exist in most all situations. For example, OR 213, a major north south arterial from the southern portions of the County, and areas below, joins I-205 before departing three exits later to become 82nd Avenue. Current traffic on 213 during rush hours can extend south of this juncture for up to a mile prior to I-205, and there is simply no other place for that traffic to go except onto I-205. This is also true for US 99E and OR 43. These situations, created and maintained by ODOT, will exist well into the future without major construction of new or improved routes other than I-205. Safety may likely improve on I-205 by forcing more traffic onto local roads through diversion, decreasing safe travel on those roads. ODOT is pushing traffic safety onto Clackamas County and affected municipalities.

ODOT has not included in its traffic estimates local traffic and local commutes. Prior communications indicate they do not consider local traffic to be part of the diversion analysis. This is wrong. Much, even most, of the local traffic uses I-205 directly because ODOT designed the State roads within Clackamas County to use I-205 for local purposes, ODOT simply excludes those local commutes from its analysis. There is no realistic reason local commutes should not be counted as part of ODOT's Congestion Pricing analysis, especially in determining whether traffic will lessen, and air quality improve due to tolling. ODOT simply does not account for these local trips, or for the increases in traffic the County is projected to have into the future. Equity itself should estop ODOT from ignoring a situation it helped create.

The Hamlet Of Beavercreek strongly opposes ODOT's EA and projected tolling.



**ODOT I-205 Toll EA - RECORD #2976 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** W C

**Last Name :** Nickles

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** If tolling on I-205 is put in place, it will make travel Hwy 43 nearly impossible. We live 2 blocks off 43 and the increase in traffic throughout the day will make travel from our home much longer in time and frustration to go anywhere. It is already a mess morning and evening travel times, and the tolling of I-205 will add so much traffic, that it will become more difficult to even access our only route of travel, if we can at all. Having to pay a toll, to even attend our Church in Oregon City, is ridiculous. We are very much opposed to any suggestion of an additional taxation on our already fixed retirement income.

**ODOT I-205 Toll EA - RECORD #2977 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Mike and Rebecca

**Last Name :** Herron

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** PLEASE, NO TOLLING ON OREGON ROADS!

I prefer our monies be wisely spent.

It's been promised forever that our bridges and roads would be repaired if only we paid more in gasoline taxes. Instead, those monies appear to have been spent on bike paths, extended street corners, and salmon restoration projects that happen to be on dangerous major roads (case in point: 99W and Bethel Rd. intersection, Amity). None of these help the potholes or the crowded road situations.

Obviously, Oregon is not an east coast state with available alternate transportation. With our rural design, we need our cars to get from Point A to Point B.

Electric cars are being crammed at us. Those necessary batteries are not "green." And, that it takes fossil fuel to build them.

We need our cars. We need smart and fiscally responsible to use the money that has flowed so freely into state coffers.

**WE NEED NO TOLLS!**

**ODOT I-205 Toll EA - RECORD #2978 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Robert

**Last Name :** Klaebe

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Why should we tear up a sections of Oregon to widen freeways when adding lanes has never worked!?

Doing this without an EIS is reckless and destructive. Don't ruin lives just to make the problem worse!

**ODOT I-205 Toll EA - RECORD #2979 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Robert

**Last Name :** Smith

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
No more radical left, nutjobs, dictating to everyone on the freeway, wasting our time. We expel more carbon sitting in gridlock.  
Build, build build!!! It's time for MORE freeways and wider roads! We're not all going to ride bikes everywhere, or take trains and buses. Public transportation is a joke and now very dangerous! Go for it ODOT!! You have a lot more support than people are willing to admit.

<b>ODOT I-205 Toll EA - RECORD #2982 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Erica
<b>Last Name :</b>	Rooney
<b>Affiliation :</b>	City of Lake Oswego
<b>Submission Method :</b>	Letter
<b>Q3. Comments :</b>	Please see the City of Lake Oswego's response to the EA, as attached.  Thank you.
<b>Attachments :</b>	I-205 Tolling Project - Submitted Response to EA - Lake Oswego 04-21-2023 .pdf (4 mb)



April 21, 2023

Mandy Putney  
ODOT Urban Mobility Office  
19277 SW Boones Ferry Road  
Tualatin, OR 97224

Sent via email: [I205TollEA@odot.oregon.gov](mailto:I205TollEA@odot.oregon.gov)

Dear Director Putney,

Thank you for the opportunity to provide technical review and public comment on the Environmental Assessment of the Interstate 205 Toll Project (I-205 Project).

The City of Lake Oswego has continued to pose questions and concerns about the I-205 Project and the impacts it will have on not only our community but a significant portion of Clackamas County. We have provided feedback in the technical spaces with staff, as well as policy with our elected officials. These efforts and requests for collaboration to address these concerns have been ignored. Further, it is evident in the Environmental Assessment our mitigation concerns have not been adequately responded to, nor have appropriate mitigation measures been proposed to offset the expected impacts of the project. The City of Lake Oswego urges further analysis with an Environmental Impact Statement (EIS) for this project, in alignment with the Regional Mobility Pricing Project (RMPP), to address the deficiencies and issues of the I-205 Project. Our comments further echo the unified voice of Clackamas County cities, as well as the Clackamas County Board of Commissioners.

The comments that follow contain a reiteration of issues that we have brought forward before, specific examples of technical shortfalls that we found in the most recent review, and our request for moving forward.

### **Lake Oswego's recommendations were not incorporated into the Environmental Assessment**

The Public Agency engagement opportunities were very limited and lacked adequate time to review materials. Only two meetings were held to engage participating agency staff personnel, and the results and concerns raised in those meetings did not produce satisfactory outcomes.

*Appendix C-1, I-205 Toll Project Mitigation Workshop Summaries* does not adequately reflect the local agency concerns, and the proposed mitigations did not reflect meeting our recommendations

After the 2<sup>nd</sup> meeting in November 2022, Lake Oswego reiterated the concern that none of the proposed mitigation within our jurisdiction would alleviate congestion either in the current state or with the proposed increase in diversion. We strongly recommended that the diversion be mitigated by providing improvements at minimum improve local access across or on to the impacted system. Instead, the proposed mitigations shown in Table 3-15 and 3-16 in the Environmental Assessment (pages 3-40 and 3-41) are pedestrian improvements that will not improve conditions. These proposed improvements will cause more congestion at the Stafford/Rosemount roundabout. Additionally, some of the proposed mitigations are implementations of signal coordination that have previously been denied by the Oregon Department of Transportation (ODOT) and have been proven to not be possible given current conditions on State Street/Hwy 43.

In response to the mitigation meetings, the City sent a letter on January 5, 2023 (Attachment A) to ODOT specifically recommending mitigation that would have some worth and help offset the impacts of diversion. Our requests from that letter are reiterated in summary below:

### **State Street**

The City requests that ODOT improve the safety for active transportation users along the entire corridor that is being impacted, beyond the two intersections. This also includes constructing bike facilities and ADA improvements, which is a standard practice for our transportation system improvements to provide multi-modal transportation options and accessibility. Understanding that the coordination of the signal system will increase traffic delays for those wishing to access commercial areas along the corridor, the City requests that ODOT carefully consider the delays to the minor-street approaches when adjusting the timing of signals.

### **Stafford Road Corridor**

Since Stafford Road is a critical emergency access route serving Lake Oswego, West Linn, and Stafford-Hamlet, the City would not recommend installing raised crosswalks at the roundabout, as they would delay emergency response vehicles. Also, since pedestrian infrastructure only exists on the northern leg of the roundabout, the City would not recommend installing a Rectangular Rapid Flashing Beacon (RRFB) on the east leg until a sidewalk is provided south of the roundabout. The City would accept improved street lighting and crosswalk markings, as well as the installation of an RRFB on the northern leg to improve safety for pedestrians crossing between Atherton Drive and Rosemont Road.

The City would recommend the following additional improvements on the Stafford Road/McVey Avenue corridor to allow drivers, bikers, and walkers to safely and efficiently use the roadway with the additional traffic diverting to and from Interstate 205:

- *Stafford Road at Bergis Road:* A traffic signal has been identified in the City's Transportation System Plan (Project #141) and is projected to be warranted at the Stafford Road/Bergis Road intersection prior to 2027. The traffic signal would ensure access for residents on Bergis Road to use Stafford to travel to/from their destination and would improve pedestrian connectivity across Stafford Road. Project may need to be completed with realignment of Bergis Road (Project #223).
- *McVey Avenue at South Shore Boulevard:* Pedestrian crossing improvements should be provided at this major intersection that includes access to a major commercial area in the neighborhood.
- *McVey Avenue at Cornell Street:* A traffic signal has been identified in the City's Transportation System Plan (Project #63). A signal in this location would ensure residents south of McVey Avenue could still use the corridor to travel to/from their destinations and would improve pedestrian safety at this popular crossing location.
- *McVey Avenue:* Pedestrian and bicycle connectivity is limited along McVey Avenue between South Shore Boulevard and State Street. With the additional diversion expected in this area, improvements would be needed to ensure pedestrians and bicyclists are able to safely use the roadway in this stretch.

### **Childs Road**

The City of Lake Oswego supports the City of Rivergrove's concerns and recommends that ODOT make safety improvements to pedestrian crossings at major intersections along this diversion route. Improvements to signing and striping, as well as possible enhancements to the common crossing areas, would ensure pedestrians can remain safe when additional traffic unfamiliar with the area is introduced to the streets.

## **Lake Oswego's Review of the Environmental Assessment has identified numerous technical concerns**

Several inconsistencies and concerns were found during the review of the Environmental Assessment, the Transportation Technical Report, and the other appendices that call into question the accuracy of the analysis for the I-205 Project. It was very difficult to review thousands of pages to confirm consistency and identify modifications that may have been made



from previous drafts. Because of the significant number of concerns (not all of which are identified in this section), the City reiterates the request to pause the I-205 Toll Project until it can be aligned with the Regional Mobility Pricing Program and conduct an analysis showing the full impacts of regional tolling on the overall transportation system prior to implementing tolling on any one segment. This request is in solidarity with cities throughout Clackamas County, Clackamas County, and partner agencies.

Due to the fact that the I-205 Project is overseen by ODOT and that it will have significant effects to facilities under their jurisdiction, the analysis would be expected to follow the guidelines and procedures of ODOT's Analysis Procedures Manual<sup>1</sup> (APM). Departure from the methodologies presented in the APM may significantly understate the impacts of the project to facilities adjacent to the interstate as well as within neighboring jurisdictions. **Some examples of where the analysis departs from recommended procedures are as follows:**

- All turning movement counts were limited to a two-hour collection period. Page 3-12 in the Analysis Procedures Manual recommends collecting counts within a three-hour period to capture the peak period. While the study's identified AM peak hour (7:45am to 8:45am) would have likely been captured in the counts collected between 7:00am and 9:00am, there is a possibility the PM peak hour (5:00pm to 6:00pm) could have extended beyond the identified counting period between 4:00pm and 6:00pm.
- While the analysis did make slight adjustments to account for impacts of the COVID pandemic, there is no discussion of any adjustment to the existing turning movement counts to reflect 30<sup>th</sup> highest hour volumes or evidence supporting the analysis accounted for any seasonal variations (although page 14 identifies consideration of seasonal variations was included in the approach). Chapter 5 of the Analysis Procedures Manual provides directions on developing existing year volumes and states "traffic counts alone should not be used for design or operational analysis of projects." The analysis should provide discussion or evidence that the analysis volumes reflect ODOT's general requirements for analysis.
- Several intersections were observed to have been incorrectly evaluated with the analysis software. Per page 3-35 in the Analysis Procedures Manual, "outside the Portland, Salem and Eugene MPO urban areas the unadjusted saturation flow rate is 1750 passenger cars per hour of green per lane." As one example, the intersection of Stafford Road/I-205 Northbound Ramps (#2), which falls outside the Portland Metro service area, was analyzed in all scenarios with an ideal flow rate of 1,900 passenger cars per hour per lane. The report should use the appropriate flow rates or provide a saturation flow rate study to defend the use of a higher rates at the intersections where they are used.

---

<sup>1</sup> Oregon Department of Transportation, *Analysis Procedures Manual Version 2*, November 2022.

- Similar to above, some intersections had improper values in the “Total Lost time” field. Per Appendix 12/13A of ODOT’s Analysis Procedures Manual, this field can be adjusted based on values for the yellow and all-red times. An example of where the analysis failed to adjust the “Total Lost time” include the values for the eastbound approach to the intersection of Stafford Rd/Ek Rd.

**Outside of not following the guidelines from ODOT’s Analysis Procedures Manual, issues identified in a review of the Transportation Technical Report are as follows:**

- On page 9 of the Transportation Technical Report, the report states that a small portion of Interstate 5 was included in the analysis because most sections of I-5 did not meet the three criteria for including them in the Area of Potential Impact (API). While there is analysis of the Nyberg/I-5 Ramp intersections, there is no segment analysis of Interstate 5 between Interstate 205 and Nyberg Road or of the segment south of Interstate 205. Analysis of these two segments is important to see the impacts of traffic choosing to remain on Interstate 5 instead of using Interstate 205.
- In Table 5-10 on page 83 of the Transportation Technical Report, it is shown that the project on Interstate 205 will cause five segments of I-205 to fail to meet ODOT’s volume-to-capacity (v/c) mobility standard in the northbound direction. In Table 5-11 on page 87, it is shown that the project will cause six segments of I-205 to fail the appropriate v/c mobility standard. Without the project, only one segment in the southbound direction would be reported to fail the appropriate standard. While the report continues to explain that the interstate would operate with less congestion with the project, hours of congestion and level of service are not the appropriate standard that ODOT uses to evaluate their facilities (the Highway Design Manual uses volume-to-capacity ratio as the standard).
- In Table 5-14 on page 106 of the Transportation Technical Report, the intersection of Stafford Road/I-205 Northbound Ramps is shown to fail the appropriate mobility standards during the AM peak hour in 2045 due to the impacts of the I-205 Project (going from a volume-to-capacity ratio of 0.65 in the No Build Alternative to a 0.80 in the Build Alternative when ODOT’s Highway Design Manual requires the ramp to operate at less than 0.75 following the project). This is not referenced in the Environmental Assessment and no potential mitigation is identified.
- Analysis results for multiple intersection operations are not realistic. For instance, the analysis for Stafford/Borland shows the intersection operating at 0.61 volume-to-capacity under 2021 PM peak hour conditions before it decreases to 0.60 in the 2027 No Build Alternative, even though it is expected to have approximately 350 more vehicles (volume) with no increase in capacity.

- The Transportation Technical Report provides details on page 110 regarding how PM peak hour delays were estimated at intersections near the Stafford Road/I-205 Ramps using VISSIM. Delay and level of service are not the appropriate mobility standard for the interstate ramps (or the Clackamas County intersections). In review of the analysis, the I-205 project causes volumes for both the northbound and southbound I-205 ramps to exceed the allowable capacity during the PM peak hour (going from a volume-to-capacity ratio of 0.45 in the No Build Alternative to a 1.19 in the Build Alternative for northbound ramps and from 0.57 to 0.78 for southbound ramps when ODOT requires both ramp intersections to operate at less than 0.75). Additionally, the VISSIM results for this intersection were not included in the technical appendix for review.
- Table 5-17 on page 116 shows that the I-205 Project will cause the intersection of OR 43/A Avenue to fail to meet ODOT's mobility standards during the AM Peak Hour in 2027 (going from a volume-to-capacity ratio of 0.98 to a 1.01 when the standard is 0.99); however this is not shown in Figure 5-30 on page 155 in the Technical Report or on Figure 3-7 on page 3-23 in the Environmental Assessment (it is indicated that it fails in both the No Build and Build Alternatives in 2045 only). Page 115 of the Technical Report explains that the Build Alternative only increases the v/c ratio by 0.03 during this period; however, this amount would be sufficient to cause it to fail to meet the appropriate ODOT standards and it should be identified accordingly.
- No queuing analysis was conducted for either the intersection of OR 43/A Avenue or OR 43/McVey Avenue. The City of Lake Oswego would want to ensure queues at these intersections won't block other streets or accesses and lead to safety issues for other drivers, bicyclists, and pedestrians.
- Observing that the Transportation Technical Report highlights significant impacts at the intersections of Stafford/Rosemont and OR 43/McVey Avenue as well as at OR 43/A Avenue, the City of Lake Oswego would request analyzing impacts at major intersections that fall between these locations. This would include intersections at Overlook Drive, Bergis Road, South Shore Boulevard, and Cornell Street along the Stafford/McVey corridor and the intersections of Middlecrest Road/Wilbur Street, North Shore Road, Foothills Road, B Avenue, and Terwilliger Boulevard along OR 43.

**Other issues identified in a review of the appendices to the Transportation Technical Report include:**

- The appendix for the technical analysis of the I-205 Project did not include several key items identified in Section 3.4 in the Transportation Technical Report. For instance, the referenced tube counts were not included in the appendix and could have been used to support the selected peak hours for analysis. Additionally, the timing worksheets for each

of the signalized intersections were also not included for reference and could have been used to verify the timing for traffic signals when evaluating impacts.

- There are inconsistencies in the software and analysis methodologies used to evaluate multiple intersections. For instance, the intersection of Stafford Road/Borland Road was evaluated using Synchro 10 (HCM 6<sup>th</sup> Edition) for existing 2021 conditions during the AM peak hour, Synchro 10 (HCM 6<sup>th</sup> Edition) and VISSIM for existing 2021 conditions during the PM peak hour, and SIDRA Intersection 8.0 for 2027 and 2045 conditions for AM and PM peak hours. It is unknown which methodology was used for the SIDRA evaluation, as it has access to HCM 6<sup>th</sup> Edition and SIDRA analysis methodologies. Section 3.5 of the Transportation Technical Report only describes the use of Synchro 10 to analyze intersections (and VISSIM in the case of case of Stafford near the I-205 ramps) and did not provide mention of SIDRA, which can provide different results when compared to Synchro 10.
- To determine a critical intersection volume-to-capacity (v/c) ratio per Section 13.4.4 of ODOT's Analysis Procedure Manual, a value needs to be calculated in post-processing by referencing both HCM 6<sup>th</sup> Edition and HCM 2000 outputs. The appendix is missing some outputs for several intersections from either the HCM 2000 or HCM 6<sup>th</sup> Edition, but includes reference to the sheets in the calculation spreadsheet. The data should be provided in the appendix to verify correct critical movement values are used.
- Some intersections had volumes assigned to movements that did not have the appropriate lane in the model. For instance, the analysis of the Stafford Road/Ek Road intersection for the AM Peak under 2021 conditions assigned 10 vehicles to an eastbound right-turn movement, but the model only assumes vehicles can turn left or proceed through the intersection. This is similar to the westbound approach having 50 vehicles assigned to the westbound left-turn movement, but only showing a right-turn or through movement available. Having improper lanes identified in the analysis model can significantly impact the report of the intersection's operation.
- Some traffic volume adjustments gathered from the model and used in the analysis were not realistic. For instance, the eastbound approach at OR 43/McVey Avenue only increased by 5 vehicles between the 2021 AM peak hour conditions and the 2045 AM peak hour conditions. It would be expected that volumes would increase by significantly more than 0.03% per year rate based on historic growth rates. Also, it was observed that the I-205 project would lead to more people visiting a public park during the AM peak hour.

**In review of the safety analysis in both the Environmental Assessment and the Transportation Technical Report, the following concerns were identified:**

- ODOT’s Top 5% and Top 10% Safety Priority Index System (SPIS) crash locations along the interstate shown in Figure 3-3 on page 3-8 of the Environmental Assessment were largely in approximately nine areas that have exiting or merging traffic (I-5/I-205 interchange, near the OR 43 ramps, and where traffic weaves between OR 213 and 82<sup>nd</sup> Drive). No segments on I-205 were shown to be within the Top 5% or Top 10% of SPIS sites. Conversely, around 43 locations and 2 segments in the neighboring communities were identified within either the Top 5% or Top 10% of SPIS sites. This fact demonstrates that the higher crash areas are largely within communities rather than on the interstate.
- Crashes on the interstate were largely identified as “failing to avoid the vehicle ahead” or rear-end collisions. These crashes do not often result in serious injuries or fatalities. Crashes in the neighboring communities (as seen above to have more high-crash areas) can often be more serious in nature or include vulnerable users such as bicyclists or pedestrians. Increasing traffic volumes in these areas would be expected to increase the frequency of crashes and would be potentially more serious than those that occur on the interstate system. This is supported in Tables 5-37, 5-38, and 5-39 showing 19 of the 50 intersections studied having an increase in injury/fatality rates with the Build Alternative in 2045. Table 5-40 on page 144 also shows 4 of 6 corridor segments having an increase in injury/fatality rates. Comparatively, Table 5-41 shows the project not having any effect on reducing predicted fatal crashes on Interstate 205 in 2045.
- In the Environmental Assessment, the Area of Potential Impacts for Land Use is not consistent with other analysis areas. Diverted traffic due to the project would be expected to have significant effects on the land use of neighboring jurisdictions beyond 100 feet from Interstate 205 and this was not evaluated in full. The area of impact for land use does not correspond to the area of impact from diversion, and this does not seem adequate or appropriate.

**The Broader Regional Tolling Program must be considered**

The Regional Mobility Pricing Project is a reasonably foreseeable project that needs to be analyzed prior to making decisions regarding tolling on I-205. The regional approach to tolling is most impactful and needs to be done in a strategic manner. Leaving this out of consideration, just because it isn’t in Metro’s Regional Transportation Plan (RTP), is disingenuous and loses sight of the holistic view of the impacts to the overall transportation system. In *Appendix B: I-205 Toll Project Performance Measures*, one of the goals noted in the table is “maximize integrations with future toll systems”. The RMPP was identified within the

cumulative impact report; however, it was not included because “impacts cannot be reliably qualified or quantified at this time”. Of note, the I-205 Tolling project was not part of Metro’s RTP until recently when it was forced to be added.

**Mitigation of traffic impacts must be funded and implemented prior to the start of tolling.**

The I-205 Project cannot result in a Finding of No Significant Impact (FONSI) because the mitigation measures are unlikely to be completed at the time of tolling implementation, or possibly within the studied period. Additionally, no commitment by ODOT has been made to implement any of the mitigation either in a timely manner to align with constructing and implementing tolling, or at all. Section 3.1.4 Avoidance, Minimization, and/or Mitigation Measures does not provide concrete commitment to the mitigation. All of the statements refer to “potential mitigation strategies”, or “monitoring programs”. There is not a commitment of funds or timing associated with any of the mitigation strategies.

It is also confusing to state that “any mitigation proposed to address near-term impacts that is determined to also help alleviate pre-completion tolling impacts could be implemented before tolling begins.” What is this unidentified mitigation work, and what are the costs associated with it? How could this happen before late 2024 when the tolling is expected to start? There are conflicting timing statements throughout this section.

**The Revised Environmental Assessment needs to be reviewed and coordinated with local agencies and the public.**

There is no discussion or commitment from ODOT that leaves the City with the expectation that there will be further opportunity to comment on the Revised Environmental Assessment when it is released.

Due to the amount of concerns and issues identified in the review of the Environmental Assessment by the City and other partner agencies, the City believes that ODOT will not be able to address all the inconsistencies or errors to provide an accurate analysis of the impacts resulting from the I-205 Project. Accordingly, the City requests that ODOT continue to work with partner agencies following the release of the Revised Environmental Assessment and that another comment period be provided to ensure all parties impacted are comfortable with the final product.

Additionally, due to the extensive amount of documentation that is needed to be reviewed in this process, the City requests that a change log or red-lined version of the Environmental Assessment and appendices be provided to simplify and hasten the review of additional reports.

## **Partnering Agencies are all asking for the same approach in moving forward.**

The City of Lake Oswego, in solidarity with sixteen other local agencies and service providers, sent a letter to the State's Joint Committee on Transportation on April 5, 2023, urging legislative action to address concerns of I-205 Toll Project (Attachment B). Our position on the issue surrounding the I-205 Project remains that the impacts are too significant, and that future regional decisions need to be part of this process in order for the proper assessment to be completed and mitigation measures identified. Therefore, we reiterate here, the four key requests:

1. Pause the I-205 Toll Project until it can be aligned with the Regional Mobility Pricing Program and conduct an analysis showing the full impacts of regional tolling on the overall transportation system prior to implementing tolling on any one segment;
2. Schedule a public hearing in the Joint Committee on Transportation to provide a venue for the public to share impacts and concerns about the I-205 Toll Project, RMPP, and how ODOT plans to achieve its vision;
3. Create the Regional Toll Advisory Committee (RTAC) in statute to directly advise the Oregon Transportation Commission, as well as a technical committee comprised of regional technical staff to advise RTAC;
4. Develop a formula that allocates a portion of tolling revenues directly to impacted jurisdictions to address existing diversion, affected transportation impacts related to tolling and congestion, operations and maintenance and new infrastructure projects for all modes beyond any NEPA required mitigations.

The City of Lake Oswego continues to support these fundamental requests to address tolling in the Portland metropolitan area in a strategic and collaborative manner. All parties need to be engaged together to develop a solution that works for the metro area as a whole – not just one project at a time, developed without consideration of larger ramifications and area-wide impacts.

For all of the reasons detailed in this letter, we respectfully ask the ODOT/FHWA consider the requests of the City of Lake Oswego and multiple other agencies in pausing this project for a more cohesive and inclusive analysis that all parties can stand behind.

Sincerely,

A handwritten signature in black ink that reads "Erica Rooney". The signature is fluid and cursive, with the first name "Erica" being larger and more prominent than the last name "Rooney".

Erica Rooney, PE  
Public Works Director and City Engineer

cc: Lake Oswego Mayor and Councilors  
Martha Bennett, City Manager  
Will Farley, PE, Traffic Engineer

Attachments:

- LO Recommendation, January 5, 2023
- Joint Agency Letter, April 5, 2023





January 5, 2023

Ms. Mandy Putney  
Director, Urban Mobility Office  
Oregon Department of Transportation  
355 Capitol Street NE, MS 11  
Salem, OR 97301

RE: I-205 Tolling Project Traffic Impacts & Environmental Assessment

Dear Ms. Putney:

Thank you for the opportunity to partner with ODOT's Urban Mobility Office when determining what improvements are needed to offset the traffic impacts of the I-205 Tolling Project. Based on the expected diversion to be added through Lake Oswego on Stafford Road, McVey Avenue, and State Street (Oregon Highway 43), the City formally requests the following improvements to the public street system be included in the project's Environmental Assessment.

#### State Street

The ODOT project team has shared results showing a significant amount of diversion using Oregon 43 through West Linn and Stafford Road/McVey Avenue through the Stafford region of Clackamas County. A significant impact along State Street is expected north of where these two diversion routes converge at the State Street/McVey Avenue intersection. The following intersections are expected to have increased safety and operational impacts for both drivers and pedestrians frequenting the businesses along the State Street corridor:

- State Street at B Avenue
- State Street at A Avenue
- State Street at Foothills Road
- State Street at Northshore Road
- State Street at Wilbur Street/Middlecrest Road
- State Street at McVey Avenue

As mitigation for the additional diversion along the corridor, ODOT's project team has recommended providing pedestrian improvements at the State Street/McVey Avenue intersection including implementing Leading Pedestrian Interval and enhancing the signage. Additionally, the project team has recommended providing adaptive signal systems to help coordinate traffic between A Avenue and McVey Avenue so less delay is experienced by drivers

passing through the City. As City staff expressed earlier, these have been requested of ODOT for several years now, as the need already exists for these warranted improvements.

#### City Requests:

The City appreciates the project team recommending these currently-necessary improvements and requests that ODOT improve the safety for active transportation users along the corridor. Please consider improving all pedestrian crossings along the corridor to be compliant with current Americans with Disability Act Standards including reconstructing pedestrian ramps and updating the traffic signal indications and buttons. Also, ODOT should evaluate providing bicycle infrastructure to allow those who choose to ride a bike to safely share the road with the increased traffic needing the roadway.

Understanding that the coordination of the signal system will increase traffic delays for those wishing to access commercial areas along the corridor, the City requests that ODOT carefully consider the delays to the minor-street approaches when adjusting the timing of signals. ODOT should also consider improving the safety of the intersections along the corridor by adding reflective backplates to the indications and improving the vehicle detection.

Since additional diversion from the I-205 Tolling Project will likely impact all intersections north of McVey Avenue as traffic travels through the downtown core, the City requests that ODOT include the following additional improvements to the corridor:

- *State Street at B Avenue:* Significant redevelopment is anticipated to occur on the northwest corner of this intersection prior to 2027. Additional safety improvements should be included at this intersection, including the implementation of Leading Pedestrian Intervals for pedestrians and reflective backplates for the signal indications.
- *State Street at Terwilliger Boulevard:* The City has identified the need for speed feedback signs near this intersection in the City's Transportation System Plan (Project #110). Additionally, traffic signal warrants should be reviewed for this busy intersection, as the diversion would be expected to increase the traffic turning left onto Oregon Highway 43 at this location.

#### Stafford Road

The ODOT project team shared the expected impacts along the Stafford Road corridor north of Interstate 205 and recommended improvements to the Stafford Road/Rosemont Road/Atherton Drive roundabout including improved street lighting for vulnerable users, providing Rectangular Rapid Flashing Beacons (RRFBs), and installing raised crosswalks.

#### City Requests:

Since Stafford Road is a critical emergency access route, the City would not recommend installing raised crosswalks at the roundabout, as they would delay emergency response

vehicles. Also, since pedestrian infrastructure only exists on the northern leg of the roundabout, the City would not recommend installing an RRFB on the east leg until a sidewalk is provided south of the roundabout. The City would accept improved street lighting and crosswalk markings as well as the installation of an RRFB on the northern leg to improve safety for pedestrians crossing between Atherton Drive and Rosemont Road.

The additional diversion from the I-205 Tolling Project triggering the need for improvements at Stafford Road/Rosemont Road/Atherton Drive and at the State Street/McVey Avenue intersections is expected to also impact safety and operations at intersections within the City between the two points. The City would recommend the following additional improvements on the Stafford Road/McVey corridor to allow residents to safely and efficiently use the roadway with the additional traffic diverting to and from Interstate 205:

- *Stafford Road at Bergis Road:* A traffic signal has been identified in the City's Transportation System Plan (Project #141) and is projected to be warranted at the Stafford Road/Bergis Road intersection prior to 2027. The traffic signal would ensure access for residents on Bergis Road to use Stafford to travel to/from their destination and would improve pedestrian connectivity across Stafford Road. Project may need to be completed with realignment of Bergis Road (Project #223).
- *McVey Avenue at South Shore Boulevard:* Pedestrian crossing improvements should be provided at this major intersection that includes access to a commercial area in the neighborhood.
- *McVey Avenue at Cornell Street:* A traffic signal has been identified in the City's Transportation System Plan (Project #63). A signal in this location would ensure residents south of McVey Avenue could still use the corridor to travel to/from their destinations and would improve pedestrian safety at this popular crossing location.
- *McVey Avenue:* Pedestrian and bicycle connectivity is limited along McVey Avenue between South Shore Boulevard and State Street. With the additional diversion expected in this area, improvements would be needed to ensure pedestrians and bicyclists are able to safely use the roadway in this stretch.

### Childs Road

During a recent meeting with ODOT and their project team, the City of Rivergrove expressed concern with additional diversion expected to use Childs Road when circumventing the tolling on Interstate 205. The City of Lake Oswego would like to echo this concern and recommend that ODOT make safety improvements to pedestrian crossings at major intersections along this diversion route. Improvements to signing and striping as well as possible enhancements to the common crossing areas would ensure pedestrians can remain safe when additional traffic unfamiliar with the area is introduced to the streets.

We appreciate being involved in this process, and ask that ODOT include our requests in the mitigation from the I-205 Tolling project, as the residents who will be severely impacted need improvements that allow them mobility through and within the City of Lake Oswego. For further details or coordination, please contact Will Farley, the City's Traffic Engineer, and myself.

Sincerely,

A handwritten signature in blue ink that reads "Erica Rooney". The signature is fluid and cursive, with the first name "Erica" being more prominent than the last name "Rooney".

Erica Rooney, PE  
Public Works Director/City Engineer

Cc: Joe Buck, Mayor  
Martha Bennett, City Manager  
Will Farley, Traffic Engineer



**The 2023 State Legislature Must Take Action on the I-205 Toll Project  
April 05, 2023**

Dear Clackamas County State Legislators and Members of the Joint Committee on Transportation:

The local governments listed here respectfully request your immediate assistance to address our shared concerns about the proposed I-205 Toll Project.

The importance of I-205 as a dependable and safe route for freight, regional, and interstate movement cannot be overstated. This critical need is the reason that the communities who rely on I-205 have been united in their advocacy to fix the bottleneck between Stafford Road and the Abernethy Bridge.

Unfortunately, the Oregon Department of Transportation's (ODOT) current approach to toll I-205 ahead of the rest of the region and prior to building the third lane on I-205 will have devastating impacts on neighboring communities. ODOT's plan will shift traffic from the interstate onto roadways within communities, causing increased safety risks and more congestion on local roads that are already failing.

ODOT's public engagement efforts to date have ignored and dismissed many of the questions and concerns raised by our cities, the county, the region and our shared constituents. ODOT staff have made it clear that they are being directed by the legislature to toll I-205 and that they are pursuing this approach per your direction. **We implore you to take legislative action this session to lessen the detrimental effects of the proposed tolling in our communities and your districts.**

To help you and the entire Clackamas delegation center on the shared priorities of our jurisdictions, we collectively request legislative action on the following four items that will have an immediate impact on the direction of the proposed toll program:

1. Direct ODOT to pause the I-205 Toll Project until it can be aligned with the Regional Mobility Pricing Program (RMPP), and, direct ODOT to conduct an analysis showing the full impacts of regional tolling on the overall transportation system prior to implementing tolling on any one segment;
2. Schedule a public hearing in the Joint Committee on Transportation, being mindful of the Committee's May 5<sup>th</sup> bill deadline, to provide a venue for the public to share impacts and concerns about the I-205 Toll Project, RMPP, and how ODOT plans to achieve its vision;
3. Create the Regional Toll Advisory Committee (RTAC) in statute to directly advise the Oregon Transportation Commission. Retain RTAC in perpetuity to guide development and implementation of the regional toll program. Also, create a technical committee comprised of regional technical staff to advise RTAC;
4. Direct ODOT to develop a formula that allocates a portion of tolling revenues directly to impacted jurisdictions to address existing diversion, affected transportation impacts related to tolling and congestion, operations and maintenance and new infrastructure projects for all modes beyond any NEPA required mitigations.

We respectfully request your leadership to advance these solutions to ensure ODOT is meeting the needs of our shared constituents and is only allowed to advance a project if it is fair, equitable, and beneficial to all Oregonians.

**ODOT I-205 Toll EA - RECORD #2983 DETAIL**

**Submission Date :** 4/21/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** Letter

**Q3. Comments :** [See attachments]

**Attachments :** SB0933 - Introduced.pdf (36 kb)  
March 2022 Clackamas Caucus to Congressional Delegation (FINAL).pdf (257 kb)  
RES\_WestCountyBridgeTaskForce(1).pdf (1 mb)  
CRC toll cost break down.pdf (345 kb)  
CRC tolling plan called stupid.pdf (45 kb)  
Tolling Ain't worth it!.pdf (17 kb)

# Senate Bill 933

Sponsored by Senator MEEK, Representative BYNUM, Senator BONHAM, Representatives HIEB, NERON; Senators HANSELL, WEBER, WOODS, Representatives LEWIS, RUIZ, WALTERS

## SUMMARY

The following summary is not prepared by the sponsors of the measure and is not a part of the body thereof subject to consideration by the Legislative Assembly. It is an editor's brief statement of the essential features of the measure **as introduced**.

Prohibits Oregon Transportation Commission from establishing toll on Interstate 205 or Interstate 5. Provides exception for tolls on Interstate 5 bridges that cross Columbia River.

Directs Department of Transportation to conduct analysis of alternative funding sources for specified bridge projects. Sunsets report January 2, 2024.

Declares emergency, effective on passage.

## A BILL FOR AN ACT

Relating to tolling; creating new provisions; amending ORS 383.150; and declaring an emergency.

**Be It Enacted by the People of the State of Oregon:**

**SECTION 1. Section 2 of this 2023 Act is added to and made a part of ORS 383.001 to 383.245.**

**SECTION 2. (1) Notwithstanding ORS 383.001 to 383.245, the Oregon Transportation Commission may not assess a toll on Interstate 205 or Interstate 5.**

**(2) The prohibition to assess tolls under subsection (1) of this section does not apply to the Interstate 5 bridges that cross the Columbia River.**

**SECTION 3.** ORS 383.150 is amended to read:

383.150. (1) The Oregon Transportation Commission shall establish a toll program.

(2) As part of the toll program, after seeking and receiving approval from the Federal Highway Administration, the commission may assess variable rate tolls. Tolling may include, but is not limited to assessing variable rate tolls for the purpose of:

(a) Managing congestion; and

(b) Partially or wholly funding the construction, operation or maintenance of a highway.

*[(3) The commission shall assess tolls in the following locations:]*

*[(a) On Interstate 205, beginning at the Washington state line and ending where it intersects with Interstate 5 in this state.]*

*[(b) On Interstate 5, beginning at the Washington state line and ending where it intersects with Interstate 205.]*

*[(4) To the extent necessary and permitted by state and federal law and Article IX, section 3a, of the Oregon Constitution, the commission shall ensure tolls assessed pursuant to subsection (3) of this section or tolls assessed as part of the Interstate 5 Boone Bridge and Seismic Improvement Project:]*

*[(a) Reduce traffic congestion by managing demand on the tollway and by improving operations on the tollway;]*

*[(b) Reduce traffic congestion as a result of the tollway, not only on the tollway but also on adjacent, connected or parallel highways to the tollways, regardless of ownership;]*

*[(c) Improve safety not only on the tollway but also on adjacent, connected or parallel highways*

**NOTE:** Matter in **boldfaced** type in an amended section is new; matter *[italic and bracketed]* is existing law to be omitted. New sections are in **boldfaced** type.



1 to the tollways, regardless of ownership; and]

2 [(d) Minimize and mitigate impacts to historically and currently underrepresented and disadvan-  
3 tagged communities.]

4 [(5)] (3) Any unit of government assessing tolls on highways for which the unit of government  
5 is the road authority, pursuant to ORS 810.010, shall collaborate with other units of government to:

6 (a) Determine whether assessing tolls may result in traffic, equity, safety or climate impacts as  
7 a result of assessing tolls;

8 (b) Determine appropriate investments or efforts that may minimize or reduce any potential im-  
9 pacts; and

10 (c) Periodically review any investments or efforts identified and implemented under this sub-  
11 section.

12 [(6) Before assessing tolls in the locations described under subsection (3) of this section, the com-  
13 mission shall report to the Joint Committee on Transportation established under ORS 171.858.]

14 [(7)] (4) The commission may enter into agreements with the State of Washington, or the State  
15 of Washington's tollway operator or other designee, relating to establishing, reviewing, adjusting  
16 and collecting tolls for the program described in this section.

17 [(8)] (5) As used in this section, "highway" has the meaning given that term in ORS 366.005.

18 **SECTION 4. (1) The Department of Transportation shall conduct an analysis of all rea-  
19 sonable alternative funding sources, existing or prospective, for highway projects on the  
20 Abernethy Bridge, Tualatin River Bridge and the Boone Bridge and make a report on the  
21 department's findings.**

22 **(2) The department shall submit the report required by this section, and may include  
23 recommendations for legislation, to the Joint Committee on Transportation in the manner  
24 provided under ORS 192.245 no later than December 1, 2023.**

25 **SECTION 5. Section 4 of this 2023 Act is repealed on January 2, 2024.**

26 **SECTION 6. This 2023 Act being necessary for the immediate preservation of the public  
27 peace, health and safety, an emergency is declared to exist, and this 2023 Act takes effect  
28 on its passage.**

29



March 2, 2022

The Honorable Ron Wyden  
221 Dirksen Senate Office Building  
Washington, D.C. 20510

The Honorable Jeff Merkley  
531 Hart Senate Office Building  
Washington, D.C. 20510

The Honorable Suzanne Bonamici  
2231 Rayburn House Office Building  
Washington, D.C. 20515

The Honorable Cliff Bentz  
1239 Longworth House Office Building  
Washington, D.C. 20515

The Honorable Earl Blumenauer  
1111 Longworth House Office Building  
Washington, D.C. 20515

The Honorable Peter DeFazio  
2134 Rayburn Office Building  
Washington, D.C. 20515

The Honorable Kurt Schrader  
2431 Rayburn House Office Building  
Washington, D.C. 20515

*[Sent electronically via email]*

**Subject: Clackamas County Legislators Request Assistance with I-205 Tolling Concerns**

Dear Members of the Oregon Congressional Delegation,

As bipartisan, bicameral members of the Oregon Legislature representing districts located in Clackamas County, we are writing to raise our serious concerns about the Oregon Department of Transportation's (ODOT) current proposal to exclusively toll I-205 ahead of the rest of the Portland metro region – and to respectfully ask for your help and support to elevate our concerns with the Oregon Transportation Commission (OTC), ODOT, and other relevant stakeholders so we can reach a meaningful solution for Oregonians.

The current proposal for tolling I-205 will lead to more local traffic congestion, reduced road safety, and increased costs to everyday Oregonians; it is fundamentally unfair to our constituents and local businesses, and it will not help create the regional tolling program that OTC aims to establish. For these reasons we are united in our opposition to the current I-205 tolling plan.

This plan will divert more vehicles from I-205 onto our local streets, generating significant traffic and safety problems at a time when our towns and neighborhoods are already experiencing substantial population

growth and local congestion. We are especially concerned for the reduced safety of families with young children, seniors, and those with disabilities. Our local roads and infrastructure, which already experience significant diversion, simply will not be able to handle the additional influx of traffic from I-205 when it is exclusively tolled.

To be clear, there are no transportation alternatives for drivers that want or need to avoid a toll along I-205 except to drive on local roads. Little to no transit exists along this corridor, and no meaningful plan has been proposed to address this gap. Additionally, many local residents will not have the benefit of altering their schedule to avoid peak-pricing proposed by ODOT. Drivers don't choose when their kids are dropped off at school, when they must show up for work, and when congestion happens around them.

Tolling I-205 can only be part of a larger, regional plan for improvements to transportation infrastructure and relief of congestion across the metro area. Unfortunately, that is not what is occurring here. Tolling local drivers who rely on I-205 for their everyday needs - when this project connects and benefits many parts of the region and state that will not have to shoulder the same cost - is fundamentally inequitable to those who live and work in Clackamas County. This plan will increase costs on everyday Oregonians at a time when inflation is already making life unaffordable for too many.

**Our repeated requests for dialogue with the OTC have, so far, been ignored. We are now asking for your support and assistance in raising these issues with the OTC and helping us start a serious conversation around addressing them in a meaningful way.**

Our concerns around the negative impacts to local traffic and safety – combined with the disproportionate financial burden placed upon our constituents and local businesses by this project – is a real problem that continues to go unaddressed by the OTC. Their failure to engage in a meaningful dialogue with us and those we represent to address these issues will undermine regional support for this plan and the Oregon Toll Program at-large. Said another way, if implementation of the I-205 toll program stumbles, it will create a lack of confidence in the effectiveness of regional tolling, potentially jeopardizing that project. The natural consequence in that scenario is that only I-205 is tolled for several decades. This scenario is unacceptable.

In addition to raising our specific concerns outlined above, we also plan to request the following of the OTC:

1. Create a formal structure to facilitate dialogue with impacted parties and jurisdictions (*Currently, the only mechanism for providing any feedback is to testify at OTC meetings*).
2. Delay tolling on I-205 until federal approval of regional tolling is secured.
3. A commitment to maintaining the current construction schedule for phase 1A (Abernethy Bridge improvements) of the I-205 Improvements Project.
4. A comprehensive financial report that provides transparency to project costs and funding sources.

We welcome the opportunity to work together with your office on elevating these very serious concerns. Thank you in advance for your attention to this matter and for any assistance you might be able to provide.

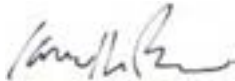
Sincerely,



**Representative Mark Meek (Co-Chair)**  
*House District 40*



**Representative Rick Lewis (Co-Chair)**  
*House District 18*



**Representative Janelle Bynum**  
*House District 51*



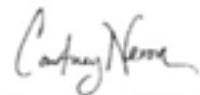
**Representative James Hieb**  
*House District 39*



**Senator Kaye Jama**  
*Senate District 24*



**Senator Bill Kennemer**  
*Senate District 20*



**Representative Courtney Neron**  
*House District 26*



**Representative Karin Power**  
*House District 41*



**Representative Rachel Prusak**  
*House District 37*



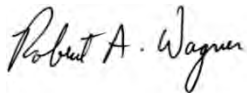
**Representative Jeff Reardon**  
*House District 48*



**Representative Andrea Salinas**  
*House District 38*



**Senator Chuck Thomsen**  
*Senate District 26*



**Senator Rob Wagner**  
*Senate District 19*



**Representative Anna Williams**  
*House District 52*

**Toll-free West County Bridge Task Force Resolution**

1 A resolution by the Clark County Board of Councilors to create a task force to advance  
2 a toll-free West County Bridge.

3  
4 **Because** our bi-state community continues to suffer daily from a worsening chronic  
5 failing level of service due to an insufficient number of Columbia River Bridges; and  
6

7 **Because** one of the crucial solutions to that problem is to build an additional toll-free  
8 West County Bridge;  
9

10 **Because** the majority of Clark County citizens voted to support an additional toll-free  
11 West County Bridge in a 2013 county-wide advisory vote election; and  
12

13 **Because** the Board, in support of the citizens, adopted seven guiding principles in the  
14 toll-free East County Bridge Policy Resolution on December 22, 2015, to be upheld as  
15 foundational to any new Columbia River Bridge project; and  
16

17 **Because** a local dedicated Task Force focused on expediting a viable community  
18 supported project would complement, expedite, serve as a resource, and help facilitate  
19 the success of the legislators in Oregon and Washington and the Bi-State Coordination  
20 Committee so that a practical bridge may be funded and fast-tracked; and  
21

22 **Because** that Task Force would provide for collaboration between the communities of  
23 Washington and Oregon; and  
24

25 **Because** this matter was considered at a duly advertised public hearing, where the  
26 Board concluded that adoption of this policy would be in the best interests of the  
27 economic wellbeing, public health, safety and welfare of the Citizens, now therefore:  
28

29 **BE IT ORDERED AND RESOLVED BY THE BOARD OF COUNTY COUNCILORS OF**  
30 **CLARK COUNTY, STATE OF WASHINGTON, AS FOLLOWS:**  
31

32 The Board adopts these findings and commits to form and sponsor a toll-free West  
33 County Bridge Task Force.  
34

35 The bridge must be simple, cost effective, free of voter rejected tolls and light rail,  
36 designed to maximize the free flow of cars, trucks, and buses, and safely convey  
37 bicycles and pedestrians to existing trails.  
38





# Tolling Has Exorbitant Cost and Privacy Issues

## Expensive Overhead

Today's "Modern" tolling systems are much more expensive than many people realize. For every dollar paid in a toll, 44% goes to pay overhead. So for every \$100 paid in tolls, only \$56 goes to pay for the actual bridge and "Other Uses" (as yet undefined).

## Loss of Privacy

To pay the base toll charge, drivers will have to have a transponder within their vehicle. The transponder can be used to track the vehicle's location via cell towers. The alternative, which allows you to retain your privacy, requires added fees to the base toll charge.

### "Pay As You Go" Peak Period Example

Fee Breakdown		Where the Fees Go	
Toll	\$6.00	Pay as You Go	\$3.00
License Plate Identification Fee	\$1.00	Toll Overhead 44%	\$2.64
Handling Charge	\$2.00	To Bridge and Other Uses	\$3.36
<b>Total One Way Expense</b>	<b>\$9.00</b>	<b>Total One Way Expense</b>	<b>\$9.00</b>

### "Transponder" Peak Period Example

Fee Breakdown		Where the Fees Go	
Toll	\$6.00	Toll Overhead 44%	\$2.64
		To Bridge and Other Uses	\$3.36
<b>Total One Way Expense</b>	<b>\$6.00</b>	<b>Total One Way Expense</b>	<b>\$6.00</b>

## Where are the Additional Fees Going?

Of the \$9.00 one way fee, only \$3.36 goes toward repayment of the bridge and "Other Uses."

## Alternative Payment Method

An EBT card, also known as a "food stamp card," will be able to be used to pay the toll. Imagine being at poverty level and having to use your EBT card to get to your job, (ETB is currently being used on the Tacoma Narrow tolling system). This form of payment maybe treated as the "pay as you go" system with a \$3.00 each way charge in addition to the toll payment.

## Some Don't Pay, Others Pay More

Approximately 10% of the systems users will not be charged do to a one time passing through the electronic system. It is too expensive to find them.

Businesses will pay for each axle on a truck, approximately four times the rate of the average vehicle unless the truck is larger, oversize, double, or triple trailer truck with more than 4 axles.

### Who else may not pay?

What happens to those who repeatedly drive though without paying?

## Tolling Will Damage Regional Economy and is Not Economically Prudent!

CRC Won't Toll I-205, Expert Accidentally Calls New Tolling Plan "Stupid."

## Blogtown

[News](#) **CRC Won't Toll I-205, Expert Accidentally Calls New Tolling Plan "Stupid."**

Posted by [Sarah Mirk](#) on Tue, Jun 22, 2010 at 10:58 AM

The Columbia River Crossing (CRC) staff dropped a bombshell last week on a panel convened to review the \$3 billion bridge project: the CRC will not be tolling the I-205 bridge. Hearing of the new plan, one of the expert panelists, [Dr. Michael Meyer](#), a civil engineering professor from Georgia, accidentally called the idea of tolling only one bridge across the river stupid, before quickly changing his description to "myopic."

The [eight-person review panel](#) (including no Oregonians) was [pulled together by Oregon and Washington's governors](#) after four local leaders complained the freeway and light rail bridge to Vancouver would have ["unacceptable impacts"](#) on communities.

Here's a transcript of what went down at the marathon eight-hour independent review panel meeting last week:

*CRC Staffer Khalid Bekka:* I want to make sure I stress that up front, going forward on financial modeling, I-205 is not part of that at all. Going forward, the scenario includes only I-5 tolling.

*Commissioner Timothy Neuman:* So you're not moving forward with any scenario that has tolling on 205?

*Bekka:* No.

...

*Commissioner Dr. Michael Meyer:* I know it's not part of the project, but being an outsider, you've got two major bridges across the river, what an ideal situation to manage the flows across the river. From a management of flow perspective, you're just looking at I-5? From a broader public policy perspective, it sure seems, from an outside perspective **stupid - oh nope, uh, uh, I did not say that. If there's a reporter in the room, I did not say that.** It's, uh, perhaps...

*Someone off camera:* Inefficient?

*Dr. Meyer:* No, no, uh... myopic, most people would know what that means, myopic not to look at the total crossings of the river.

*CRC Director Richard Brandman:* Absolutely.

Whoops.

Tolling has been a controversial issue for the bridge, but until now the CRC staff has been analyzing options that involve tolling both I-205 and I-5, to raise revenue for the expensive project but also to control traffic flows, so that commuters don't clog up I-205 just to avoid the I-5 toll. On their website and among their tolling materials, the project states that's it's "unknown"



whether I-205 will be tolled, but it's clear from Director Richard Brandman's comments last week that the CRC won't be further studying the matter.  
More background on the panel and tolling plus Brandman's response below the cut.

Clackamas County Commission Chair Lynn Peterson [penned a letter](#) (pdf) last month to the CRC staff, reminding them that Clackamas's support of the project was conditional on the project also tolling I-205, since tolling only I-5 would drive traffic into her county.  
Anyway, here's Brandman's explanation for why the project won't be tolling I-205.

*Dr. Meyer:* So you have your project, but there's a bigger picture that people need to make decisions on, really, I guess, right?

*Brandman:* Let me answer you this way. If you look at the scenarios, the sensitivities of tolling both bridges was performed in the tolling analysis. There were several scenarios in that were analyzed for tolling I-205. And that was to provide information to the implications of tolling just I-5 or both bridges.

There has been a determination that for this project, the tolling of I-5 would be the only bridge assumed in the financial planning of this project, because tolling I-205 takes you into a whole host of other issues. Statutory issues, for example, there are stat issues on tolling existing bridges on interstates where there are not capacity projects involved to increase your capacity. You're also introducing a much broader conversation that really is of a regional nature about what is the future of the whole entire freeway system for tolling and congestion pricing in the Portland Vancouver metropolitan area. Those are issues that are best addressed at the regional level with Metro and the regional transportation council of Clark County. You've got further issues of political issues, where you have those that are in high offices in the US Department of Transportation and the Congress of the United States that don't believe it's a good idea to toll existing bridges without projects on those bridges. It's not to say that at some point I-205 wouldn't be tolled, it's not to say that I-205 wouldn't be tolled within the same time frame of this project... that conversation will play itself out in a different venue.

You can download a video of the meeting [here online](#), this moment occurs about two hours in.



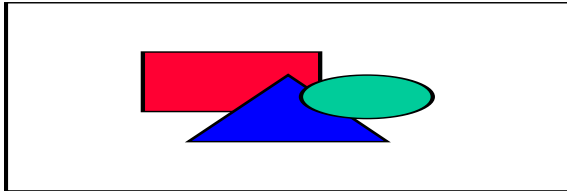
#### Share via

- <http://blogtown.portlandmercury.com/gyrobase/SocialBookmark?service=Twitter&oid=2622497&url=http://www.portlandmercury.com/BlogtownPDX/archives/2010/06/22/crc-wont-toll-i-205-expert-accidentally-calls-new-tolling-plan-stupid&title=CRC+Won%27t+Toll+I-205%2C+Expert+Accidentally+Calls+New+Tolling+Plan+%22Stupid.%22>  
<http://blogtown.portlandmercury.com/gyrobase/SocialBookmark?service=Twitter&oid=2622497&url=http://www.portlandmercury.com/BlogtownPDX/archives/2010/06/22/crc-wont-toll-i-205-expert-accidentally-calls-new-tolling-plan-stupid&title=CRC+Won%27t+Toll+I-205%2C+Expert+Accidentally+Calls+New+Tolling+Plan+%22Stupid.%22>

[wont-toll-i-205-expert-accidentally-calls-new-tolling-plan-stupid&t=CRC+Won%27t+Toll+I-205%2C+Expert+Accidentally+Calls+New+Tolling+Plan+%22Stupid.%22](http://www.portlandmercury.com/BlogtownPDX/archives/2010/06/22/crc-wont-toll-i-205-expert-accidentally-calls-new-tolling-plan-stupid&t=CRC+Won%27t+Toll+I-205%2C+Expert+Accidentally+Calls+New+Tolling+Plan+%22Stupid.%22)



- <http://www.facebook.com/sharer.php?u=http://www.portlandmercury.com/BlogtownPDX/archives/2010/06/22/crc-wont-toll-i-205-expert-accidentally-calls-new-tolling-plan-stupid&t=CRC+Won%27t+Toll+I-205%2C+Expert+Accidentally+Calls+New+Tolling+Plan+%22Stupid.%22>  
[http://www.facebook.com/sharer.php?u=http://www.portlandmercury.com/BlogtownPDX/archives/2010/06/22/crc-wont-toll-i-205-expert-accidentally-calls-new-tolling-plan-stupid&t=CRC+Won%27t+Toll+I-](http://www.facebook.com/sharer.php?u=http://www.portlandmercury.com/BlogtownPDX/archives/2010/06/22/crc-wont-toll-i-205-expert-accidentally-calls-new-tolling-plan-stupid&t=CRC+Won%27t+Toll+I-205%2C+Expert+Accidentally+Calls+New+Tolling+Plan+%22Stupid.%22)

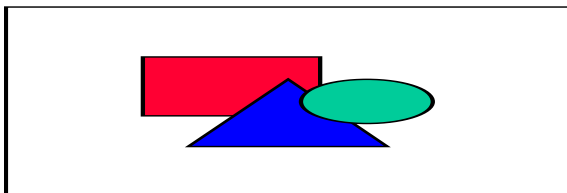


- <http://www.portlandmercury.com/portland/Custom/Tools/EmailThis?oid=2622497>  
<http://www.portlandmercury.com/portland/Custom/Tools/EmailThis?oid=2622497>

### Comments (10) [RSS](#)

[Oldest](#) [First](#) [Unregistered](#) [On](#) [Unregistered](#) [Off](#) [Registered](#) [On](#) [Registered](#) [Off](#) [Add a comment](#)

Comment by JustinO on June 22, 2010 at 11:05 AM 1



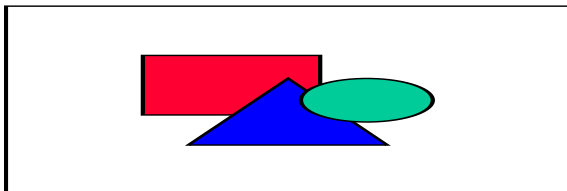
<http://www.portlandmercury.com/portland/Profile?oid=2622585>

<http://www.portlandmercury.com/portland/Profile?oid=2622585>

Just a word of advice: if you've made a foot-in-mouth statement, don't call attention to it by asking if there's a reporter in the room.

Posted by [JustinO](#) on June 22, 2010 at 11:05 AM

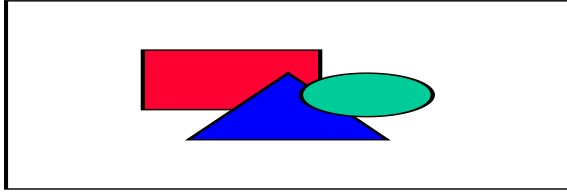
Comment by Reymont on June 22, 2010 at 11:09 AM 2



[profile?oid=850120](http://www.portlandmercury.com/portland/Profile?oid=850120)

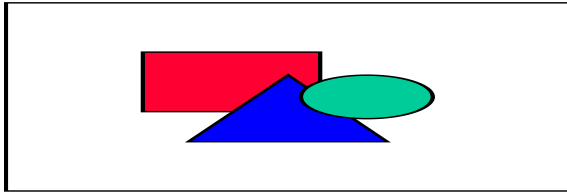
[profile?oid=850120](http://www.portlandmercury.com/portland/Profile?oid=850120)

And the reporter in the room yelled "NO TAKEBACKS!" and ran off giggling.  
Posted by [Reymont](#) on June 22, 2010 at 11:09 AM  
Comment by [ujfoyt](#) on June 22, 2010 at 11:15 AM 3



<http://www.portlandmercury.com/portland/Profile?oid=1060920>  
<http://www.portlandmercury.com/portland/Profile?oid=10609203>

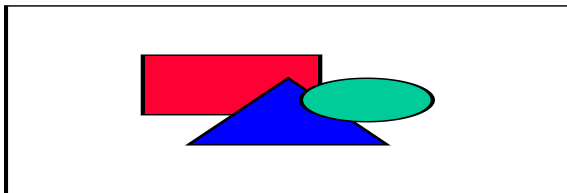
Well, it is stupid not to toll both bridges. Can you imagine the back-ups on the I-205 bridge if they don't toll it? On the other hand, it should be pretty clear sailing on the I-5 bridge.  
Posted by [ujfoyt](#) on June 22, 2010 at 11:15 AM  
Comment by Nick Christensen on June 22, 2010 at 11:26 AM 4



<http://www.portlandmercury.com/portland/Profile?oid=1403299>  
<http://www.portlandmercury.com/portland/Profile?oid=14032994>

It's a 10 mile detour to use the I-205 bridge from Vancouver to Portland. That's at least \$1 in gas and probably 20-30 minutes in time.

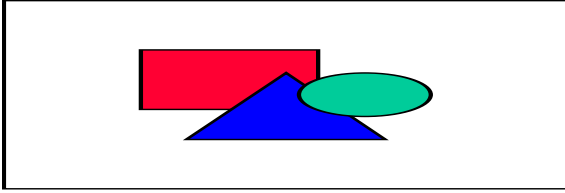
Perhaps the detour argument is a bit overstated. Decreased congestion on I-5 will get more traffic out of Clackamas County than a lack of toll on I-205 will generate south of Mount Scott.  
Posted by [Nick Christensen](#) on June 22, 2010 at 11:26 AM  
Comment by [Reymont](#) on June 22, 2010 at 11:26 AM 5



<http://www.portlandmercury.com/portland/Profile?oid=850120>  
<http://www.portlandmercury.com/portland/Profile?oid=8501205>

@Ujfoyt - That actually sounds pretty awesome. I don't have to go to the 'Couv very often during peak hours, but when I did I'd totally be willing to pay a toll to go to the front of the line.

Seems like all the East-West arteries would be clogged, too, from people trying to get over to the free bridge. Columbia, Sandy, and Marine Drive would just be chockablock full, right?  
Posted by [Reymont](#) on June 22, 2010 at 11:26 AM  
Comment by [ujfoyt](#) on June 22, 2010 at 12:38 PM 6



<http://www.portlandmercury.com/portland/Profile?oid=1060920>

<http://www.portlandmercury.com/portland/Profile?oid=10609206>

Reymont, I think that a lot of people would use I-205 at first, but after they realize how much more time they are spending in traffic, I think some would revert to using I-5. A lot of diehards, though, I think, would stay with I-205. But not tolling (assuming the feds allow tolls, as they did in Tacoma) both bridges just puts the funding on probably the smallest amount of people. I am surprised at the number of Oregon license based plates I see south-bound on I-205 in the afternoon commute, Looks like there are commuters from both states, not just from Vancouver to Oregon.

Posted by [ujfoyt](#) on June 22, 2010 at 12:38 PM

Unregistered Comment on June 22, 2010 at 12:44 PM 7

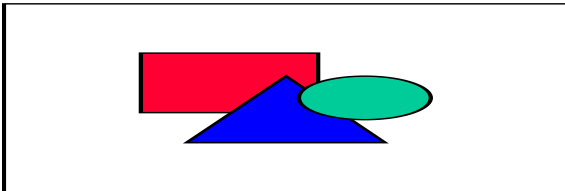
[7](#)

"You're also introducing a much broader conversation that really is of a regional nature about what is the future of the whole entire freeway system for tolling and congestion pricing in the Portland Vancouver metropolitan area."

Hey, now that's a good idea!

Posted by Michelle on June 22, 2010 at 12:44 PM

Comment by Ross Williams on June 22, 2010 at 1:48 PM 8



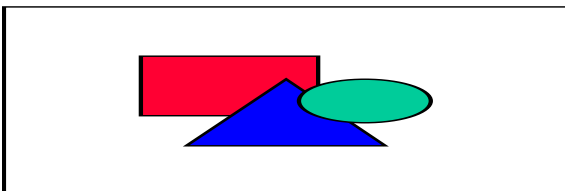
<http://www.portlandmercury.com/portland/Profile?oid=829459>

<http://www.portlandmercury.com/portland/Profile?oid=8294598>

Its not out of the way for east Clark County. About equal distance from SR500 to downtown Portland via I205 or I5. Same with SR 14. And those are about 2/3 of the lanes connecting to the I5 bridge. The issue for Clackamas County is not the traffic going to Clackamas County, its the convenience for freight in and out of the warehouse operations in the county near I205. If the I205 bridge is clogged, it becomes a lot less desirable location.

Posted by [Ross Williams](#) on June 22, 2010 at 1:48 PM

Comment by PortlandAfoot on June 22, 2010 at 8:13 PM 9



[rofile?oid=2473120](#)

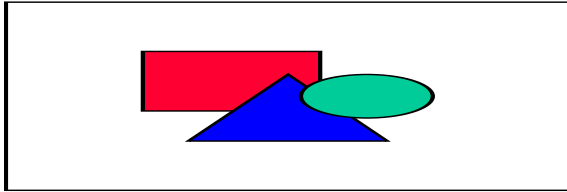
[rofile?oid=24731209](#)

The real constituency here isn't the people who would switch to 205 if I-5 were tolled -- it's the East Vancouver/Camas people who already use the 205 bridge daily and would scream bloody murder at anyone who tolls their 30-year-old bridge to pay for west Vancouver's new one.

(As if taxpayers in west Vancouver ... and Portland ... and Peoria, Illinois ... hadn't all spent for years to pay for the 205 bridge, of course.)

Posted by [PortlandAfoot](#) on June 22, 2010 at 8:13 PM

Comment by PortlandAfoot on June 22, 2010 at 8:15 PM 10



<http://www.portlandmercury.com/portland/Profile?oid=2473120>

<http://www.portlandmercury.com/portland/Profile?oid=247312010>

Also: this is funny.

## **Tolling Ain't like it used to be!**

Now days "Modern" tolling systems are really expensive! For every buck you put in 44% goes to pay overhead. So for every \$100 you pay in tolls..... only \$56 goes to pay for the actual bridge and "other"!

**And**

Drivers will either have a transponder (will tracks vehicles) to pay tolls.

**Or**

"Pay as you go" and boy do you! Peak period example.

Toll		\$6.00
License plate identified fee (ea. way)	\$1.00	
Handling charge (ea. way)	<u>\$2.00</u>	
Total (ea. way)	\$9.00	

Payment to principle and "other"      **56% of \$6.00 toll is \$3.36**

**Of the \$9.00 out of your pocket and the regional economy, you get \$3.36 toward bridge repayment and "other" while interest rates are charged against the original price of the bridge.**

**Who thinks that's a good idea?**

**Modern tolling has high overhead, extra expense, and technical issues!**

**Or**

You can use your ETB card, food stamp card to pay to go to work to a job that does not pay enough in wages to keep you from poverty level public assistance. (ETB is used on the Tacoma Narrow tolling system) This form of payment maybe treated as the "pay as you go" system with a \$3.00 each way charge in addition to the toll payment.

**Some don't pay**

Approximately 10% of the systems users will not be charge do to a one time passing through the electronic system. It is too expensive to find them.

**And**

Business will pay... for each axle on a truck... approximately four times the rate of the average vehicle unless the truck is large, oversize, double, or triple trailer truck with more than 4 axles.

**Who else may not pay?**

**Those who just drive though with out paying and it becomes too expensive to try and make them pay....**

**This is just a little information..... what about when your account for paying tolls is empty and the charges related to that!**

**How about that old saying.....**

**"They Get YOU Coming and Going!"**

**ODOT I-205 Toll EA - RECORD #2984 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Douglas

**Last Name :** Kean

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
The proposed expansion of I-205 would add additional vehicle capacity, encouraging more motorists to use the highway. This would result in increased vehicle emissions, leading to increased area air pollution. The sections of I-205 proposed for expansion also cross the Tualatin and Willamette rivers. Pollution, vehicle shrapnel, debris, and litter polluting the rivers would likely increase as well. These waterways are vital to Oregon's citizens, wildlife, and ecosystem. If ODOT wants to expand I-205, they must provide the public with a clear picture of the tangible environmental impacts said expansion would lead to. ODOT must conduct an EIS.

**ODOT I-205 Toll EA - RECORD #2985 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Garlynn

**Last Name :** Woodsong

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:

I demand that ODOT conduct an Environmental Impact Statement of the proposed I-205 freeway expansion that studies congestion pricing before freeway expansion.

In this time of climate crisis, it's insane, and a form of climate arson, to be focusing on widening freeways, while neglecting to build out complete, connected bicycle, transit, and pedestrian facilities, and claiming that the money is not available to do so. We should instead enact congestion pricing to control congestion and manage our existing facilities for smooth traffic flow, and use the proceeds to fund the build out of our bicycle, pedestrian, and transit networks. Today, anybody can get anywhere from anywhere using a car. The same is definitely NOT true for walking, bicycling, or transit. The vast majority of our region and state is not accessible safely using these modes.

I realize that ODOT is just doing what the Legislature told it to do in 2017. However, times have changed, budgets have ballooned, the climate crisis has worsened, and we must now re-evaluate our priorities, cancel all freeway and roadway widening projects, and re-invest our scarce public funds in bicycling, transit, walking, transit oriented development, public place-making, and climate justice.

As somebody whose household owns three cars, I have no concerns about my ability to drive anywhere in Oregon. It's easy to do so, even on I-205 or I-5. What I cannot do easily, however, is take transit, ride my bicycle, or walk to major and minor destinations, because safe, comfortable, accessible facilities continue to not exist. We still continue to act like we're an impoverished developing state like Alabama, rather than a leading global economy like Switzerland. This must change. Oregon is home to more Fortune 500 companies than Switzerland, yet we continue to act in a regressive manner that is more like Alabama. We need to do better.



<b>ODOT I-205 Toll EA - RECORD #2986 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Douglas R
<b>Last Name :</b>	Allen
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email

**Q3. Comments :**

Please accept the attached comments regarding the I-205 Toll Project Environmental Assessment.

[Text from attachment]

Comments on I-205 Tolling Environmental Assessment by Douglas R. Allen  
April 21, 2023

This project requires an Environmental Impact Statement to fully scope project alternatives, and determine the full range of environmental impacts.

There are rightfully four components of this project that need to be considered, along with reasonable alternatives to them. They are:

- 1) Reconstruction of the Abernethy Bridge ("Phase 1a Project")
- 2) Tolling to pay for the Abernethy Bridge reconstruction currently underway
- 3) Lane additions and additional bridge reconstruction between Stafford Rd. and the Abernethy Bridge
- 4) Tolling to pay for the construction in item 3.

From the time that the Oregon Legislature passed HB 2017, in the 2017 legislative session, there have been two or more simultaneous and contradictory narratives about these four components regarding how they are funded and whether tolling is part of the construction projects. Until May 4, 2022, they were lumped into two separate projects, the "I-205: Stafford Road to OR 213 Improvements Project" and the "I-205 Tolling Project."

HB 2017 provided no funding for the "I-205 Improvements Project" but mandated tolling ("value pricing") be implemented on I-205 over freeway segments that include the "I-205 Improvements Project." Furthermore, the Oregon Legislature also approved a "budget note" in 2017 asking ODOT to look at using toll revenues to fund the "I-205 Improvements Project."

During 2018, ODOT studied implementation of "value pricing" and early in 2018 produced the legislatively mandated "Cost to Complete Report" for the "I-205 Improvements Project."

<https://static1.squarespace.com/static/63040dd5335b6d4b85545662/t/635b03f6bc4fe474029181dc/1666909202717/cost-to-complete.pdf>

This was presented to the Oregon Transportation Commission in January, 2018, and then presented at the May 23, 2018 meeting of the Joint Committee on Transportation of the Oregon Legislature, Agenda Item 1. Video of that meeting is available here:

<https://olis.oregonlegislature.gov/liz/mediaplayer/?clientID=4879615486&eventID=2018051027>

Presenters were Paul Mather (ODOT), Rian Windsheimer (Region I ODOT Administrator), and Steve Drahota (with HDR consulting firm that prepared the "Cost To Complete" report). The quotes below are identified by their location within the video in minutes and seconds.

Senator Lee Beyer questioned how it would be possible to build the "I-205 Improvement Project" without toll revenue, and was told that tolling could be studied later.

34:43 Sen. Beyer: "My question would be: At what point do we have the information necessary to submit to the Federal Government, the right to do the value pricing on this."

34:56 Windsheimer: "This report does not assume, um, tolling as a, as a revenue source. This cost to complete report assumes that we are moving forward with what's known as a categorical exclusion in terms of our environmental process. We've been running to complete that, and that's what these, all these assumptions assume. If you were to move forward with ah, ah, asking to move forward with a tolling scenario, we would need to back up, and begin an environmental process around that tolling effort. And so that

would be up to two, three, or more years of environmental work associated with implementing tolling, so that is going to vastly change what you are seeing here, in terms of the cost-to-complete report, and the timeline. Um, your question regarding when are we talking about submitting to the Federal Government as part of the value pricing component that we're going to be forwarding. I know you're going to get a chance to hear more from Travis about this a little bit later, but we expect to have that by the end of the year [2018]."

36:01 Sen. Beyer: "My assumption, and I think the Committee's assumption, is that this would be a tolling project, [murmurs of agreement from Committee] and I don't know where you are gonna get the money, or where we're gonna get the money, if we don't do it that way."

Later in the same Joint Committee on Transportation meeting, Third Agenda Item, Travis Brouwer, Assistant Director, ODOT gave a presentation on "Portland Metro Region Congestion Pricing (HB 2017, section 120)" (video times are hrs:min:sec)

1:26:30 Sen. Beyer asks for clarification on the apparent discrepancy between the first agenda item report (Cost To Complete) in which ODOT said they didn't anticipate tolling, and that tolling would add three to four years to the process, and Brouwer's report that Option E, tolling the Abernethy Bridge, would likely be the Value Pricing Policy Advisory Committee recommendation and ultimately be adopted by OTC to pay for I205.

1:27:15 Brouwer replies that they appear to be in conflict, then says they started the environmental process for I-205 before they knew if they would need tolling, knowing that they could add that environmental analysis on later. They felt that this wouldn't take any longer than if they had started at the beginning with the longer process that would analyze tolling.

In December, 2018, ODOT reported back to the Oregon Legislature with possible funding scenarios for the "I-205 Improvements Project."  
[https://www.oregonlegislature.gov/committees/201911JCT/Reports/HB%205045%20\(2017\)%20-%20Interstate%20205%20Project%20Funding%20Scenarios%20\(December%202018\).pdf](https://www.oregonlegislature.gov/committees/201911JCT/Reports/HB%205045%20(2017)%20-%20Interstate%20205%20Project%20Funding%20Scenarios%20(December%202018).pdf)

All three scenarios anticipated tolling the section of I-205 now under consideration.

Furthermore, on December 10, 2018, The Oregon Transportation Commission sent a letter to the Federal Highway Administration regarding proposed "value pricing" in the Portland region:

[https://www.oregon.gov/odot/tolling/ResourcesHistory/VP%20Final\\_FHWAApplication\\_Draft.pdf](https://www.oregon.gov/odot/tolling/ResourcesHistory/VP%20Final_FHWAApplication_Draft.pdf)

On page 6 of the referenced document, the letter states:

"HB 2017 also established a Congestion Relief Fund as the repository for all net tolling revenues to ensure that highway toll revenues will be used to provide congestion relief. Initial investments include two planned projects on I-5 and I-205: the seismic reconstruction and widening of a segment of I-205 between Oregon Highway 99E and Stafford Road, including the George Abernethy Bridge..."

ODOT, OTC, and the Legislature clearly set forth their intent that tolling would fund the "I-205 Improvement Project."

Nevertheless, on December 20, 2018, FHWA granted ODOT a "Documented Categorical Exclusion" (DCE) for the entire "I-205 Improvements Project," all phases, which stated a contrary point-of-view.

<https://www.i205corridor.org/s/nepa-categorical-exclusion-documentation.pdf>

Page 2 of the DCE states that "...value pricing is not considered a reasonable and foreseeable action."

Not only did the DCE contradict the stated policies of ODOT, the OTC, and the Oregon Legislature, it was based on a false claim regarding how the project qualified for a DCE.

On page 8, the DCE stated: "This project qualifies as a categorical exclusion as outlined in 23 CFR §771.117 under the following listed CEs: d-13" However, exclusion d-13 does not cover general purpose lane additions. The 14 lane-miles of additional main-line freeway lanes that were included in the DCE meant that the project did not actually meet the requirements for the listed exclusion. Nevertheless, FHWA approved the DCE.

A DCE exempts a federally funded project from the NEPA requirement to do an Environmental Assessment (EA) or Environmental Impact Statement (EIS). A DCE requires ODOT to document to FHWA how the project meets the requirements of a particular listed "categorical exclusion."

Based on the public record, it appears that the DCE was crafted to shield the project from the requirements of NEPA, by both excluding tolling from the project, and claiming that it qualified for a listed Categorical Exclusion when in fact it did not qualify.

Cost increases for the Abernethy Bridge caused ODOT to request that tolling of the project area be included in the Regional Transportation Plan (RTP) and Metropolitan Transportation Improvement Plan (MTIP).

When this request was approved, and tolling was even more explicitly a component of the project, FHWA re-evaluated the project.

<https://static1.squarespace.com/static/63040dd5335b6d4b85545662/t/635b0583c7148252058ef9e0/1666909572646/reevaluation-nepa.pdf>

The "Re-Evaluation of the Categorical Exclusion for the I-205: Stafford Road to OR 213 Improvements Project" was issued May 4, 2022. The I-205 Tolling Project Environmental Assessment appears to be the first opportunity to challenge the assumptions and effects of the "Re-Evaluation."

FHWA concluded that the later phases of the project should be included in the Environmental Analysis for the I-205 Tolling Project, but allowed the Abernethy Bridge reconstruction to proceed under the original DCE.

The unfortunate effect of the "Re-Evaluation" has been to further shield the project from NEPA analysis in a properly scoped EIS.

The "Re-Evaluation" notes that tolling is now a reasonably foreseeable component of the Abernethy Bridge (Phase 1a) project, but the EA does not examine a tolling alternative in which tolls are imposed only at the lowest level necessary to pay for a reasonable portion of the Abernethy Bridge project, and in which the subsequent lane widening and additional bridge reconstruction phase, and associated tolling, would not occur, or would be scaled back. This alternative needs to be evaluated, and an EIS is the proper vehicle to do so.

The NEPA process should not be viewed as an opportunity to perform the minimum analysis possible, but as an opportunity to inform subsequent decisions about the project, including decisions to alter or down-scope the later construction and tolling phases. The current EA misses so badly, that we clearly need a full EIS if we are to learn about reasonable alternatives to a costly, and possibly unneeded project.

I request that FHWA and ODOT engage in a full EIS, and study the following scenarios to support subsequent decisions by the Oregon Transportation Commission and the Oregon Legislature:

Scenarios should determine congestion/delay, diversion, and revenue, and cost for each, and presume the Abernethy Bridge reconstruction- Phase 1a- is completed as planned.

A. Scenarios with no transit on freeway:

1. No tolls, no widening.
2. Toll, no widening, generate revenue for Abernethy Bridge
3. Toll, no widening, maximize through-put.
4. Toll, no widening, single managed lane with toll surcharge and/or vehicle occupancy restrictions to assure free-flow.
5. No toll, widening.
6. Toll, widening, generate revenue for Abernethy Bridge and rest of project
7. Toll, widening, maximize through-put.
8. Toll, widening, single managed lane with toll surcharge and/or vehicle occupancy restrictions to assure free-flow.

B. Same scenarios as above, but with express buses operating at 10-minute frequency for most of the day, running from Clackamas Town Center to Beaverton Transit Center via I205, I-5, and Hwy 217, with stops at Oregon City, Tualatin, Kruse Way, Tigard, Washington Square, and Beaverton, supported by an enhanced feeder network serving all listed stops with frequent service bus and/or rail connections.

The EIS should also evaluate alternatives for (or the need for) seismic strengthening of the bridges (other than the Abernethy Bridge currently undergoing reconstruction) instead of full replacement and/or widening, as the project currently plans.

The EIS should also analyze the cumulative effects of all of the construction projects and expansions related to I-205 including those already constructed and those currently under construction. At a minimum, this cumulative analysis should include all construction on I-205 and Highway 217 funded by HB 2017 of the 2017 Oregon Legislature, but ideally should look at the entire history of the freeway system in the Portland area.

**Attachments :**

EA\_Comments.pdf (129 kb)

Comments on I-205 Tolling Environmental Assessment by Douglas R. Allen  
April 21, 2023

This project requires an Environmental Impact Statement to fully scope project alternatives, and determine the full range of environmental impacts.

There are rightfully four components of this project that need to be considered, along with reasonable alternatives to them. They are:

- 1) Reconstruction of the Abernethy Bridge ("Phase 1a Project")
- 2) Tolling to pay for the Abernethy Bridge reconstruction currently underway
- 3) Lane additions and additional bridge reconstruction between Stafford Rd. and the Abernethy Bridge
- 4) Tolling to pay for the construction in item 3.

From the time that the Oregon Legislature passed HB 2017, in the 2017 legislative session, there have been two or more simultaneous and contradictory narratives about these four components regarding how they are funded and whether tolling is part of the construction projects. Until May 4, 2022, they were lumped into two separate projects, the "I-205: Stafford Road to OR 213 Improvements Project" and the "I-205 Tolling Project."

HB 2017 provided no funding for the "I-205 Improvements Project" but mandated tolling ("value pricing") be implemented on I-205 over freeway segments that include the "I-205 Improvements Project." Furthermore, the Oregon Legislature also approved a "budget note" in 2017 asking ODOT to look at using toll revenues to fund the "I-205 Improvements Project."

During 2018, ODOT studied implementation of "value pricing" and early in 2018 produced the legislatively mandated "Cost to Complete Report" for the "I-205 Improvements Project."

<https://static1.squarespace.com/static/63040dd5335b6d4b85545662/t/635b03f6bc4fe474029181dc/1666909202717/cost-to-complete.pdf>

This was presented to the Oregon Transportation Commission in January, 2018, and then presented at the May 23, 2018 meeting of the Joint Committee on Transportation of the Oregon Legislature, Agenda Item 1. Video of that meeting is available here:

<https://olis.oregonlegislature.gov/liz/mediaplayer/?clientID=4879615486&eventID=2018051027>

Presenters were Paul Mather (ODOT), Rian Windsheimer (Region I ODOT Administrator), and Steve Drahota (with HDR consulting firm that prepared the "Cost To Complete" report). The quotes below are identified by their location within the video in minutes and seconds.

Senator Lee Beyer questioned how it would be possible to build the "I-205 Improvement Project" without toll revenue, and was told that tolling could be studied later.

34:43 Sen. Beyer: "My question would be: At what point do we have the information necessary to submit to the Federal Government, the right to do the value pricing on this."

34:56 Windsheimer: "This report does not assume, um, tolling as a, as a revenue source. This cost to complete report assumes that we are moving forward with what's known as a categorical exclusion in terms of our environmental process. We've been running to complete that, and that's what these, all these assumptions assume. If you were to move forward with ah, ah, asking to move forward with a tolling scenario, we would need to back up, and begin an environmental process around that tolling effort. And so that would be up to two, three, or more years of environmental work associated with implementing tolling, so that is going to vastly change what you are seeing here, in terms of the cost-to-complete report, and the timeline. Um, your question regarding when are we talking about submitting to the Federal Government as part of the value pricing component that we're going to be forwarding. I know you're going to get a chance to hear more from Travis about this a little bit later, but we expect to have that by the end of the year [2018]."

36:01 Sen. Beyer: "My assumption, and I think the Committee's assumption, is that this would be a tolling project, [murmurs of agreement from Committee] and I don't know where you are gonna get the money, or where we're gonna get the money, if we don't do it that way."

Later in the same Joint Committee on Transportation meeting, Third Agenda Item, Travis Brouwer, Assistant Director, ODOT gave a presentation on "Portland Metro Region Congestion Pricing (HB 2017, section 120)" (video times are hrs:min:sec)

1:26:30 Sen. Beyer asks for clarification on the apparent discrepancy between the first agenda item report (Cost To Complete) in which ODOT said they didn't anticipate tolling, and that tolling would add three to four years to the process, and Brouwer's report that Option E, tolling the Abernethy Bridge, would likely be the Value Pricing Policy Advisory Committee recommendation and ultimately be adopted by OTC to pay for I-205.

1:27:15 Brouwer replies that they appear to be in conflict, then says they started the environmental process for I-205 before they knew if they would need tolling, knowing that they could add that environmental analysis on later. They felt that this wouldn't take any longer than if they had started at the beginning with the longer process that would analyze tolling.

In December, 2018, ODOT reported back to the Oregon Legislature with possible funding scenarios for the "I-205 Improvements Project."

[https://www.oregonlegislature.gov/committees/2019I1-JCT/Reports/HB%205045%20\(2017\)%20-%20Interstate%20205%20Project%20Funding%20Scenarios%20\(December%202018\).pdf](https://www.oregonlegislature.gov/committees/2019I1-JCT/Reports/HB%205045%20(2017)%20-%20Interstate%20205%20Project%20Funding%20Scenarios%20(December%202018).pdf)

All three scenarios anticipated tolling the section of I-205 now under consideration.

Furthermore, on December 10, 2018, The Oregon Transportation Commission sent a letter to the Federal Highway Administration regarding proposed "value pricing" in the Portland region:

[https://www.oregon.gov/odot/tolling/ResourcesHistory/VP%20Final\\_FHWAApplication\\_Draft.pdf](https://www.oregon.gov/odot/tolling/ResourcesHistory/VP%20Final_FHWAApplication_Draft.pdf)

On page 6 of the referenced document, the letter states:

"HB 2017 also established a Congestion Relief Fund as the repository for all net tolling revenues to ensure that highway toll revenues will be used to provide congestion relief. Initial investments include two planned projects on I-5 and I-205: the seismic reconstruction and widening of a segment of I-205 between Oregon Highway 99E and Stafford Road, including the George Abernethy Bridge..."

ODOT, OTC, and the Legislature clearly set forth their intent that tolling would fund the "I-205 Improvement Project."

Nevertheless, on December 20, 2018, FHWA granted ODOT a "Documented Categorical Exclusion" (DCE) for the entire "I-205 Improvements Project," all phases, which stated a contrary point-of-view.

<https://www.i205corridor.org/s/nepa-categorical-exclusion-documentation.pdf>

Page 2 of the DCE states that "...value pricing is not considered a reasonable and foreseeable action."

Not only did the DCE contradict the stated policies of ODOT, the OTC, and the Oregon Legislature, it was based on a false claim regarding how the project qualified for a DCE.

On page 8, the DCE stated: "This project qualifies as a categorical exclusion as outlined in 23 CFR §771.117 under the following listed CEs: d-13" However, exclusion d-13 does not cover general purpose lane additions. The 14 lane-miles of additional main-line freeway lanes that were included in the DCE meant that the project did not actually meet the requirements for the listed exclusion. Nevertheless, FHWA approved the DCE.

A DCE exempts a federally funded project from the NEPA requirement to do an Environmental Assessment (EA) or Environmental Impact Statement (EIS). A DCE



requires ODOT to document to FHWA how the project meets the requirements of a particular listed "categorical exclusion."

Based on the public record, it appears that the DCE was crafted to shield the project from the requirements of NEPA, by both excluding tolling from the project, and claiming that it qualified for a listed Categorical Exclusion when in fact it did not qualify.

Cost increases for the Abernethy Bridge caused ODOT to request that tolling of the project area be included in the Regional Transportation Plan (RTP) and Metropolitan Transportation Improvement Plan (MTIP).

When this request was approved, and tolling was even more explicitly a component of the project, FHWA re-evaluated the project.

<https://static1.squarespace.com/static/63040dd5335b6d4b85545662/t/635b0583c7148252058ef9e0/1666909572646/reevaluation-nepa.pdf>

The "Re-Evaluation of the Categorical Exclusion for the I-205: Stafford Road to OR 213 Improvements Project" was issued May 4, 2022. The I-205 Tolling Project Environmental Assessment appears to be the first opportunity to challenge the assumptions and effects of the "Re-Evaluation."

FHWA concluded that the later phases of the project should be included in the Environmental Analysis for the I-205 Tolling Project, but allowed the Abernethy Bridge reconstruction to proceed under the original DCE.

The unfortunate effect of the "Re-Evaluation" has been to further shield the project from NEPA analysis in a properly scoped EIS.

The "Re-Evaluation" notes that tolling is now a reasonably foreseeable component of the Abernethy Bridge (Phase 1a) project, but the EA does not examine a tolling alternative in which tolls are imposed only at the lowest level necessary to pay for a reasonable portion of the Abernethy Bridge project, and in which the subsequent lane widening and additional bridge reconstruction phase, and associated tolling, would not occur, or would be scaled back. This alternative needs to be evaluated, and an EIS is the proper vehicle to do so.

The NEPA process should not be viewed as an opportunity to perform the minimum analysis possible, but as an opportunity to inform subsequent decisions about the project, including decisions to alter or down-scope the later construction and tolling phases. The current EA misses so badly, that we clearly need a full EIS if we are to learn about reasonable alternatives to a costly, and possibly unneeded project.

I request that FHWA and ODOT engage in a full EIS, and study the following scenarios to support subsequent decisions by the Oregon Transportation Commission and the Oregon Legislature:

Scenarios should determine congestion/delay, diversion, and revenue, and cost for each, and presume the Abernethy Bridge reconstruction- Phase 1a- is completed as planned.

A. Scenarios with no transit on freeway:

1. No tolls, no widening.
2. Tolls, no widening, generate revenue for Abernethy Bridge
3. Tolls, no widening, maximize through-put.
4. Tolls, no widening, single managed lane with toll surcharge and/or vehicle occupancy restrictions to assure free-flow.
  
5. No tolls, widening.
6. Tolls, widening, generate revenue for Abernethy Bridge and rest of project
7. Tolls, widening, maximize through-put.
8. Tolls, widening, single managed lane with toll surcharge and/or vehicle occupancy restrictions to assure free-flow.

B. Same scenarios as above, but with express buses operating at 10-minute frequency for most of the day, running from Clackamas Town Center to Beaverton Transit Center via I-205, I-5, and Hwy 217, with stops at Oregon City, Tualatin, Kruse Way, Tigard, Washington Square, and Beaverton, supported by an enhanced feeder network serving all listed stops with frequent service bus and/or rail connections.

The EIS should also evaluate alternatives for (or the need for) seismic strengthening of the bridges (other than the Abernethy Bridge currently undergoing reconstruction) instead of full replacement and/or widening, as the project currently plans.

The EIS should also analyze the cumulative effects of all of the construction projects and expansions related to I-205 including those already constructed and those currently under construction. At a minimum, this cumulative analysis should include all construction on I-205 and Highway 217 funded by HB 2017 of the 2017 Oregon Legislature, but ideally should look at the entire history of the freeway system in the Portland area.

**ODOT I-205 Toll EA - RECORD #2987 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Victoria Jean

**Last Name :** Bateman

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Traffic will not be improved until we invest in public transportation, and we allow for higher density construction. This freeway expansion won't address our region-wide traffic issues, and will just waste money that could be used to actually address our issues.

**ODOT I-205 Toll EA - RECORD #2988 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Anders

**Last Name :** Hart

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I strongly urge ODOT to conduct a full Environmental Impact Statement (EIS) for the I-205 Toll Project. The current Environmental Assessment (EA) is inadequate, as it only compares two scenarios: the No Build (without tolling) and Build (tolling and a lane addition). A more comprehensive analysis would include a third scenario with tolling but no lane additions.  
This scenario is crucial because adding road capacity will inevitably increase traffic and emissions, as described by the Fundamental Law of Road Congestion. Adding lanes to this stretch of I-205 would not solve the congestion problem, but rather worsen it in the long run, even with tolling. On the other hand, tolling without lane additions would likely reduce traffic volumes and emissions, and possibly eliminate the need for capacity additions altogether.  
Oregon is already failing to meet its greenhouse gas emissions (GHG) reduction targets, and transportation is the largest source of emissions in our state. We cannot afford to invest in projects that will increase our carbon footprint and contribute to the climate crisis. Adding lanes to I-205 would not only harm our environment but also divert resources from other transportation priorities, such as safety and active transportation.  
Therefore, I urge that ODOT completes a full EIS that includes a tolling scenario but no lane additions. An EIS would provide a more rigorous and transparent analysis that would reveal the true costs and benefits of each option. ODOT has a responsibility to act in the best interest of the public and to follow its own mission statement of providing a "safe and reliable multimodal transportation system that connects people and helps Oregon's communities and economy thrive."

**ODOT I-205 Toll EA - RECORD #2989 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Lisa

**Last Name :** Caballero

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Fourteen miles of new freeway lanes deserve an Environmental Impact Statement, not a mere Environmental Assessment. And what affect will tolling, or congestion pricing have? As has happened with other mega freeway projects in the US, will tolling reduce or change the hourly distribution of traffic enough that arguments for expansion, like much traffic congestion itself, will just vanish? We don't know the answer to that question because ODOT hasn't studied it. The brakes need to be put on this project until we have answers to some obvious questions.

**ODOT I-205 Toll EA - RECORD #2990 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Tom

**Last Name :** Buchele

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Freeway expansion is controversial and requires an EIS because all the current research shows that such expansion induce new traffic and eventually cause more congestion and air pollution. Such expansions are all totally contrary to Oregon state law and policy in favor of reducing greenhouse gas emissions.

<b>ODOT I-205 Toll EA - RECORD #2991 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Barry
<b>Last Name :</b>	Haskins
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email

### Q3. Comments :

Hi,

First, western Clackamas County is in desperate need of relief from traffic congestion on and around the Interstates. Second, I am not opposed to ODOT seeking alternate funding, particularly in light of diminished revenue from gasoline taxes, but the present plan is very unfair. Some questions:

- Why is ODOT targeting residents of Clackamas County, and those who much pass through Clackamas County?
- Why is ODOT targeting a region that has seen a large population growth (in large part due to Portland's and Metro's policies), but very little arterial roadway improvement in four decades?
- Portland has 11 bridges with 50 lanes crossing the Willamette River: 46 lanes available to vehicular traffic, and four for mass transit. Why is this area of many options given a pass?
- Why do you intend to make those who cannot afford electric vehicles pay twice?
- Why is ODOT unfairly targeting a region with few options?
- Why does Tri-Met focus on a hub-and-spoke model, with few rims/beltline options?
- Recognizing the that current context is I-206 from the Abernathy Bridge to Stafford road, with is ODOT not working with Tri-Met to bringing more busses to the congested regions?
- Could the old Willamette Falls Viewpoint be converted into a Park-and-Ride?
- Since the Boone Bridge is targeted next, why does ODOT not work with Tri-Met to extend WES another two or three miles?
- Could the Baldock Rest Area be made to double as a Park-and-Ride?
- Why not consider a bridge between Milwaukie and Lake Oswego? And another between West Linn and Gladstone?
- Why not consider a bridge to replace the Canby Ferry?

Most people will accept a toll for a new bridge or a new roadway, but tolling to repair an existing infrastructure is very distasteful.

Why is ODOT attempting to unfairly oppress a region that has few other options, while giving commuters crossing the Marquam and Fremont bridges a pass? Why not the Hwy 219 bridge at Newberg? Why not the Marion Street, Center Street, or Independence Street bridges near Salem? Counting the 20 bridges from the Columbia River to Albany, ODOT is focused on the 12th and 14th. Why punish those who need to cross these two bridges? The 13th bridge is Oregon City's Arch Bridge. In conjunction with Rosemont Road, or Willamette Falls Drive, I have used this bridge many times – at least 50 times -- to avoid the gridlock of I-205 and the Abernathy Bridge. Your planned action will ensure that this tiny 2-lane bridge must carry traffic of a major arterial.

The only explanation that I can come up with for your targeting this region is money. I suppose someone looked at a map and recognized that West Linn, Lake Oswego, Wilsonville and the Stafford area have average incomes larger than other cities. This short-sighted thinking does not account for all of the average and below-average incomes of people who must pass through the region.

I recognize that ODOT plans to add tolls to I-205 initially, and then add tolls to I-5 near Wilsonville the following year. I focus on the latter because this is my commute path, but my arguments apply to the I-205 project as well.

I spent my first 25 years living in Portland. This included North, Northeast,



Southeast, and Southwest Portland, and a time in Tualatin. 27 years ago, I began working at my current employer on the outskirts of Lake Oswego. About the same time, my wife took a job half a mile away from mine. Living in SW Portland, it took us 20 minutes to drive eight miles to work. When my wife and I tried to buy a home, we looked for all over the SW Portland metropolitan area. We could not find one that we could afford, even on two incomes, at least one that was acceptable to both of us. We eventually found an acceptable house, but it was in Woodburn. My first concern was length of commute and cost of fuel, but after driving it a couple times, we realized that the 21 mile commute was barely worse than our eight mile commute. On occasion, we can still make the commute in 23 minutes, but it too often takes an hour.

Much of the traffic between California and Washington, and almost all of the traffic between Oregon's two largest cities, must travel I-5 through Wilsonville. I-5 through Wilsonville has needed attention for nearly two decades, especially southbound between 3pm and 6pm. Most days, I do not leave work until 6:30 because of traffic. In the mornings, I usually come in at 8:30, after the worst of the morning commute is over. I often take surface streets the entire way, except for a two mile stretch where I must cross the river. I have tried to adjust to ODOT's neglect of this region. Many times, to avoid excess congestion, I have driven to Newberg or Oregon City to cross the Willamette.

My wife and I came to Woodburn because of the affordable housing, but the schools did not meet our expectations. So, our kids go to Wilsonville, and my wife also works for Wilsonville School District. Although we have tried to carpool, the school schedule and my work schedule rarely permit it. My second son attends Wilsonville High School, and must sometimes drive separately. His older brother graduated and now works swing shift at Costco in Wilsonville. On any given day, my family crosses the Boone bridge between four and eight times.

Many of my neighbors moved to Woodburn for similar reasons: they could not afford to live near their employer. Many of them commute to the Portland metropolitan area for work. Most of them cannot afford to move across the river. I earn above average, and I cannot afford to move. Maybe in another five to ten years, but not now. Why is ODOT trying to punish us? At my place of employment, many of the higher earners live nearby. ODOT's proposed bridge tolls will have minimal impact on them, but it will adversely impact those who must live further away.

Bridge tolls are not exactly a head tax, but they far too closely resemble one for those who need to use a tolled crossing. Worse, they discriminate against those who must use particular crossings, and give a pass to those who don't.

Gasoline and diesel taxes worked very well. Heavier vehicles, which tend to cause more road wear, consume more fuel. The more fuel a vehicle consumes, the more fuel tax is paid. This was simple. USDOT and NHTSA have been pushing for stricter fuel economy standards, and for alternatives to petroleum fuels. Automobile manufacturers have responded by producing what has been asked for. ODOT has responded poorly and haphazardly. ODOT must be funded, but the funding needs to be fair. The present plan is to double tax the drivers who can least afford it. Middle and lower income Oregonians cannot afford electric vehicles; upper income people can. Upper income people can install charging systems in their homes, and solar panels to offset the energy consumption. Upper income people can afford to live near their employers. Middle and lower income people cannot afford \$50,000 cars, and often must commute farther to earn their income.

Fairness dictates that ODOT must find a funding solution that incurs cost proportional with use. A resident who drives two miles from Charbonneau to downtown Wilsonville should not be forced to pay more than a commuter driving along 99E from Salem to Portland. Similarly, an 8,000 pickup should pay more than a 3,000 car (as is the case with the present gas tax). And ODOT should not allow some to avoid the fuel tax altogether. Electricity is already taxed. Since many electric car owners will consume significantly

more electricity, one option might be to tax electricity consumption in excess of a standard baseline. What to do about those with wind turbines or solar panels? Can the utility companies know how much electricity is generated on site, and report this number in addition to that purchased from the utility? Can the electric cars simply be required to report their mileage, and pay a monthly amount based on usage? Electric cars have been in the works for more than a century. The present age was ushered in with the GM EV-1 more than 25 years ago. ODOT has had time to come up with a better and more equitable strategy.

In 2018, an ODOT representative held a town hall in Wilsonville. She insisted that the Boone Bridge had only become “a bottleneck in the last five years”. Several in the audience, including myself, confirmed that we had been struggling this this bottleneck for more than a decade at that point. She was clearly not a decision maker; her comments were often prefaced with, “My engineers say...”, or “Our engineer

Below are just a handful of screen captures that I have taken of me traveling surface streets to avoid freeway congestion, and of google maps clearly showing surface streets as a faster option than the freeway. Some of these show the commute through Wilsonville being half an hour longer than the normal five minutes, to upwards of an hour and a half longer than normal. This is very wrong! – the freeway should carry more traffic volume, and permit traffic to move faster. ODOT’s neglect should not push traffic onto the local streets. This is tantamount to the road gutters overflowing into the neighborhood houses.

ODOT must fix these problems, and ODOT must get funded, but the funding must be equitable. The present plan is not equitable.

**Attachments :**

tckQohdhZx6nf9fS.png (175 kb)  
qtkR8ey6R0WObZOX.png (305 kb)  
ff1YP3MaaH60NuFi.png (38 kb)  
0ZojcH7IbNvA6IDY.png (82 kb)  
6SDIYbI5Q3NeOJDw.png (127 kb)  
R0UdPBWxs8DtQKgK.png (76 kb)  
foS3so2jOWeFXxPZ.png (151 kb)  
8HUoq0uqpwiwwKHt.png (115 kb)  
r3B07YDT7422Pypf.png (96 kb)  
QUqz9mAnPatnoKbQ.png (92 kb)  
VUkvo8V3yJnijUBU.png (225 kb)  
MbfGoQoxFl6ESjKu.png (99 kb)  
MxQgoogT1F75Ct1Y.png (441 kb)  
UwdqnOI0maZdLB26.png (214 kb)  
TD8tHlqQ0rvIPtB3.png (168 kb)  
QvgKi2o59JhTe0e0.png (120 kb)  
LSK7QapeVd23EoO0.png (213 kb)  
HpWe3SIIMWKLlyB4.png (133 kb)  
7Mg3lhS0kuek000X.png (182 kb)  
A0s31HzL7sPFOSBT.png (164 kb)  
SNle0qOSGmC222XE.png (142 kb)  
mIYxgNkAlz5Hhh5H.png (175 kb)  
ZsJJA1RwmSvzTFaE.png (164 kb)  
mNfoR0tq0Lj7vzOq.png (197 kb)  
8q6JPsoC4LJSxWCo.png (149 kb)  
gPWalih4nV9VYQQz.png (228 kb)  
hzXO09dz2MQLy4UQ.png (128 kb)  
bsU8n0MYn9xmKoFN.png (193 kb)  
nyBYvL4DJEyqscLA.png (144 kb)  
T7dScSDqgVQSHRel.png (299 kb)  
sG6r0JE0QwBByyf.png (129 kb)  
JQCNRgAWc0d9SR2.png (104 kb)

**ODOT I-205 Toll EA - RECORD #2992 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Chuck

**Last Name :** Moran

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Induced demand won't solve our traffic problems, it only guarantees additional pollution and spends down our limited carbon budget faster! We should be investing in alternative modes instead to get more drivers off the road. Tolls, congestion pricing, bike infrastructure, buses, rail, ...

<b>ODOT I-205 Toll EA - RECORD #2993 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Tim & Eileen
<b>Last Name :</b>	Morgan
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email

**Q3. Comments :**

Dear ODOT Environmental Assessment Committee

I am a resident of Oregon City and own a business in Tigard, to which I and my wife work at and commute to Monday-Fridays. Because I am a business owner, I take very few vacations or time off, and the costs to run my business, including insurance, utilities, internet, payroll, office rent, postage and cost of fuel/or KW (I mostly drive an electric vehicle) have gone up significantly. Needless to say, a toll would add to my expense, and I cannot change the hours of my business, as we have to be open to the public during specific times during every workday.

Instead of conducting all of your numerous reports and convening all of your many committees to discuss how to be more equitable with these tolls, why don't you put this very same energy and time into lobbying to the federal gov't for more money to pay for this Federal Highway? According to a Recent issue of Oregon Truck Dispatch Magazine, an article within the publication states that Oregon tops the list of the most expensive states for truckers. Trucking companies in Oregon pay the state and federal government \$33,064 per year ranking number 1 as the highest Highway User Taxes published by Oregon Trucking Association quarterly magazine of any state in the US.

I use the 205 and I-5 every day, and most of the vehicles on the road with me are TRUCKS. So, what are you doing with all of that money that is being collected by various tax being collected for our roads? I am tired of hearing all the "meetings and discussions" regarding who will be tolled. Your efforts are discriminatory. I even read in the recent hearing from the Muslim faith population, so now we are drawing in religious beliefs? What about Christians and Evangelicals? Did you know that Clackamas County has one of the highest populations in the US of Russian Evangelicals? We are all humans who use the roadway to work or get to the doctors, or visit family and friends. If you are going to toll people, it is discriminatory to charge some more than others, if they equally use the roadway, one vehicle with 4 wheels it should be charged the same. And while this should be common sense, just in case you live under a rock, people will manipulate their situation so as to make themselves fit into whatever category will save them money to avoid the toll, leaving the few of us working stiffs, who have to work every day, and who have employees that depend on us to pay them. Cut out the social justice discounts. The only folks who should get a break on tolls are retired over 65, and only low income who are going back and forth to a paying job and have to use the highway to get to work. That is all that is fair. The way you could fund this proposal, is to apply for a refund on your state income tax return. Submit your invoices, apply each year for the refund if you meet the income requirements. This would prove if someone was really eligible for reduction or free toll access.

Right now, society forces all sorts of taxes for the middle-class working stiffs to pay. Homeless camp taxes, property taxes to support schools with more programs than ever existed, taxes to pay the rent for those who can't, taxes on the purchase of new cars etc., now the Federal Government is going to make those with better credit pay more for their mortgage interest rates, as if the rates are not high enough already. Our property taxes have gone up significantly in the past 3 years, as well as our business costs. I have so many government taxes on everything I purchase and I work in an industry that requires state approval to raise the prices of the products I sell for my customers. I just can't raise my product prices, because the state government requires prior approval with justification of the rate increase.

Tolling is not going to get people to drive less!!!!!!!!! This is a foolish progressive notion made by those who most likely live in a studio condo in the Pearl District, with blinders on every day, and I guarantee you those who speak like this do not own a business, and most likely work from home. May I ask them however, how they get their things they purchase online every day? Do they think it flies in on a magic carpet? No, a big truck brings it to the warehouse that picks the order that then puts it on a smaller truck that comes to their doorstep. How do you think the workers go to work each day to keep all of our utilities working, including the utilities that run the electricity so that the condo owner with blinders on can order their stuff off Amazon? Those

folks don't ride bikes when they must be at work since many people depend on their utilities to survive, like those in hospitals or specialty care centers, prisons, etc. If the State wanted to encourage bicycles, why did Washington County just build 10,000 new homes, and why are they putting a third lane on the 217? Why does Metro continue to expand the urban growth boundary further out, and allow massive home developments, causing more and more folks to need cars to get to their work place without added additional road capacity? When I built a new home in Clackamas County in 2019, the taxes and fees for the permits was just over \$45,000 to push paper around. Why didn't some of this money go into roads or maybe it did.

To further this argument, if ODOT thinks a toll will keep cars off the road, they need to work with TriMet, who does not serve sufficiently along the edges of the metro area. If you want people to get out of their cars, give us more transportation infrastructure to do so. Give us a train that goes from Milwaukie to Beaverton, give us a train that goes from West Linn to Tigard or Wilsonville, give us dedicated bus lanes on freeways, and give us safe buses, not full of drug addicted zombies. Don't make us go all the way into Portland and catch a connection. If someone works in Hillsboro (and a lot of people do) but they live in West Linn, they should be able to take a train more direct than going through all of Portland and having a 2-hour commute.

We can't ride bikes all the time, the weather here does not permit this year-round, not to mention the dedicated bike paths in the Portland Metro area are riddled with crime and homeless camps, making them a dangerous option, especially at night. It is unreasonable that some of your committee members have publicly stated that the reason for this toll is to get more Oregonians to not use their cars. How are we to get elderly to doctors, and moms with children to their appointments, and school? Not every child has bus service, mine did not, and it was not safe to have them walk to school.

Here is what I'm asking this committee to focus on regarding this tolling program. First, please stop segregating everyone into race, social class and religion. We are all Oregonians and we should all be treated equally. Myself and many others cannot carry the financial hardship for everyone who doesn't want to get educated and work to make a living. I pay \$2,200 per month for health insurance to cover my wife and myself. It was \$400 less per month if I continued the same group plan. So, \$400 per month of my health premium is subsidizing others not paying for health care and not my family. Focus your energy in getting someone to draw up a grant for our two US Oregon Senators to receive some transportation money to fix I-205 and I-5 the two federal highways that allow transportation and commerce between Washington and California. This is a Federal highway problem used by people in neighboring states also other than just residence of Oregon. You are trying to get everyone work from home which is not possible. Business day starts at 8:00AM in most cases. We need to be open so people get to work and have their appointments with doctors, hospitals, schools, banks and retail store. Stop wasting time how you are going to allow some groups of people to get a free ride while the rest of us pay for them.

How will you collect this money? We understand there will be a pass system and that works for the honest folks and trucks who will buy the pass, but already, many folks have no license plates on their cars. For those who don't willingly sign up or ask for discounts, will you send invoices, what about out of staters, do they just get a "warning" each time they route through (Washingtonians and Californians are in abundance on the 205 and I-5 roadways for my 40 mile commute each day!) and how aggressively will you collect the fare? Will it just be that if you don't pay, you get away with it, and the honest folks who buy the easy pass will pay, and you are depending on that, and it will be more than enough, so that you can virtue signal that you allowed BIPOC folks to use the highway fare-free? How many administrative positions are you going to hire to chase these unpaid toll bills? What will be the enforcement action to prevent those who do not pay from using the interstate? How are you going to stop the non-payers from entering I-205 and I-5? To me there seems to be more question about how you are going to allow for exceptions for those to pay then how everyone will pay and not allow

access for those who refuse to pay and stop them from using the proposed toll road. My two solutions are, raise the gas tax 10 to 15 cents per gallon or have our 6 congressional representatives and 2 US Senators request a federal highway grant to fund the project. The cost to collect from the cars that don't participate in the collection scanners will most likely cost more to hire and track the employees for enforcement. If Oregon could receive 1% of the funds going to the Ukraine war with Russian, we could fix most of the highways in Oregon. Direct our congressional representatives to find the funds to pay for this project. The reason they are in Washington is to find money for projects in our state.

Thank you for considering my points and recommendation for your public comment.

**Attachments :**

Dispatch Magazine Article.pdf (120 kb)

# Oregon Tops List of Most Expensive States for Trucking



WHEREVER YOU TURN, the costs of everyday items have increased, and businesses have not been spared from these inflation-driven price increases. However, new research has shown that the trucking industry in Oregon bears a significantly higher burden, and pays more in taxes and fees, than operators in other states.

Based on a recent American Transportation Research Institute (ATRI) study, Oregon is the most expensive state to operate a commercial heavy vehicle when it comes to trucking-specific taxes out of the 50 states and Washington, D.C. These trucking-specific taxes are in addition to regular business taxes that trucking companies also pay.

In 2023, Oregon trucking companies pay **\$33,064** in state and federal highway user taxes each year (\$22,508 in state taxes and \$10,556 in federal taxes). To put that into

perspective, here are the other states that round out the top five:

- ▶ #2—Connecticut: \$30,014
- ▶ #3—Pennsylvania: \$25,533
- ▶ #4—California: \$25,458
- ▶ #5—Illinois: \$23,497

The least expensive state to operate a commercial heavy vehicle in terms of trucking-specific taxes is Alaska at \$12,339 (State: \$1,783; Federal: \$10,556). Our neighbors to the north also pay less than Oregon operators. Washington comes in at number eight, with \$20,633 in trucking-specific taxes.

Even while trucking in Oregon faces a disproportionately higher tax burden than our colleagues in other states, the cost of trucking has increased exponentially in recent years all across the country.

New research from ATRI found that the total marginal cost of trucking grew by 12.7% in 2021 (the most recent data available) to \$1,855 per mile, the highest on record. Leading contributors to this increase were fuel (35.4% higher than in 2020), repair and maintenance (18.2% higher than in 2020), and driver wages (10.9% higher than in 2020). On a cost-per-hour basis, costs increased to \$74.65.

Our team at OIA recognizes that the constantly increasing cost of trucking in Oregon is not sustainable, which is why we continue to advocate for reasonable policies and legislation to alleviate the burdens on our operators. If you're interested in lending your voice to our advocacy activities, please contact our team at [info@otrucking.org](mailto:info@otrucking.org). Together, we can help raise awareness about the increased cost of trucking and advocate for reasonable fee structures for trucking operators in Oregon. 🚛

## Did You Know?

- Oregon is the **#1** state for state and federal highway user taxes.
- Oregon trucking companies pay **\$33,064** in state and federal highway user taxes each year.
- Oregon trucking companies pay **\$3,050** more than the next highest taxing state.

## Top Five States with the Highest Highway User Taxes

State Ranking by \$ Total	State	Total Annual State Highway User Fees (\$)	Federal Fuel Heavy Vehicle Use and Excise Taxes	Total State and Federal Highway User Fees
1	Oregon	\$22,508	\$10,556	\$33,064
2	Connecticut	\$19,458	\$10,556	\$30,014
3	Pennsylvania	\$14,977	\$10,556	\$25,533
4	California	\$14,902	\$10,556	\$25,458
5	Illinois	\$12,941	\$10,556	\$23,497



**ODOT I-205 Toll EA - RECORD #2994 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Robert

**Last Name :** Duvoisin

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Another billion dollar freeway project getting pushed through. Another big expansion in conflict with Oregon's environmental and carbon targets. I've commuted to work by bicycle or public transportation for 20 years. It angers and pains me to see the state spending so much money, and expecting the next generation to pick up the tab and the environmental impact of freeway expansions. Conduct an Environmental Impact study and see how this will induce demand and increase emissions.  
I say no more money for cars, and yes to spending more on public transit and safe routes for pedestrians and cyclists.

**ODOT I-205 Toll EA - RECORD #2995 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Alexandria

**Last Name :** Nurmi

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Expanding freeways creates induced demand, meaning more people driving, more cars on the road, more pollution and carbon in the atmosphere. It also doesn't help traffic, because of induced demand you will always just get more traffic no matter how many lanes you add, but if you add lanes now that will just justify adding more lanes which will make climate change even worse!

**ODOT I-205 Toll EA - RECORD #2996 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Richard

**Last Name :** Leonetti

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** >From Kris Strickler's (Director of ODOT) written opinion piece on tolling is the evidence that tolling will have bad effects on air quality, congestion and safety. Every result is worse from the proposed tolling unless the claim is made that tolls are the lowest cost way to raise additional taxes, which is doubtful.

Closely reading his statements he expects that the tolling will divert more traffic to the neighborhoods "...causing congestion...and making it less safe for people to travel by bike, walk or drive in their own communities." Slow moving traffic increases air pollution.

He goes on to say about this community traffic "We need to guide those drivers back to the interstate or help them travel...like transit or biking." The tolls are what will drive them off the interstate: bringing them back is contradictory. It is a fairytale if you think that people now driving these interstate highways will be willing or able to complete their trips by transit or on a bike.

The only way that tolling makes any sense is to add capacity, a lane or two, and toll these additional lanes to pay for them. In the Seattle area they have done this on several highways and it has provided uncongested fast lanes for those willing to pay, and overall less congestion on the toll free lanes.

Tolling all lanes without increasing capacity is just a new tax imposed on a certain region of the state. In all likelihood it will move some congestion off the interstate but severely impact the neighborhood streets.

**ODOT I-205 Toll EA - RECORD #2997 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Becky

**Last Name :** Hawkins

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I demand that ODOT conduct an EIS for the proposed I-205 Freeway Expansion because we need to consider every possible option for reducing congestion, including tolling with no build.

I understand that ODOT is primarily concerned with moving cars and trucks efficiently. But it seems like ODOT regards a short-term alleviation of congestion as an acceptable priority. Because of induced demand, adding a traffic lane will hurt our climate goals and create a long-term increase in traffic. Please consider every alternative and take a good look at all of the effects.

Thank you,

<b>ODOT I-205 Toll EA - RECORD #3000 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Dave
<b>Last Name :</b>	Farmer
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email

**Q3. Comments :**

EA comments from Willamette resident [ ].

This EA is totally incomplete. It should include the entire project. From the Boone Bridge to the Columbia River. Both I-5 and I-205. These two freeways are considered one corridor by the authorities. This was in place since I-205 planning started. Anything important changed on either of these freeways, affects the entire corridor. This is true even into Washington. Because this is only one system.

When a through traffic vehicle reaches the Southern starting point of I-205, it has to make only one choice which freeway to take for the continuing trip past Portland. There are no practical routes to change freeways. This is true for this entire corridor. So if one Freeway has important changes, it affects the traffic flow of both freeways, the entire length. This is from the Columbia River to the Boone Bridge. Everything that is transportation, Northbound or Southbound will be affected.

When the tolls start on I-205, many heavy through traffic trucks that are anticipated to pay about four times what a car pays will divert or re-route to I-5.

This will cause congestion on I-5. Even a moderate increase in 18 wheel type trucks and trucks that are somewhat smaller can cause much more congestion, with all of its negative effects.

Trucks accessing Portland area destinations will be subjected to much slower and unpredictable trips. This will significantly hurt many local heavy industries, and transportation hubs that are plentiful here.

I-205 was built for the exact purpose of relieving congestion on I-5 and local side streets that were becoming very congested.

When there are two tolled bridges in one city on one freeway, this makes the problem twice as bad. This uneven route tolling will last about 1.5 years. That is a very long time to have traffic patterns disrupted. This includes business and personal trips.

Vehicles diverting-rerouting will do extreme damage to the local people. At first ( about 1.5 years) this will strike Oregon City's Arch Bridge and downtown area, which now is very slow, unsafe for more traffic, and stuck between the bluff and 99E and the Willamette River. Oregon City and the Willamette area were built before cars. This CANNOT be mitigated. It is not our fault. It is not our fault our third lane on I-205 has not been built. More than 105,000 vehicles use the Abernethy Bridge daily

(an average). In this area we have been ignored for many years, because there was not enough money. But when the Federal 1.1 Billion dollars were allocated

I-205 received none. This hurts our people, businesses, and most importantly our safety.

Our side streets that will receive much diversion traffic will suffer much more wear. People will not be able to back out of a driveway safely. Most of these streets were never built or designed for heavy traffic. Examples are Willamette Falls Drive with many cross walks and pedestrians. Ostman road which is approaching failing condition.

Highway 43 which is already a problem. This will be repeated through this entire corridor so the entire system needs a full and thorough Environmental Assessment. Because the entire corridor will get tolls and once tolling is built, it cannot be changed.

Tolling will devastate many families that cannot afford even discounted toll amounts. This will hurt our whole economy because this money will not be available for anything else.

About half of our toll money is wasted collecting it. That makes no sense since there are other existing revenue forms that could be

increased for very little extra cost. Our long overdue third lane will help the most with congestion, not tolls.

The Native Americans deserve Restorative Justice, because all of this land was stolen from them. They deserve freedom from tolls forever. The underconstruction Grande Ronde Cultural Center in Oregon City and soon to be open Atthey Creek Middle School in West Linn need to be assessed closely.

Thanks

**ODOT I-205 Toll EA - RECORD #3001 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Rita

**Last Name :** Moore

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
I strongly urge ODOT to conduct a full Environmental Impact Statement (EIS) for the 1-205 Toll Project. The current Environmental Assessment (EA) is inadequate, as it only compares two scenarios: the No Build (without tolling) and Build (tolling and a lane addition). A more comprehensive analysis would include a third scenario with tolling but no lane additions.

This scenario is crucial because adding road capacity will inevitably increase traffic and emissions, as described by the Fundamental Law of Road Congestion. Adding lanes to this stretch of 1-205 would not solve the congestion problem, but rather worsen it in the long run, even with tolling. On the other hand, tolling without lane additions would likely reduce traffic volumes and emissions, and possibly eliminate the need for capacity additions altogether.

Oregon is already failing to meet its greenhouse gas emissions (GHG) reduction targets, and transportation is the largest source of emissions in our state. We cannot afford to invest in projects that will increase our carbon footprint and contribute to the climate crisis. Adding lanes to 1-205 would not only harm our environment but also divert resources from other transportation priorities, such as safety and active transportation.

Therefore, I urge ODOT to complete a full EIS that includes a tolling scenario but no lane additions. An EIS would provide a more rigorous and transparent analysis that would reveal the true costs and benefits of each option. ODOT has a responsibility to act in the best interest of the public and to follow its own mission statement of providing a safe and reliable multi-modal transportation system that connects people and helps Oregon's community and economy thrive without exacerbating its impact on climate change.

**ODOT I-205 Toll EA - RECORD #3003 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Matthew

**Last Name :** Markstaller

**Affiliation :** Daimler Trucks North America LLC

**Submission Method :** I-205 EA email

**Q3. Comments :** Thank you for responding to my questions. Your responses really don't address my questions at all, and only further illustrate how out of touch ODOT is with the needs of your constituency.

Traffic has been much reduced since Covid, it's gone back to levels it was 10 or 20 years ago since many people are working remotely. It's absurd to say tolls will reduce traffic, the roads won't get more efficient, you're simply rerouting traffic to other roads, which will make them more congested. At best you are keeping people off the roads because they can't afford it.

Regarding the money, the infrastructure was built decades ago much more efficiently. ODOT or any government entity cannot accomplish anything anymore except with absurd budget levels. Why don't you learn to do things like a private entity does and you could do construction projects for 1/3 of the cost you do it for.

I really want to move from this state because of you and our over bloated state government.

Thanks,

**Attachments :** image003.png (40 kb)



**ODOT I-205 Toll EA - RECORD #3005 DETAIL****Submission Date :** 4/21/2023**First Name :** John**Last Name :** McCabe**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** <https://cmap.clackamas.us/maps/traffic> I forgot to mention that Mandy Putney stated in a Public Meeting that there are no Federal Funds for the I 205 project, so there must be tolling. This was followed by her statements could not be used as a public request item. The meeting and the repose can be seen online, unless ODOT has purged the meeting.  
The link above is the CMAPS from which I obtained the true daily trip counts.

**ODOT I-205 Toll EA - RECORD #3017 DETAIL**

**Submission Date :** 4/21/2023  
**First Name :** Margaret  
**Last Name :** Tweet  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** I object to the arbitrary deadline of 4 pm. It should be midnight like other commenting is. There are no instructions about how to add to a comment. I noticed that when I added another comment that it was required at the end of the survey to hit the done button twice. I submitted this comment earlier, but hit the done button just once, and don't know if made it thru, so I am re-submitting the comment again via email.

When I added additional comments on the online form, I noticed the done button came up twice at the end of the survey. Very confusing, and possibly prevented form submissions by requiring hitting the DONE button twice to complete the form. resubmitting my comments previously submitted via the online form input due to uncertainty about whether the online form was accepted or not. I support NO BUILD NO TOLLS alternative. 3 improvements are currently being constructed and included as part of the "No-Build" alternative, the Abernethy Bridge upgrade and interchange improvements at I-205 on-ramps and OR 43 E. Per the interactive map orange segment, New I-205 Capacity is Assumed in Both Alternatives. (build and No build). In addition to the Abernathy Bridge, under the Build and Toll plan, 8 other I-205 bridges would be upgraded or replaced to withstand a major earthquake. Seismic upgrades or replacements are costly, and may be unnecessary. Have there been any significant earthquakes in this area? That data wasn't included in the summaries about seismic improvements. The cost of tolling operations as high as 30-60% cost to charge and collect tolls, are not revealed on webpage. A gas tax costs about 1% to collect, far more efficient to fund road improvements. The costs of tolls as a means to limit driving for middle and low income drivers is unfair. Tolls are usually charged by the axle, so trucks will pay high tolls to travel on I-205, yet this is not explained in the economic impact section. Little information about tolling costs is provided. The home I own is 11 blocks from I-205 within the study area near Johnson Creek. The negative impacts from tolls and mitigation will further degrade the neighborhood if tolls extend North along I-205 as is being discussed. Drivers will divert to nearby neighborhoods to avoid the tolls. Many low and middle income families live in this area, and will face a heavy toll burden if I-205 tolls are imposed. Per the Economics section, "Tolling increases household transportation costs"... By how much? The FAQ explains that the toll rates are not decided yet. Mitigation suggestions to manage the likely diversion to neighborhood streets would make the neighborhood worse. Roundabouts take up valuable traffic space and safety shoulder space too. The curb of the roundabout is hazardous as many vehicles drive over the curb not realizing how high it is. Trucks are unstable with some wheels on a curb, and others on the road. In snow and icy conditions, the curb and entire roundabout may not be visible, which is hazardous. Additionally, drivers are not familiar with the variable rules for roundabouts. Accidents are a problem in roundabouts due to attempts to enter and exit a roundabout when in heavy traffic and drivers unfamiliar with roundabouts. The suggested traffic calming bump outs make roads too narrow to safely pass other vehicles, and can't be seen in snowy conditions. Flat tires from driving into a bump out are a problem I have witnessed, leaving drivers stranded. Narrowing the drivers' visual field by putting in trees is not as important as roads wide enough to travel safely and avoid an accident. Narrower roadways are not a good mitigation strategy either. Removing turn lanes is not a good mitigation strategy. It's better to use the space for improved traffic flow than to pave over turn lanes. Again, No build NO tolls is the option I support.

**ODOT I-205 Toll EA - RECORD #3020 DETAIL****Submission Date :** 4/21/2023**First Name :** Loretta**Last Name :** Anderson**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** Adding highway tolls is the wrong thing to do. There is plenty of money now for what is needed. Hard working folks are trying to make ends meet. Government never seems to have enough. Highway funds are spent on other than highways. It is time for users other than automobiles to pay up. The ticket to ride mass transit does not even cover the cost of a ride. Special lanes for bikes. Why don't we have license, registration, & insurance requirements for bikes using these lanes? I understand there are a number of other areas highway money is spent. Punishing the automobile driver is unacceptable. I won't blame people for diverting through neighborhoods. The freeways were presented to we the people as a better alternative. Guess not anymore.

**ODOT I-205 Toll EA - RECORD #3026 DETAIL****Submission Date :** 4/21/2023**First Name :** Mary**Last Name :** Torg**Affiliation :****Submission Method :** I-205 EA email

**Q3. Comments :** I have heard people say they will have to quit their job if there are tolls. Stores in the toll areas will lose customers. I would head north instead of south if it avoids tolls. Maybe just have tolls during the time of heavy traffic. Or have a lane that is a toll road so those that cannot afford toll roads can still use that route. Have the speed on the toll lane faster. But do not toll everyone on that road. We already pay taxes for our roads. So my choice do not put in toll roads.

**ODOT I-205 Toll EA - RECORD #3027 DETAIL**

**Submission Date :** 4/24/2023  
**First Name :** David & Deborah  
**Last Name :** Mauk  
**Affiliation :**  
**Submission Method :** I-205 EA email

**Q3. Comments :** There are many ways to travel down the road to reducing congestion without having an adverse impact on a region's population, prosperity & environment. Implementing tolling before providing more transportation options, all of which fall within the purview of ODOT's mandate, is premature at this time. It will adversely affect the region's households, workers, businesses, environment & economy. Without other transport options, the tolling plan disproportionately burdens local users. The area effected by planned tolls lacks basic means of transportation for drivers to reasonably consider alternatives to using a tolled roadway. HOV & fast lanes. Park & ride facilities. Carpool incentives. Multimodal options such as buses, trams & rail. Optional non-toll routes. As it's currently designed, these options are not available, nor are there reasonable alternatives to get door-to-door. A better, more acceptable plan has these transportation options in place prior to implementation. The current plan does not provide adequate mitigation for communities directly affected by traffic diversions from tolls. As a direct result of tolling, West Linn, Oregon City, Lake Oswego, Canby, Aurora & Wilsonville will suffer from greater congestion, decreased public safety, more pollution, higher costs, declining tax valuations, reduced civic revenue & less economic activity. The communities & small businesses of Canby & Aurora would also be substantially impacted by a toll at the Boone Bridge. Traffic diversions would surge, while business from the population core north of the toll would contract, causing those communities to decline instead of thrive. The existing toll plan fails to consider the cumulative affect tolling will have on Oregon consumers, households & small businesses. It's not just the expense of trip tolls, but the hidden, additional cost burden that will fall on lower income, middle-class & family-wage workers paying higher prices for basic goods & services, because those prices were increased by businesses whose own costs of deliveries, vehicle use, commuting & freight have gone up due to tolls. Tolling will put inflationary pressure on household & business incomes, & lead to greater inequality & less economic activity, as there will be fewer dollars to spend in the metro economy. Local communities will be hit hard. ODOT states that tolling is needed to pay for seismic upgrades on the interstate bridges spanning specific rivers in the area. Seismic improvements are eligible for Federal funds without tolling. ODOT is empowered to optimize the acquisition & use of these funds before accruing toll revenue. To provide a safe & reliable multimodal transportation system that connects people & helps Oregon's communities & economy thrive,' is ODOT's mission statement. The tolling plan as it now exists will not provide reliable multimodal transportation connecting people. Congestion from diversions will rise. It will make communities less safe. Economic activity will decline. ODOT will fail at its mission. To be successful in fulfilling its mission, ODOT needs to reconsider the role of tolling in delivering on that promise. It needs to fully demonstrate that tolling is superior to an existing, ready-to-roll, cost-effective alternative - vehicle registration fees - in achieving its objectives. Tolling by all appearances looks like a preordained solution, not the best solution, for equitably reducing congestion, limiting neighborhood rerouting, improving the environment, & supporting safe travel & economic growth that 'keeps Oregon moving.' Tolling is but one option on the transportation table, not the main course, nor the pedestal on which that table rests. It makes sense to postpone tolling beyond the I-5 Columbia bridge until these issues are more fully addressed.

**ODOT I-205 Toll EA - RECORD #3030 DETAIL**

**Submission Date :** 4/27/2023

**First Name :** Tyler

**Last Name :** Stone

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :**

Dear ODOT, I am a resident of Clackamas county and West Linn and would be significantly harmed from implementing costly tolls on our critical roadway with no alternative options, except for taking local streets resulting in increased time, pollution, noise, and adverse economic impacts to our local neighborhoods and communities. I have read many public comments made from the Cities of West Linn, Lake Oswego, Tualatin, and Oregon City, as well as tremendous response from Clackamas County. Unequivocally, there is massive opposition to tolling our roads and the extreme negative impacts from implementing this highly flawed program, which is not only reflected at the governmental entity level, but also within the views of all the collective residents. ODOT has absolutely bungled this entire tolling operation. The "studies" conducted have not been thorough, show minimal to no mitigation research or efforts, and haven't even shown the willingness and time to consult with local residents and business owners who would be the most impacted by the toll program. Why? Because the response would be that tolling is not wanted and not welcome by our local Oregonians in this critical region. ODOT clearly knows this, as we've seen the same negative feedback time and again in survey results and public response, and that appears to be any semblance of a quality study has not been pursued to date, as the department rushes along a predetermined timeline of adding incremental costs to our region. I, along with so many others, are extremely disappointed by ODOT. This tolling mess is a direct result of poor leadership in our transportation department, causing undue stress and harm to our citizens without any regard to your actions. Our local residents deserve much, much better transparency, communication, and leadership within ODOT. Sincerely,

**ODOT I-205 Toll EA - RECORD #3032 DETAIL****Submission Date :** 4/28/2023**First Name :** Shawna**Last Name :** Stouder**Affiliation :****Submission Method :** I-205 EA email**Q3. Comments :**

Hi,

I am against implementing a toll on any of Oregon's bridges. We are lucky to have so many beautiful rivers in this state which means we have many bridges. I will vote against it if given a chance as well as lobby others to do the same

**ODOT I-205 Toll EA - RECORD #3033 DETAIL**

**Submission Date :** 4/29/2023

**First Name :** Stephen

**Last Name :** Garner

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** The tolling proposals for bridges are clearly indicative of the lack of cost-benefit analysis by beaurocratic planners in our OR gummint.



**ODOT I-205 Toll EA - RECORD #3048 DETAIL**

**Submission Date :** 4/19/2023  
**First Name :** Cam  
**Last Name :** Gilmour  
**Affiliation :**  
**Submission Method :** I-205 EA email  
**Q3. Comments :** Please find the attached pdf. which has my comments on the I-205 Toll Project.  
**Attachments :** I-205 Toll Project EA Comment.pdf (29 kb)

April 19, 2023

Re: I-205 Toll Project Environmental Assessment Comments

While the project is long overdue, paying for it with toll revenue, and using time of day toll rates to discourage trips on I-205, will cause significantly adverse social and economic impacts on area businesses and households.

Only considering toll revenue to pay for the project is a critical flaw of the Environmental Assessment. Traditional funding sources spread the cost of major projects over a statewide base of light and heavy vehicle owners, making the cost of these projects per owned vehicle a small fraction of what tolls cost. This fact should have been addressed in the EA, and was not. The tone of the EA is that of an advertisement for tolls—huge benefits and minor adverse effects. This could not be further from the truth.

This is Oregon's first project to use tolls for freeway congestion relief, and toll revenue for bonds to pay for the project. The EA suggests it is tolls, which will vary throughout the day and night, that will be responsible for congestion relief. The EA did not explain that it is the addition of two travel lanes, one in each direction, that will cause the greatest reductions in traffic congestion. The additional lanes will increase freeway capacity by 50%.

Increase freeway traffic capacity being responsible for improved travel times was not made obvious in the EA. Instead, the EA insinuates tolls are responsible for travel time savings, not greater freeway capacity.

The EA suggests that tolls are worth the cost to freeway users as computed travel time savings have a greater value than the cost of the toll, or so says the EA. This is untrue because most freeway users will be unable to monetize the travel time savings they gain. Unfortunately, these same users will have no choice but to pay the toll, since a build alternative of operating new lanes as express toll lanes was not considered in the EA.

Express toll lanes leave existing non-tolled freeway lanes open for traffic not entering the tolled lanes. All freeway users benefit as the new tolled lanes will attract traffic willing to pay the toll, and the old lanes will have less traffic, allowing this traffic as well as tolled traffic to travel at faster speeds. This was not discussed in the EA. Express lanes are fair, just and equitable. Tolling all lanes as the proposed project will do is not.

The EA suggests that drivers who cannot afford tolls can take their trip during non-rush hours, or find another way to make the trip such as taking a bus. There is no evidence in the EA to support this contention. If the contention was true, this would be observable today. If one has the option to avoid congested traffic conditions that option will be exercised. Altering trips to avoid rush hours was not quantified in the EA.

The EA says tolls will account for 7%-30% of traffic reduction during rush hours. At the lower end, 7%, tolls don't reduce congestion enough to warrant the cost of the project. At the higher end, 30%, traffic diversion to nearby

roads and streets will cause significant impacts not addressed in the EA. There is no proof that most of the toll avoiders will choose a non-rush hour trip.

The EA says traffic diversion will be minor to moderate, not unlike the diversion today caused by congestion and crashes as traffic re-routes to avoid stop and go traffic. There is no evidence offered to support this assertion. Tolls will cause more traffic to re-route than current freeway conditions do.

The Environmental Assessment emphasizes project benefits of reduced travel times, conflating that conclusion by inferring congestion relief is due to tolls. Again, most of the improved travel times will be due to adding the new freeway lanes. The 50% increase in traffic capacity, not tolls, account for most of the forecasted congestion relief.

The EA states that adverse project impacts, such as traffic diversion to local streets, can be mitigated, and financial impacts on persons meeting certain federal income poverty levels can be mitigated as well. These conclusions are not supported by information in the EA's technical documents; assertions are not facts.

Toll cost abatement runs counter to the EA's statements that tolls will decrease use of the freeway. Toll abatement will reduce the toll revenue needed to pay for the project. Express toll lanes were not included as an alternative because they don't raise enough revenue to pay for the project. Toll cost abatement will reduce revenue too, challenging ODOT's ability to sell toll backed revenue bonds. This fact alone should sideline the EA and lead to more detailed study of all planned toll projects before deciding to proceed with the I-205 Toll Project.

The project as proposed did not consider using revenue from the State Highway Fund or the Federal Highway Trust Fund. These funding sources built the interstate system in Oregon, not revenue from tolls. It is ridiculous to imply, as recent changes in state transportation statues do, that toll revenue is needed to supplement revenue sources in place that have not kept up with needs. This flies in the face of what legislators have done in the past to fund important transportation needs across the state.

The Oregon Legislature has increased transportation taxes and fees for decades. In fact, the last two cent gas tax and equivalent weigh-mile tax increase will go into effect in 2024, from a ten cent hike approved in 2017. Before that there was the JTA, OTIA I, II and III and the State Modernization Program 12 cent increase in 1987.

Since 1987 gas taxes have increased from 12 cents/gallon to 40 cents/gallon, a 233% increase. ODOT staffing levels have increased 20% since 1987, and now take 1 in 6 dollars of the budget. The revenue needed from existing sources can be identified should ODOT be run more efficiently. Reducing personnel services costs by 10 percent would pay for this project. A gas tax hike of 4 cents would too. Why weren't these considerations addressed in the EA?

In spite of large percentage increases in transportation revenue since 1987, the legislature concluded tolls are needed to supplement existing sources of transportation revenue. They could have continued the increases adopted in 2017, in 2021 or during the current 2023 session, benefitting not only ODOT, but counties and cities that receive 30% and 20% of this revenue, respectively.

Transportation expenditures from these revenues, combined with federal revenue, have statewide transportation and economic benefits unlike the toll approach to "supplement" gas and weight-mile tax revenue. ODOT's 2023-25 budget request exceeds \$6 billion. FHWA should have required ODOT to include a non-toll revenue funding source build alternative in the EA.

As already said, the EA should have had two build alternatives: one with tolling and one without. This was not done because ODOT has been directed by the legislature to use toll revenue.

Comparing a project funded with revenue from the State Highway Fund and Federal Trust Fund would have allowed reviewers of the EA to see that a non-tolling alternative would have significant traffic congestion reduction and economic benefits. Reviewers would have learned that a non-tolled project will have significantly less financial hardship on I-205 users and nearby communities who will bear the brunt of traffic diversion caused by tolls. FHWA should require ODOT to do this comparison by rejecting the EA and requiring an EIS for the project to proceed.

Since the Oregon legislature mandated that tolls for freeway projects on congested Portland freeways, FHWA should have already required ODOT to do a comprehensive draft and final environmental impact statement process to address the cumulative benefits and costs of tolling not just I-205, but I-5 as well. In this context the I-205 Toll Project Environmental Assessment is incomplete. The cumulative impacts of tolling will remain unknown if each toll facility project be studied separately.

Finally, data used in the EA largely ignores the demographic changes taking place in Oregon, and Portland in particular. Population growth rates are declining, people are driving less, not more, and work at home trends have taken hold. These factors combine to reduce the rate of growth of vehicle miles traveled on the state highway system. These factors were not adequately addressed in the Environmental Assessment. There is time to correct the omissions in an EIS and consider other alternatives described in these comments.

The Federal Highway Administration should not issue a finding of no significant impact on the I-205 Toll project. The project has significantly adverse impacts on household finances, business operations and costs, and the EA did not address the cumulative impacts of tolling Portland freeways. A non-tolling alternative was not considered and should have been. An express lane tolling alternative used in many states that gives freeway users a choice to use tolled lanes was rejected and not studied further as it should have been.

FHWA, at a minimum, should require ODOT to prepare a draft and final environmental impact statement that includes all reasonable build alternatives. Better yet, FHWA should require ODOT to prepare a Portland Freeway

systems level EIS that addresses the cumulative effect of all toll projects now in development and in the planning stages.

<b>ODOT I-205 Toll EA - RECORD #3049 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Cam
<b>Last Name :</b>	Gilmour
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email

**Q3. Comments :**

[Text from attachment]

April 21, 2023

Comments on the I-205 Toll Project EA

The last gas tax increase in 2017, House Bill (HB 2017) ends in 2024 with the last 2 cents of the 10 cents/gallon legislatively approved package. This gas tax increase produced a gush of new revenue, so I can understand why subsequent legislation has not addressed continuing the 2 cent increases called for in the Oregon Transportation Plan. HB 2017 also mandated ODOT to pursue tolling, which they have done.

In 2021, HB 3055 further instructed ODOT to pursue tolls and what is called Value Pricing. Value pricing is time day pricing, as known as congestion pricing. As traffic congestion worsens, the toll rate goes up. Oregon's tolling approach is unlike any other state in the country, for example Washington. In Washington, (I-405) tolls are charged to enter high occupancy (known as HOV) express lanes. Remaining freeway lanes are not tolled. That is not the case on the I-205 Tolling Project now under study (Tualatin River Bridge to Abernethy Bridge in Oregon City). The proposed new lane in each direction and the existing two lanes will be tolled, there is no a toll-free option.

Users will have no alternative to paying tolls on I-205—like the old turnpikes. I wanted to alert the public to this, even though the legislature in 2017 and 2021 gave tolling decisions and toll rate setting to the governor appointed, non-elected Oregon Transportation Commission. They are scheduled to set tolls in late 2024, should ODOT get ultimate approval from the Federal Highway Administration to proceed.

The approvals to date have been judged by FHWA to meet the requirement of federal law: 23USC129C and 23USC166, even though these laws clearly state existing lanes cannot be tolled. The federal laws refer to these lanes as "existing non-HOV lanes." In fact, FHWA will allow tolls to be charged at the Abernethy Bridge before the new lanes are open to traffic on the freeway. Tolling can be charged without the benefit of new freeway capacity. Your trip won't be faster until the I-205 Toll Project is completed, possibly 5 years from now.

Since in the neighborhood of 50% of I-205 users have household incomes of less than \$80,000, it is likely many users of the tolled freeway will be unable to afford these tolls, and will have no available non-tolled freeway lanes to use. This will cause significant diversion to local roads and streets, making them less safe. Businesses and residences will be also be adversely affected by traffic re-routing.

Since ODOT has suggested the initial toll may be slightly over \$2/trip, many commuters will spend at least \$80/month to use the freeway. Currently these users who drive 15,000 miles pay \$285 a year in gas taxes. At \$2 toll per trip, will cost the average commuter \$960 in tolls, plus the existing gas tax of \$285, annually.

Tolling will become is a cash cow for ODOT, and a personal budget killer for freeway users.

ODOT plans to abate the tolls on low income households, but the fact is since many users who live in West Linn, Oregon City, Tualatin, Canby, Gladstone and Happy Valley, cities with average household incomes of \$75,000-\$80,000, will be hard pressed to pay the tolls. If ODOT offers toll abatement to these households there will not be enough toll revenue to pay for the toll revenue bonds ODOT plans to use to pay for the project.

Many of these households use I-205 multiple times a day, unlike commuters who may take only two trips a day, 5 days a week. I won't go into the financial hardship on hundreds of small businesses who use I-205 multiple times a day, let alone garbage haulers traveling to and from the regional waste disposal center in Oregon City. ODOT should have to address this before a final decision is made to proceed with the project and pay for it with toll revenue.

To date the ODOT project team at advisory committee meetings has assured that concerns will be dealt with and impacts will be mitigated. One has to be skeptical about this because information on the project website maintained by ODOT is positive, and concerns from the public are absent. I argued in a Clackamas Review editorial last month ODOT needs to find another funding source to pay for the I-205 added lanes.

As stated in ODOT's 23-25 budget request, their beginning fund balance is

\$600,000,000. At 5% inflation they are losing \$30,000,000 per year in purchasing power alone by letting this money sit unused. \$30 million would cover a 30 year bond at a 4.5 percent interest rate on the \$500 million project. ODOT has cash flow needs that the fund balance is needed for, but \$600 million appears to be excessive.

Like property and casualty insurance, the state gas tax and federal funds available to ODOT spread the cost of road construction and maintenance over a broad base of users. This division of costs of driving on the state highway system and local roads and streets ensures that motorists will not be unduly burdened when the total cost of owning and operating light and heavy vehicles is considered. Gas taxes are a small percentage of these costs.

Tolling changes this, albeit at this time only for users of I-205. The I-205 tolls could be in place in late 2024 when the OTC will be presented for approval recommended toll rates.

The aforementioned information begs the question, should the legislature take another look at tolling? Absolutely. This appears to be unlikely. Should FHWA require ODOT to prepare and draft and final environmental impact statement, as they have done on all major freeway expansions, none of which involved tolling.

The proposed I-205 freeway expansion will be the first tolling project on a freeway in Oregon. There should have been no question that an EIS process is needed to do a better job of studying the significantly adverse impacts the project will have on household and business finances, and on the livability of nearby communities. There is no meaningful mitigation to minimize these impacts. It there is how this will be done was not explained in the EA. Promised, yes, explained and detailed no.

Using traditional highway funding sources will avoid the harmful financial impacts on household and businesses caused by tolls. FHWA needs to deny ODOT a finding of no significant impacts on the I-25 Toll Project EA. ODOT should be directed to address the issues raised in EA in a draft Environmental Statement. The EIS should include a build alternative that does not use tolls, and a tolling alternative that uses express toll lanes. Express lanes give users the choice to tolled to enter the express lanes, or stay in the existing lanes that are not tolled.

If FHWA does not require that the EA be set aside and replaced with an EIS, the public and the legislature will never know whether a freeway capacity improvement funded with gas taxes offers similar benefits to a project funded with tolls without the adverse impact described in this comment.

**Attachments :**

I-205 Toll Project EA Comments.pdf (46 kb)



April 21, 2023

## Comments on the I-205 Toll Project EA

The last gas tax increase in 2017, House Bill (HB 2017) ends in 2024 with the last 2 cents of the 10 cents/gallon legislatively approved package. This gas tax increase produced a gush of new revenue, so I can understand why subsequent legislation has not addressed continuing the 2 cent increases called for in the Oregon Transportation Plan. HB 2017 also mandated ODOT to pursue tolling, which they have done.

In 2021, HB 3055 further instructed ODOT to pursue tolls and what is called Value Pricing. Value pricing is time day pricing, as known as congestion pricing. As traffic congestion worsens, the toll rate goes up.

Oregon's tolling approach is unlike any other state in the country, for example Washington. In Washington, (I-405) tolls are charged to enter high occupancy (known as HOV) express lanes. Remaining freeway lanes are not tolled. That is not the case on the I-205 Tolling Project now under study (Tualatin River Bridge to Abernethy Bridge in Oregon City). The proposed new lane in each direction and the existing two lanes will be tolled, there is no a toll-free option.

Users will have no alternative to paying tolls on I-205—like the old turnpikes. I wanted to alert the public to this, even though the legislature in 2017 and 2021 gave tolling decisions and toll rate setting to the governor-appointed, non-elected Oregon Transportation Commission. They are scheduled to set tolls in late 2024, should ODOT get ultimate approval from the Federal Highway Administration to proceed.

The approvals to date have been judged by FHWA to meet the requirement of federal law: 23USC129C and 23USC166, even though these laws clearly state **existing lanes cannot be tolled**. The federal laws refer to these lanes as "*existing non-HOV lanes*." In fact, FHWA will allow tolls to be charged at the Abernethy Bridge **before** the new lanes are open to traffic on the freeway. Tolls can be charged without the benefit of new freeway capacity. Your trip won't be faster until the I-205 Toll Project is completed, possibly 5 years from now.

Since in the neighborhood of 50% of I-205 users have household incomes of less than \$80,000, it is likely many users of the tolled freeway will be unable to afford these tolls, and will have no available non-tolled freeway lanes to use. This will cause significant diversion to local roads and streets, making them less safe. Businesses and residences will be also be adversely affected by traffic re-routing.

Since ODOT has suggested the initial toll may be slightly over \$2/trip, many commuters will spend at least \$80/month to use the freeway. Currently these users who drive 15,000 miles pay \$285 a year in gas taxes. At \$2 toll per trip, will cost the average commuter \$960 in tolls, plus the existing gas tax of \$285, annually.

Tolling will become is a cash cow for ODOT, and a personal budget killer for freeway users.

ODOT plans to abate the tolls on low income households, but the fact is since many users who live in West Linn, Oregon City, Tualatin, Canby, Gladstone and Happy Valley, cities with average household incomes of \$75,000-\$80,000, will be hard pressed to pay the tolls. If ODOT offers toll abatement to these households there will not be enough toll revenue to pay for the toll revenue bonds ODOT plans to use to pay for the project.

Many of these households use I-205 multiple times a day, unlike commuters who may take only two trips a day, 5 days a week. I won't go into the financial hardship on hundreds of small businesses who use I-205 multiple times a day, let alone garbage haulers traveling to and from the regional waste disposal center in Oregon City. ODOT should have to address this before a final decision is made to proceed with the project and pay for it with toll revenue.

To date the ODOT project team at advisory committee meetings has assured that concerns will be dealt with and impacts will be mitigated. One has to be skeptical about this because information on the project website maintained by ODOT is positive, and concerns from the public are absent.

I argued in a Clackamas Review editorial last month ODOT needs to find another funding source to pay for the I-205 added lanes.

As stated in ODOT's 23-25 budget request, their beginning fund balance is \$600,000,000. At 5% inflation they are losing \$30,000,000 per year in purchasing power alone by letting this money sit unused. \$30 million would cover a 30 year bond at a 4.5 percent interest rate on the \$500 million project. ODOT has cash flow needs that the fund balance is needed for, but \$600 million appears to be excessive.

Like property and casualty insurance, the state gas tax and federal funds available to ODOT spread the cost of road construction and maintenance over a broad base of users. This division of costs of driving on the state highway system and local roads and streets ensures that motorists will not be unduly burdened when the total cost of owning and operating light and heavy vehicles is considered. Gas taxes are a small percentage of these costs.

Tolling changes this, albeit at this time only for users of I-205. The I-205 tolls could be in place in late 2024 when the OTC will be presented for approval recommended toll rates.

The aforementioned information begs the question, should the legislature take another look at tolling? Absolutely. This appears to be unlikely. Should FHWA require ODOT to prepare and draft and final environmental impact statement, as they have done on all major freeway expansions, none of which involved tolling.

The proposed I-205 freeway expansion will be the first tolling project on a freeway in Oregon. There should have been no question that an EIS process is needed to do a better job of studying the significantly adverse impacts the project will have on household and business finances, and on the livability of nearby communities. There is no meaningful mitigation to minimize these impacts. It there is how this will be done was not explained in the EA. Promised, yes, explained and detailed no.

Using traditional highway funding sources will avoid the harmful financial impacts on household and businesses caused by tolls. FHWA needs to deny ODOT a finding of no significant impacts on the I-25 Toll Project EA. ODOT should be directed to address the issues raised in EA in a draft

Environmental Statement. The EIS should include a build alternative that does not use tolls, and a tolling alternative that uses express toll lanes. Express lanes give users the choice to tolled to enter the express lanes, or stay in the existing lanes that are not tolled.

If FHWA does not require that the EA be set aside and replaced with an EIS, the public and the legislature will never know whether a freeway capacity improvement funded with gas taxes offers similar benefits to a project funded with tolls without the adverse impact described in this comment.

Cam Gilmour

**ODOT I-205 Toll EA - RECORD #3052 DETAIL**

**Submission Date :** 5/5/2023

**First Name :**

**Last Name :**

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** The proposed toll on I-305 and other tolls on Oregon bridges and highways are nothing more than an ODOT scam. Oregon State budgets and ODOT budgets have been greatly mismanaged and getting more money will only increase the incompetency. It should be no surprise that people are leaving Oregon as the Democrat controlled legislature, Governors, and administration only know how to tax, spend and regulate.

**ODOT I-205 Toll EA - RECORD #3053 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Anna

**Last Name :** Belais

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
Freeway expansion is climate arson. We should not waste precious time and money inducing fossil fuel demand. A full EIS must be done.

<b>ODOT I-205 Toll EA - RECORD #3054 DETAIL</b>
---

<b>Submission Date :</b>	4/21/2023
<b>First Name :</b>	Sharon
<b>Last Name :</b>	Nasset
<b>Affiliation :</b>	
<b>Submission Method :</b>	I-205 EA email

**Q3. Comments :**

Citizen Comment EA Tolling on I-5 and or I-205

April 21, 2023

The FHWA must reject the tolling project currently proposed by ODOT at this time.

1. Consent of the governed has to been granted for ODOT to seek tolling as a new way to collect funds. No public hearing have taken place.

2. The Oregon Transportation Commission has not held any public hearings concerning Tolling. The only conversation on tolling took place in Pendleton Oregon over a decade ago. This conversation must take place as hearings, with presentations to the Oregon /Washington Joint Transportation Commissioners and the local citizens. To date there have been no hearings solely on tolling, it's effects on the economy, or why would we suddenly change to tolling over a fuel tax. The only hearing held on tolling was the Columbia River Crossing project by the Transportation Commissioners. The hearing took place 200-miles away in central Oregon, in the year 2012. Identified as an informational working lunch decision Item J.

3. Approximately a dozen citizen's show up at the Joint Washington and Oregon Transportation Commission Hearing we drove the 200-miles to the hearing. Tolling as an Agenda issue was a working lunch for the Commissioners. Stated as no formal vote would be taken, we where shut out of the room for the "luncheon" not allowed handouts. The closed door hearing with quorum is A violation of the federal Sunshine Laws and Open Meeting Law of both states. Any documents from that meeting are Null-Void.

4. The refusal of the Oregon Transportation Commissioners to hold Hearings in the Portland metropolitan area is because they lack information tolling, data on other funding sources, and the Commissioners know that the citizens do not want tolls for large scale funding of our roads.

5. The use of tolling to control congestion is a freedom of movement issue. The government shall not in anyway impede the movement of goods, services, or citizens. Using tolls to impede movement is unconstitutional.

6. The FHWA is coming up with funding, Washington State is coming up with their funding, and Oregon is expecting to put a toll on those already paying their fair share. Washington commuters who currently pay Oregon Income Tax and who have already put up their share will also be paying the majority of the tolls. The FHWA funding pays for non-local traffic double charging them with a toll is not moral. Karma is a seed what you sow, you reap, taking more than your share is stealing do not agree to be involved in unfair dealings provide true oversight.

7. A request to have a complete and thorough audit of the CRC funds and process by the US Inspector General's Office. The project started as \$20-million and was over \$200-million without legislative approval. ODOT "self" funded CRC for years before Oregon placed a Budget Note on the CRC Project. The Washington State Legislators hired a specialist in transportation accounting to audit a previous audit the conclusion both found fraud. Millions in questionable payments, including lobbyist, and approximately \$10-million in missing receipts. The monthly expense sheets required for state and federal funding from 2004-2015 are missing. We need to know how ODOT used "maintenance and operations" and diverted "flex-grant funding" from what to keep the project alive without legislative oversight. Before tolling or more funding is given by citizens clear accountability on previously spent funds must be required. For several years the Oregon Legislators and the Oregon Transportation Commission didn't do oversight of CRC or ODOT's Budget because they thought that each other was providing oversight. SEE the problem?

8. Tolling, fuel tax, and additional funding sources must be fully explored The range of funding alternatives must include fuel tax scenarios. County by county price scenarios of gas taxes. Tolling on the I-5 freeway system need extreme monitoring. Electric utilities currently collect taxes. Is the Department of Transportation working on diverting a percentage of these taxes to transportation funding? The utilities tax collection system currently in use works well. Every property with 220 electrical service is a charging station needing only a receptacle outlet to access service. The addition of receptacle on most properties will enable limiting the need for diesel heavy equipment in residential areas. Smart Meters can distinguish between 110 and 220 electrical usage allowing a percentage of the utility taxes deviated to transportation funding viable.\* Asking utility companies to put out bonds to



pay for the addition of 220 receptacle outlets for all properties, Smart Meters, and the ability to charge personal account with electrical usage in different location on one account would be an enormous game changer in converting to electrical energy usage.

10. The departments of transportation have not provided alternative financing consistent with other locations. Such as a port to port connection having additional funding sources available and those that focus on the economy, land use, plus grants associated industrial areas.

11. The ODOT has not provided the gas taxes scenarios of gas taxes by counties. Example 10 cents a gallon annually is \$360-million annually in Oregon and 1 year would pay for the project pay for I-205. The Willamette Valley 20cents a gallon, the coast 10 cents, and east of the mountains 5 cents a gallon..... etc. How much money would be raised for transportation? Options and conversations have not take place.

12. When elected office have asked ODOT for gas scenarios in presentations they can not provide any data and often joke that people don't like gas taxes..... we hate tolls yet they provide tolling data

13. Oregon SB933 shows Bi-partisan rejection of tolls on I-205

14. I-5 interstate freeway system into The I-5 interstate toll-road system. The need to have several independent and joint commissioner hearings is extremely important on tolling and not tolling of the main lanes of the I-5 freeway system. Putting tolls on the extra lanes adjacent to the main lanes such as, HOV, HOT, to pay for an advantage in the traveling experience still keeps the I-5 freeway system intact choosing to pay an additional fee as a toll for use of an additional "non-freeway" lane or stay on the freeway system. Putting tolls on I-5 main lanes will change the I-5 freeway to a toll way instate highway..

15. With Portland putting tolls on the main line of the I-5 every city from Canada to Mexico would have the right to toll I-5 ending the freeway system. Especially if it keep on as being stated.

16. The Oregon Legislators have not had regularly scheduled meetings on transportation or the BRP because the Chair has been out with health issues for months and will be out for several months to come. The information and hearings that need to take place at the legislative branch of government have not taken place. Elected officials need hearings, data, information, and public hearings to make decisions of any tolling concepts. .

18. OTC members express deep skepticism about freeway project funding  
March 11, 2022 by Jonathan Maus (Publisher/Editor)

<https://bikeportland.org/2022/03/11/otc-members-express-deep-skepticism-about-freeway-project-funding-350107>

19. Shakeup at Oregon Transportation Commission as two members step down before terms expire April 14, 2023 by Jonathan Maus (Publisher/Editor)

<https://bikeportland.org/2023/04/14/shakeup-at-oregon-transportation-commission-as-two-members-step-down-before-terms-expire-372946#>

The OTC consists of five un-elected members who oversee the budget and policies of the Oregon Department of Transportation. The commission is in disarray after continual changes in membership and years of COVID-19. The Chair Van Brocklin Chair in 2019 (during COVID) member 2017 stepping down in June 2023 Commissioner Marcilynn Burke member 2021 stepping down in June 2023

Commissioner Sharon Smith expire this June 2019 term expires in June 2023  
Vice Chair Julie Brown the most veteran member of Commission 2018 term expires in June 2024  
Commissioner Lee Beyer 2023 term expires in June 2025  
Maurice Henderson served just four months 2021 stepped down in 2021. Without public hearing, uninformed legislators, missing data, and the Oregon Transportation Commissions continual upset, changes, and lack of consistency and oversight is all we have going in Oregon we even have a new Governor. Public rumors the Governor of Oregon like some of our US Congress Members doesn't like tolls.... And has grown cold. We need public hearing, and meetings with honest data. And a very good reason to go from fuel tax, impact fees and other funding sources to tolling. An outside company should not handle tolling if necessary it need to be state owned, and managed. The enormous transfer of wealth from citizens and transportation funding directly to private banks, WHY?

**Attachments :**

- The FHWA must reject the tolling project citizen comment.pdf (57 kb)
- 1. Request of BCCC on WTC tolling hearings pdf.pdf (35 kb)
- 2. The need to keep tolls off off I-5 Main lanes..pdf (25 kb)
- CRC\_TSCReport\_AppendixC.pdf\_tolling.pdf (138 kb)
- 1. Tolling hearing 09-19-12\_\_PENDLETON\_AGENDA. 2pdf.pdf (30 kb)
- Tolls track drives every where.pdf (12 kb)

**The FHWA must reject the tolling project currently proposed by ODOT at this time.**

1. Consent of the governed has to be granted for ODOT to seek tolling as a new way to collect funds. No public hearing have taken place.
2. The Oregon Transportation Commission has not held any public hearings concerning Tolling. The only conversation on tolling took place in Pendleton Oregon over a decade ago. This conversation must take place as hearings, with presentations to the Oregon /Washington Joint Transportation Commissioners and the local citizens. To date there have been no hearings solely on tolling, it's effects on the economy, or why would we suddenly change to tolling over a fuel tax. The only hearing held on tolling was the Columbia River Crossing project by the Transportation Commissioners. The hearing took place 200-miles away in central Oregon, in the year 2012. Identified as an informational working lunch decision Item J.
3. Approximately a dozen citizen's show up at the Joint Washington and Oregon Transportation Commission Hearing we drove the 200-miles to the hearing. Tolling as an Agenda issue was a working lunch for the Commissioners. Stated as no formal vote would be taken, we where shut out of the room for the "luncheon" not allowed handouts. The closed door hearing with quorum is **A violation of the federal Sunshine Laws and Open Meeting Law of both states. Any documents from that meeting are Null-Void.**
4. The refusal of the Oregon Transportation Commissioners to hold Hearings in the Portland metropolitan area is because they lack information tolling, data on other funding sources, and the Commissioners know that the citizens do not want tolls for large scale funding of our roads.
5. The use of tolling to control congestion is a freedom of movement issue. The government shall not in anyway impede the movement of goods, services, or citizens. **Using tolls to impede movement is unconstitutional.**
6. The FHWA is coming up with funding, Washington State is coming up with their funding, and Oregon is expecting to put a toll on those already paying their fair share. Washington commuters who currently pay Oregon Income Tax and who have already put up their share will also be paying the majority of the tolls. The FHWA funding pays for non-local traffic double charging them with a toll is not moral. Karma is a seed what you sow, you reap, taking more than your share is stealing do not agree to be involved in unfair dealings provide true oversight.
7. A request to have a complete and thorough audit of the CRC funds and process by the US Inspector General's Office. The project started as \$20-million and was over \$200-million without legislative approval. ODOT "self" funded CRC for years before Oregon placed a Budget Note on the CRC Project. The Washington State Legislators hired a specialist in transportation accounting to audit a previous audit the conclusion both found fraud. Millions in questionable payments, including lobbyist, and approximately \$10-million in missing receipts. The monthly expense sheets required for state and federal funding from 2004-2015 are missing. We need to know how ODOT used "maintenance and operations" and diverted "flex-grant funding" from what to keep the project alive without legislative oversight. Before tolling or more funding is given by citizens

clear accountability on previously spent funds must be required. For several years the Oregon Legislators and the Oregon Transportation Commission didn't do oversight of CRC or ODOT's Budget because they thought that each other was providing oversight. SEE the problem?

8. Tolling, fuel tax, and additional funding sources must be fully explored  
The range of funding alternatives must include fuel tax scenarios. County by county price scenarios of gas taxes. Tolling on the I-5 freeway system need extreme monitoring.  
Electric utilities currently collect taxes. Is the Department of Transportation working on diverting a percentage of these taxes to transportation funding? The utilities tax collection system currently in use works well. Every property with 220 electrical service is a charging station needing only a receptacle outlet to access service. The addition of receptacle on most properties will enable limiting the need for diesel heavy equipment in residential areas. Smart Meters can distinguish between 110 and 220 electrical usage allowing a percentage of the utility taxes deviated to transportation funding viable.\* Asking utility companies to put out bonds to pay for the addition of 220 receptacle outlets for all properties, Smart Meters, and the ability to charge personal account with electrical usage in different location on one account would be an enormous game changer in converting to electrical energy usage.
10. The departments of transportation have not provided alternative financing consistent with other locations. Such as a port to port connection having additional funding sources available and those that focus on the economy, land use, plus grants associated industrial areas.
11. The ODOT has not provided the gas taxes scenarios of gas taxes by counties. Example 10 cents a gallon annually is \$360-million annually in Oregon and 1 years would pay for the project pay for I-205. The Willamette Valley 20cents a gallon, the coast 10 cents, and east of the mountains 5 cents a gallon..... etc. How much money would be raised for transportation? Options and conversations have not take place.
12. When elected office have asked ODOT for gas scenarios in presentations they can not provide any data and often joke that people don't like gas taxes..... we hate tolls yet they provide tolling data
13. Oregon SB933 shows Bi-partisan rejection of tolls on I-205
14. **I-5 interstate freeway system into The I-5 interstate toll-road system.**  
The need to have several independent and joint commissioner hearings is extremely important on tolling and not tolling of the main lanes of the I-5 freeway system. Putting tolls on the extra lanes adjacent to the main lanes such as, HOV, HOT, to pay for an advantage in the traveling experience still keeps the **I-5 freeway system** intact choosing to pay an additional fee as a toll for use of an additional "non-freeway" lane or stay on the freeway system. Putting tolls on I-5 main lanes will change the I-5 freeway to a toll way instate highway..
15. With Portland putting tolls on the main line of the I-5 every city from Canada to Mexico would have the right to toll I-5 ending the freeway system. Especially if it keep on as being stated.
16. The Oregon Legislators have not had regularly scheduled meetings on transportation or the BRP because the Chair has been out with health issues for months and will be out for several months to come. The information and hearings that need to take place at the legislative branch of government have not taken place. Elected officials need hearings, data, information, and public hearings to make decisions of any tolling concepts. .

18.

OTC members express deep skepticism about freeway project funding

March 11, 2022 by Jonathan Maus (Publisher/Editor)

<https://bikeportland.org/2022/03/11/otc-members-express-deep-skepticism-about-freeway-project-funding-350107>

19.

Shakeup at Oregon Transportation Commission as two members step down before terms expire April 14, 2023 by Jonathan Maus (Publisher/Editor)

<https://bikeportland.org/2023/04/14/shakeup-at-oregon-transportation-commission-as-two-members-step-down-before-terms-expire-372946#>

The OTC consists of five un-elected members who oversee the budget and policies of the Oregon Department of Transportation. The commission is in disarray after continual changes in membership and years of COVID-19.

The Chair Van Brocklin	Chair in 2019 (during COVID)	member 2017 stepping down in	June 2023
Commissioner Marcilynn Burke		member 2021 stepping down in	June 2023
Commissioner Sharon Smith	expire this June	2019 term expires in	June 2023
Vice Chair Julie Brown	<b>the most veteran member of Commission</b>	2018 term expires in	June 2024
Commissioner Lee Beyer		2023 term expires in	June 2025
Maurice Henderson	served just four months	2021 stepped down in	2021

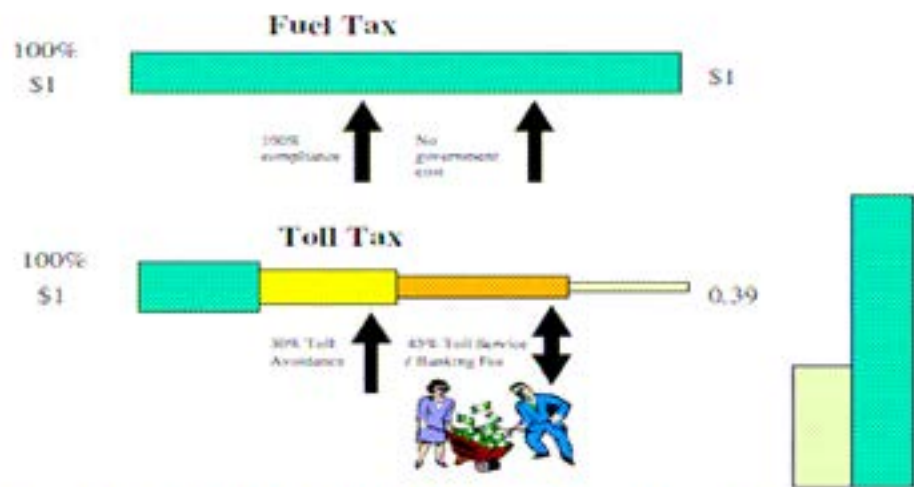
Without public hearing, uninformed legislators, missing data, and the Oregon Transportation Commissions continual upset, changes, and lack of consistency and oversight is all we have going in Oregon we even have a new Governor. Public rumors the Governor of Oregon like some of our US Congress Members doesn't like tolls.... And has grown cold.

We need public hearing, and meetings with honest data.

And a very good reason to go from fuel tax, impact fees and other funding sources to tolling

An outside company should not handle tolling if necessary it need to be state owned, and managed

The enormous transfer of wealth from citizens and transportation funding directly to private banks, WHY?



10 Cents on a Gallon of Fuel Is \$330-Million Annually in Oregon

Sharon Nasset

[www.ThirdBridgeNow.o](http://www.ThirdBridgeNow.o)

503.283.9585

Paid for by Economic Transportation Alliance /ThirdBridgeNow.com a 501c3 Non-Profit Public Charity

[www.thirdbridgenow.org](http://www.thirdbridgenow.org) • Third Bridge Now 2114 Main St. PMB #154 Van. WA 98660 • 503.283.9585

To The Board Member of Clark County Council

January 1, 2023

### **Your Action is Requested**

Whereas

Constructed 1917, we have the current I-5 bridge after decades of “political fighting”. The Clark County citizens and business leaders stood up and forced the Clark County Commissioners to take action to construct our bi-state bridge as a county to county bridge.

The Clark County Councilors have the unique responsibility of having the largest amount of Columbia River waterfront inside their boundaries. This includes several ports Woodland, Ridgefield, Vancouver, Camas, and Washougal. Your boundaries also include several cities, businesses, and all forms of property zoning. Plus you represent the citizens who will pay the largest portion of tolls on daily commutes when using the I-5 and I-205 freeway interstate bridges.

It is very important to have a full conversation on all the ramifications of putting tolls on the I-5 freeway system. This conversation must take place as hearings, with presentations to the Washington Transportation Commissioners and the local citizens. To date there have been no hearings solely on tolling, it's effects on the economy, or why would we suddenly change to tolling over a fuel tax by either the Washington Transportation Commission or Oregon Transportation Commission. The only hearing held on tolling the Columbia River Crossing project by the Transportation Commissioners took place 200-miles away in central Oregon, in the year 2012. Identified as an informational working lunch decision Item J. Approximately a dozen citizens show up at the Joint Washington and Oregon Transportation Commission Hearing. We were shut out of the room the “luncheon” was held in because no formal vote would be taken. (A violation of the Open Meeting Law) I am sure you understand how disrespected we felt! It was so insulting, rude, and unkind. We were not allowed the handouts for the two-hour meeting, and sat in the hearing room waiting for their return. We took time off from work, paid for hotel rooms, and had traveling expenses just to hear the tolling decision. Some of the Transportation Commissioners were unable to make the meeting, stating the distances and had phoned into the meeting. There have been NO Hearings by the Transportation Commissions of Washington and Oregon concerning converting **The I-5 interstate freeway system** into **The I-5 interstate toll-road system**.

The need to have several independent and joint commissioner hearings is extremely important on tolling and not tolling of the main lanes of the I-5 freeway system. Putting tolls on the extra lanes adjacent to the main lanes such as, HOV, HOT, to pay for an advantage in the traveling experience still keeps **the I-5 freeway system** intact choosing to pay an additional fee as a toll for use of an additional “non-freeway” lane or stay on the freeway system. While several seem to be singularly focus on a toll to finance ‘one’ bridge across the Columbia River they have lost sight of the fact every municipality between Canada and Mexico will have the right to place a toll on the new I-5 interstate toll highway system. Here are a few on the many questions and problems that must be thoroughly answered and verified.

1. The Federal Highway Administration funding does not come from tolls placed on I-5. The State of Washington has formerly stated \$650-\$850-million would be provided to SW Washington, large projects have been funding in other areas of State so it is SW Washington's turn. So is Oregon's lack of funding, is that why a toll is suggested?
2. Oregon receives \$30-million on 1-cent a gallon fuel tax annually. Ten cents a gallon fuel tax annually is \$300-million and ten years at ten cents is \$3 billion the entire amount that Oregon needs. Scenarios

showing differing fuel tax by counties, etc have not been provided. The price of fuel takes enormous leaps up and down as much as a dollar per gallon with no local benefit. The citizens want to see difference step tax scenarios. An example: Would 3 years of a 25-cent a gallon the closer you are to the I-5 FREEWAY system and 5 cents across the rest of the State of Oregon cover the money for a new I-5 crossing?

3. Fuel tax is 100% in compliance and 100% of funds collected goes directly into transportation funding
4. Toll tax is 70% in compliance and 60% of net funds collected go directly into transportation funding. Why would we consider changing to a tolling funding system that takes millions or billions of dollars annually from the taxpayers sending it directly to banks and away transportation funds?
5. Electric utilities currently collect taxes. Is the Department of Transportation working on diverting a percentage of these taxes to transportation funding? The utilities tax collect system currently in use works well.
6. Privacy issues with the new “toll tags” individual identification pings on every cell tower tracing all movements instead of a “responding tag” specific the each machine. The expensive toll tag ID system can be used every time another toll is placed on the former I-5 FREEWAY to easily track the movement of US Citizens.
7. Once the first toll is place on the main lanes of the I-5 permanent or not municipality between Canada and Mexico will have the right to place a toll on the new **I-5 interstate toll highway system**.  
Will there be a limit on how high the toll can be?  
What size community can place a toll on I-5?  
How many tolls can be on I-5 at one time?  
What can the toll money be use on now that it doesn't have to be solely for infrastructure?  
Can new town spring up along I-5 be allowed to immediately impose a toll?

### **Your Action is Requested**

Please send correspondence to the Washington and Oregon Governors asking them to immediately have the Transportation Commissioners provide presentations and listening posts inside the study area, boundaries of the I-5 Transportation and Trade Corridor. I am also asking you to seek the support of the Project Sponsor Agencies SW WA Regional Transportation Councils, and CTRAN having them require hearings to take place to receive their support on any project going forward considering a toll. It would be important to ask other elected bodies to join you in seeking responsible leadership in provide additional information concerning the consideration of placing a toll of any kind on **the I-5 Freeway Interstate System**. It might be necessary to involve California Transportation Commissioners in the enormous of change to the I-5 freeway interstate international system.

Thank you sincerely for you immediate attention on this important matter it is greatly appreciated.  
Former Chair of the Clark County **West County Bridge No-Tolls Advisory Vote 2013** committee,

Sharon Nasset

Sharon Nasset 503.283.9585

\*Agenda attached.

JOINT MEETING OF THE OREGON AND WASHINGTON TRANSPORTATION COMMISSIONS AGENDA

September 19, 2012 Pendleton, Oregon *Wednesday, September 19 12:10 J.*) Working Lunch – Conduct an informational discussion about the Columbia River Crossing project, tolling governance, and legislative oversight efforts. Informational. (2 hours, *Kris Strickler, ODOT and Nancy Boyd, WSDOT*)

## **An important Reason to Keep The I-5 Freeway System Toll-Free.**

The I-5 freeway system from Canada to Mexico carries billions of dollars of freight and millions of citizens enjoying the “free” movement of goods and services. The idea of pooling our money together to pay for our road system has always been very important. Oregon was one of the first States to have a gas tax used to up-keep the roads. The idea of toll roads and turnpikes was absolutely a freedom of movement issue and did not work for farm communities that only had cash after a crop. Always having to have money in your pocket to be picked isn’t what citizens wanted then, and they don’t want it now. The I-5 freeway-mainline has never had a toll on it since the “Freeway System” went in the 1960’s as a new model to the nation. The States of California and Washington have added additional lanes to the mainline that are pay for service however you can drive the entire transcontinental freeway and not pay a toll. The drag on the economy locally and nationally to siphon off billions of dollars by allowing a toll on the mainline of I-5 freeway would be an enormous mistake. Once Oregon does it in Portland at the I-5 bridges and the Rose Quarter every town on the “non” freeway system would do it too. If we have a right they would have a right to add tolling as well. The type of tolling suggested is not honest and over 40% goes to the company handling the machines and does the money transacting. They provide the machines, maintain the machines, they also take in the money, count the money, deposit the money, tell us what is our share, and have no responsibility to go after those who don’t pay the toll. If you do not know that, that is shady, you do not know accounting or business. Taking in the money, counting, deposit, and do the books, by “one/company” not a good business model.

The losing of our freeway system and the adding of tolls by any towns along I-5 freeway are unacceptable. The Federal Highway Administration should not allow the new extremely expensive adding in of the “banking system” and financially risky tolling scheme.

1. Fuel tax is 100% in compliance and 100% of funds collected goes directly into transportation funding
2. Toll tax is 70% in compliance and 60% of net funds collected go directly into transportation funding. Why would we consider changing to a tolling funding system that takes millions or billions of dollars annually from the taxpayers sending it directly to banks and away transportation funds?
3. Electric utilities currently collect taxes. Is the Department of Transportation working on diverting a percentage of these taxes to transportation funding? The utilities tax collect system currently in use works well.
4. Every property with 220 electrical service is a charging station needing only a receptacle outlet to access service. The addition of receptacle on most properties will enable limiting the need for diesel heavy equipment in residential areas. Smart Meters can distinguish between 110 and 220 electrical usage allowing a percentage of the utility taxes deviated to transportation funding viable.\* Asking utility companies to put out bonds to pay for the addition of 220 receptacle outlets for all properties, Smart Meters, and the ability to charge personal account with electrical usage in different location on one account would be an enormous game changer in converting to electrical energy usage.

**We have projects that are toll-free and lessen congestion tremendously those community projects have been block! Please look at to the alternative that can be funded without a toll.**

**Thank You,**

Paid for by Economic Transportation Alliance /Third Bridge Now a 501c3 Non-Profit Public Charity  
[www.thirdbridgenow.org](http://www.thirdbridgenow.org) • Third Bridge Now 2114 Main St. PMB #154 Van. WA 98660 • 503.283.9585





## **Appendix C – CRC Tolling Study Committee Report Travel Demand Forecasting, Revenue Projections, Determination of Net Revenues, and Financial Capacity Analysis**

---

### **Travel Demand Forecasting**

Regional travel demand models are used to forecast how people may choose to travel in the future given projected growth patterns for population and employment as well as future transportation facilities. The Portland-Vancouver area regional travel demand model used for the Columbia River Crossing (CRC) project was developed jointly by the Portland-area Metro Regional Government (Metro) and the Southwest Washington Regional Transportation Council (RTC). The model, run by Metro and peer-reviewed by a national panel of experts in October 2008, applies a four-step process in estimating future travel demands:

Step 1: Person-trips are estimated from adopted regional growth projections and adopted regional transportation plans. Growth projections include population and employment forecasts throughout the metropolitan region. Transportation plans include future transportation facilities, including roadways, transitways, and bicycle and pedestrian facilities.

Step 2: Predicted person-trips are then distributed to zones across the metropolitan region. Over 25,000 network routes, or “links,” are used in the model, as well as over 2,000 transportation analysis “zones.” The model predicts how many people will want to travel from one zone to another via different links.

Step 3: Person-trips between each of the zones are broken down by mode of travel (drive alone, carpool, transit, bicycle, walking) based on each option’s attractiveness when considering travel time and cost, as well as each traveler’s socioeconomic characteristics. Travel costs include parking fees, transit fares, tolls, and automobile operating costs.

Step 4: The model assigns each trip to a specific routing in the model’s network. For the CRC’s tolling analysis work, the model predicts how many people are projected to cross the Columbia River on I-5 and I-205 via automobile and transit. The model is used to predict weekday peak period vehicle volumes across each bridge, which are later used to develop daily traffic demands.

The regional travel demand model is appropriate for comparing the relative weekday effects of travel across the Columbia River for different tolling scenarios. The model used for tolling analysis purposes allows relative generalizations to be made about I-5 and I-205, including vehicle and transit trips, and the duration of vehicular congestion experienced along each river crossing.

Daily and hourly traffic volumes in 2030 would vary for the I-5 bridge and the I-205 bridge with different tolling levels. Based on information included in the model regarding how much people value their time for different types of trips, lowering or raising toll rates affects how many people choose to pay the specific toll, divert to the alternative bridge, travel during another time of the day, take transit, or travel to a different destination altogether. The scenario analysis found:

- For most of the I-5 only toll scenarios, the majority of drivers would not change their travel patterns. Some would choose a new destination or a non-tolled route. Diversion to transit is minimal due to the already increased ridership associated with project improvements.
- Route diversion tends to increase as toll rates increase; however, the percentage of diversion tends to be lower during peak periods when travelers' willingness to pay tolls may be higher and/or alternative routes are congested, and thus, time consuming.
- For scenarios that toll both the I-5 and I-205 bridges, traffic levels would be higher on I-5 and lower on I-205 compared to tolling only the I-5 bridge. However, compared to the No Toll project scenario, total cross-river traffic demand would be less on both the I-5 and I-205 bridges as many trips would divert to transit or not be made across the Columbia River.

See the attached spreadsheet titled *Traffic Effects for Tolling Scenarios* for more detailed information about traffic diversion, average daily traffic volumes and hours of congestion predicted for each of the tolling scenarios.

Additional work refining one or two likely scenarios will be undertaken to inform financial planning and final rate setting prior to issuing toll revenue bonds. That analysis would independently review and refine many key assumptions, including land use projections, and also examine parts of the network beyond the I-5 and I-205 river crossings, such as key interchanges with these highways, and critical roadways and intersections. An updated and detailed toll traffic and revenue report is warranted before issuing debt, and would be required by the credit rating agencies if any of the bonds were to be backed solely by toll revenues.

## **Revenue Projections**

The annual traffic and revenue projections produced for the CRC project are derived from outputs of the Metro regional travel demand model. The Metro model employs inputs for users' values of time as a surrogate for the relationship of time and cost reflecting the potential toll on the I-5 bridge crossing. The regional model was further supplemented by the development of a corridor level traffic model (VISSIM) which provided traffic operation capabilities to estimate the effect of future congestion in the corridor. This became the basis for "post-processing" the model results to refine traffic demand projections. The traffic and revenue projections show both the annualization of the direct Metro model results and the refined post-processed results, the latter of which bracket the mid-range of anticipated traffic and revenue impacts.

Ten toll scenarios that vary toll rates and toll locations (I-5 only or both I-5 and I-205 bridges) were developed by the CRC team for analysis, in conjunction with the Oregon and Washington departments of transportation. Toll rates were assumed to vary by time of day according to a fixed schedule that applies higher toll rates in peak periods and lower rates during off-peak times when demand is less. Toll rates were originally specified in constant year 2006 dollars in the project's Draft Environmental Impact Statement (EIS); however the actual tolls paid are assumed to increase with expected inflation, projected at 2.5 percent per year. See Exhibit 1 for information about each scenario.

It is expected that the toll collection will be all-electronic, which allows tolls to be collected without toll booths causing drivers to slow down to pay tolls. Thus, drivers would either have a transponder, paying the rates noted in Exhibit 1, or the vehicle would be identified via the license plate, in which case a \$1.00 “pay-by-plate” processing fee would be added to each transaction. For example, a vehicle traveling during the peak period (6 am to 10 am) without a transponder would be charged \$2.00 plus the \$1.00 processing fee, or \$3.00 for their trip in one direction.

### Exhibit 1. Tolling Scenarios Evaluated

	Scenarios Analyzed	Min/Max Toll Rate (2006\$)	Min/Max Toll Rate (2018\$)	Tolls Collected	Toll Schedule Type	Tolling Start Date
Tolling I-5 Only	<b>Scenario 1A</b> <i>DEIS Toll Rate</i>	\$1.00 / \$2.00	\$1.34 / \$2.69	Each Way	Symmetric Variable Toll Schedule	July 1, 2018 (FY 2019)
	<b>Scenario 1B</b> <i>Lower than DEIS Toll Rate</i>	\$1.00 / \$1.50	\$1.34 / \$2.02			
	<b>Scenario 1C</b> <i>Flat Toll Rate</i>	\$1.65	\$2.22		Symmetric Fixed Toll Schedule	
	<b>Scenario 1D</b> <i>Additional Price Points</i>	\$1.00 / \$2.50	\$1.34 / \$3.36		Symmetric Variable Toll Schedule	
	<b>Scenario 1E</b> <i>1.5x DEIS Toll Rate</i>	\$1.50 / \$3.00	\$2.02 / \$4.03			
	<b>Scenario 1F</b> <i>2x DEIS Toll Rate</i>	\$2.00 / \$4.00	\$2.69 / \$5.38			
	<b>Scenario 1G</b> <i>3x DEIS Toll Rate</i>	\$3.00 / \$6.00	\$4.03 / \$8.07			
	<b>Pre-Completion Tolling<sup>1</sup></b> <i>DEIS Toll Rate</i>	\$1.00 / \$2.00	\$1.34 / \$2.69	Each Way	Symmetric Variable Toll Schedule	July 1, 2013 (FY 2014)
Tolling I-5 and I-205	<b>Scenario 2A</b> <i>DEIS Toll Rate</i>	\$2.00 / \$4.00	\$2.69 / \$5.38	Southbound Only <sup>2</sup>	Symmetric Variable Toll Schedule	July 1, 2018 (FY 2019)
	<b>Scenario 2B</b> <i>Lower than DEIS Toll Rate</i>	\$2.00 / \$3.00	\$2.69 / \$4.03			
	<b>Scenario 2C</b> <i>Lower I-205 Toll</i>	I-5: \$2.00 / \$4.00 I-205: \$2.00 / \$3.00	I-5: \$2.69 / \$5.38 I-205: \$2.69 / \$4.03			

<sup>1</sup> Pre-Completion Tolling to be added to any other scenario

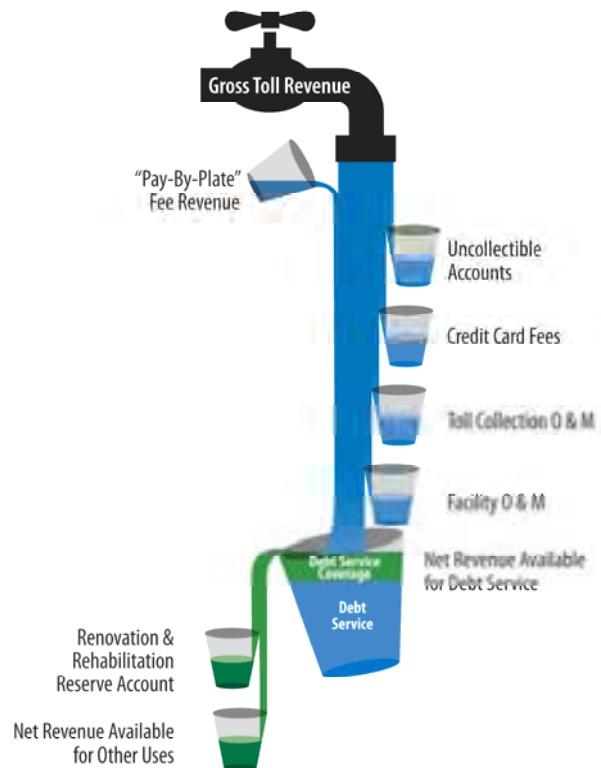
<sup>2</sup> A round-trip toll is collected on scenarios tolling Southbound only

The rates for commercial vehicles are assumed to be proportionately greater than passenger cars, roughly as a function of the number of axles for a commercial vehicle. For the purposes of this analysis, it is assumed that commercial vehicles will pay on an N minus one basis based upon axles, that is, a five-axle truck would pay four times the passenger car rate (five minus one times the passenger rate). Model volumes were provided for medium (three-axle) and large (five-axle) trucks. The exact commercial toll schedule will be a function of the future development of the electronic toll collection system. Toll schedules assumed for each scenario are shown on the attached spreadsheets, *Toll Rate Schedules for I-5 Scenarios* and *Toll Rate Schedules for I-5 and I-205 Scenarios*.

## Determination of Net Revenues

To arrive at the portion of revenues available to support financing via the repayment of debt, several deductions must be made from gross toll revenues and fees. Key among these deductions is the obligation to pay for toll collection and facility operation and maintenance (O&M) costs for the bridge and roadway. The deductions from gross revenues include the following:

- Potential toll revenue lost due to uncollectable accounts
- Credit card and banking fees associated with toll payment and accounts
- Toll collection operations and maintenance costs, including maintenance, periodic replacement of equipment, back office costs and bridge insurance
- Routine operations and maintenance of the bridge and roadway facilities



Facility O&M costs include routine maintenance of the bridge and all roadways within the project area as well as incident response for the project area. After gross revenues have paid all of the above deductions, including toll collection and facility O&M costs, the remaining net revenue is available for debt repayment.

The net revenue stream represents the cash flow that can be used directly for financing to repay bonds, or to directly pay for construction if pre-completion tolling is implemented. In addition to bond repayment, there will be a periodic need for renovation and rehabilitation activities for the project. These costs are assumed to be funded out of excess net revenues after annual debt repayments that result from the debt service coverage requirement placed on net revenues. A reserve account may be created that would be funded from these excess net toll revenues.

## Financial Capacity Analysis

Tolling the I-5 bridge does not have the financial capacity to yield a funding contribution equal to the \$2.38 billion cost in year of expenditure dollars for the highway portion of the project. Rather, a number of funding sources will likely be needed to build the project, including federal and state (Oregon and Washington) funding sources combined with funding from tolls.

For the purposes of this analysis, the bridge is assumed to be substantially completed by the end of fiscal year 2018, with revenue operations beginning on July 1, 2018 (state fiscal year 2019). Toll bond proceeds are assumed to be received in the middle and latter years of construction to maximize their funding contribution, and other funding

sources are assumed to cover construction costs in the initial years. Other project improvements to the highway and interchanges would continue into 2019, and the last bonds needed to fund these completion activities are assumed to be issued after tolling has commenced.

The CRC toll bonds were assumed to be backed by other revenue sources, and the full faith and credit of one or both states to provide the bonds with a credit rating and interest costs equivalent to that of general obligation debt of either state.

The use of toll bonds will increase the total costs paid during and after construction due to the added interest and issuance costs. However, these financing costs are treated separately from the project capital cost during construction. Increased use of toll bonds will increase the total costs paid due to added interest and issuance. The construction cost does not increase as a result; rather it adds a financing cost both during and after construction.

State-backed bonds are limited by Washington State Constitution to a 30 year repayment period. Accordingly, debt with the maturity of up to 30 years was assumed to maximize the total proceeds that can be generated by the forecasted net toll revenue stream.

A minimum debt service coverage factor of 1.25 was assumed for state-backed debt whereby net toll revenues were maintained at 1.25 times the projected annual debt service. The intent of this is to provide some protection against draws on the revenue sources pledged to backup toll revenues, such as motor vehicle fuel tax revenues, in the event of lower-than-projected toll revenue performance.

Interest rates on state-backed bonds are assumed to be 6.00 percent for current interest bonds ("CIBs") and 6.50 percent for capital appreciation bonds ("CABs"), based on the current double-A credit ratings in both states. Issuance costs are assumed to be 0.2 percent of the total par amount of bonds issues for state-backed bonds. Additional costs would include 0.5 percent of the par amount for current interest bonds for underwriting (underwriter's discount) and 1.0 percent of the par amount for capital appreciation bonds.

Interest is assumed to be capitalized through the year before the project completion date, or up to two years after full toll collection commences. Earnings on invested funds (construction fund and capitalized interest fund) are assumed to be at an annual rate of 2.50 percent. While this might be higher than current yields on short-term investments, it is substantially less than the assumed future interest cost of borrowing, (between 6.0 and 6.5 percent for state-backed bonds), and thus represents approximately the same level of negative arbitrage currently being experienced by issuers of tax-exempt bonds.

## **Funding Range**

Based on the analysis done for this report, several preliminary conclusions can be reached:

1. Tolling can contribute a significant amount of funding to the project.
2. Tolling cannot be the only funding source for the project. Several funding sources, including state (Oregon and Washington) and federal, will be needed to supplement tolling funds.

3. Toll rates on I-5 can only be raised so high before total revenue and funding decrease. The limit is approximately two times the toll rate studied in the project's Draft EIS.
4. State backing of the debt is necessary to maximize the toll funding contribution. By essentially making the debt equivalent to general obligation bonds, state-backing affords the debt a high credit rating and relatively low interest rates. Non-recourse debt that is backed solely by toll revenues is anticipated to carry a lower or minimum investment-grade credit rating, which would entail higher interest rates, increased capitalized interest costs, and higher debt service coverage requirements.

Further study is warranted as the project design and cost of the project are refined, or as more information is available about other funding sources.

### Traffic Effects for Tolling Scenarios

Average SB I-5 Duration of Congestion	Average SB I-5 Duration	Average Daily Traffic Volumes			Diversions to I-205 Compared to No Toll Scenario		
		I-5 Bridge Total	I-205 Bridge Total	Crossings Total	I-205 Compared to No Toll Scenario	Average SB I-5 Duration	Average SB I-5 of Congestion
4.0	2.0 hrs	134,000	146,400	280,400	-	2.0 hrs	4.0
7.75	7.25 hrs	184,000	210,000	394,000	-	7.25 hrs	7.75
1.5	5.5 hrs	220,000	203,000	423,000	-	5.5 hrs	1.5
1.0	3.5 hrs	181,000	216,000	397,000	13,000	3.5 hrs	1.0
1.0	4.0 hrs	190,000	211,000	401,000	8,000	4.0 hrs	1.0
1.0	3.75 hrs	175,000	215,000	390,000	12,000	3.75 hrs	1.0
1.0	3.25 hrs	173,000	218,000	391,000	15,000	3.25 hrs	1.0
0.75	2.75 hrs	154,000	224,000	378,000	21,000	2.75 hrs	0.75
0.5	2.0 hrs	133,000	231,000	364,000	28,000	2.0 hrs	0.5
0.0	1.0 hrs	89,000	240,000	329,000	37,000	1.0 hrs	0.0
Scenario 2A		198,000	177,000	375,000	-26,000	4.25 hrs	1.25
Scenario 2B		201,000	181,000	382,000	-22,000	4.5 hrs	1.25
Scenario 2C		192,000	185,000	377,000	-18,000	4.0 hrs	1.0
Existing Conditions (2005)		134,000	146,400	280,400	-	2.0 hrs	4.0
No Build		184,000	210,000	394,000	-	7.25 hrs	7.75
No Toll Scenario		220,000	203,000	423,000	-	5.5 hrs	1.5
Scenario 1A		181,000	216,000	397,000	13,000	3.5 hrs	1.0
Scenario 1B		190,000	211,000	401,000	8,000	4.0 hrs	1.0
Scenario 1C		175,000	215,000	390,000	12,000	3.75 hrs	1.0
Scenario 1D		173,000	218,000	391,000	15,000	3.25 hrs	1.0
Scenario 1E		154,000	224,000	378,000	21,000	2.75 hrs	0.75
Scenario 1F		133,000	231,000	364,000	28,000	2.0 hrs	0.5
Scenario 1G		89,000	240,000	329,000	37,000	1.0 hrs	0.0

SB = southbound | NB = northbound

#### Notes

1. Year 2030 results shown, except for Existing Conditions (2005).
2. Average duration of daily congestion levels shown.
3. All results are approximate.
4. The no toll scenario is included for comparison purposes. Tolling is needed to fund the project.



### Toll Rate Schedules for I-5 Toll Scenarios

Tolling I-5	Scenario 1A	Scenario 1B	Scenario 1C	Scenario 1D	Scenario 1E	Scenario 1F	Time Period		2006 Dollars	2018 Dollars
							Midnight to 5 AM	5 AM to 6 AM		
No Tolls	Studied for comparison purposes Raises ~\$0	Draft EIS Variable Toll: EIS Toll structure from the Draft	Lower than Draft EIS Toll: Peak period tolls are lower than DEIS	Same toll all day, rate based on weighted average of Draft EIS variable toll	Additional Price Points: Variable toll schedule; rates change more throughout day	1.5X Draft EIS Variable Toll: All tolls are 1.5 times the Draft EIS rates	2X Draft EIS Variable Toll: All tolls are twice the Draft EIS rates	Collected Both Directions	\$1.00	\$1.34
								Collected Both Directions	\$1.25	\$1.68
								Collected Both Directions	\$1.50	\$1.92
								Collected Both Directions	\$1.75	\$2.16
								Collected Both Directions	\$2.00	\$2.40
								Collected Both Directions	\$2.25	\$2.64
								Collected Both Directions	\$2.50	\$2.88
								Collected Both Directions	\$2.75	\$3.12
								Collected Both Directions	\$3.00	\$3.36
								Collected Both Directions	\$3.25	\$3.60
								Collected Both Directions	\$3.50	\$3.84
								Collected Both Directions	\$3.75	\$4.08
Collected Both Directions	\$4.00	\$4.32								
Collected Both Directions	\$4.25	\$4.56								
Collected Both Directions	\$4.50	\$4.80								
Collected Both Directions	\$4.75	\$5.04								
Collected Both Directions	\$5.00	\$5.28								
Collected Both Directions	\$5.25	\$5.52								
Collected Both Directions	\$5.50	\$5.76								
Collected Both Directions	\$5.75	\$6.00								
Collected Both Directions	\$6.00	\$6.24								
Collected Both Directions	\$6.25	\$6.48								
Collected Both Directions	\$6.50	\$6.72								
Collected Both Directions	\$6.75	\$6.96								
Collected Both Directions	\$7.00	\$7.20								
Collected Both Directions	\$7.25	\$7.44								
Collected Both Directions	\$7.50	\$7.68								
Collected Both Directions	\$7.75	\$7.92								
Collected Both Directions	\$8.00	\$8.16								
Collected Both Directions	\$8.25	\$8.40								
Collected Both Directions	\$8.50	\$8.64								
Collected Both Directions	\$8.75	\$8.88								
Collected Both Directions	\$9.00	\$9.12								
Collected Both Directions	\$9.25	\$9.36								
Collected Both Directions	\$9.50	\$9.60								
Collected Both Directions	\$9.75	\$9.84								
Collected Both Directions	\$10.00	\$10.08								
Collected Both Directions	\$10.25	\$10.32								
Collected Both Directions	\$10.50	\$10.56								
Collected Both Directions	\$10.75	\$10.80								
Collected Both Directions	\$11.00	\$11.04								
Collected Both Directions	\$11.25	\$11.28								
Collected Both Directions	\$11.50	\$11.52								
Collected Both Directions	\$11.75	\$11.76								
Collected Both Directions	\$12.00	\$12.00								
Collected Both Directions	\$12.25	\$12.24								
Collected Both Directions	\$12.50	\$12.48								
Collected Both Directions	\$12.75	\$12.72								
Collected Both Directions	\$13.00	\$12.96								
Collected Both Directions	\$13.25	\$13.20								
Collected Both Directions	\$13.50	\$13.44								
Collected Both Directions	\$13.75	\$13.68								
Collected Both Directions	\$14.00	\$13.92								
Collected Both Directions	\$14.25	\$14.16								
Collected Both Directions	\$14.50	\$14.40								
Collected Both Directions	\$14.75	\$14.64								
Collected Both Directions	\$15.00	\$14.88								
Collected Both Directions	\$15.25	\$15.12								
Collected Both Directions	\$15.50	\$15.36								
Collected Both Directions	\$15.75	\$15.60								
Collected Both Directions	\$16.00	\$15.84								
Collected Both Directions	\$16.25	\$16.08								
Collected Both Directions	\$16.50	\$16.32								
Collected Both Directions	\$16.75	\$16.56								
Collected Both Directions	\$17.00	\$16.80								
Collected Both Directions	\$17.25	\$17.04								
Collected Both Directions	\$17.50	\$17.28								
Collected Both Directions	\$17.75	\$17.52								
Collected Both Directions	\$18.00	\$17.76								
Collected Both Directions	\$18.25	\$18.00								
Collected Both Directions	\$18.50	\$18.24								
Collected Both Directions	\$18.75	\$18.48								
Collected Both Directions	\$19.00	\$18.72								
Collected Both Directions	\$19.25	\$18.96								
Collected Both Directions	\$19.50	\$19.20								
Collected Both Directions	\$19.75	\$19.44								
Collected Both Directions	\$20.00	\$19.68								
Collected Both Directions	\$20.25	\$19.92								
Collected Both Directions	\$20.50	\$20.16								
Collected Both Directions	\$20.75	\$20.40								
Collected Both Directions	\$21.00	\$20.64								
Collected Both Directions	\$21.25	\$20.88								
Collected Both Directions	\$21.50	\$21.12								
Collected Both Directions	\$21.75	\$21.36								
Collected Both Directions	\$22.00	\$21.60								
Collected Both Directions	\$22.25	\$21.84								
Collected Both Directions	\$22.50	\$22.08								
Collected Both Directions	\$22.75	\$22.32								
Collected Both Directions	\$23.00	\$22.56								
Collected Both Directions	\$23.25	\$22.80								
Collected Both Directions	\$23.50	\$23.04								
Collected Both Directions	\$23.75	\$23.28								
Collected Both Directions	\$24.00	\$23.52								
Collected Both Directions	\$24.25	\$23.76								
Collected Both Directions	\$24.50	\$24.00								
Collected Both Directions	\$24.75	\$24.24								
Collected Both Directions	\$25.00	\$24.48								
Collected Both Directions	\$25.25	\$24.72								
Collected Both Directions	\$25.50	\$24.96								
Collected Both Directions	\$25.75	\$25.20								
Collected Both Directions	\$26.00	\$25.44								
Collected Both Directions	\$26.25	\$25.68								
Collected Both Directions	\$26.50	\$25.92								
Collected Both Directions	\$26.75	\$26.16								
Collected Both Directions	\$27.00	\$26.40								
Collected Both Directions	\$27.25	\$26.64								
Collected Both Directions	\$27.50	\$26.88								
Collected Both Directions	\$27.75	\$27.12								
Collected Both Directions	\$28.00	\$27.36								
Collected Both Directions	\$28.25	\$27.60								
Collected Both Directions	\$28.50	\$27.84								
Collected Both Directions	\$28.75	\$28.08								
Collected Both Directions	\$29.00	\$28.32								
Collected Both Directions	\$29.25	\$28.56								
Collected Both Directions	\$29.50	\$28.80								
Collected Both Directions	\$29.75	\$29.04								
Collected Both Directions	\$30.00	\$29.28								
Collected Both Directions	\$30.25	\$29.52								
Collected Both Directions	\$30.50	\$29.76								
Collected Both Directions	\$30.75	\$30.00								
Collected Both Directions	\$31.00	\$30.24								
Collected Both Directions	\$31.25	\$30.48								
Collected Both Directions	\$31.50	\$30.72								
Collected Both Directions	\$31.75	\$30.96								
Collected Both Directions	\$32.00	\$31.20								
Collected Both Directions	\$32.25	\$31.44								
Collected Both Directions	\$32.50	\$31.68								
Collected Both Directions	\$32.75	\$31.92								
Collected Both Directions	\$33.00	\$32.16								
Collected Both Directions	\$33.25	\$32.40								
Collected Both Directions	\$33.50	\$32.64								
Collected Both Directions	\$33.75	\$32.88								
Collected Both Directions	\$34.00	\$33.12								
Collected Both Directions	\$34.25	\$33.36								
Collected Both Directions	\$34.50	\$33.60								
Collected Both Directions	\$34.75	\$33.84								
Collected Both Directions	\$35.00	\$34.08								
Collected Both Directions	\$35.25	\$34.32								
Collected Both Directions	\$35.50	\$34.56								
Collected Both Directions	\$35.75	\$34.80								
Collected Both Directions	\$36.00	\$35.04								
Collected Both Directions	\$36.25	\$35.28								
Collected Both Directions	\$36.50	\$35.52								
Collected Both Directions	\$36.75	\$35.76								
Collected Both Directions	\$37.00	\$36.00								
Collected Both Directions	\$37.25	\$36.24								
Collected Both Directions	\$37.50	\$36.48								
Collected Both Directions	\$37.75	\$36.72								
Collected Both Directions	\$38.00	\$36.96								
Collected Both Directions	\$38.25	\$37.20								
Collected Both Directions	\$38.50	\$37.44								
Collected Both Directions	\$38.75	\$37.68								
Collected Both Directions	\$39.00	\$37.92								
Collected Both Directions	\$39.25	\$38.16								
Collected Both Directions	\$39.50	\$38.40								
Collected Both Directions	\$39.75	\$38.64								
Collected Both Directions	\$40.00	\$38.88								
Collected Both Directions	\$40.25	\$39.12								
Collected Both Directions	\$40.50	\$39.36								
Collected Both Directions	\$40.75	\$39.60								
Collected Both Directions	\$41.00	\$39.84								
Collected Both Directions	\$41.25	\$40.08								
Collected Both Directions	\$41.50	\$40.32								
Collected Both Directions	\$41.75	\$40.56								
Collected Both Directions	\$42.00	\$40.80								
Collected Both Directions	\$42.25	\$41.04								
Collected Both Directions	\$42.50	\$41.28								
Collected Both Directions	\$42.75	\$41.52								
Collected Both Directions	\$43.00	\$41.76								
Collected Both Directions	\$43.25	\$42.00								
Collected Both Directions	\$43.50	\$42.24								
Collected Both Directions	\$43.75	\$42.48								
Collected Both Directions	\$44.00	\$42.72								
Collected Both Directions	\$44.25	\$42.96								
Collected Both Directions	\$44.50	\$43.20								
Collected Both Directions	\$44.75	\$43.44								
Collected Both Directions	\$45.00	\$43.68								
Collected Both Directions	\$45.25	\$43.92								
Collected Both Directions	\$45.50	\$44.16								
Collected Both Directions	\$45.75	\$44.40								
Collected Both Directions	\$46.00	\$44.64								
Collected Both Directions	\$46.25	\$44.88								
Collected Both Directions	\$46.50	\$45.12								
Collected Both Directions	\$46.75	\$45.36								
Collected Both Directions	\$47.00	\$45.60								
Collected Both Directions	\$47.25	\$45.84								
Collected Both Directions	\$47.50	\$46.08								
Collected Both Directions	\$47.75	\$46.32								
Collected Both Directions	\$48.00	\$46.56								
Collected Both Directions	\$48.25	\$46.80								
Collected Both Directions	\$48.50	\$47.04								
Collected Both Directions	\$48.75	\$47.28								
Collected Both Directions	\$49.00	\$47.52								
Collected Both Directions	\$49.25	\$47.76								
Collected Both Directions	\$49.50	\$48.00								
Collected Both Directions	\$49.75	\$48.24								
Collected Both Directions	\$50.00	\$48.48								
Collected Both Directions	\$50.25	\$48.72								
Collected Both Directions	\$50.50	\$48.96								
Collected Both Directions	\$50.75	\$49.20								
Collected Both Directions	\$51.00	\$49.44								
Collected Both Directions	\$51.25	\$49.68								
Collected Both Directions	\$51.50	\$49.92								
Collected Both Directions	\$51.75	\$50.16								
Collected Both Directions	\$52.00	\$50.40								
Collected Both Directions	\$52.25	\$50.64								
Collected Both Directions	\$52.50	\$50.88								
Collected Both Directions	\$52.75	\$51.12								
Collected Both Directions	\$53.00	\$51.36								
Collected Both Directions	\$53.25	\$51.60								
Collected Both Directions	\$53.50	\$51.84								
Collected Both Directions	\$53.75	\$52.08								
Collected Both Directions	\$54.00	\$52.32								
Collected Both Directions	\$54.25	\$52.56								
Collected Both Directions	\$54.50	\$52.80								
Collected Both Directions	\$54.75	\$53.04								
Collected Both Directions	\$55.00	\$53.28								
Collected Both Directions	\$55.25	\$53.52								
Collected Both Directions	\$55.50	\$53.76								
Collected Both Directions	\$55.75	\$54.00								
Collected Both Directions	\$56.00	\$54.24								
Collected Both Directions	\$56.25	\$54.48								
Collected Both Directions	\$56.50	\$54.72								
Collected Both Directions	\$56.75	\$54.96								
Collected Both Directions	\$57.00	\$55.20								
Collected Both Directions	\$57.25	\$55.44								
Collected Both Directions	\$57.50	\$55.68								
Collected Both Directions	\$57.75	\$55.92								
Collected Both Directions	\$58.00	\$56.16								
Collected Both Directions	\$58.25	\$56.40								
Collected Both Directions	\$58.50	\$56.64								
Collected Both Directions	\$58.75	\$56.88								
Collected Both Directions	\$59.00	\$57.12								
Collected Both Directions	\$59.25	\$57.36								
Collected Both Directions	\$59.50	\$57.60								
Collected Both Directions	\$59.75	\$57.84								
Collected Both Directions	\$60.00	\$58.08								
Collected Both Directions	\$60.25	\$58.32								
Collected Both Directions	\$60.50	\$58.56								
Collected Both Directions	\$60.75	\$58.80								
Collected Both Directions	\$61.00	\$59.04								
Collected Both Directions	\$61.25	\$59.28								
Collected Both Directions	\$61.50	\$59.52								
Collected Both Directions	\$61.75	\$59.76								
Collected Both Directions	\$62.00	\$60.00								
Collected Both Directions	\$62.25	\$60.24								
Collected Both Directions	\$62.50	\$60.48								
Collected Both Directions	\$62.75	\$60.72								
Collected Both Directions	\$63.00	\$60.96								
Collected Both Directions	\$63.25	\$61.20								
Collected Both Directions	\$63.50	\$61.44								
Collected Both Directions	\$63.75	\$61.68								
Collected Both Directions	\$64.00	\$61.92								
Collected Both Directions	\$64.25	\$62.16								
Collected Both Directions	\$64.50	\$62.40								
Collected Both Directions	\$64.75	\$62.64								
Collected Both Directions	\$65.00	\$62.88								
Collected Both Directions	\$65.25	\$63.12								
Collected Both Directions	\$65.50	\$63.36								
Collected Both Directions	\$65.75	\$63.60								
Collected Both Directions	\$66.00	\$63.84								
Collected Both Directions	\$66.25	\$64.08								
Collected Both Directions	\$66.50	\$64.32								
Collected Both Directions	\$66.75	\$64.56								
Collected Both Directions	\$67.00	\$64.80								
Collected Both Directions	\$67.25	\$65.04								
Collected Both Directions	\$67.50	\$65.28								
Collected Both Directions	\$67.75	\$65.52								
Collected Both Directions	\$68.00	\$65.76								
Collected Both Directions	\$68.25	\$66.00								
Collected Both Directions	\$68.50	\$66.24								
Collected Both Directions	\$68.75	\$66.48								
Collected Both Directions	\$69.00	\$66.72								
Collected Both Directions	\$69.25	\$66.96								
Collected Both Directions	\$69.50	\$67.20								
Collected Both Directions	\$69.75	\$67.44								
Collected Both Directions	\$70.00	\$67.68								
Collected Both Directions	\$70.25	\$67.92								
Collected Both Directions	\$70.50	\$68.16								
Collected Both Directions	\$70.75	\$68.40								
Collected Both Directions	\$71.00	\$68.64								
Collected Both Directions	\$71.25	\$68.88								
Collected Both Directions	\$71.50	\$69.12								
Collected Both Directions	\$71.75	\$69.36								
Collected Both Directions	\$72.00	\$69.60								
Collected Both Directions	\$72.25	\$69.84								
Collected Both Directions	\$72.50	\$70.08								
Collected Both Directions	\$72.75	\$70.32								
Collected Both Directions	\$73.00	\$70.56								
Collected Both Directions	\$73.25	\$70.80								
Collected Both Directions	\$73.50	\$71.04								
Collected Both Directions	\$73.75	\$71.28								
Collected Both Directions	\$74.00	\$71.52								
Collected Both Directions	\$74.25	\$71.76								
Collected Both Directions	\$74.50	\$72.00								
Collected Both Directions	\$74.75	\$72.24								
Collected Both Directions	\$75.00	\$72.48								
Collected Both Directions	\$75.25	\$72.72								
Collected Both Directions	\$75.50	\$72.96								
Collected Both Directions	\$75.75	\$73.20								
Collected Both Directions	\$76.00	\$73.44								
Collected Both Directions	\$76.25	\$73.68								
Collected Both Directions	\$76.50	\$73.92								
Collected Both Directions	\$76.75	\$74.16								
Collected Both Directions	\$77.00	\$74.40								
Collected Both Directions	\$77.25									

## Toll Rate Schedules for I-5 & I-205 Toll Scenarios

No Tolls		Scenario 2A		Scenario 2B		Roundtrip Tolls		Roundtrip Tolls		Roundtrip Tolls	
Studied for comparison purposes		Draft EIS Variable Toll on Both Bridges: Draft EIS tolls on both bridges		Lower than Draft EIS Toll on Both Bridges: Peak period toll is lower than Draft EIS rate		Lower than Draft EIS Toll on Both Bridges: Peak period toll is lower than Draft EIS rate		Lower Toll on I-5; Peak period toll is lower on I-205 than I-5;		Lower Toll on I-5; Peak period toll is lower on I-205 than I-5;	
Raises ~\$0		Raises ~\$2.8 - \$3.4 billion		Raises ~\$2.1 - \$2.5 billion		Raises ~\$2.4 - \$3.0 billion		Raises ~\$2.4 - \$3.0 billion		Raises ~\$2.4 - \$3.0 billion	
Time Period		Northbound		Northbound		Northbound		Northbound		Northbound	
Time Period		Southbound		Southbound		Southbound		Southbound		Southbound	
Midnight to 5 AM		\$2.00		\$2.00		\$2.00		\$2.00		\$2.00	
5 AM to 6 AM		\$3.00		\$2.50		\$3.00		\$3.00		\$3.00	
6 AM to 10 AM		\$4.00		\$3.00		\$4.00		\$4.00		\$4.00	
10 AM to 3 PM		\$3.00		\$2.50		\$3.00		\$3.00		\$3.00	
3 PM to 7 PM		\$4.00		\$3.00		\$4.00		\$4.00		\$4.00	
7 PM to 8 PM		\$3.00		\$2.50		\$3.00		\$3.00		\$3.00	
8 PM to midnight		\$2.00		\$2.00		\$2.00		\$2.00		\$2.00	
Midnight to 5 AM		No Toll		No Toll Collected		No Toll Collected		No Toll Collected		No Toll Collected	
5 AM to 6 AM		No Toll		No Toll Collected		No Toll Collected		No Toll Collected		No Toll Collected	
6 AM to 10 AM		No Toll		No Toll Collected		No Toll Collected		No Toll Collected		No Toll Collected	
10 AM to 3 PM		No Toll		No Toll Collected		No Toll Collected		No Toll Collected		No Toll Collected	
3 PM to 7 PM		No Toll		No Toll Collected		No Toll Collected		No Toll Collected		No Toll Collected	
7 PM to 8 PM		No Toll		No Toll Collected		No Toll Collected		No Toll Collected		No Toll Collected	
8 PM to midnight		No Toll		No Toll Collected		No Toll Collected		No Toll Collected		No Toll Collected	

### Notes

1. These are toll rate schedules analyzed for planning and testing purposes. Actual toll rates will depend on a final finance plan and will be determined by the Oregon and transportation commissions to meet legislative funding direction.
2. Toll funding contribution ranges assume 30-year state-backed debt.
3. No Toll scenario included for comparison purposes. Tolling is needed to fund the project.
4. Assumes medium trucks pay 2x and large trucks pay 4x the auto toll rate using a transponder; administrative fee would be added to process payments not involving a transponder.
5. Tolls are assumed to escalate at 2.5% per year to match the expected rate of inflation.
6. Tolling during construction could be added to any scenario. Rates assumed to match Scenario 1A, except there would be no toll from midnight to 5am. Tolling early could be added to any scenario.

# JOINT MEETING OF THE OREGON AND WASHINGTON TRANSPORTATION COMMISSIONS

## AGENDA

September 19, 2012

Pendleton, Oregon

### Tuesday, September 18

**6:00 PM** No-host dinner with Oregon and Washington Commissions. (Hamley Steakhouse, 8 SE Court Avenue, Pendleton, OR 97801)

### **JOINT MEETING OF THE OREGON AND WASHINGTON TRANSPORTATION COMMISSIONS**

***Pendleton, Red Lion Hotel***

***Walla Walla Room***

***304 SE Nye Avenue***

***Pendleton, Oregon 97801***

***(541) 276-6111, Fax (541) 276-2413***

### Wednesday, September 19

**8:00 AM** ODOT's regular monthly agenda review and briefing session with ODOT staff in the Cayuse Room.

### Joint Meeting: Oregon and Washington Transportation Commissions

- 9:00 AM** E) Introductions (30 min., *Oregon and Washington Commissions*)
- 9:30 AM** F) Economic ties between Washington and Oregon. Informational. (40 min., *Michael Fischer, Cambridge Systematics*)
- 10:10 AM** G) Receive an informational presentation of the Rail Corridor. Informational. (30 min. *John Sibold, WSDOT*)
- 10:40 AM** H) Receive an informational presentation of the Electric Highway. Informational. (30 min. *Jim Whitty, ODOT and Jeff Doyle, WSDOT*)
- 11:10 AM** I) Receive an informational presentation on Road Usage Fee/Charge efforts under way. Informational. (45 min. *Jim Whitty, ODOT and Jeff Doyle, WSDOT*)
- 11:55 AM** Working Lunch – break and pick up lunches in Cayuse Room.
- 12:10 PM** J) Working Lunch – Conduct an informational discussion about the Columbia River Crossing project, tolling governance, and legislative oversight efforts. Informational. (2 hours, *Kris Strickler, ODOT and Nancy Boyd, WSDOT*)

**JOINT MEETING OF THE OREGON AND WASHINGTON  
TRANSPORTATION COMMISSIONS  
AGENDA  
September 19, 2012  
Pendleton, Oregon**

**Wednesday, September 19, (continued)**

**2:10 PM**      K)      Wrap-up **Informational**. (20 min., *Secretary Hammond and Director Garrett.*)

**2:30 PM**                      ADJOURN

**FORMAL MONTHLY MEETING  
Pendleton, Red Lion Hotel  
Walla Walla Room  
304 SE Nye Avenue  
Pendleton, Oregon 97801  
(541) 276-6111, Fax (541) 276-2413**

**Regular Monthly Meeting: Oregon Transportation Commission**

*Note: The Commission may choose to take agenda items out of order, pull, defer or shorten presentation time of agenda item(s) to accommodate unscheduled business needs. Anyone wishing to be present for a particular item should arrive when the meeting begins to avoid missing an item of interest.*

**Website address to view agendas/minutes on the Internet:** [http://www.oregon.gov/ODOT/COMM/otc\\_main.shtml](http://www.oregon.gov/ODOT/COMM/otc_main.shtml)

*The meeting location is accessible to persons with disabilities. A request for an interpreter for the hearing impaired or for other accommodations for persons with disabilities should be made at least 48 hours before the meeting to Jacque Carlisle, Commission Assistant, at (503) 986-3450.*

**2:45 PM**      B)      Public Comments. (**Up to 15 min.**)  
*(Public testimony is valued by the Commission, and those who wish to testify are encouraged to sign up on the public comment sheet provided at the meeting handout table. Note: This part of the agenda is for comments on topics not scheduled elsewhere on agenda. General guidelines: provide written summaries when possible and limit comments to 3 minutes. If you bring written summaries or other materials to the meeting, please provide the Commission Assistant with 10 copies prior to your testimony.)*

**3:00 PM**      C)      Request to approve and receive public comments of the 2015-2018 Statewide Transportation Improvement Plan (STIP) Funding Allocation and Project Selection process for the **Enhance** category. **Approval/Informational**. (**60 min., Jerri Bohard and Paul Mather**)

**JOINT MEETING OF THE OREGON AND WASHINGTON  
TRANSPORTATION COMMISSIONS  
AGENDA  
September 19, 2012  
Pendleton, Oregon**

**Wednesday, September 19, (continued)**

- 4:00 PM**      D1)      Approve \$184,200 in Transportation Enhancement (TE) funds to construct wildlife fencing adjacent to I-5 in conjunction with project #16763 (I-5: Glendale-Hugo Paving and Climbing Lane). Approve amending the Statewide Transportation Improvement Program (STIP) to add the TE Discretionary funds.
- D2)      Approve a request to amend the Statewide Transportation Improvement Program (STIP) to add \$184,200 to construct wildlife fencing adjacent to Interstate 5 in conjunction with the Interstate 5: Glendale-Hugo Paving and Climbing Lane project in Region 3. The total estimate for this project is nearly \$50 million.
- Approval. (5 min., *Jerri Bohard*)
- 4:05 PM**      E)      Consider approving items on the Consent Calendar (See following page).  
                  Approval. (5 min., *Matthew Garrett*)
- 4:10 PM**      ADJOURN

**CONSENT CALENDAR**

1. Approve the minutes of the August 15-16, 2012, Commission meeting in Baker City.
2. Confirm the next two Commission meeting dates:
  - Tuesday and Wednesday October 16-17, 2012, meeting in Silverton
  - Wednesday, November 14, 2012, in Salem
3. Adopt a resolution for authority to acquire real property by purchase, condemnation, agreement or donation.
4. Approve the following Oregon Administrative Rule:
  - a. Amendment of 734-020-0019 relating to advisory speeds.
  - b. Amendment of 735-063-0065, 735-063-0067 and 735-063-0070 relating to CDL "V" restriction.
  - c. Amendment of 735-070-0004 relating to cancellation of driving privileges for providing a false or fictitious address to DMV.

5. Approval a request to amend the 2012-2015 Statewide Transportation Improvement Program (STIP) to add the Preliminary Engineering (PE) phase for the Interstate 205: U.S. 26 to Clackamas River Seismic Retrofit project. This project will be funded by project savings realized in the State Bridge Financial Plan. The estimated cost of the PE phase of this project is \$750,000.

## E-ZPasses Track Vehicles In NY Even Off Toll Roads New Yorkers may not realize they are being tracked

[http://autos.aol.com/article/e-zpasses-track-vehicles-ny-toll-roads/?icid=maing-grid7|main5|dl6|sec1\\_ink2%26pLid%3D375937](http://autos.aol.com/article/e-zpasses-track-vehicles-ny-toll-roads/?icid=maing-grid7|main5|dl6|sec1_ink2%26pLid%3D375937)

Posted: Sep 16, 2013

| By: AOL Autos Staff

New York's E-ZPass uses a radio-frequency identification sensor, or RFID tag, which allows residents of the Big Apple to pay road tolls electronically. But most drivers don't know that the state is using the passes to gather data far from toll booths, according to an article in Forbes.

Internet hacker "Puking Monkey" wanted to see where his RFID tag was being scanned. He rigged the E-ZPass so a light would turn on and a toy cow would moo every time the RFID tag was read. He found his pass being read several times on short trips around New York, far from any tollbooths.

While speaking at the hacker convention Defcon, Puking Monkey called his findings "intrusive and unsettling." Tag readers on the streets are part of New York's traffic initiative "Midtown in Motion", which uses the passes to track traffic movement to improve flow. The New York Department of Transportation wasn't forthcoming about the program, but TransCore, the manufacturer of the RFID tags used in E-ZPasses, told Forbes via email "The tag ID is scrambled to make it anonymous ... the system cannot identify the tag user and does not keep any record of the tag sightings."

Still, it's an unsettling reminder that if the state of New York can track drivers without notifying them, potentially anyone can. Puking Monkey told the crowd at Defcon that drivers can protect themselves by keeping their E-ZPasses in a bag and bringing them out when driving through tollbooths. Laws governing electronic information gathering are hazy and undefined in most states. Californians have their cars photographed and tracked by police, with no transparency on how that data is being used.

Gallery: Your Guide To The Cars Of 2014  
Acura MDX Acura RLX Audi R8 Audi RS7

Filed under: Driving Laws

[http://autos.aol.com/article/e-zpasses-track-vehicles-ny-toll-roads/?icid=maing-grid7|main5|dl6|sec1\\_ink2%26pLid%3D375937](http://autos.aol.com/article/e-zpasses-track-vehicles-ny-toll-roads/?icid=maing-grid7|main5|dl6|sec1_ink2%26pLid%3D375937)

**ODOT I-205 Toll EA - RECORD #3055 DETAIL**

**Submission Date :** 4/21/2023

**First Name :** Heather

**Last Name :** Rose

**Affiliation :**

**Submission Method :** I-205 EA email

**Q3. Comments :** Message - Why do you demand that ODOT conduct an Environmental Impact Statement for the proposed I-205 Freeway Expansion?:  
And what of your vision when taking Oregon as a possible Olympic Games backup?

<http://oregon2028.com/>



**ODOT I-205 Toll EA - RECORD #3069 DETAIL**

**Submission Date :** 3/9/2023

**First Name :** Paul

**Last Name :** Edgar

**Affiliation :**

**Submission Method :** Toll program email

**Q3. Comments :** Please help get these comments get filed and routed to the right places. There was a calculated omission within this issued Environmental Assessment and that was a need for a project alternative that uses ODOT and FHWA funding only without tolling and should have considered in addition to the no build. Since this was not done the difference in freeway performance between a project funded with tolls and one without tolls will not be known and that is wrong.

This is unfortunate should the tolled alternative be selected since the no-build does not meet the project purpose.

The Environmental Assessment estimates that toll revenue will collect \$131 million annually and that amount will increase a traffic volumes increase in future years. The economic impact of this is a push according to the Economics Technical Report. However, this is not a push at the household and individual business level. Households and businesses will have less money to spend, and in particular in Oregon.

A shift-share economic analysis of this should have been done and was not. Reducing household and business income because of of tolls and transferring that money to other sectors needs more analysis since the payers and recipients are not the same.

It has always been known that the Oregon Legislature could have choose to fund this project with traditional revenue sources. While that may have been thought of as a long shot, it should not have been precluded as a non-toll funding alternative. The Oregon Legislature has a long history of funding highway and freeways needs with gas tax and has doubled it, since 2000 and it is significantly less expensive than tolls, and it has the added benefit of sharing these revenue increases with cities and counties.

Within this EA it tells us that the toll charges will vary depending the amount of traffic congestion. While \$2.20 was presented as the toll charge during peak hours, there are multiple sectors and the consultant technical report pegged the rate at \$4.00 depending on the amount of congestion. That report also used the toll rates in year one of operation, and inflated that rate through 2045.

The traffic technical report said higher peak hour tolls could reduce freeway use by 10 to 30 percent and we know it could be much higher. That means those trips will divert to local streets and roads and other state highways. This was not adequately addressed in the EA.

In my opinion the EA did not consider all reasonable alternatives, especially a non-toll revenue dependent one. Just because a legislative body has told ODOT to consider tolling, it should not mean a toll alternative should be the only build alternative considered in a federally required NEPA document.

The assumptions in the technical reports did not adequately address several possible "futures" scenarios that would reduce the need for the project period, meaning a project that just addressed the bridges would be reasonable as traffic congestion levels off (a possible future scenario).

The alternative analysis set-up guaranteed that the toll revenue only project will look superior to the no-build. I urge you not to issue a finding of no significant impact. A full EIS process is needed for Oregon's first all lanes tolled freeway capacity improvement project.

**ODOT I-205 Toll EA - RECORD #3070 DETAIL**

**Submission Date :** 4/14/2023  
**First Name :** BIPOC Discussion Group Participant  
**Last Name :** BIPOC Discussion Group Participant  
**Affiliation :**  
**Submission Method :** Discussion group  
**Q3. Comments :** [Transcribed from recording]

We don't often think about other state people - how we prioritize people in the state of Oregon and how we can reduce the effect from this and take care of them. So like I think, you know, you take it from the car, paycheck to paycheck, you know protect from like monthly. Maybe I cross every day, so maybe I pay monthly \$50 - this is just an example, you know? So we don't really know the effect of this thing, yaknow? So weekly, maybe we have a test, maybe we take it off money from my paystub. We don't know how much they took it. We're not feeling like nobody thinking about it. Upset about it. So I think the way the thinking maybe I don't know, I would request from the thinking like that way that, uh, take off from the paycheck to paycheck. That's also not that much idea for Oregon people, you know?

Facilitator: So if I understand what you said, if you want to make a payment for toll fees from your paycheck, is that correct?

Yes yes yes.

Facilitator: Like, you said we'd pay through the taxes?

Yeah so we don't recognize [that we're paying the toll]. That's a business thought you know, okay, that's it.

Facilitator: Thank you.

<b>ODOT I-205 Toll EA - RECORD #3073 DETAIL</b>
---

<b>Submission Date :</b>	4/5/2023
<b>First Name :</b>	Matthew
<b>Last Name :</b>	Bancroft
<b>Affiliation :</b>	Locally Affected Property Owner/ Daily Commuter/ Tax Payer
<b>Submission Method :</b>	I-205 EA email

**Q3. Comments :**

The ODOT toll proposal is a terrible idea. It is poorly thought out, extremely unfair, and is inaccurate in its current proposed state as an all or nothing, two option, "false dilemma" style proposition. After reviewing the sited studies and various materials that the claims are derived from I can see many false correlations that have been exploited in order to create the claims made by ODOT on everything from funding, to maintenance, to traffic mitigation. Please look these over for yourself as I'm sure that you'll find many as well.

First of all, This is not a two option proposal, we either add tolls or we do nothing to the highway. The current proposal is tantamount to a permanent, open ended money grab by ODOT that is being strong armed into fruition through this all or nothing perception. While I agree, somewhat, that these upgrades are needed, I fully disagree that tolling is the answer to their funding. A limited timeline, creative, tax collection option or other alternative funding choice would achieve the same funding goal while not giving ODOT an open ended monetary collection system that is wielded at their discretion in perpetuity mostly against daily commuters and local communities.

The idea that tolling relieves traffic is only acceptable if you negate the clear understanding that you are diverting that same traffic onto other local roadways that cannot handle the burden. This is made quite clear by the ODOT statements that tolling has been proven to reduce traffic and that variable tolling during peak hours will limit peoples desire to travel at those times, but we all know that peak travel times aren't dictated by drivers, they are dictated by employers, so obviously charging more cannot possibly change traffic patterns.

If my commute is currently ten minutes on back roads and twenty minutes on the highway but under the new proposal it will now realistically be twenty minutes on backroads and ten minutes on the highway, then what's the difference? The toll, obviously. My commute hasn't changed. The burden of costs has shifted more to local communities and to me as a driver as I now have to pay the new toll and I get no relative time savings in my commute. It's simply the same time frame that now costs more. (Never mind the clear environmental toll of running gas vehicles at lower, less efficient speeds, off highway for a longer duration of time every day.)

As it's proposed on the I-205, my wife and I would both be forced to pay this "variable toll" at the height of commute times, (the most expensive tolls), minimally four times a day five days a week in two small commuter cars, (that's eight tolls/day or forty tolls/week), just to get to and from work. A freight truck using the route intermittently would pay a negligible amount but would be responsible for more wear and tear and traffic displacement on the same stretch of road. Hardly seems fair or well thought out. Basically a small group of local commuters are being forced to foot the bill for these upgrades.

As someone who has lived in states with and without tolled highway systems I can tell you that the systems that are not tolled are certainly better in nearly every way. Both have comparable integrity and maintenance levels regardless of tolling. Tolled highways, however, create undue and unjust burdens on local communities surrounding the highway, from increased noise, pollution, loss of property value, increase in local traffic congestion and wear and tear on locally funded and maintained roadways. They create added local traffic and congestion to communities that are then forced to increase taxes or foot the bill for otherwise unnecessary maintenance in the direct forms of road widening, re-striping, repaving, adding traffic control devices, and in secondary costs such as noise barriers, foot bridges, safe pedestrian passage ways, new landscaping and visual preservation plant outs. Traffic flows better without tolls in every instance, as toll systems require traffic to slow, or even stop, in order for toll collection. Even in this proposed camera capture system currently being floated, traffic would need to slow for the radio collection from transmitters as well as the photo collection of license plates and drivers faces as it does in every other state that uses these systems (MA, NH, NY, etc.). Tolled highways flood secondary routes and streets with more traffic both in the form of commuters and freighters, not only increasing congestion and traffic but ruining local neighborhoods and killing

property values. So the claim that traffic would decrease anywhere, in any instance is simply not sound and flies in the face of already demonstrated factual evidence.

Let's talk about this variable toll idea. Is there a cap on toll fees? Who gets tolled what amount? Who decides what those amounts will be? Is there any public input? Obviously there is no way to budget for a variable cost so who controls that burden?

Also obvious, the tolling system is directly connected to a drivers financial system in the form of a credit card, a bank card, or account, so what security measures are in place to safeguard these systems? This collection system poses an untold security risk to anyone using it. ODOT plans to collect data on traffic numbers, license plates, driver photos, and more. Who has access to this info? What exactly is it used for? Who owns it? Where is it stored? For how long? Can it be sold? Can data collection or storage be outsourced to other entities? If so, what can they do with it? More importantly who is responsible when this information is hacked or compromised?

Given these points I propose that ODOT be mandated to use a portion of all tolls collected to directly reimburse drivers/property owners from local communities affected by these changes quarterly or annually in a way as to offset not just the cost of the tolls, but also the loss of community comfort, property value losses, any necessary home upgrades to compensate for these negatives and any and all new costs to local communities as discussed above to compensate for added traffic off the highway. Maybe then this would be an acceptable proposal.

ODOT needs to think better. You need to hold them to that.

**ODOT I-205 Toll EA - RECORD #3074 DETAIL**

**Submission Date :** 4/13/2023  
**First Name :** Latinx Discussion Group Participant  
**Last Name :** Latinx Discussion Group Participant  
**Affiliation :**  
**Submission Method :** Discussion group  
**Q3. Comments :** [Transcribed and translated from Spanish]

My concern is that I want it to be clear on how many times I am going to pay. Will it be every time I go through or is it a monthly payment or per year when I do my taxes? Will there be a discount for local residents that we have to use on the highway several times or possibly every day? I would like you to consider giving some discounts.

There are families that have many members. In my house we are all adults. Are there forms we can fill out per family because if there's 3 of us in the family we would go through the round trip charge using our 3 cars. Are all 3 of us going to be charged? Will we be charged per family or for the residents of this area that get a discount or reduced price since we're Oregon residents and because we drive by way more than non-locals.

**ODOT I-205 Toll EA - RECORD #3075 DETAIL**

**Submission Date :** 4/13/2023  
**First Name :** Latinx Discussion Group Participant  
**Last Name :** Latinx Discussion Group Participant  
**Affiliation :**  
**Submission Method :** Discussion group  
**Q3. Comments :** [Transcribed and translated from Spanish]

At first, people will say that it is only two dollars. But if you account for the toll being two dollars and you have to drive by several times a day, you could end up spending like 10 dollars a day. If those 10 dollars are multiplied throughout the month, it would be practically an extra bill that would be added to us.

**ODOT I-205 Toll EA - RECORD #3076 DETAIL**

**Submission Date :** 4/13/2023  
**First Name :** Latinx Discussion Group Participant  
**Last Name :** Latinx Discussion Group Participant  
**Affiliation :**  
**Submission Method :** Discussion group  
**Q3. Comments :** [Transcribed and translated from Spanish]

There are people who have more than one vehicle and if it could be considered a single payment? There are large families that use more than one car.



**ODOT I-205 Toll EA - RECORD #3077 DETAIL**

**Submission Date :** 4/13/2023

**First Name :** Latinx Discussion Group Participant

**Last Name :** Latinx Discussion Group Participant

**Affiliation :**

**Submission Method :** Discussion group

**Q3. Comments :** [Transcribed and translated from Spanish]

Will seniors be charged the same cost? Will they be charged per car or will there be priority given to seniors?

**ODOT I-205 Toll EA - RECORD #3078 DETAIL**

**Submission Date :** 4/13/2023  
**First Name :** Latinx Discussion Group Participant  
**Last Name :** Latinx Discussion Group Participant  
**Affiliation :**  
**Submission Method :** Discussion group  
**Q3. Comments :** [Transcribed and translated from Spanish]

I have seen freeways in Guatemala that are private where they use this type of toll collection. The form of payment is cash or card. There is a toll booth and when you pay you are given a receipt. When you return you just show that receipt and they let you pass. It is one payment for the whole day and the rate varies depending on the type of vehicle you have or if it's a commercial vehicle. This could be a good option here and adapt it to this plan that is being made since there won't be a toll booth. It could be that you identify the vehicle by the license plate or another system, and you could use it without any issues especially for local residents that drive by frequently and rest assured that a payment will be processed with ease.

**ODOT I-205 Toll EA - RECORD #3079 DETAIL**

**Submission Date :** 4/13/2023  
**First Name :** Latinx Discussion Group Participant  
**Last Name :** Latinx Discussion Group Participant  
**Affiliation :**  
**Submission Method :** Discussion group  
**Q3. Comments :** [Transcribed and translated from Spanish]

I agree with what [ ] said, I am from Guatemala and the way it is charged there is by a single daily payment where a receipt is given to you.

In this case, I was hearing that there is a plan to put cameras or a laser with enhanced technology that will avoid the payment process with the receipt system so that the traffic is not congested. Maybe there could be a camera that detects it is the same license plate and there will be no need to make another payment a day. Also, people coming from other states would be charged the same. This system could be worked on.

**ODOT I-205 Toll EA - RECORD #3080 DETAIL**

**Submission Date :** 4/13/2023  
**First Name :** Latinx Discussion Group Participant  
**Last Name :** Latinx Discussion Group Participant  
**Affiliation :**  
**Submission Method :** Discussion group  
**Q3. Comments :** [Transcribed and translated from Spanish]

I agree that a discount should be given to those of us who reside here in Oregon and that it should only be one payment a day because everything is too expensive now to be paying the toll every time.

<b>ODOT I-205 Toll EA - RECORD #3081 DETAIL</b>
---

**Submission Date :** 4/13/2023  
**First Name :** Latinx Discussion Group Participant  
**Last Name :** Latinx Discussion Group Participant  
**Affiliation :**  
**Submission Method :** Discussion group  
**Q3. Comments :** [Transcribed and translated from Spanish]

What others are saying is a good idea, to detect by means of the license plate or sticker of the car to process the toll payment and that the same camera will detect that it has already been paid once and will not be charged again for the rest of the day. Let the people who decide to do so talk about it and listen to our comments.

**ODOT I-205 Toll EA - RECORD #3082 DETAIL**

**Submission Date :** 4/6/2023  
**First Name :** Russian Discussion Group Participant  
**Last Name :** Russian Discussion Group Participant  
**Affiliation :**  
**Submission Method :** Discussion group  
**Q3. Comments :** [Transcribed and translated from Russian]

Regular working class people are against tolling. We are already paying a lot of taxes, and these taxes go towards roads, road repairs, etc. If we start paying for tolling, it will be too much of a financial burden for families, working groups, and businesses. There is already a budget designated for road repairs and improvements since we pay taxes. Thus, ODOT's initiative is simply a scam. We are against it. We are against it.

**ODOT I-205 Toll EA - RECORD #3083 DETAIL**

**Submission Date :** 4/6/2023  
**First Name :** Russian Discussion Group Participant  
**Last Name :** Russian Discussion Group Participant  
**Affiliation :**  
**Submission Method :** Discussion group  
**Q3. Comments :** [Transcribed and translated from Russian]

I live in West Linn and the proposed toll will cover the section from West Linn towards Gresham. The only ways I can avoid this tolled section are to use the small bridge over the Willamette River (near the waterfalls), or I will have to go towards Portland using a different route, making it a long driving loop.

Gresham has a lot of Russian-speaking people. My husband is an American, and my children speak Russian, but poorly. The only way for me to emerge my kids into a Russian-speaking environment is to bring them to activities in Gresham. I continuously use the services offered by the Multnomah county libraries. They host Russian-speaking events for children: story times, book readings, and crafts. Also, every Monday I take my kids to a Russian school that is located on Glisan street. The school that I take my kids to is a 6-year program.

If tolling is approved, my family will suffer. We live paycheck-to-paycheck. All our money goes towards bills. We do not have additional funds. If tolling takes place, I will have to make the decision to stop the Russian language learning program for my kids, which is very important for my family. My entire family lives in Russia and I am the only family member here. If my kids do not speak the language, they will not be able to communicate with their grandmother, relatives, cousins. It's a loss of connection. It would be a real blow for me. Their ethnicity is half Russian and being able to speak the language is an important part of the culture.

This is my answer to the question, "How would the toll affect your family?" It will be a drastic change for my family: paying the toll, or losing the language. Thank you.

**ODOT I-205 Toll EA - RECORD #3084 DETAIL**

**Submission Date :** 4/6/2023  
**First Name :** Russian Discussion Group Participant  
**Last Name :** Russian Discussion Group Participant  
**Affiliation :**  
**Submission Method :** Discussion group  
**Q3. Comments :** [Transcribed from recording]

I just wanted to say thank you so much to both of you because their replies were very nice and I know it's a very difficult situation and people are probably not very happy with that. But I just wanted to mention something that I don't think was mentioned a lot. And the main issue is the emissions and traffic. There are different ways to decrease those things without increasing the payments and incentivizing people to stay at home.

Better public transportation can be one of the solutions which will definitely decrease long term, access to the public transportation. It will decrease the cost for the families, it will decrease the traffic, it will decrease the emissions. All the European countries are using a lot of public transportation and it's a wonderful thing. So instead of just creating and putting more burden on the low and middle class families, I think it's important to actually invest in the communities and provide them with alternative options on how they get to where they need to go and make it accessible that they can bring their kids wherever they want to. They can go to work and do that.

I just recently saw there's a MAX from Hillsboro to downtown Portland and I thought it was amazing. Why not create more of that and also increase the safety of those MAX stations, because I was using it until somebody got stabbed at my station and I was kind of like 'I don't want to use it anymore'. So that's going to incentivize and fix all the problems, it's not going to cost additional money for people who can't afford it and it's going to be a sustainable solution for everyone. Thank you.