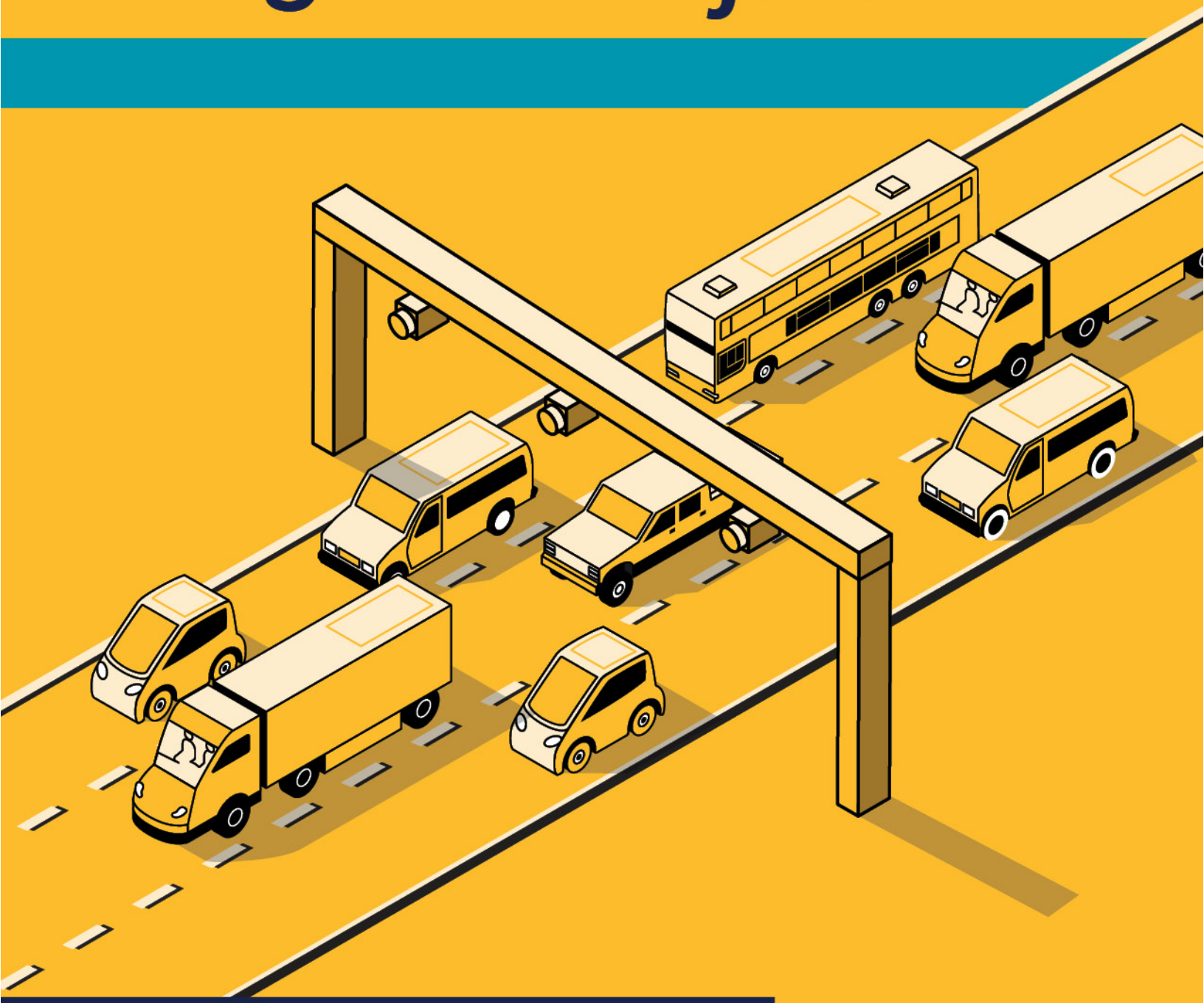
I-205 Toll Project



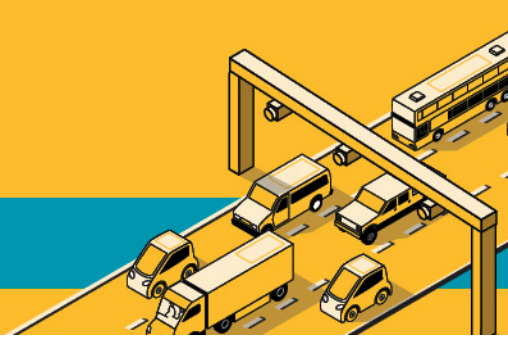
Engagement Summary

SUMMER – FALL 2020

March 2021

Oregon Department of Transportation

I-205 Toll Project



Final

ENGAGEMENT SUMMARY

SUMMER – FALL 2020

Prepared for:

Oregon Department of Transportation

Prepared by:

wsp

ei enviroissues

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
BIPOC	Black, Indigenous and People of Color
COVID-19	coronavirus disease 2019
FHWA	Federal Highway Administration
I-	Interstate
I-205 Improvements Project	I-205 Improvements Stafford Road to OR 213 Project
IP	Internet Protocol
NEPA	National Environmental Policy Act
ODOT	Oregon Department of Transportation
OR 213	Oregon Route 213
PEL	Planning and Environmental Linkages
Project	I-205 Toll Project

EXECUTIVE SUMMARY

Project Context

In summer 2020, the Oregon Department of Transportation (ODOT) launched an education and engagement period for the Interstate 205 (I-205) Toll Project (Project). The agency sought input at the beginning of the environmental review process to help refine the draft purpose and need for the Project, the toll alternatives to be studied, and key issues for analysis as required by the National Environmental Policy Act (NEPA). This report summarizes public input received from more than 4,600 survey responses, letters, emails, voicemails, and comments at meetings and briefings between August 3 and October 16, 2020. ODOT values these comments; they will help the agency move ahead with the Project with an understanding of community concerns and how to best address them.

Planning and environmental review for the Project builds on direction from the Oregon Legislature and the results of a feasibility analysis. In 2017, Oregon House Bill 2017 ("Keep Oregon Moving") was passed to improve area highways; enhance transit, biking, and walking facilities; and use technology to make the transportation system work better. As part of this comprehensive transportation package, the Oregon Transportation Commission was directed to study tolling on I-5 and I-205 in the Portland metro area. In response, ODOT initiated the Portland Metro Area Value Pricing Feasibility Analysis (Value Pricing Feasibility Analysis) to explore toll options, determine how and where tolling could help improve congestion on I-5 or I-205 during peak travel times, and discuss potential benefits and impacts to travelers and adjacent communities.

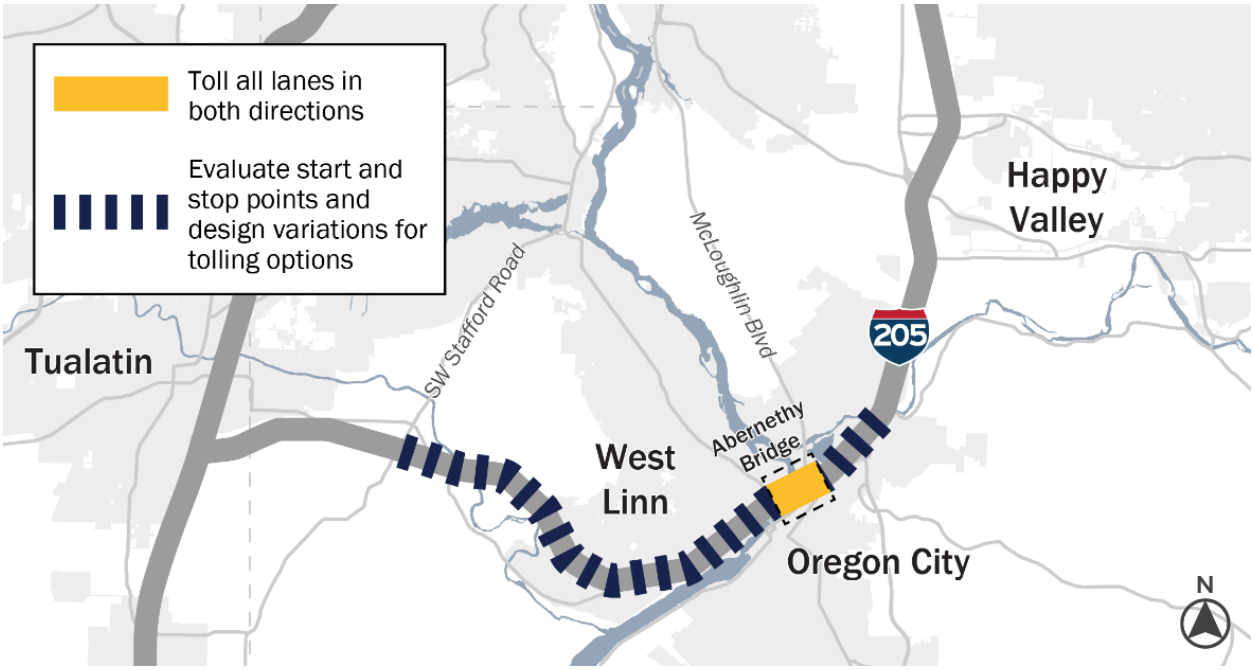
The Value Pricing Feasibility Analysis concluded that tolls could be used to help improve travel on I-5 or I-205 during peak times and raise revenue for congestion relief projects. Three consistent issues became apparent for ODOT's tolling program to address:

- Impacts to communities experiencing low income[1] due to a toll.
- The need for improved transit and other transportation choices.
- The potential for freeway pricing to cause traffic to divert to local streets.

The Value Pricing Feasibility Analysis recommended moving forward with further analysis based on Concept E—tolling on or near the Abernethy Bridge—for the I-205 corridor (Figure ES-1). Based on this recommendation, the Oregon Transportation Commission then directed ODOT to meet the Oregon Legislature's directive and proceed with the NEPA process for tolling on both I-5 and I-205 while addressing the three priority issues that emerged from the public process.

[1] For purposes of the project, "low-income" will be defined as 200 percent of the federal poverty level to be consistent with data available through the U.S. Census Bureau, to be aligned with regional stakeholder definitions of low-income, and to be more inclusive of the costs of living above and beyond food costs.

Figure ES-1. Project Area



The Project's proposed purpose is to manage congestion between Stafford Road and Oregon Route 213 (OR 213) and raise revenue for congestion relief improvements. Revenue generated by these tolls could help pay for planned roadway improvements on I-205 in the same area while helping to manage the more than 6 hours of daily congestion in this portion of the I-205 corridor (pre COVID-19 pandemic).

An electronic toll collection system would be used to automatically collect tolls from vehicles traveling on the corridor. Electronic toll collection systems connect to prepaid accounts by reading a transponder in the vehicle or by reading a license plate while maintaining travel speeds. An electronic toll collection system eliminates the need for tolls booths and users needing to stop to pay the toll.

Engagement Approach

This engagement ran from August 3 to October 16, 2020. During this time, ODOT hosted numerous education and engagement activities to reach a broad audience.[2]

[2] A few engagement activities occurred in July 2020 prior to the start of the formal comment period. At these presentations, participants were notified of the starting date for the formal comment period, and the launches of the online open house and online survey, which were August 3, 2020.

This engagement was an opportunity for agencies, community groups, corridor travelers, and the public to provide their input on the following:

- Draft Purpose and Need Statement, including Project goals and objectives.
- Recommended alternatives as potential tolling strategies to study in depth.
- Concerns and potential impacts to consider during the environmental review.

Because of the ongoing COVID-19 pandemic, all engagement activities were conducted virtually to maintain physical distancing and protect public health. The Project team actively sought out comments from local, regional, and regulatory agencies; residents and businesses that rely on or are located next to I-205; and members of communities who have been historically and currently excluded and underserved in planning processes and underserved by the transportation system.[3] Methods used for outreach and engagement are summarized in Table ES-1.

Table ES-1. Engagement Outcomes: By the Numbers

Connections			Number of Comment Submittals Received*	
7,600	English online open house unique users		3,743	Completed English surveys
2,000	Spanish online open house unique users		79	Completed Spanish surveys
127	Webinar attendees		68	Completed Vietnamese surveys
27	Presentations given		110	Completed Chinese surveys
2,638	People who clicked on English Facebook ads		72	Completed Russian surveys
4,304	People who clicked on Spanish Facebook ads		239	Emailed comments
38K+	Views on ODOT social media posts		22	Letters
4,500	Recipients of Project emails		2	Voicemails
2.3M	Digital advertising impressions through local news outlets		309	Comments from briefings, webinars, and committee meetings
90K+	Readers reached with Spanish newspaper print ads			
9	Multilingual community engagement liaisons			

* All survey responses, comment letters, emails, or comments at a webinar or meeting are collectively referred to as "comment submittals" throughout this report. Some comment submittals identified multiple ideas, each of which is considered individually as a comment.

Engagement Outcomes

The primary method used to provide comments was an online survey, which was made available in five languages. Based on survey data, many respondents live in Clackamas County (54%) and use an automobile as their primary mode of transportation (82%). Of those who

[3] As defined in the Oregon Toll Program's Equity Framework, historically and currently excluded and underserved communities include: people experiencing low-income or economic disadvantage; Black, Indigenous and People of Color (BIPOC); older adults and children; persons who speak non-English languages, especially those with limited English proficiency; persons living with a disability; and other populations and communities historically excluded and underserved by transportation projects.

provided their demographic information, 651 (16% of total respondents) identified as Black, Indigenous or People of Color, which is similar to the population of the largest four counties of the Portland metro area as reported by the U.S. Census Bureau American Community Survey data (2014 to 2018). People who identified as Hispanic or Latin American were likely underrepresented in the survey responses. About 7% of survey respondents completed the survey in a non-English language, which is lower than the percentage of people who speak a language other than English at home across the Portland metro area. In addition, about a quarter (23%) of respondents reported their income as less than $50,000, which is a lower percentage than the region as a whole.[4]

Key Takeaways and Themes

ODOT specifically asked for feedback on the Project's draft purpose and need, goals and objectives, recommended alternatives, and key issues of concern. While these were the topics ODOT asked about, respondents provided comments on other topics as well.

The Project team analyzed all comments received to identify key takeaways and themes between various types of comments and demographic groups to inform decision-making for this and future phases of the Project. The results are not statistically representative, meaning the respondent sample is not predictive of the opinions of the Portland metro area population as a whole.[5]

This section summarizes overarching themes heard during this engagement. The full report provides more detail on the findings below:

- A majority of respondents across all demographic groups and commenting methods expressed strong opposition to tolling in general or to the specifics of the Project as it is currently proposed.
- Submitted comments and questions reflect respondents' need and desire for additional information as well as misunderstandings with the proposed tolling system. Partner agencies and members of the public asked how toll revenue would be spent and provided expenditure recommendations.
- Respondents requested clarity on the relationship of the I-205 Toll Project to the I-205 Improvements Project.
- Commenters expressed numerous concerns with potential effects to quality of life, safety, and air quality from I-205 traffic potentially rerouting onto local roadways to avoid a toll.

[4] In a 20-mile radius around Portland, about 38% of households have incomes less than $50,000 per year, according to the 2017 U.S. Census Bureau American Community Survey. In the I-205 corridor near the Abernethy Bridge, about 34% of households have incomes less than $50,000.

[5] The survey and comment period were open to anyone who wanted to participate. Respondents do not represent a random sampling of households in Clackamas County or the Portland metro area and therefore are not statistically representative of the population as a whole.

- The perceived lack of fairness of tolling I-205 was one of the top areas of concern identified across all demographic groups, but particularly among residents of West Linn, Oregon City, and other parts of Clackamas County.
- Commenters expressed concerns that tolls would be a financial hardship for their households or for households experiencing low income, particularly during the COVID-19 pandemic.
- Recommendations for the environmental review process centered on adding Project alternatives, including consideration of a "no toll" alternative, which is required.
- Toll discounts, maintaining functional toll-free routes and enhancing multimodal transportation options were among the top ideas to address the potential for negative impacts from tolls. These ideas closely mirror the findings from the Value Pricing Feasibility Analysis.
- Distrust of government in general, as well as ODOT in particular, was expressed.
- The ongoing COVID-19 pandemic was mentioned by commenters, and appeared to underlie identified concerns about traffic and economics.

ODOT Responses to Comments

ODOT has developed responses to agency and public comments received during the engagement process, which are documented in the full report. These responses provide information to respond to comments and identify actions that ODOT will take as Project development moves forward. This section provides ODOT's responses to a few of the key comment themes heard during the engagement process.

Linkage of I-205 tolling and improvements: Toll funding could fund portions of the I-205 Improvements Project.

Phased construction of the I-205 Improvements Project is planned, and the financial plan is being developed. ODOT has determined that toll revenue could be used to fund portions of these improvements for a safer and less congested I-205 corridor, pending the results of the I-205 Toll Project environmental assessment. Additional funding sources may also be identified for the improvements. The I-205 Improvements Project would upgrade or replace the Abernethy Bridge and eight other bridges on I-205 in order to withstand a major earthquake, provide interchange improvements, and build the missing third lane in each direction.

Initiation of planning for a regional tolling system: We are beginning a pre-NEPA analysis of a Regional Tolling System for I-5 and I-205.

ODOT is pursuing a system-wide approach to address concerns about fairness, diversion, equity, climate, and congestion management. This system-wide tolling approach will begin with a "pre-NEPA" (PEL or Planning and Environmental Linkages) process to evaluate congestion pricing for the I-5 corridor through the Portland metro area and the extensions of I-205 south and north of the current I-205 Toll Project. The I-205 Toll Project between Stafford

Road and OR 213 will continue to move forward in the NEPA process as a separate project. ODOT will develop messaging and communication strategies to clarify this plan for the regional system and the schedules for both projects.

Alternatives to move forward for additional study: Alternative 3 (toll Tualatin River and Abernethy bridges) and Alternative 4 (toll four segments) will be assessed in the draft environmental assessment along with a "No Build" alternative.

ODOT's early assessment identified Alternatives 3 and 4 as the two alternatives that would best meet the screening criteria, documented in the draft Comparison of Screening Alternatives Technical Report. As such, ODOT recommended these two alternatives be carried forward into the draft environmental assessment for further study, along with a No Action Alternative. ODOT understands that some stakeholders are interested in Alternative 5 (single zone toll) because it performed fairly well in regional measures during the initial screening analysis and because it spreads the toll over the longest extent on I-205. However, this type of single-zone tolling structure does not scale well to the regional structure as it tends to create concentrated rerouting patterns that could result in significant impacts to communities located near the toll area boundaries. The Project team is looking at refinements to Alternative 4 to better achieve the regional benefits offered by Alternative 5, including reduced diversion and rerouting impacts at the regional scale. A more in-depth analysis Alternatives 3 and 4 will be performed in the next phase of the NEPA process, including detailed modeling to understand changes to traffic patterns and potential impacts and benefits to social and environmental resources.

Prioritizing equity in the Project: The Project's goals, objectives, and measures have been updated to further prioritize equity. As directed by the Oregon Transportation Commission's Strategic Action Plan, equity is one of three central, guiding tenets for ODOT. The Oregon Toll Program has created the Equitable Toll Report, a new overarching policy document that will guide the Oregon Toll Program as it moves forward, as well as the Project goals and objectives. The Project goals and objectives are what most directly inform the engagement and evaluative process. Based on comments received from the public, agencies, the Equity and Mobility Advisory Committee, and specific outreach to historically and currently excluded and underserved communities, ODOT is working to clarify how equity will be incorporated into the Project development process in measurable ways. New language will be added to the goals and objectives to better align the document with the equity performance measures.

Next Steps

The Project team will conduct a detailed analysis of the benefits and impacts of tolling on I-205 as the NEPA process moves forward in 2021 and 2022. The results of this analysis will be published for public review in a draft environmental assessment in 2022 and a final NEPA decision in 2023. If approved, tolling on I-205 could begin as early as 2024.

1 INTRODUCTION

1.1 Purpose of this Report

This report summarizes public input received as part of the engagement process for the Interstate 205 (I-205) Toll Project (the Project). The engagement process was used to gather feedback on the Project's draft Purpose and Need Statement, the range of alternatives, and the scope of issues to be addressed in the Project's environmental analysis prepared under the National Environmental Policy Act (NEPA). The Project is in a very early stage of the NEPA process, so ODOT will use this input to shape both the engagement process and the NEPA process as the Project moves forward.

The public input collected during this process will be considered by the Federal Highway Administration (FHWA) and the Oregon Department of Transportation (ODOT) as the agencies finalize the draft Purpose and Need Statement, refine the alternatives carried forward, and identify the potential environmental impacts for analysis that will be documented in the environmental assessment.[6]

Agency, tribal, and public input was collected between August 3, 2020, and the close of the public comment period on October 16, 2020. Multiple strategies were employed to encourage diverse perspectives as part of the decision-making process. This report details these efforts, and the public, agency, and tribal inputs received.

Diverse perspectives

ODOT used multiple strategies to ensure diverse perspectives were heard.

1.2 Project History

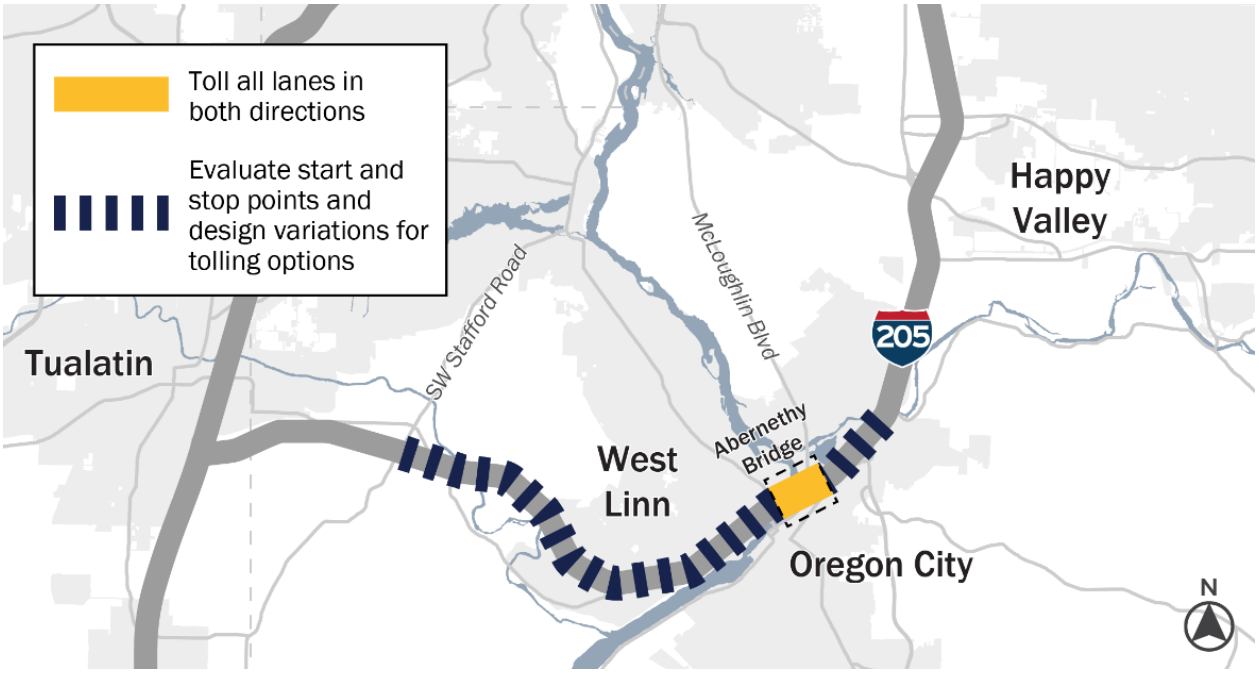
House Bill 2017, known as "Keep Oregon Moving," committed hundreds of millions of dollars in projects that funded bottleneck relief highway projects, freight rail enhancements, improvements to transit, and upgrades to biking and walking facilities. The legislation also directed the Oregon Transportation Commission to pursue and implement tolling on I-5 and I-205 in the Portland metro area to help manage traffic congestion.

In response to House Bill 2017, ODOT initiated the Portland Metro Area Value Pricing Feasibility Analysis (Value Pricing Feasibility Analysis) to explore the available tolling options, determine how and where tolling could help improve congestion on I-5 or I-205 during peak travel times, and begin to understand potential benefits and impacts to travelers and adjacent communities. This feasibility analysis determined that tolling could help manage congestion and raise revenue on I-5 and I-205. An extensive 8-month public and stakeholder engagement process in 2017-2018 included eight open houses, six discussion groups with historically and currently excluded and underserved communities, three online surveys, and one listening

[6] An environmental assessment is a document prepared in compliance with NEPA that identifies the purpose and need for a project, project alternatives, impacts and benefits of project alternatives, and mitigation measures to determine if there would be any significant impacts that would result from implementation of that project.

session hosted by the Oregon Transportation Commission, resulting in more than 5,000 comment submittals considered in identifying the final recommendations. Ultimately, Concept E (tolling on or near the Abernethy Bridge) was recommended for the I-205 corridor (Figure 1-1).

Figure 1-1. Project Area



Following the Value Pricing Feasibility Analysis and receiving input from the FHWA on next steps, the Oregon Transportation Commission directed ODOT to proceed with the National Environmental Policy Act process for tolling on both I-5 and I-205.

Key concerns identified during the Value Pricing Feasibility Analysis, which have been used to guide Project development, include:

- Avoid negatively affecting low-income communities.
- Improve transit and other transportation choices.
- Address the potential for tolls to divert traffic to local streets.

1.3 Project Description

The Project would toll all lanes of I-205 on or near the Abernethy Bridge, consistent with Concept E identified in the Value Pricing Feasibility Analysis. The Project's purpose is to manage congestion between Stafford Road and Oregon Route 213 (OR 213) and raise revenue for congestion relief improvements. Revenue generated by these tolls could help pay for planned roadway improvements on I-205 in the same area while helping to manage the more than 6 hours of daily congestion on this portion of the I-205 corridor. In September 2020, the

Oregon Transportation Commission adopted a policy concept that net toll revenue[7] will be invested back in the corridor in which it is collected.

Tolling on I-205 would consist of an all-electronic system that would automatically collect tolls from vehicles traveling on the corridor by reading the transponder in the vehicle or by reading a license plate while maintaining travel speeds (Figure 1-2).

Figure 1-2. Electronic Toll Collection System

Electronic Tolling

An electronic toll collection system would eliminate the need for tolls booths and keep vehicles moving on I-205.

The Project timeline is shown on Figure 1-3. ODOT is at an early stage in the NEPA process. This engagement served as a formal comment period to seek feedback on the draft Project purpose and need, as well as the alternatives recommended for study in the NEPA process. The analysis performed to-date has been very high-level and would be further refined during the development of the environmental assessment when an in-depth analysis of potential benefits and impacts is prepared. ODOT is expected to provide its recommendations to FHWA for alternatives to be carried forward for evaluation in the draft environmental assessment by early 2021. The environmental assessment will identify potential impacts and benefits that would result from the tolling alternatives, as well as mitigation measures to avoid, minimize, and mitigate impacts. The Project team will continue to collect public input over the course of the Project, including during the public comment period for the draft environmental assessment. If approved, tolling on I-205 could begin as early as 2024.

[7] Net toll revenue is the revenue that remains after paying for toll operations.

Figure 1-3. I-205 Toll Project Timeline

1.4 Connection to the I-205 Improvements Stafford Road to OR 213 Project

Consistent with the policy concept adopted by the Oregon Transportation Commission, revenue generated by tolls on I-205 could help pay for improvements on the corridor, including portions of the I-205 Improvements Stafford Road to OR 213 Project (I-205 Improvements Project). The I-205 Improvements Project includes seismic upgrades of the Abernethy Bridge and eight other bridges on I-205, as well as widening the last two-lane segment of I-205 to three lanes (in each direction). The environmental review for the I-205 Improvements Project was completed in 2018.

1.5 COVID-19 Pandemic

Because of the ongoing COVID-19 pandemic, all engagement activities were conducted virtually with digital tools to maintain physical distancing and protect public health, as later described in Sections 2 through 4.

Although this engagement took place during the COVID-19 pandemic when travel patterns were altered due to stay-at-home orders earlier in 2020 and continued social distancing, ODOT's traffic data shows that as of the week of September 21-25, 2020, traffic levels on I-205 near Stafford Road are lower in the morning peak period, but have returned substantially in the afternoon peak period. Other major roadways in the Portland metro area show similar patterns of traffic levels returning ODOT traffic experts expect traffic levels to further return following the pandemic.

2 ENGAGEMENT PROCESS

2.1 Comment Period Overview

This engagement ran from August 3 to October 16, 2020. Engagement for the Project provided agencies, community groups, corridor travelers, and the public with the opportunity to review why the Project is needed and what it is intended to accomplish, as well as the alternatives under consideration as potential tolling strategies along I-205. ODOT received more than 4,600 survey responses, comment letters, emails, and comments at a webinar or meeting (collectively referred to as comment submittals),[8] which will help shape the Project's upcoming analysis in the NEPA process, including the alternatives studied in the environmental assessment.

Because of the ongoing COVID-19 pandemic, all engagement activities were conducted virtually to maintain physical distancing and protect public health. Near the end of the initial 45-day comment period, wildfires burning in Clackamas County led ODOT to extend the comment period by 30 days to ensure that everyone in the Project vicinity had sufficient time to submit comments.

2.2 Topics for Public and Stakeholder Review

ODOT requested comments on the Project's draft Purpose and Need Statement, including goals and objectives, the recommended alternatives for further study, and topics or key issues to be considered. The comments will be used by ODOT and FHWA in finalizing the purpose and need, determining which alternatives are studied in the environmental assessment, and assessing impacts and benefits in the environmental assessment.

2.2.1 Draft Project Purpose and Need Statement

The draft Purpose and Need Statement was developed by ODOT based on input received during the Value Pricing Feasibility Analysis (see Section 1.2) and input from agency partners and stakeholders. The Project's draft Purpose and Need Statement identifies the transportation problem that the Project is intended to address (purpose) and the reasons behind the problem (need).

The goals and objectives identify additional desirable outcomes that the Project would like to accomplish. The goals and objectives were developed based on community input received through the Value Pricing Feasibility Analysis, as well as in consultation with partner agencies, stakeholders, and the Project team's equity consultants. Alternatives are developed as potential solutions to the stated problem and meet the stated needs. Alternatives are then compared to determine if and how well they meet the goals and objectives and the Purpose and Need Statement.

[8] All survey responses, comment letters, emails, or comments at a webinar or meeting are collectively referred to as "comment submittals" throughout this report. Some comment submittals identified multiple ideas, each of which is considered individually as a comment.

The **draft purpose statement** follows:

> "The purpose of the I-205 Toll Project is to manage congestion on I-205 between Stafford Road and OR 213 and raise revenue to fund congestion relief projects through the application of variable-rate tolls."

The following five **draft need statements** were also shared to demonstrate why the Project was necessary and important:

- Population growth contributes to increasing congestion.
- Traffic congestion results in unreliable travel.
- Traffic congestion impacts freight movement.
- Traffic congestion contributes to climate change.
- Critical congestion relief projects need construction funding.

The following **draft goals** are desired outcomes of the Project beyond its purpose and the need:

- Provide equitable benefits for all users.
- Limit additional traffic diversion from I-205 to adjacent roads and neighborhoods.
- Support safe travel regardless of mode of transportation.
- Improve air quality and reduce contributions to climate change effects.
- Support multimodal transportation choices.
- Support regional economic growth.
- Support travel demand management.
- Maximize integration with future toll systems.
- Maximize interoperability with other transportation systems.

Attachment A includes the Project's full draft Purpose and Need Statement, including goals and objectives.

2.2.2 Draft Range of Alternatives

ODOT shared five potential scenarios for how tolls could be implemented on I-205 (referred to as tolling "alternatives") for review and comment; a "no action" (no toll) option is also required to be studied in the NEPA process. The draft alternatives presented, also referred to as "screening alternatives," were developed based on the concept recommended for the I-205 corridor in the Value Pricing Feasibility Analysis (Concept E), which was to toll all lanes of I-205 at or near the Abernethy Bridge. All five draft alternatives were based on this recommended concept. Table 2-1 lists the five draft alternatives and overall considerations identified by the Project team for each.

Table 2-1 Draft Alternatives and High-Level Considerations

Alternatives	Considerations (identified by Project team)
Alternative 1: Toll on the Abernethy Bridge	• Simple to understand and implement. • Limited ability to manage traffic demand. • Concentrated diversion through Oregon City.
Alternative 2: Toll the Abernethy Bridge, with tolling gantries off bridge	• Refinement of Alternative 1. • Designed to limit diversion of through trips on I-205.
Alternative 3: Individually toll multiple bridges to be rebuilt	• Tolls on reconstructed bridges over Tualatin River and Willamette River. • Split toll amount between two locations. • Through trip pays more than local access trip.
Alternative 4: Segment-based tolls - Stafford Road to OR 213	• Toll split across four segments: amount paid depends on number of segments traveled. • Most flexible for traffic operations management. • More complex pricing structure to communicate to users.
Alternative 5: Single zone toll - Stafford Road to OR 213	• One toll rate for all trips entering toll zone. • Through trips pay the same as local access trips. • More complex implementation because of the multiple toll points.
No Action	• No toll on I-205.

All alternatives were developed with toll rates set to generate net toll revenue sufficient to fund the following:

- Tolling infrastructure and system.
- Seismic upgrade and reconstruction of the Abernethy Bridge.
- Third lane construction on I-205 between Stafford Road and OR 213, including associated overpass/underpass and interchange improvements.

As of the close of the comment period on October 16, 2020, no decision on the use of toll revenue had been made. The Oregon Transportation Commission adopted a policy concept in September 2020 that all toll revenue collected in a corridor will be invested in the corridor in which it was collected

In advance of this engagement, ODOT compared and scored the five draft tolling alternatives against one another using the following screening criteria:

- Transportation demand.
- Traffic on I-205.
- Diversion effects.
- Cost and revenue.
- Implementation and operation.

ODOT scored the alternatives comparatively on a scale of "much worse" to "much better" as documented in the draft Comparison of Screening Alternatives Technical Report, included in Attachment A. ODOT's assessment identified Alternative 3 and Alternative 4 as the two alternatives that would best meet the screening criteria. As such, ODOT recommended these two alternatives be carried forward into the draft environmental assessment for further study, along with a No Action Alternative.

It is important to note that a more in-depth analysis of each of the alternatives carried forward will be performed in the next phase of the NEPA process, including detailed modeling to understand changes to traffic patterns and potential impacts and benefits to social and environmental resources.

ODOT requested comments on the presented range of draft alternatives, as well as the screening process and the alternatives recommended for further study in the environmental assessment. These comments will be considered in determining which alternatives are studied in the environmental assessment

2.2.3 Topics to be Studied or Issues to be Considered in the NEPA Process

In addition to requesting specific feedback on the prepared draft documents, as described in Sections 2.2.1 and 2.2.2, ODOT also asked the public, agencies, and tribes what else should be considered during the study of tolls on I-205.

ODOT also sought public input to inform development of the Project, Project evaluation criteria, performance measures, and community mobility and equity priorities, including the agency's approach to equitable engagement and achieving equitable outcomes.

3 AGENCY AND TRIBAL COORDINATION

This section describes ODOT and FHWA's coordination with agencies and tribes as part of the engagement efforts for the Project.

3.1 Agency Coordination

3.1.1 Participating Agencies

ODOT and FHWA identified 43 federal, state, regional, and local agencies with a potential interest in the Project and invited them to serve as Participating Agencies in the NEPA process. Agencies received an invitation letter from FHWA, accompanied by the draft Purpose and Need Statement, draft Comparison of Alternatives Report and Executive Summary, and a draft Agency Coordination Plan.

Agencies were invited to attend a virtual meeting, held on August 12, 2020, to learn about the Project, understand the role of Participating Agencies, and ask questions. Representatives from 15 agencies attended the meeting. They were also notified of the Project website, online open house, survey, and the series of public webinars. ODOT requested that agencies submit comments on the draft Purpose and Need Statement, the range of alternatives, and issues or concerns to consider in the NEPA process. Attachment D includes a summary of the Participating Agency coordination meeting. The presentation for the meeting was similar to the presentation for the public webinars (included in Attachment A).

Seventeen agencies accepted the invitation to serve as Participating Agencies, as discussed in Section 8 and documented in the Project's Agency Coordination Plan.

In addition to the August 12, 2020, Participating Agency coordination meeting, ODOT also coordinated with agencies through public meetings and briefings and Project working groups, as described in Section 4.1.1.

3.1.2 Project Working Groups

For purposes of the Project, ODOT convened three working groups, composed of staff from partner agencies:

- **Regional Partner Agency Staff:** This group is composed of partner agency staff represented on the Region 1 Area Commission on Transportation, Metro Joint Policy Advisory Committee on Transportation, and Southwest Washington Regional Transportation Commission. This group meets in advance of Region 1 Area Commission on Transportation meetings to hear Project updates and provide input on information that the Region 1 Area Commission on Transportation may request.
- **Regional Modeling Group:** This group is composed of partner agency staff members with a technical understanding of transportation modeling to provide input on the modeling approach for the Project.

- **Transit and Multimodal Working Group:** This group is composed of partner agency staff members with knowledge of the local transit, pedestrian, and bicycle system to provide input on how these elements could be affected by or be incorporated into the Project approach.

Prior to and during this engagement, ODOT met with each of these groups to provide Project updates, answer questions, and encourage agencies to submit comments during the public comment period. Attachment D contains summaries of these meetings, including comments and discussion.

3.2 Tribal Consultation

The following seven Native American tribes with a potential interest in the Project were also invited to serve as Participating Agencies:

- Confederated Tribes of the Grand Ronde Community of Oregon.
- Confederated Tribes of the Siletz Indians.
- Confederated Tribes of the Umatilla Indian Reservation.
- Confederated Tribes of Warm Springs Reservation of Oregon.
- Confederated Tribes and Bands of the Yakama Nation.
- Cowlitz Indian Tribe.
- Nez Perce Tribe.

No tribes accepted the invitation to serve as a Participating Agency. ODOT and FHWA will initiate formal government-to-government consultation with these tribes.

4 PUBLIC AND STAKEHOLDER INVOLVEMENT

4.1 Outreach Overview

Information was shared digitally through the Project website, online open houses, briefings, Project working groups, advisory committee meetings, and community webinars. To help ensure that information was engaging in these digital formats, Project information was shared in a variety of ways using graphics and videos. Project staff provided presentations throughout this engagement to many partner and community groups in and around the I-205 corridor, as well as to the Oregon Toll Program's Equity and Mobility Advisory Committee and ODOT's Region 1 Area Commission on Transportation. Public feedback was collected primarily through an online survey. Partner agencies and members of the public also had the opportunity to review information and share comments with ODOT directly via email, web comment form, voicemail, or comments at stakeholder briefings.

To more equitably share information and capture responses within the community, Project materials and the online survey were translated into multiple languages that are spoken within the Project region: Simplified and Traditional Chinese, Russian, Spanish, and Vietnamese. Spanish is the most common language spoken at home besides English throughout the region (8%) and the others are spoken by less than 3% of the population. Community liaisons helped to work with different language communities within the Portland metro area to share Project information and collect feedback during this engagement.

4.1.1 Input Opportunities

PROJECT WEBSITE

The Project website, www.OregonTolling.org, provided information about the Project and ways to get involved. Visitors could access Project information, including materials presented to the Projects' Equity and Mobility Advisory Committee, fact sheets (in multiple languages), and answers to frequently asked questions. The website also provided links to the online open house, Project email address, web comment form, and voicemail line. Technical memos and draft documents for review also were available.

ONLINE OPEN HOUSE AND ONLINE SURVEY

Between August 3 and October 16, 2020, ODOT hosted an online open house. This temporary, interactive website included eight virtual "stations" with informational videos and documents about modern tolling; the Project; the draft Purpose and Need Statement; and the proposed alternatives. The site also included an online survey that served as the primary tool for collecting stakeholder and public feedback. The online survey included multiple choice and write-in questions along with some images and diagrams. About 7,600 unique visitors accessed the English language site and about 2,000 unique visitors accessed the Spanish language site.

WEBINARS

Three informational webinars were held via Zoom and streamed live on YouTube to provide a Project overview and information. The presentation content at the three webinars was identical and is included in Attachment A. During each webinar, the Project team posed questions using "Poll Everywhere," a texting tool to promote interaction and feedback. Participants could ask questions via chat and email. These were answered in real time by the Project team. Webinars were recorded and posted to the Project website so that members of the public could view them at a later date. Table 4-1 provides an overview of attendance and viewership at the three webinars.

Table 4-1. Webinar Date and Viewership

Webinar Date and Time	Webinar Attendees (Zoom webinar)	Livestreaming Views (YouTube)	Post-Event Views (YouTube)
Wednesday, August 12, 2020 12:00 - 1:00 p.m.	33	9	267
Tuesday, August 18, 2020 4:00 - 5:00 p.m.	41	19	87
Thursday, August 20, 2020 6:30 - 7:30 p.m.	18	7	117

COORDINATION WITH COMMUNITY LIAISONS AND MULTI-LINGUAL ENGAGEMENT

The Project team worked with community engagement liaisons to connect with multilingual audiences that historically have not been engaged by transportation projects during planning. The community engagement liaisons provided in-language Project information to communities throughout the region. The Project team provided fact sheets and surveys translated into Spanish, Russian, Vietnamese, Simplified Chinese, and Traditional Chinese to the community engagement liaisons, who then distributed them to community members. The community engagement liaisons interacted with service providers, freight haulers, I-205 commuters, schools, and online Facebook groups. This engagement led to many conversations and questions among community members. Some of this engagement did not result in a completed survey.

ODOT translated the entire online open house into Spanish and advertised the Spanish site through in-language print and digital ads in Spanish language publications (digital, print, and radio). ODOT also translated a flyer with Project information into Spanish, Russian, Vietnamese, Simplified Chinese, and Traditional Chinese.

COORDINATION WITH COMMUNITY-BASED ORGANIZATIONS AND PARTNER AGENCIES

In an effort to reach community members who may not use ODOT's existing communication platforms, ODOT coordinated with community-based organizations and partner agencies to share notifications about the comment period. These outreach tactics included the following:

- Emailing an outreach toolkit with fact sheet, flyer, sample news article, and sample social media posts to more than 100 community groups and neighborhood organizations.
- Making telephone calls to about 20 community organizations that support historically and currently excluded and underserved populations to alert them to the comment period, the toolkit, and informational resources in non-English languages.
- Distributing 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.

PUBLIC MEETINGS AND ADVISORY COMMITTEE MEETINGS

Project staff presented information and answered questions about the Project at 27 meetings of regional policy groups, boards, councils, and community and business organizations. The presentations focused on the draft Purpose and Need Statement and initial toll alternatives. All the presentations were conducted via online meeting platforms and most were live streamed to a public audience. Attachment D provides summaries of these briefings, including comments and questions.

For purposes of the Oregon Toll Program, ODOT convened an Equity and Mobility Advisory Committee. This committee is a group of individuals with professional or lived experience in equity and mobility coming together to advise the Oregon Transportation Commission and ODOT on how tolls, in combination with other demand management strategies, can include benefits for communities that have been historically and currently excluded and underserved by transportation projects. The committee will consider needs and opportunities for achieving community mobility and equity priorities as part of the NEPA process for toll implementation. The committee will advise on the equity foundation of these toll projects, including guidelines, strategies and processes. Members of the public are invited to attend committee meetings via the live stream and provide public comment at the meetings or by email to the committee. The Equity and Mobility Advisory Committee met twice during this engagement.[9]

The Region 1 Area Commission on Transportation is a standing committee that advises the Oregon Transportation Commission on transportation issues in ODOT Region 1 (Portland metro area). The committee is composed of 31 voting members including (but not limited to) private industry, transit agencies, stakeholders and elected officials. Members of the public are invited to attend Region 1 Area Commission on Transportation meetings via the live stream and provide public comment at the meetings or by email to the committee. The Region 1 Area Commission on Transportation met twice during this engagement.[10]

[9] Meeting summaries for the two meetings of the Equity and Mobility Advisory Committee that occurred during the comment period not included here because their discussions were not focused issues specific to the I-205 Toll Project engagement. Public comments that were addressed to the committee are included as part of this summary.

[10] Summaries of the Region 1 Area Commission on Transportation from August and October 2020 are included in Attachment D.

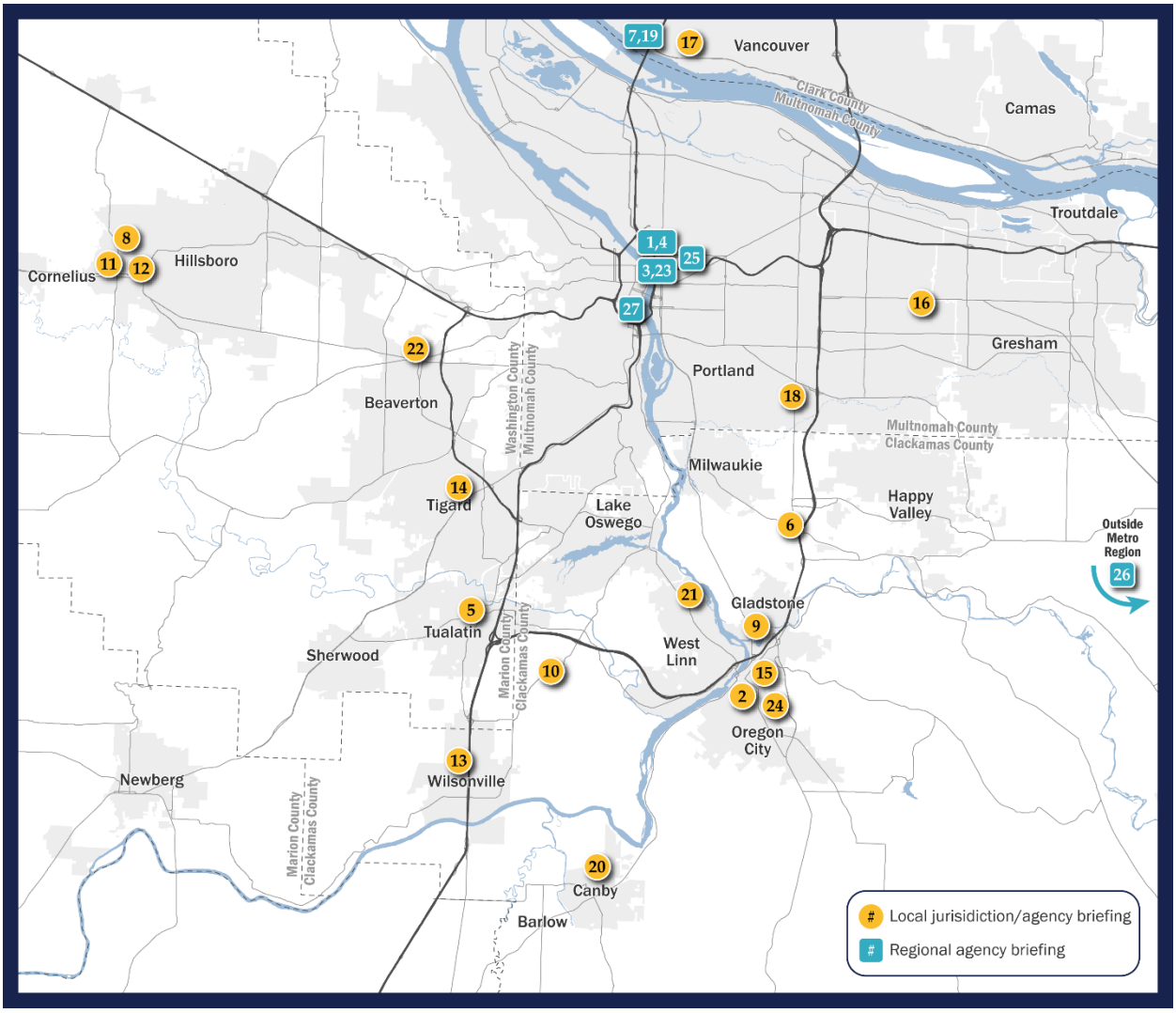
ODOT also participated in virtual meetings held by partner agencies and presented Project information. Most of these meetings were open to viewing by the public. ODOT presented to the organizations listed in Table 4-2 and mapped in Figure 4-1.[11]

Table 4-2. Community Briefings

Number on Figure 4-1	Location/Organization	Date
1	Metro Transportation Policy Alternatives Committee	July 10
2	Clackamas County Diversion Committee Staff	July 13
3	Metro Joint Policy Advisory Committee on Transportation	July 16
4	Metro TPAC	July 22
5	City of Tualatin	July 27
6	North Clackamas Chamber of Commerce	August 3
7	SW Washington Regional Transportation Council	August 4
8	Washington County Coordinating Committee TAC	August 6
9	City of Gladstone	August 11
10	Stafford Hamlet	August 11
11	Washington County Board of Commissioners	August 11
12	Washington County Coordinating Committee	August 17
13	City of Wilsonville	August 17
14	City of Tigard	August 18
15	City of Oregon City	August 19
16	East Portland Action Plan	August 19
17	City of Vancouver	August 24
18	Lents Neighborhood Association	August 25
19	SW Washington Regional Transportation Council	September 1
20	City of Canby	September 2
21	City of West Linn	September 8
22	Westside Transportation Alliance	September 9
23	Metro Joint Policy Advisory Committee on Transportation	September 17
24	Clackamas County Coordinating Committee TAC	September 22
25	Metro Council	September 24
26	Region 5 Area Commission on Transportation	October 1
27	TriMet Equity Advisory Committee	October 13

[11] A few engagement activities, more specifically presentations at public meetings, occurred in July 2020 prior to the start of the formal comment period. At these presentations, participants were notified of the starting date for the formal comment period, and the launches of the online open house and online survey, which were August 3, 2020.

Figure 4-1. Community Briefings



OTHER INPUT METHODS

Community members could also provide input by sending emails or letters to the Project team, submitting a comment through the Project website, emailing OregonTolling@odot.state.or.us, or leaving a voicemail on the Project phone line at 503-837-3536.

4.1.2 Comment Period Notification Methods

Public notification of the engagement opportunities occurred through several channels as described in the sections below. Attachment A provides copies of all notifications published or posted by ODOT.

NEWS RELEASE AND E-NEWSLETTERS

ODOT regularly sends communications to interested parties through electronic email newsletter lists. The following communications about this engagement were sent multiple times to email lists in 2020:

- A news release distributed statewide and to the Project email list on August 3, which reached about 6,700 subscribers.
- Toll Project eNews delivered to Project listserv on July 17, August 11, September 11, and September 18 to more than 4,500 subscribers.

SOCIAL MEDIA POSTS

ODOT used its existing agency social media accounts to communicate about this engagement. Social media notifications included the following:

- 1 ODOT Facebook Post, with more than 18,000 video views, more than 230 reactions, more than 420 comments, and more than 120 shares.
- 3 ODOT Facebook events for the public webinars with 408 guest RSVPs.
- 3 ODOT Twitter tweets, with approximately 20,000 views, 27 comments, and 11 shares.
- 1 ODOT LinkedIn post, with 687 views, 13 likes and 1 comment.
- Social media posts from partner agencies and media, including KGW, BikePortland and Canby Now.

PAID ADVERTISING

ODOT placed print and digital advertisements to reach an expanded audience during this engagement, as listed in Table 4-3 through Table 4-6. Figure 4-2 shows samples of these advertisements. The purpose of placing advertisements was to make the broader community aware of the Project while encouraging those who were interested to participate in the comment period. Attachment A includes copies of all advertisements published or posted by ODOT.

Table 4-3 Digital/Radio Media Outlet Advertisement Reach

Media Outlets	Average Reach	Runtime	Performance
Portland Observer	44,000 weekly unique site visits	8/5 – 8/11, 8/26 – 9/1	5,000 impressions
The Skanner	150,000 unique monthly site visits	8/5 – 9/4	1,901,305 impressions, 1,677 ad clicks
El Latino de Hoy	5,100 unique monthly site visits	8/5 – 9/4	Not available (publication does not provide analytics)
Pamplin Media: • The Times (Tigard, Tualatin, Sherwood) • West Linn Tidings • Canby Herald • Clackamas/Oregon City News	64,700 daily readers	8/3 – 9/16	431,000 impressions, 925 clicks
Oregon City News e-blast (Pamplin Media)	26,000 emails sent on average per blast	8/13, 8/20, 8/27, 9/3, 9/10	3,657 emails opened on average per blast
93.1 El Rey (Spanish language radio)	160,000 listenership	8/31-9/13 thirty, sixty second spots radio and streaming	No data available

Notes:
Impressions: Number of times a page is loaded/number of times a user potentially sees an ad on their screen.
Unique site visits: Number of unique individuals that visit a website within a specific timeframe.
Reach: Estimated number of individuals or readership of a publication during the time period.

Table 4-4 Print Media Outlet Advertisement Reach

Media outlets	Reach	Runtime
The Asian Reporter	20,000 monthly copies	2 monthly issues (8/3 and 9/7)
El Latino de Hoy	25,000 weekly copies (90,000 weekly readers)	2 weekly issues (8/5, 8/26)
(Pamplin Media) The Times (Tigard, Tualatin, Sherwood)	12,730 copies/29,280 readers	1 weekly issue (8/6)
(Pamplin Media) West Linn Tidings	4,070 copies/9,360 readers	1 weekly issue (8/13)
(Pamplin Media) Canby Herald	5,635 copies/12,960 readers	1 weekly issue (8/5)
(Pamplin Media) Clackamas/Oregon City	17,700 copies /40,800 readers	1 weekly issue (8/12)

Table 4-5 Facebook Advertisement Reach

	Reach	Impressions	Clicks (all)	Post Reactions	Post Shares	Link Clicks
English	78,671	267,037	5,914	259	56	2,638
Spanish #1	58,126	201,761	7,761	237	58	3,786
Spanish #2	25,424	47,873	1,199	61	19	518
All	**110,046**	**516,671**	**14,874**	**557**	**133**	**6,942**

Table 4-6 Twitter Ad Reach

Language	Impressions	Engagements	Link Clicks
English	82,827	3,071	2,830

Figure 4-2. Digital Advertisements (Facebook, El Latino de Hoy, and Portland Observer)

MEDIA AND BLOG COVERAGE

Local media that covered Project engagement included the following:

- News stories from several sources, including KGW, KOIN, KXL, Landline Media, Canby First, Portland Tribune, The Times (Tigard, Tualatin, Sherwood), Transport Topics, Portland Business Journal, and the Southeast Examiner
- Stories on local blogs including Bike Portland and Clark County Today
- Posts on local jurisdiction websites including City of West Linn, Beaver Creek Hamlet, Tualatin Life, Clackamas County, and City of Oregon City
- Posts on association websites including Alliance for Toll-Free Interstates and National Motorists Association

4.1.3 By the Numbers

Table 4-7 shows the comment source and number of comment submittals by source, with a total of 4,644 comment submittals received. As shown in this table, the online survey was the largest source of public comments.

Table 4-7 Number of Comment Submittals Received

Comment Source	Number of Comment Submittals
English online survey	3,743
Spanish online survey	79
Vietnamese online survey	68
Russian online survey	72
Simplified and Traditional Chinese surveys	110
Webinars	109
Briefings and presentations	165
Committee public comments	35
Letters	22
Email and web comment form	239
Voicemail	2
Total comment submittals received	**4,644**

4.2 Methodology for Analyzing Comments

The Project team analyzed the 4,644 comment submittals received through the online survey and via email, voicemail, letter, and during webinars and presentations. The purpose of the analysis was to identify key themes and connections between comment topics and demographic groups to inform decision-making for this phase and future phases of the Project.

4.2.1 Data Integrity

The online survey included 17 questions: seven demographic questions, five Project-related multiple-choice questions, and five open-ended (write-in) questions. The survey collected feedback on the use of I-205, the concerns and opportunities with tolls, the draft Purpose and Need Statement, the draft Project goals, and the draft tolling alternatives.

The goal of this engagement was to garner participation and engage and learn from as many members of the broader public as possible. Multiple comments could have been received from one person if they participated in multiple engagement activities. Responses to the survey were not limited by the Internet Protocol (IP) address so that multiple members of the same household or workplace could submit feedback. No evidence of intentional multiple submissions was found when the Project team reviewed data by IP address.

The survey results are not statistically representative, meaning the respondent sample is not predictive of the opinions of the Portland metro area population as a whole.[12]

4.2.2 Analysis of Open-Ended Questions

The responses to open-ended survey questions via letters, voicemails, and emails were categorized based on thematic topic. Comment submittals were categorized into multiple themes if more than one topic was discussed. Most submittals referred to multiple topics. In general, the issues and questions raised in the comments did not differ significantly among the different submission sources (for example, survey, letter, email). Consequently, themes from all responses to open-ended questions are summarized together. Section 5 through Section 9 describe the main themes and messages of the comments received. For the purpose of this summary, every comment has value, whether it is stated only once or multiple times; Attachment D includes all comments received during this engagement.

4.3 Geography and Demographics of Survey Respondents

ODOT asked respondents to self-report demographic data to understand if the responses were comparable to the population at large. Respondents could choose to not answer the demographic questions. Demographics of survey responses were compared to U.S. Census Bureau American Community Survey data (2014 to 2018) for the Portland metro area, composed of Clark County, Multnomah County, Washington County, and Clackamas County. Overall, certain demographic groups are overrepresented in the survey responses (Table 4-8). This is called out where applicable in the following sections.

Table 4-8 Location of Survey Respondents

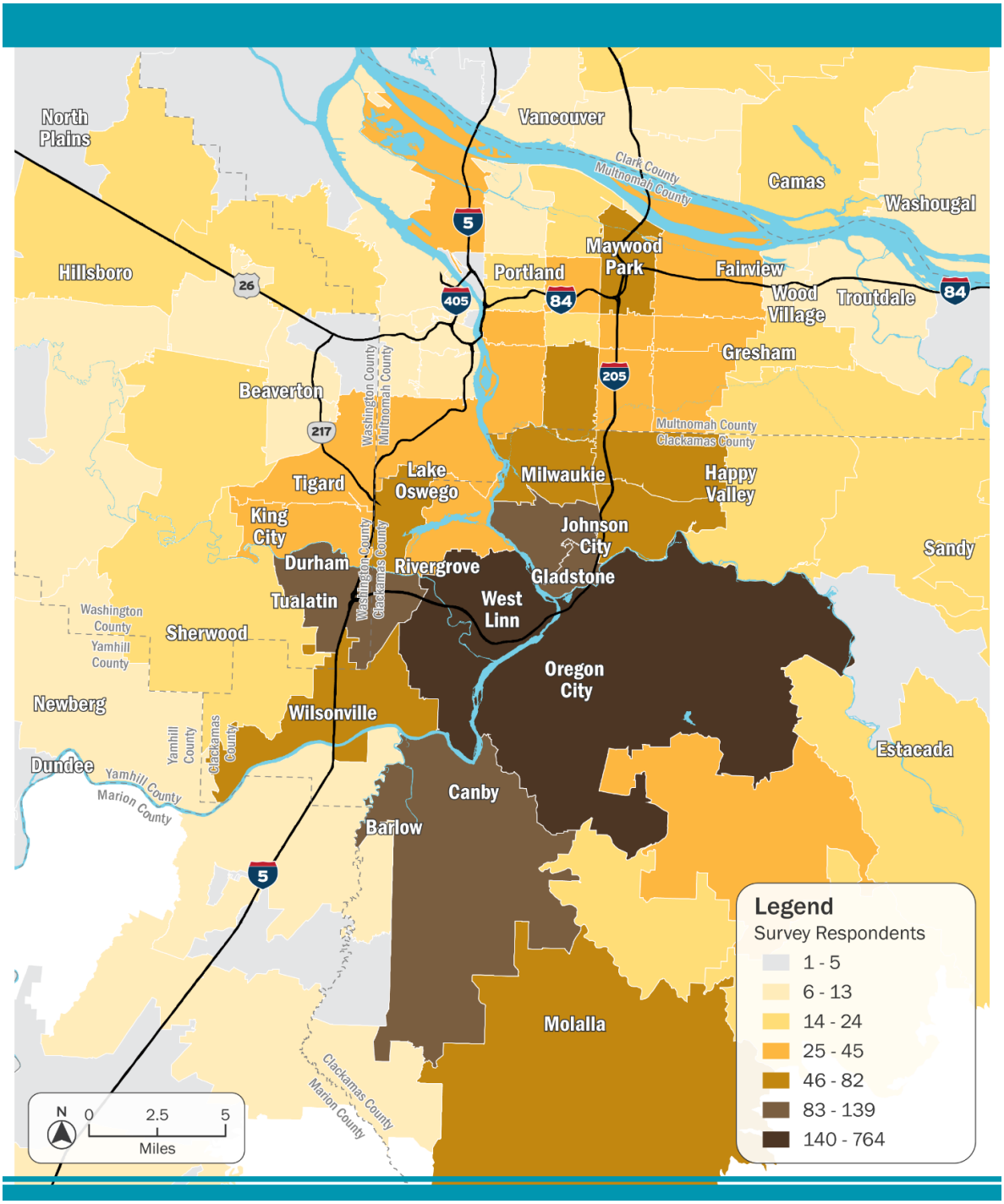
Location	Total Population	% of Portland Metro Area Population	Survey Responses	% of Survey Responses
Total	**N/A**	**N/A**	**4,072**	**100%**
Portland Metro Area	2,251,640	100%	3,311	81%
Clark County	465,384	21%	138	3%
Multnomah County	798,647	35%	709	17%
Washington County	581,821	26%	281	7%
Clackamas County	405,788	18	2,183	54%
Marion County	335,553	N/A	74	2%
Other Counties (or no ZIP code provided)	N/A	N/A	687	17%

[12] The survey and comment period were open to anyone who wanted to participate. Respondents do not represent a random sampling of households in Clackamas County or the Portland metro area and therefore are not statistically representative of the population as a whole.

4.3.1 Geography

Online survey respondents were asked to provide their ZIP code. Approximately 3,800 respondents provided a ZIP code. Of these, 77% live in the four primary counties that comprise the Portland metro area. The following heat map (Figure 4-3) shows the distribution of survey responses by ZIP code.

Figure 4-3. Heat Map of Survey Responses by ZIP Code



4.3.2 Race/Ethnicity

Most (54%) of survey respondents identified as white (Table 4-9). The second- and third-most selected race/ethnicity identifiers were "Prefer not to answer" (24.5%) and "Prefer to self-describe" (8.4%). Overall, people who identified as Hispanic or Latin American were likely underrepresented in the survey responses compared with census data for Clackamas County, where the Project is located, or the Portland metro area as a whole as shown in Table 4-9.

Table 4-9. Race/Ethnicity of Survey Respondents Compared to the Portland Metro Area and Clackamas County

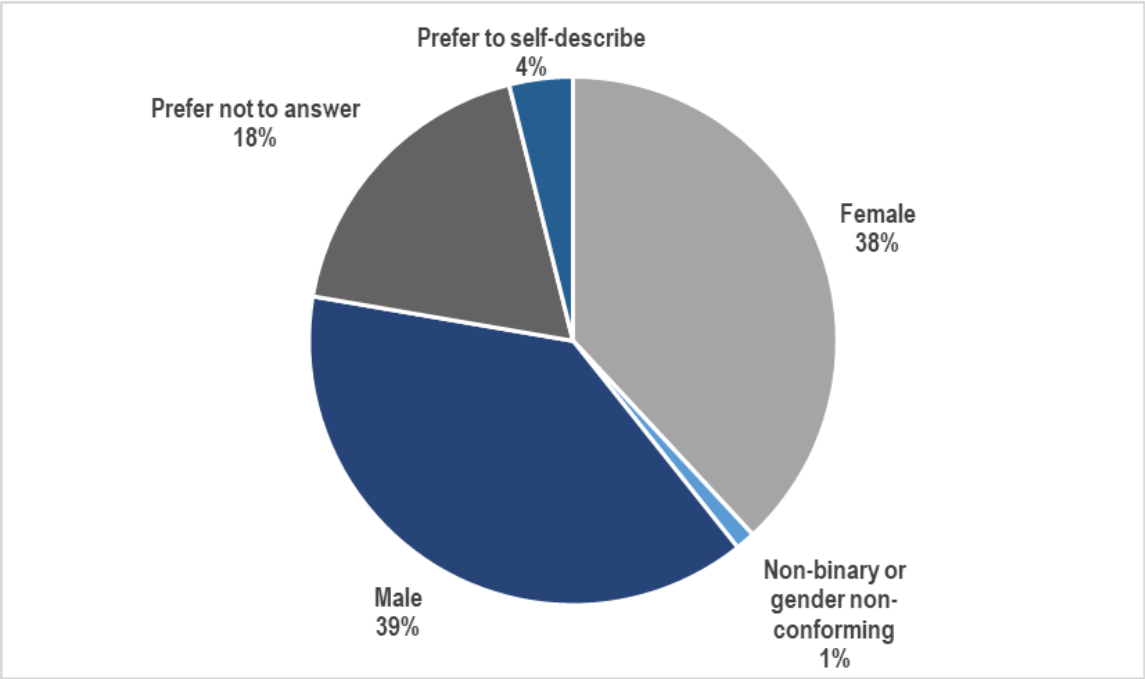
Race/Ethnicity	Survey Respondents[1]	Clackamas County	Portland Metro Area
American Indian/Alaskan Native	3%	1%	1%
Asian	6%	4%	7%
Black/African-American	4%	1%	3%
Hispanic/Latino[2]	6%[3]	9%	12%
Native Hawaiian/Pacific Islander	1%	0%	1%
Slavic	2%	N/A	N/A
Middle Eastern	1%	N/A	N/A
White	54%	88%	81%
No response/other	33%	N/A	N/A
Some Other Race	N/A	2%	3%
Two or More Races	N/A	4%	5%

1. Survey Respondents" percentages in the above table are based on responses to the following question: "How do you identify your race/ethnicity? (select all that apply)" Total will not equal 100%.
2. According to the U.S. Census Bureau, Hispanic origin can be viewed as the heritage, nationality, lineage, or country of birth of the person or the person's parents or ancestors before arriving in the United States. People who identify as Hispanic, Latino, or Spanish may be any race.
3. Composed of survey respondents who identified as Hispanic/Latin American and/or Indigenous Central or South American

4.3.3 Gender

As shown on Figure 4-4, approximately 39% of questionnaire respondents identified as male, 38% identified as female, approximately 4% preferred to self-describe, and 1% identified as non-binary or gender non-conforming. Approximately 18% said they preferred not to say.

Figure 4-4. Gender Identification of Survey Respondents



4.3.4 Age

As shown in Table 4-10, approximately 42% of survey respondents reported their age as 35 to 54, while 14% reported their age as 16 to 34 and 28% as 55 and older. Just under 16% said they preferred not to say. Compared to the Portland metro area, ages 35 to 64 were overrepresented compared to the region as whole.

Table 4-10. Age of Survey Respondents

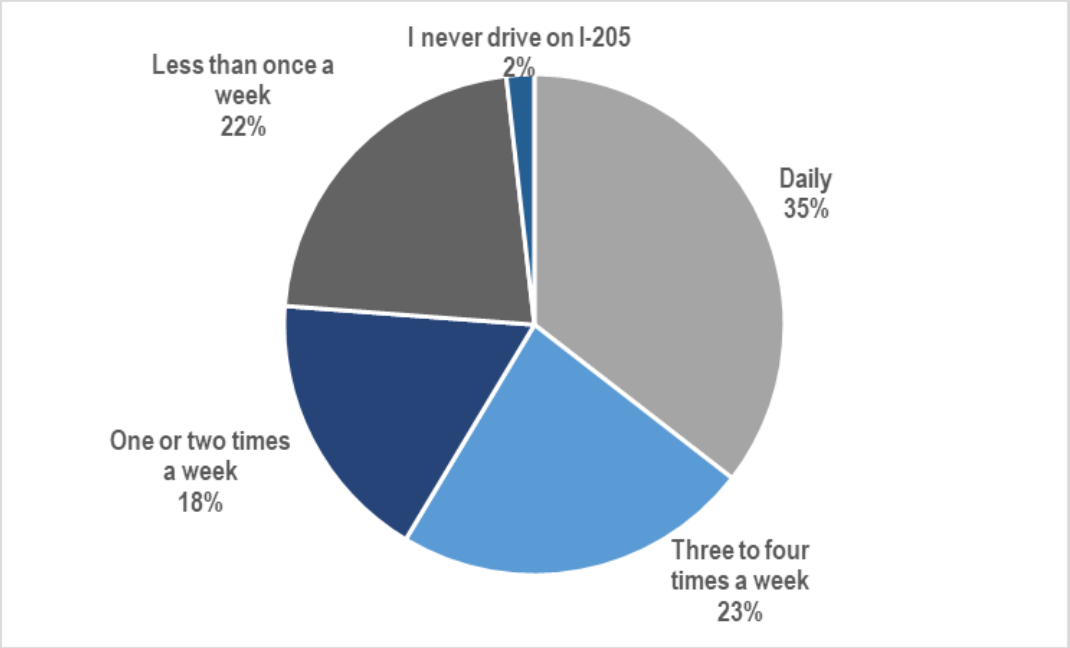
Age	Survey Respondents	Clackamas County	Portland Metro Area
16 to 24	2%	12%	12%
25 to 34	12%	12%	16%
35 to 44	21%	13%	15%
45 to 54	21%	14%	13%
55 to 64	16%	14%	13%
65+	13%	17%	14%
No response/other	16%	18%	18%

Note: The U.S. Census Bureau delineates ages as under 5, 5 to 9, 10 to 14, 15 to 19, 20 to 24, 25 to 34, 35 to 44, 45 to 54, 55 to 59, 60 to 64, 65 to 74, 75 to 84, and 85+. For Clackamas County and Portland metro area demographic data, respondents in the 15 to 19 and 20 to 24 are included in the "16 to 24" range.

4.3.5 How Often Respondents Use I-205

More than 3,900 online survey respondents described how frequently they use I-205. Of these, 35% reported using I-205 daily, 23% reported using I-205 three to four times a week, and 18% reported using I-205 one or two times a week, as shown in Figure 4-5. Additionally, 24% reported using I-205 less than once a week or never driving on I-205.[13]

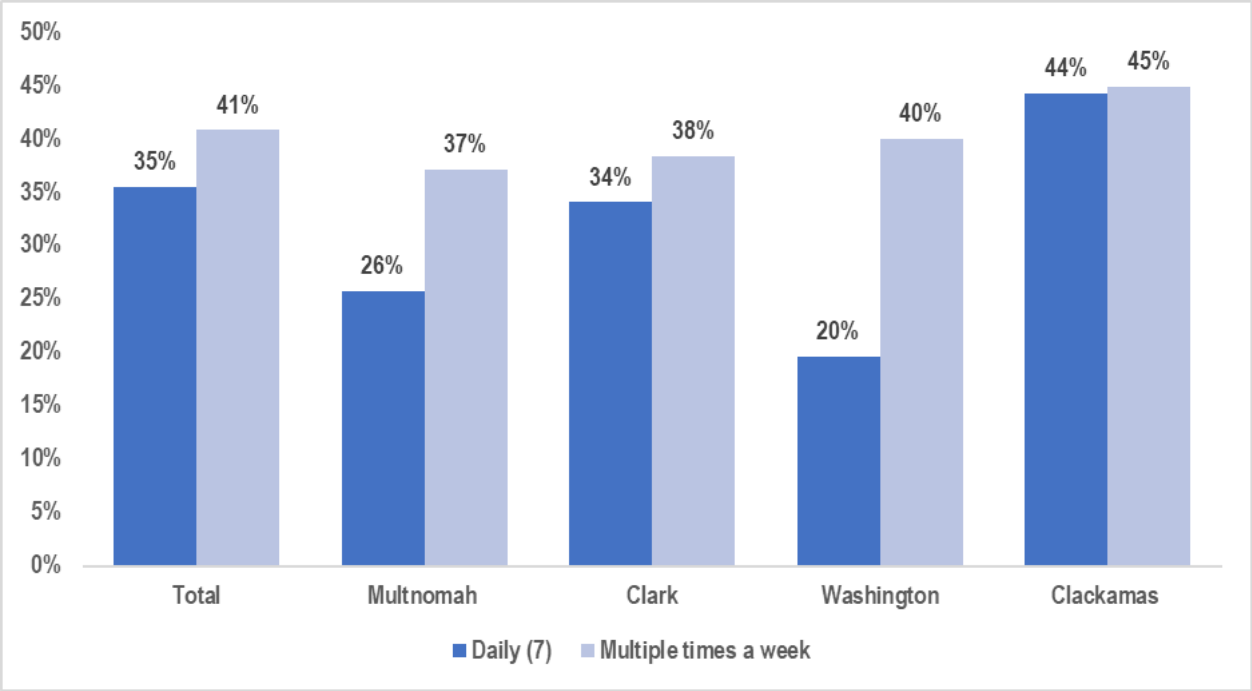
Figure 4-5. How Often Survey Respondents Use I-205 – All Respondents



[13] This survey, including this question, was asked during the COVID-19 pandemic; the question did not differentiate drivers' use before or during the pandemic.)

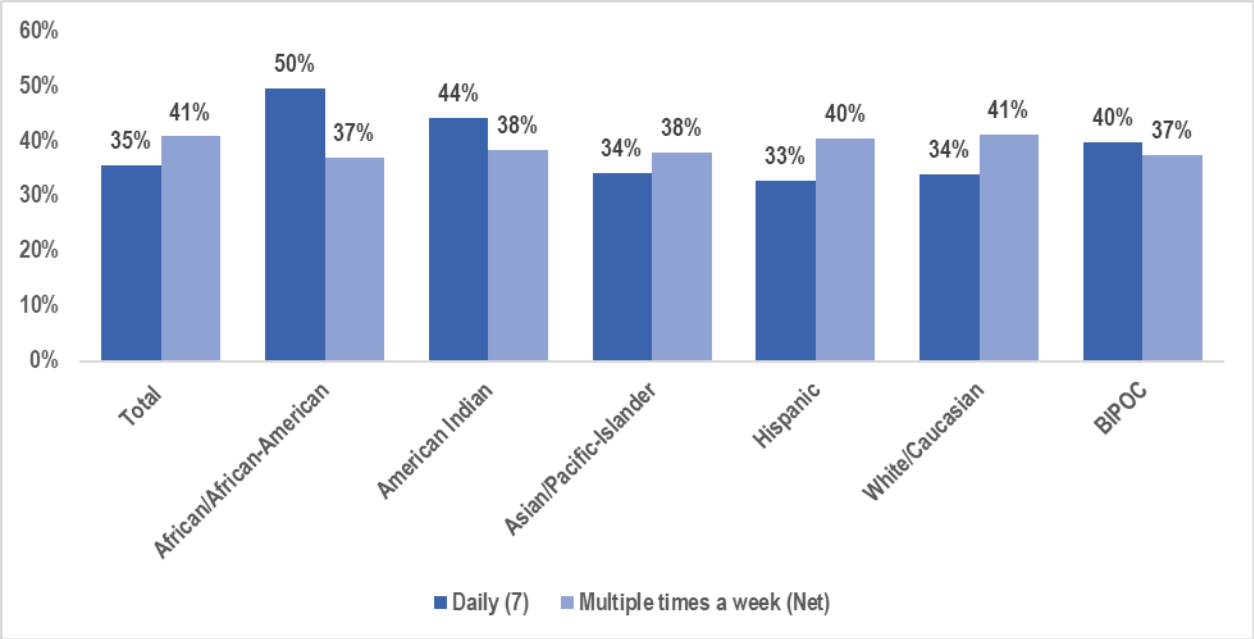
Among respondents by county (Figure 4-6), at 45% Clackamas County residents most frequently identified as daily travelers through the corridor. Among the other Portland Metro counties, Clark County was 34%, Multnomah County was 26%, and Washington County was 20%.

Figure 4-6. How Often Survey Respondents Use I-205 – by County



Among respondents by race and ethnicity (Figure 4-7), 50% of respondents who identified as Black/African-American/African traveled the corridor daily, followed by American Indian (44%), Asian/Pacific Islander (34%) and white (34%). Combined, 40% of all Black, Indigenous, and People of Color[14] drivers traveled the corridor daily.

Figure 4-7. How Often Survey Respondents Use I-205 – by Race and Ethnicity

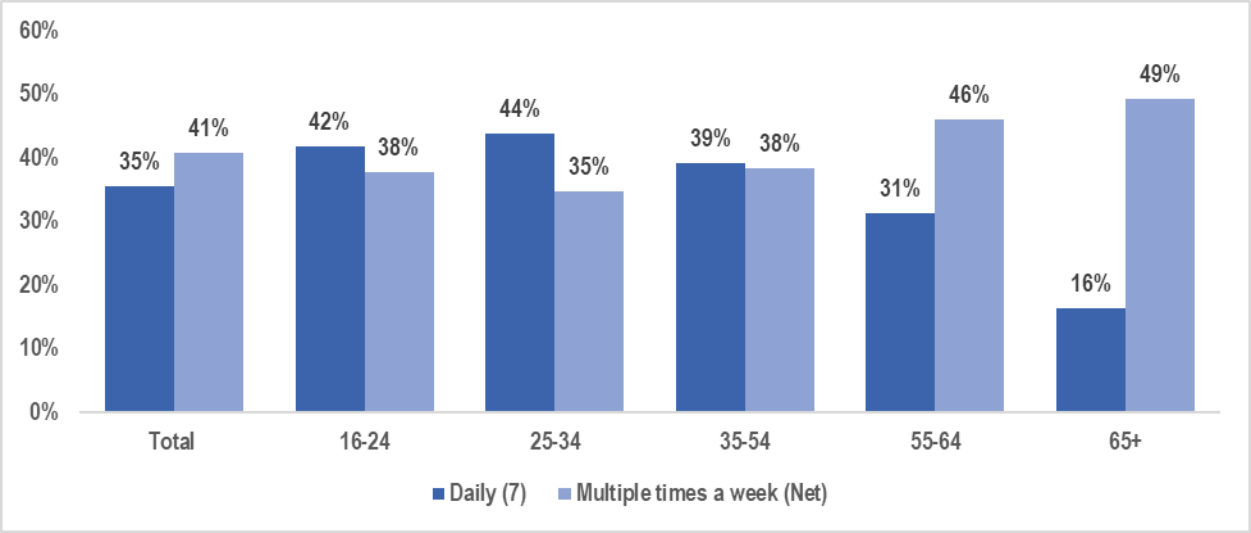


Note: In this figure the BIPOC column represents the combination of all Black, Indigenous, People of Color and recent Slavic immigrants.

[14] Black, Indigenous, and People of Color includes African/African-American, American India, Asian/Pacific Islander, and Hispanic/Latin American respondents. In some figures and tables, the acronym "BIPOC" is used to collectively represent these populations. Eighty (80) respondents self-identified as Slavic. Of these 72 completed the survey in Russian and are first generation immigrants who were encouraged to participate by a community liaison. In some cases (as noted in this report), this group was combined with other historically and currently excluded communities in reporting on responses from Black, Indigenous, and People of Color (BIPOC) communities.

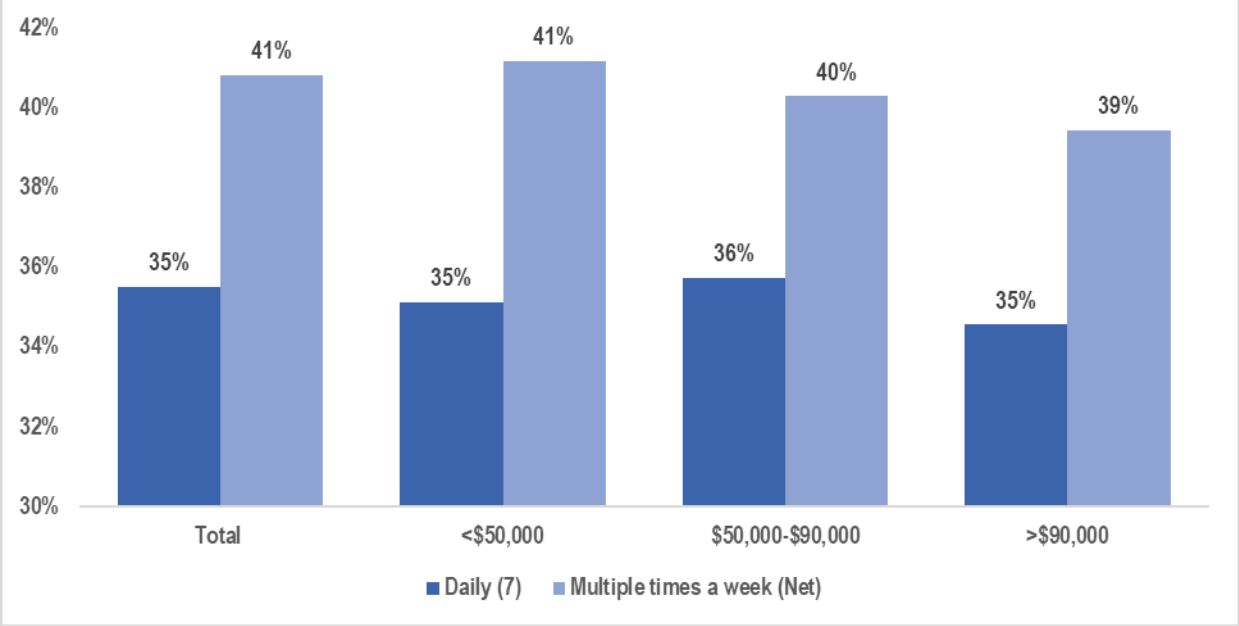
Among respondents by age (Figure 4-8), 44% of respondents aged 25 to 34 traveled the corridor daily, followed by 42% of 16 to 24, 39% of respondents aged 35 to 54, 31% of respondents aged 55 to 64, and 16% of respondents aged 65+.

Figure 4-8. How Often Survey Respondents Use I-205 – by Age



Among respondents by income (Figure 4-9), daily travel was similar across all income groups: 36% of those $50,000 to $90,000, and 35% in <$50,000 and >$90,000.

Figure 4-9. How Often Survey Respondents Use I-205 – by Income



5 KEY TAKEAWAYS AND THEMES

ODOT specifically asked for feedback on the Project's draft purpose and need, goals and objectives, recommended alternatives, and key issues of concern. While these were the topics on ODOT asked about, respondents provided comments on other topics as well. This section summarizes overarching themes heard during this engagement. Sections 5 through 9 of this report provide additional detail on the findings below. Sections 10 and 11 provide ODOT's responses to comments received.

A majority of respondents across all demographic groups and commenting methods expressed strong opposition to tolling in general or to the specifics of the Project as it is currently proposed: Many commenters provided specific and reasoned justifications for their concerns and sentiment. Examples cited included the lack of alternative non-tolled routes or travel modes, lack of knowledge about the specifics of the proposal, the personal financial impact, stated unfairness of tolling this segment of I-205 before other regional highways, and the perceived lack of travel benefits, among other reasons that are detailed in this report.[15] Many other commenters provided no rationale for their opinions. A few agencies expressed support for the concept of tolling.

Comments and questions submitted reflect respondents' need and desire for additional information as well as misunderstandings with the proposed tolling system: The lack of Project specifics at this early phase or lack of experience with a tolled system may have led many commenters to oppose the Project. The primary question raised was, "What will tolls pay for?" Other commonly asked questions included "How much will tolls cost?" "When will tolls end?" and "Why is this section of I-205 the first toll project?" These questions indicate a need to better understand and communicate how those who pay the toll will benefit and the financial implications of a toll. Several comments expressed confusion about how congestion could improve if vehicles have to slow down to pay at a toll booth, reflecting misperceptions of electronic toll collection systems.

Partner agencies and members of the public asked how toll revenue would be spent and provided expenditure recommendations. Comments also made it clear that many people need more information on the decision-making process for funding and prioritizing infrastructure projects. Respondents did not acknowledge that existing funding for ongoing maintainance and freeway improvement projects may not meet the needs of the facility. People expressed frustration that they did not recall having approved tolling, indicating an apparent need for more information about the decisions made in the Oregon Legislature's authorization of House Bill 2017.

[15] Demographic data was collected in the online survey and analyzed with regards to survey responses. Statements in this report about demographic data do not reflect input collected through other means, such as letters, emails, and voicemails.

Respondents requested clarity on the relationship of the I-205 Toll Project to the I-205 Improvements Project. Some commenters said they would be more likely to support a toll if they understood how the revenue would be spent and suggested expanding capacity or widening of I-205. Agency comments were more explicit in requesting clarification on the relationship between the I-205 Toll Project and the I-205 Improvements Project. Agencies expressed a desire for more certainty on whether tolls would be used to fund the widening and seismic improvements proposed for the I-205 Improvements Project. They also suggested that ODOT continue to pursue other (non-toll) state and federal funding sources for the I-205 Improvements Project. Further, agencies requested clarification on whether the traffic modeling for the no toll alternative (as required for study in NEPA) assumes that the I-205 Improvements Project would be built even if no toll is implemented.

Commenters expressed numerous concerns with potential effects to quality of life, safety and air quality from I-205 traffic potentially rerouting onto local roadways to avoid a toll. Respondents said tolls would increase congestion on routes that already experience a high level of diversion during peak travel times and would increase wear and tear on local roadways. Commenters said alternative travel routes lack sidewalks and are used by school children. These commenters said pedestrian safety would be compromised from the added traffic. Concerns about diversion were prevalent as one of the top three issues across all demographic groups; older, higher-income commenters from Clackamas County were particularly concerned about impacts of diversion. Many partner agencies also raised concerns about diversion and the lack of specific data at this point in time.

The perceived lack of fairness of tolling I-205 was one of the top areas of concern identified across all demographic groups, but particularly among residents of West Linn, Oregon City, and other parts of Clackamas County. Respondents expressed frustration that this section of I-205 is proposed for tolls first with the sentiment that these tolls would place an unfair burden on their communities. Commenters said this is not the worst area in the region for congestion. They said sufficient alternative routes to daily destinations (school, work, etc.) or viable alternative travel modes are lacking in the Project area. Respondents also expressed frustration that funding exists for other major infrastructure projects in the region—such as the I-5 Rose Quarter Project and the OR 217 Auxiliary Lanes Project—but not for the I-205 Improvements Project. Agencies expressed concern about why this segment of I-205 is proposed for the first tolling project and requested a regionwide discussion before tolls are implemented on segments of a specific roadway.

The concept of fairness often was combined or confused with equity, which was defined for this purpose as the potential for certain groups or communities to experience disproportionate outcomes and impacts from tolling. Responders from households earning less than $50,000 per year identified fairness as one of their top concerns.

Commenters expressed concerns that tolls would be a financial hardship for their households or for households experiencing low income. Some commenters said individuals who have the least flexibility in their work schedules and cannot telework—such as service industry and medical staff—are also the least able to afford tolls. Commenters identified a need to avoid placing burdens on people who experience low income. Other economic concerns included worries about impacts to local businesses near the tolled area of I-205 and impacts to the freight industry that travels on I-205. For respondents with household income less than $50,000 per year, top comments and concerns included an opposition to tolling, fairness, the need to minimize burdens on people experiencing low income, and the need to provide for alternative non-tolled transportation routes.

Recommendations for the environmental review process centered on adding Project alternatives, including consideration of a "no toll" alternative, which is required. Many commenters said the Project needs to consider a "no toll" alternative (which is required), while agencies suggested additional alternatives to study. Repeated suggestions included advancing Alternative 5 (in addition to Alternative 3 and Alternative 4)[16] and extending the endpoints of the tolled area.

Agencies also provided suggestions on two additional concepts or components to incorporate into the draft Purpose and Need Statement: advancing equity and transportation demand management. Comments from members of the public also included sentiments around equity and voiced their concerns about the disproportionate burden tolls may pose to low-income drivers.

Toll discounts, maintaining functional toll-free routes and enhancing multimodal transportation options were among the top ideas to address the potential for negative impacts from tolls. These ideas closely mirror the findings from the 2017-2018 Value Pricing Feasibility Analysis, which guided the development of the proposed Project. Respondents offered numerous suggestions on how impacts of tolls could be lessened. Specific suggestions included the following:

- Toll discounts, toll exemptions or income tax deductions for local residents and/or low-income drivers.
- A toll rate that varies by time of day.
- A daily, monthly, or annual cap on toll rates (or option to purchase a daily/monthly/annual toll pass).
- Fixing local roads before tolls are implemented so they can better serve as alternative routes.
- Addition and/or improvement of bicycle and/or pedestrian infrastructure.
- Adding lanes (widening) on I-205.
- Increased transit services.
- An option to pay by cash to protect privacy.

[16] See Section 2.2.2 for a description of each of the preliminary alternatives.

Commenters noted a lack of viable public transportation alternatives to driving on I-205. A few respondents felt that toll revenues should be used to enhance alternative travel modes through expansion of transit services and construction of bicycle and pedestrian facilities, while others explicitly stated that any toll revenues should only fund roadway improvements for vehicles. Those respondents without a car that rely on alternative transportation modes were the only demographic group to show support for the Project.

Distrust of government in general, as well as ODOT in particular, was expressed. Commenters expressed frustration and opinions that current funding is not well managed and skepticism that ODOT would manage toll revenues better or differently than gas taxes or other taxes. A few comments said it was essential that ODOT transparently show how toll revenue is spent. There were many messages in opposition to tolls that directed ODOT to "live within your means" of available funding and accused ODOT of a "money grab." Additional respondents pointed to the public engagement process and expressed doubt that their comments would be considered and have any effect on tolling decisions.

The ongoing COVID-19 pandemic was mentioned by commenters, and appeared to underlie identified concerns about traffic and economics. For example, there were comments about the personal financial implications of tolls alluded to this being a particularly stressful time. Comments highlighted that congestion was not as acute as 2019 and predicted that many people will continue to work from home after the pandemic ends. This is in contrast to comments received during the Value Pricing Feasibility Analysis where many commenters agreed that congestion was a problem that needed to be addressed. Further, the pandemic influenced the Project engagement approach, as all activities had to be conducted virtually. This may have influenced the level of participation and by whom as well as the tone of the comments.

6 RESULTS: TOPICS FOR PUBLIC AND STAKEHOLDER REVIEW

This section describes the overall sentiment expressed throughout this engagement and then summarizes the input received on the specific topics related to meeting NEPA requirements: Purpose and Need Statement (including the goals and objectives) and the range of alternatives (as described in Sections 2.2.1 and 2.2.2). For each of these topics, the online survey included both a multiple-choice question and an open-ended (write-in) question. Comments received about these topics via email, letter, verbal comment, or other methods are summarized with the responses to the open-ended survey questions. ODOT's responses to comments presented in this section are provided in Section 10.

6.1 Overall Sentiment

The majority of commenters who participated in this engagement expressed opposition to tolling on I-205. This sentiment was exhibited in all demographic groups and is illustrated by the 70% of online survey commenters who expressed disagreement with the draft Purpose and Need Statement for the Project. Some commenters expressed support; four agencies also expressed some level support for the concept of tolling. Opposition or support was demonstrated primarily through responses to an online survey and through the letters, emails, voicemails, and comments made at public meetings collected during this comment period. Many commenters simply made statements in opposition to the Project, such as "No tolls!" while others provided additional information on the rationale for their opposition. Some commenters noted they would support tolling if it was clear which projects would be funded by tolls, specifically the I-205 Improvements Project.

This report seeks to provide decision-makers and the public with a summary of comments received so that Project analysis and design can address concerns and opportunities raised as it moves toward the NEPA process.

6.2 Draft Project Purpose and Need

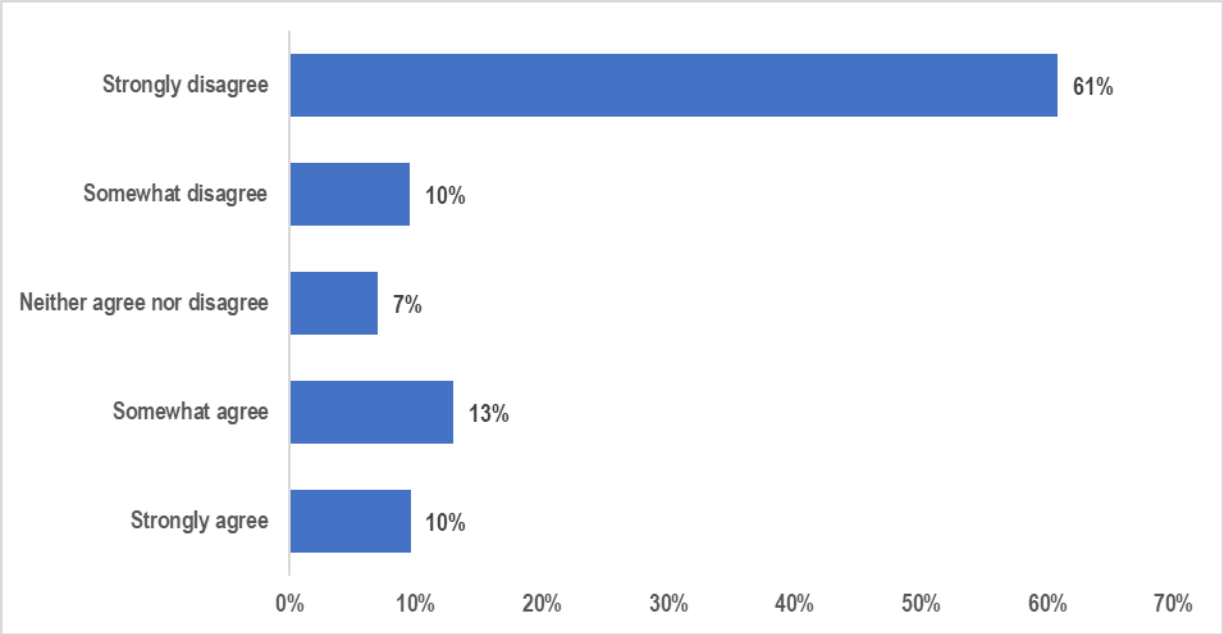
6.2.1 Multiple-Choice Questions

More than 3,800 survey respondents provided their feedback on the draft Project purpose (the problem the Project is intended to address) and draft Project need (the reasons behind the problem) identified in the draft Purpose and Need Statement (as described in Section 2.2.1).[17] Figure 6-1 shows the results to the following question.

Please indicate your level of agreement with this statement: "The draft purpose and draft need for the I-205 Toll Project reflects problems in the I-205 corridor and the reasons for moving forward with the project."

[17] An additional 60 respondents said they had no opinion about the draft Purpose and Need Statement. These respondents had to select a "no opinion" option and did not just skip the question. These responses are not included in the 3,800 survey responses reflected in Figure 6-1.

Figure 6-1. Level of Agreement with Draft Purpose and Draft Need



With one exception, responses to this question were consistent across all demographic groups. Of the responses, 71% indicated that they somewhat or strongly disagreed with the draft purpose and draft need, 23% somewhat or strongly agreed, and 7% said they neither agreed nor disagreed. The one demographic group that indicated support for the Project's draft purpose and draft need stated that they walked, biked, or took public transit as their primary means of transportation (and did not identify use of a car as one of their primary means).[18]

The strongest disagreement[19] was shown among the following groups:

- Corridor travelers who use I-205 daily or those who used only their car to travel most of the time (that is, they did not also indicate they biked, walked, and/or used public transit).
- People in age groups 16 to 24 and those older than 65.
- Clackamas County and Marion County residents.
- Frequent drivers[20] who are also experiencing low income.
- People who identified as Black/African-American/African and/or American Indian.

[18] Cross tabulations may be found in Attachment C.
[19] The groups listed as showing the strongest disagreement are those demographic groups in which more than 70% of respondents selected either "somewhat disagree" or "strongly disagree."
[20] Frequent drivers represent those who drive on I-205 at least once each week.

6.2.2 Written and Verbal Comments

Hundreds of responses to open-ended (write-in) survey questions were received as well as written and verbal comments through other methods, including formal letters from agencies (Section 8.1). Following is a summary of comments received through any method that related to the Project's draft purpose and draft need. The terms "many," "several," "some," and "few" are used to convey the frequency of a key theme or message.[21]

When asked to provide why they selected their response to the multiple choice question on the level of agreement with the draft purpose and draft need, some comments related to the draft purpose and draft need, but many others related to additional topics that are summarized in Section 7.2. When asked to provide why they selected their response to the multiple- choice question on the level of agreement with the draft purpose and draft need, some comments related to the draft purpose and draft need, but many others related to additional topics that are summarized in Section 7.2. Comments on the draft purpose and draft need primarily focused on the effectiveness of tolling, the need for the Project, and how tolling would be implemented.

Comments about purpose and need

"I agree that problems are identified but not with moving forward with the project as outlined"

"What is the wisdom of going with these small segments compared to longer corridors?"

"In the US we are VERY car centric, which isn't the most efficient, or safest way to build for transportation. We need to focus on how to move the most PEOPLE, not the most CARS." "

EFFECTIVENESS OF TOLLING TO ADDRESS CONGESTION:

- Many said the Project should consider methods other than tolling to reduce congestion.
- Many said that tolling would not effectively address congestion.
- Some said that adding lanes on I-205 would be a more effective way to reduce congestion than tolling.
- Some respondents said that tolling would create more congestion on local roads.
- A few respondents said that tolling could be effective if the Project includes options for transit, walking, and biking.
- A few respondents suggested that congestion was not bad on I-205 and tolling should be focused on I-5 instead.

[21] For purposes of indicating the frequency of key themes and messages "many" is used to indicate that it was expressed in more than half of the comments within a topic area, "several" indicate approximately 30 to 50%, "some" indicates approximately 10 to 30%, and few means it was mentioned more than once in up to approximately 10% of comments.

NEED FOR THE PROJECT:

- Several respondents noted that the Project need is based on data gathered before the COVID-19 pandemic so the Project draft Purpose and Need Statement should be reevaluated based on new traffic data and projections.
- A few respondents said that the draft Purpose and Need Statement should focus on reducing vehicle miles traveled instead of reducing congestion.

PROJECT IMPLEMENTATION:

- A few respondents said that tolling should not include highway or freeway expansion.
- A few respondents said that tolls should only be implemented temporarily and be disbanded once the I-205 Improvements Project has been completely funded.

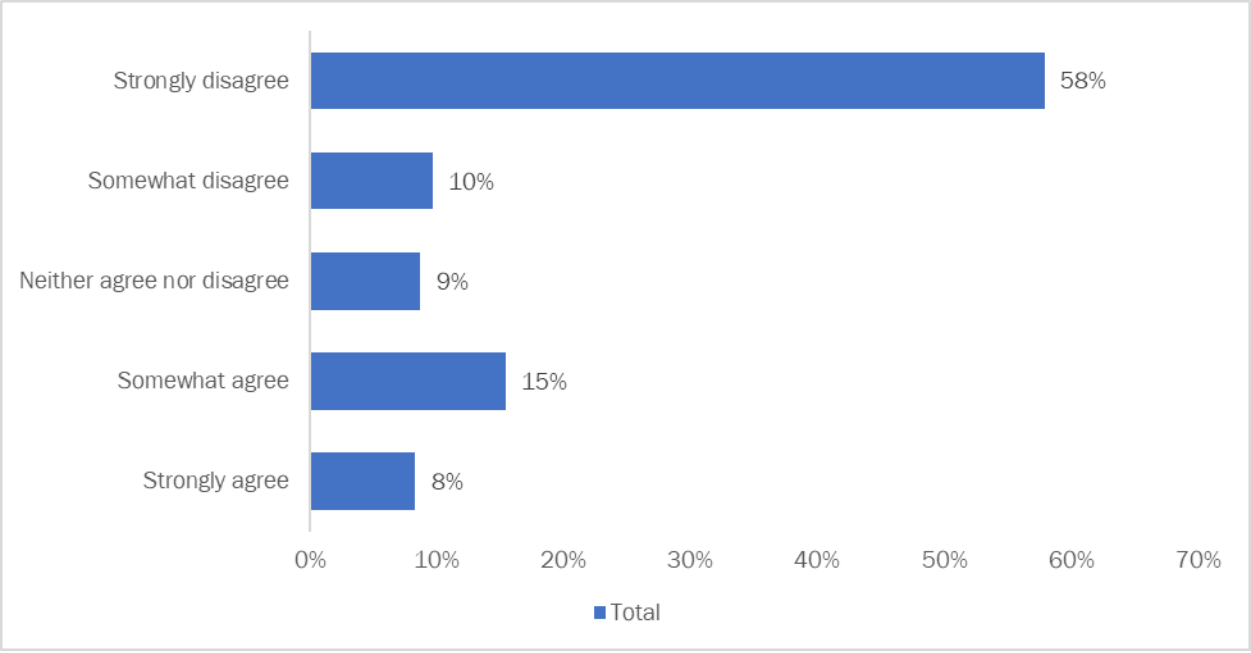
6.3 Draft Project Goals and Objectives

6.3.1 Multiple-Choice Questions

More than 3,600 survey respondents provided their feedback on the draft goals and objectives (as described in Section 2.2.1).[22] Figure 6-2 shows the results to the following question.

Please indicate your level of agreement with this statement: "The project's draft goals are right for the I-205 Toll Project and they describe the desirable outcomes that the project should strive to achieve."

Figure 6-2. Level of Agreement with Project's Draft Goals



[22] An additional 70 respondents said they had no opinion about the draft goals and objectives. These respondents had to select a "no opinion" option and did not just skip the question. These responses are not included in the 3,600 survey responses reflected in Figure 6-2.

With two exceptions, responses to this question were consistent across all demographic groups. Similar to the responses on the draft Purpose and Need Statement, 68% of the respondents indicated they somewhat or strongly disagree with the draft goals, about 23% somewhat or strongly agree, and 9% said they neither agree nor disagree. The two demographic groups that indicated support for the draft Project goals were those who identify biking as one of their primary modes of transportation (and potentially also drive) as well as those who walk, bike, or take public transit but did not indicate a car as a regular mode of transportation.

The strongest disagreement was shown among the following groups:

- Corridor travelers who used I-205 daily or who only used their car for travel most of the time (that is, they did not also indicate they biked, walked, and/or used public transit).
- People in the age group 16 to 24.
- Clackamas County and Marion County residents.
- Frequent drivers who identified as Black, Indigenous, and People of Color, Slavic, and/or are experiencing low income.
- People who identified as Black/African-American/African and/or American Indian.

6.3.2 Written and Verbal Comments

This section includes a summary of comments related to the draft goals and objectives that were received through any method.

When asked to provide why they selected their response to the open-ended question on the level of agreement with the draft goals, some comments were related to the draft goals and objectives, but many others were related to additional topics that are summarized in Section 7.2.

GOALS AND OBJECTIVES IN GENERAL:

- Many respondents said tolls are not the solution to the problem; a few agreed with the goals identified but said that tolling is not the solution.
- Many respondents said the Project goals should prioritize reducing costs to taxpayers as much as possible instead of implementing a new tolling program.
- Some respondents suggested that the goals and objectives are written with tolls assumed as the solution.
- Several respondents stated the real goal is to make money/raise revenue.

Comments about goals and objectives

Nowhere in your stated goals is there a mention of reducing traffic congestion, which I believe should be the primary goal of any project -- and I don't see that tolling is the answer.

"The draft goals presume a toll-based solution as an outcome, rather than non-tolling alternatives to mobility."

"...Nowhere in these statements is there any consideration for the cost of implementation and ongoing burden, which is borne by the taxpayers funding the project and also paying the tolls!"

- A few respondents noted that the goals are written as "sales pitches," not as plans; a few suggested that they need to be written in more understandable language.
- A few respondents said the goals are too generic or broad; others felt the goals are not realistic or achievable; others felt that the goals are conflicting or do not make sense.
- A few respondents agreed with the goals while others described them as "wrong."
- A few respondents identified the need for key metrics, baselines, and targets for goals or suggested that goals should be written as "will, shall, must" instead of "could, would, should."
- A few respondents asked how Project goals would be accomplished.

The following comment themes are grouped by each of the draft goals and objectives presented for comment.

EQUITABLE BENEFITS:

- Several respondents said tolls are not an equitable solution because they would have disproportionately negative effects on local residents, low-income individuals, seniors, those who have to drive for work, etc.
- Several respondents said tolls create a financial burden on all users, rather than a benefit.
- A few respondents said tolls are only equitable if all users are charged equally; if any group receives a discount, it is not equitable to all users, while others stated that tolls have to be based on income to be equitable or would only be equitable if local residents receive a discount.
- A few respondents said the government should not be deciding what is considered equitable.
- A few respondents stated that there has been no explanation about how this Project will be equitable and or said clarification is needed on what is meant by "equitable benefits."
- A few respondents stated that equity should not be a Project goal.

LIMIT DIVERSION:

- Several respondents stated tolls will not limit diversion and are likely to worsen diversion onto local roads.
- A few respondents noted that people would likely divert to I-5 as an alternative route.
- A few respondents asked for a definition of "limit" or an explanation of how diversion would be minimized.
- A few respondents stated that diversion cannot be limited as people will divert from I-205 to avoid a toll; one person said diversion routes need to be maintained so people can avoid a toll.

AIR QUALITY AND CLIMATE CHANGE:

- Several respondents said issues like air quality and climate change are more important than addressing traffic congestion.
- Some respondents noted that tolling would not improve air quality or climate change, but instead would shift those impacts to communities where traffic diverts onto local roadways.
- A few respondents thought tolling would worsen air quality if people drive longer routes to avoid a toll.
- A few respondents were unclear on how tolling could improve air quality; a few suggested that adding lanes to enhance traffic flow would address this goal, while another suggested that gas taxes are most effective for reducing emissions.
- A few respondents assumed drivers would stop at toll booths, thereby worsening air quality if traffic is idling.

SAFETY:

- Some respondents said tolls do not support safe travel; specifically, there were concerns about safety impacts of additional traffic on local roadways.

TRANSIT/MULTIMODAL:

- Several respondents said Project goals should focus more on reducing the need for driving by supporting transit and non-motorized transportation options.
- Some respondents noted that alternative transportation methods are not available and/or feasible in the Project area; people have no viable alternative to driving.
- Some respondents said that the Project should focus on vehicle traffic rather than transit, pedestrian, and bicycle facilities.
- Some respondents stated that people will not use public transit even if available; a few raised safety concerns about using transit, and a few noted that they would have to drive to get to transit options.
- A few respondents were unclear how tolls could support multimodal travel
- A few said that multimodal systems should not be included in improvements associated with the Project.
- A few respondents stated that Project goals could not be accomplished without enhancement to the public transit system, such as adding a light rail line along I-205, or providing services that connect individuals' homes to transit facilities.
- A few respondents commented on other transportation options that should be considered, including teleworking and the future of driverless vehicles.

REGIONAL ECONOMIC GROWTH:

- Some respondents stated that tolls will not support regional economic growth; specific concerns included loss of income for businesses in the tolled area and tolls inhibiting interstate commerce and travel.

- A few respondents were unclear on the intent of the regional economic growth goal.

FUTURE TOLL SYSTEMS AND INTEROPERABILITY:

- Several respondents noted that future toll systems are not needed or should not be assumed.
- A few respondents were unclear on the intent of the goals pertaining to future toll systems and interoperability with transportation systems.
- A few respondents noted the need for a comprehensive toll system to assess integration with future toll systems.

ADDITIONAL GOALS SUGGESTED:

- A few respondents suggested adding goals on the following topics:
  - Reduced congestion.
  - Fast efficient travel for cars and trucks.
  - Freight mobility.
  - A seismically resilient bridge.
  - Minimizing impacts to local communities.
  - Local residents' use of the facility/needs of local communities.
  - Additional travel lanes or expanded capacity.
  - Use of toll revenue.
  - Not imposing additional costs of drivers.
  - Using existing tax funding for infrastructure improvements.

6.4 Recommended Alternatives

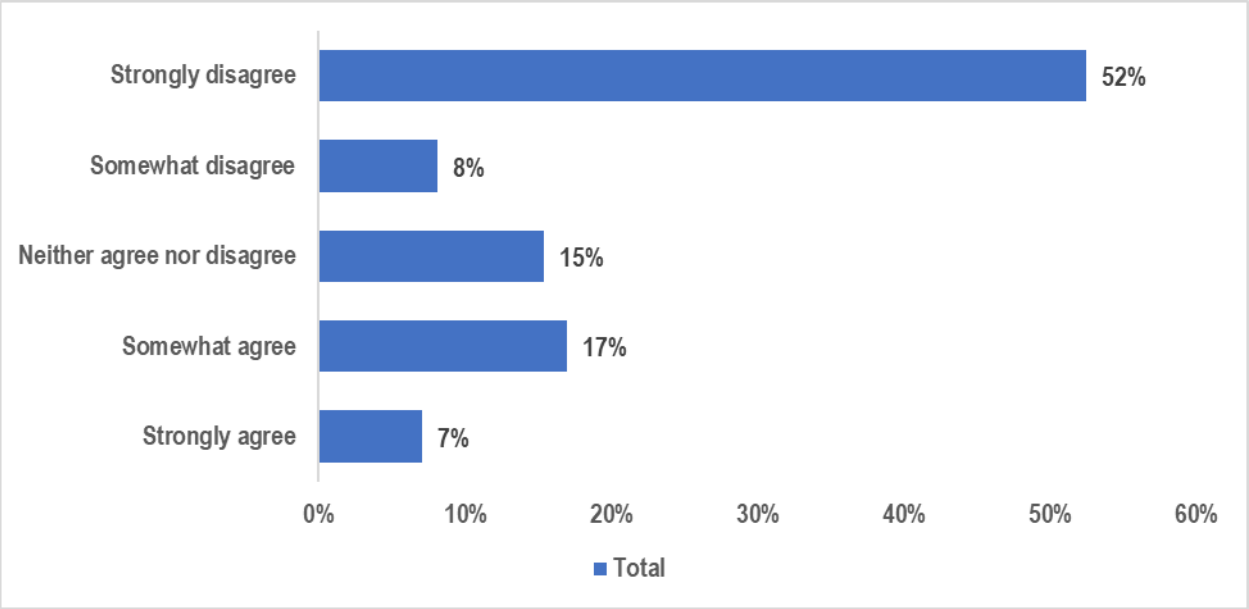
6.4.1 Multiple-Choice Questions

More than 3,400 survey respondents provided their feedback on the two recommended alternatives to be studied in the NEPA process.[23] Figure 6-3 shows the results to the following question.

Following scoring, we think that Alternative 3 and Alternative 4 seem to be the best alternatives to meet the project purpose and need and goals. We plan to study these two alternatives in more detail, as well as looking at a "no toll" option (which is required to be studied). Please indicate your level of agreement with this statement: "The recommended alternatives provide satisfactory options to study in-depth in the environmental review."

[23] An additional 200 respondents said they had no opinion about the recommended alternatives. These respondents had to select a "no opinion" option and did not just skip the question. These responses are not included in the 3,400 survey responses reflected in Figure 6-3.

Figure 6-3. Level of Agreement with Recommended Project Alternatives 3 and 4



With one exception, responses to this question were consistent across all demographic groups. Of the responses, 60% indicated somewhat or strong disagreement with the recommended alternatives, 24% somewhat or strongly agreement, and 15% said they neither agreed nor disagreed. The one demographic group that indicated support for Alternatives 3 and 4 were those who walk, bike, or take public transit (and did not indicate a car as a regular mode of transportation).

The strongest disagreement was shown among the following groups:

- Clackamas County and Marion County residents
- People who identify as Black/African-American/African and/or American Indian

6.4.2 Written and Verbal Comments

More than 990 comments were received on the alternatives via the survey and other commenting methods, including formal letters from agencies (see Section 8.1). Following is a summary of comments received through any method that were related to the range of alternatives.

Comments on alternatives addressed the proposed tolling alternatives in general, specific alternatives, additional or modified alternatives, the location of tolls, and how tolls are structured. Many people also expressed preference for converting some lanes to tolling while maintaining some

Comments about recommended alternatives

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

"Options should include NO Tolling."

"If the goal is truly to improve traffic, then by your own comparison chart, option 5 is the best option...."

lanes with no tolls. Others suggested adding more travel lanes or adding transit/high-occupancy vehicle lanes to address congestion concerns.

Respondents had differing opinions about which of the five draft alternatives were best. Many respondents were concerned that a "no tolling" option did not appear to be an alternative for future consideration.[24]

PROPOSED ALTERNATIVES IN GENERAL:

- Many respondents did not support any of the Project alternatives and suggested that tolling options should not be considered at all on the I-205 corridor.
- Many respondents said start and end points for the alternatives limit options to manage diversion and will have negative impacts on congestion in nearby towns.
- Many respondents said that at least one "no toll" alternative should be included as part of the assessment.
- Many respondents said that the alternatives are all likely to inequitably affect lower-income users.
- Several respondents indicated that freeway expansion and additional capacity is in conflict with the Project's goals related to climate change and greenhouse gas emissions.
- Several respondents said the analysis shows that none of the alternatives work very well.
- Some respondents said that since tolling is likely to also happen on I-5, ODOT should consider that condition when modeling alternatives.
- Some respondents suggested that additional factors should be used in this level of screening alternatives, particularly equity and impacts on lower-income users and climate change.

SPECIFIC ALTERNATIVES:

- Several respondents expressed concern that Alternatives 3 and 4 would lead to drivers using local routes to avoid the tolls, adversely affecting quality of life, local businesses, road user safety, and environmental health.
- Several respondents said that Alternative 5 should be carried forward and is promising because it was best on reducing traffic congestion and transportation demand.
- Some respondents expressed support Alternative 3 because it had the best results on cost and revenue.
- Some respondents said Alternatives 3 and 4 need to be modified to ensure the inclusion of travel demand management measures (for example, strategies aimed at reducing demand on the transportation system for single-occupancy vehicles and during peak travel times).

[24] The NEPA process requires that a No Action Alternative (in this case a no toll option) be studied.

- Several respondents expressed support for Alternative 1, due to need to upgrade the Abernethy Bridge and felt that it would be less impactful to other local streets and neighborhoods.

NEW OR MODIFIED ALTERNATIVES TO INCLUDE IN THE ENVIRONMENTAL ASSESSMENT:

- Some respondents suggested an alternative for a new tolled bridge across the Willamette River farther north, between the Abernethy and Sellwood Bridges.
- Several respondents suggested that one alternative should provide the option for a tolled express lane providing additional capacity with other lanes remaining toll-free.
- Several respondents said that there should be a free lane for transit, rideshares, and high-occupancy vehicles.
- Several respondents recommended that the alternatives should include a region-wide tolling program.
- Several respondents expressed concern that the current options are too small and localized to reduce congestion and generate revenue.
- A few respondents suggested an alternative with the Oregon City Arch Bridge as a pedestrian/bicycle only structure.
- Some respondents suggested an alternative that includes tolling without the additional lanes that would be built with the I-205 Improvements Project.
- Some respondents said that widening bottlenecks would be more effective than tolling.
- Some respondents suggested expanding I-205 to use the existing shoulder would help address congestion issues.
- A few respondents said that the tolling area should be increased to include more destinations along I-205.

TOLLING LOCATIONS:

- Many respondents suggested that the current proposed locations should be re-evaluated.
- Many respondents suggested a more comprehensive tolling system to reduce the highly localized rerouting effects, with additional tolled segments along I-205, particularly extending the limits to the I-5 and I-84 junctions. Several commenters also suggested tolling additional or other routes in the region, including segments of I-5, I-84, and the two bridges between Washington state and Oregon.
- Many respondents commented on a lack of transit in the I-205 corridor or suggested that the alternative should include transit enhancements, or that tolls be considered along corridors with transit alternatives first, such as along I-84.
- Several respondents suggested that tolling should begin at the I-5/I-205 junction to reduce the drivers using local roads to avoid the toll.
- Several respondents suggested adding tolls on I-5 in downtown Portland.

- A few respondents noted that the alternatives, as presently designed, do not allow for a person to easily avoid tolls if they do not have means to pay and indicated that there should always be a toll-free route available.

TOLL STRUCTURE:

- Many respondents suggested tolls be structured to only charge or to charge more for specific trip types, including out-of-state drivers, single-occupant vehicles, peak-hour commuting, and heavy freight.
- Many respondents expressed concerns about complexity and/or costs of administration and communication to the public of Alternatives 3 and 4 because segment-based tolls may be more difficult to understand.
- Some respondents suggested that restrictions on commercial truck traffic could alleviate congestion better than tolling.

7 RESULTS: KEY CONCERNS AND OPPORTUNITIES

In addition to requesting specific feedback on the prepared draft documents for the NEPA process, as described in Sections 2.2.1 and 2.2.2, ODOT also asked the public, agencies, and tribes what else should be considered during the study of tolls on I-205. The online survey included both a multiple-choice question and two open-ended questions pertaining to key concerns and opportunities. Comments received via email, verbal comment or other methods were summarized and are presented with the responses to the open-ended questions. Many of the concerns expressed were similar to the three recurring themes heard during engagement efforts for the Value Pricing Feasibility Study (see Section 1.2), but there were also numerous comments on a variety of other topics a described in this section. ODOT's responses to comments presented in this section are provided in Section 11.

7.1 Multiple-Choice Questions

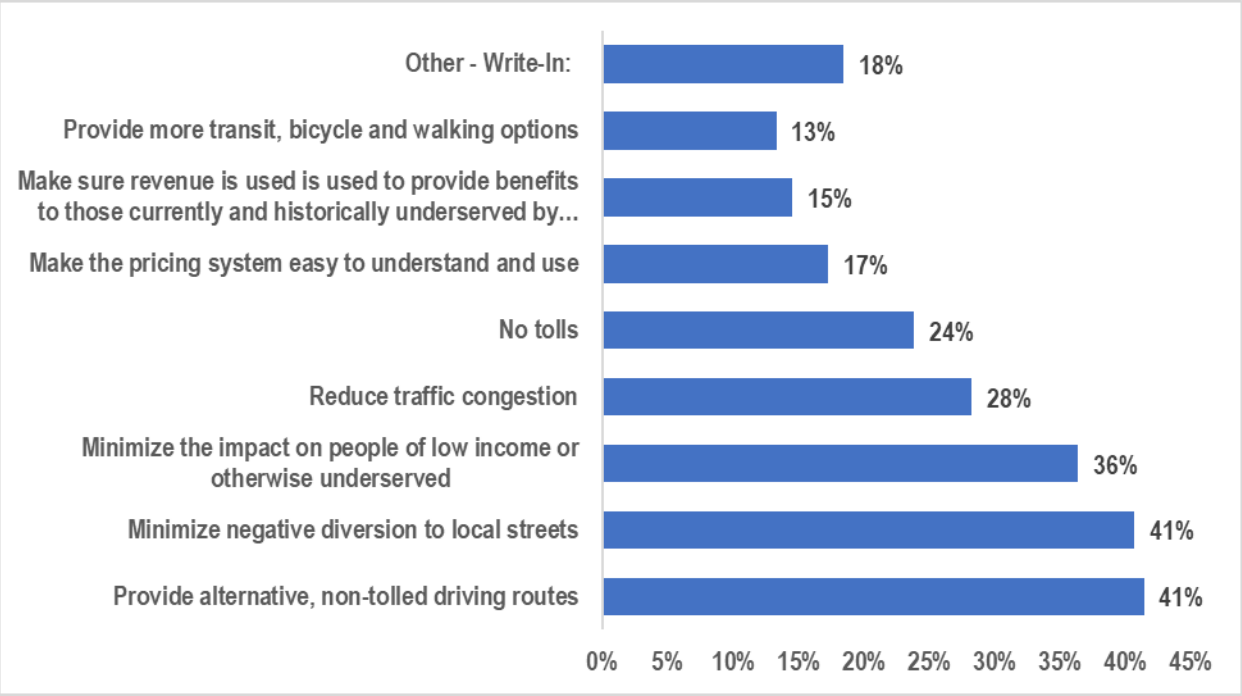
More than 3,900 survey respondents provided their feedback on key concerns and opportunities regarding tolls. Figure 7-1 shows results to the following question.

The community has identified some concerns and opportunities with tolls. Which do you feel is most important to address? (Check all that apply)

- *Minimize the impact on people of low income or otherwise underserved*
- *Reduce traffic congestion*
- *Minimize negative diversion to local streets*
- *Make the pricing system easy to understand and use*
- *Provide alternative, non-tolled driving routes*
- *Provide more transit, bicycle and walking options*
- *Make sure revenue is used is used to provide benefits to those currently and historically underserved by the transportation system.*
- *Other - Write In:*

A large number of the write-in entries were a variation of "no tolls," so the Project team separated this response and included it with the other responses to multiple-choice questions.

Figure 7-1. Key Concerns and Opportunities



More than 600 additional comments were provided by respondents in the "Other – Write in" entry space. Most respondents chose to use this space for a variety of topics, concerns, and opportunities. They are included in the summary in Section 7.2.

Among the choices provided, the top four concerns were generally consistent across demographic groups:

- Provide alternative, non-tolled driving routes.
- Minimize negative diversion to local streets.
- Minimize the impact on people experiencing low income or are otherwise underserved.
- Reduce traffic congestion.

Commenters who identified as American Indian identified some variation of a written-in "no tolls" comment as their top concern, even though that was not provided as an option. Commenters who identified as Asian/Pacific Islander identified "reduce traffic congestion" as the top concern. Commenters who primarily use public transit, walk, and those who bike said "provide more transit, bicycle and walking options" as their top concern, as well as "make sure revenue is used is used to provide benefits to those currently and historically underserved by the transportation system."

7.2 Written and Verbal Comments

This section describes the responses to Question 3 of the online survey ("What should we consider to address the concerns and opportunities you checked above?") and Question 10 ("What else would you like the Project team to know or consider when planning the I-205 Toll Project?) as well as input received via other channels (for example, letters, emails, verbal comments). Each comment was categorized with others on the same topic. The Project team read through all comments and summarized the key themes and messages for each category. As described in Section 6.2.2, the terms "many," "several," "some," and "few" are used to convey the frequency of a key theme or message.

Table 7-1 provides a list of the comment category codes and the number of times a comment submittal referenced one of the applicable comment codes. Each comment submittal can have several individual ideas. Each idea was categorized individually as a comment.

Table 7-1 Comment Codes and Number of Comments

Comment Code	Number of Comments
Revenue and taxes	2,400
Rerouting/Diversion	1,700
Fairness	1,550
Congestion observation and impacts	1,120
Toll implementation	1,080
Accountability and Trust	1,070
Proposed alternatives	990
Expand capacity (new or existing roadways)	990
Multimodal transportation	840
Equity	830
Personal financial impacts	530
Public engagement and decision processes	500
Project purpose and need	440
Environmental impacts	320
Economic impacts	320
Other congestion management ideas	220
Other tolling systems	200
Safety	180
Other concurrent projects	90

Revenue and taxes, rerouting/diversion, and fairness were generally the top three mentioned concerns among all demographic groups with the following exceptions:

- Multimodal transportation was the most frequently mentioned concern among people who bike and people who did not identify a car as one of the primary ways they travel.
- Expand capacity (new or existing roadways) was the second-most identified concern by people who identify as Black/African-American/African and by those who live in Marion County.

7.2.1 Revenue and Taxes

Approximately 2,400 comment submittals addressed revenue and taxes. These submittals included comments about existing taxes (for example, income tax, gas tax), how tax revenue is being spent, how revenue generated through tolling will be spent, and what types of projects could (or would) be funded with tolling revenue.

In general, many commenters felt that current taxes are either too high or are high enough to cover the costs of transportation improvements. Commenters expressed distrust that revenue from taxes and other sources, such as vehicle-registration fees, is being wisely spent by the State of Oregon. These comments indicate a lack of understanding, and a desire to understand, where and how transportation funding is being spent.

Comments about revenue and taxes

"It seems like the project is prioritizing revenue over demand management…"

"I would like more information on where the money from tolling will go, it was not really clear…"

"I would rather see some other means of fundraising for making seismic improvements to the Abernethy Bridge and other bridges, such as environmentally supportive taxation."

There were diverging opinions on how future toll revenue should be used to fund transportation projects: some commenters stated that toll revenue should only be used to fund automobile projects, such as roadway expansions, while other commenters felt that revenue should be used to expand access to other modes of transportation (pedestrian, bicycle, transit). In addition, commenters disagreed on whether the revenue should be used solely within the I-205 corridor and surrounding communities or whether it should be used to fund other projects in the region, such as the I-5 Bridge Replacement Project or to provide transit services in underserved communities.

The following is a summary of the major themes from the comments received pertaining to revenue and taxes.

CURRENT TAXES AND EXPENDITURE OF EXISTING REVENUE:

- Many respondents feel that they are already paying too many taxes and see a toll as another form of tax.
- Many respondents said that the existing revenue from taxes and vehicle-registration fees is sufficient to fund transportation improvements, but the funding is being ineffectively used or allocated to the wrong projects.
- Some respondents said there should be an increase in taxes as opposed to a toll, such as an increase in the gas tax or a new tax on electric vehicles.
- A few respondents said that state and federal funding for the I-205 Improvements Project should be pursued.
- A few said certain user groups should pay more in taxes or tolls, such as freight-trucking industries or out-of-state commuters.

EXPENDITURE OF FUTURE TOLL REVENUE:

- Many respondents said clarification is needed on the types of projects that could be funded with the toll revenue.
- Several respondents said revenue should not be used for non-vehicle transportation projects.
- Several respondents said revenue should be used to improve pedestrian, cycling, and transit opportunities.
- Some respondents said revenue should be used to fund projects only in the I-205 corridor.
- A few respondents said revenue should be used to fund other projects in the Portland metro area, such as the I-5 Bridge Replacement Project.
- A few respondents expressed concern that toll revenue might be used inappropriately by government officials and/or agencies for non-transportation purposes. These comments indicate that the public would like to know more about where and how ODOT is spending transportation funds.
- A few respondents said the toll should be discontinued after sufficient revenue has been generated to fund the I-205 Improvements Project.
- A few respondents indicated that tolls are necessary to create sustainable transportation infrastructure, especially bridges.
- Other respondents expressed support for tolls citing that tolls ensure that those who use the roads are paying for them.

7.2.2 Rerouting/Diversion

Approximately 1,700 comment submittals addressed rerouting and diversion, which was defined as traffic and congestion being pushed or rerouted to side streets and neighborhood streets as people try to avoid congestion or tolls. Comments included concerns about potential impacts to local communities and streets near I-205, observations about existing traffic congestion and road conditions, and thoughts about how to analyze and mitigate potential impacts from rerouting and diversion through the environmental review process and Project implementation.

The following is a summary of the major themes from the comments received pertaining to rerouting and diversion.

IMPACTS TO LOCAL COMMUNITIES AND STREETS NEAR I-205:

- Many respondents said that increased traffic on local streets would create additional inconveniences for residents accessing schools, shops, jobs, and medical facilities.
- Several respondents said that increased traffic on local streets would create additional safety risks for pedestrians and bicycles, as well as slower response times for emergency services.
- A few respondents said that increased rerouting and diversion off of I-205 would lead to increased deterioration of local streets, with additional maintenance costs borne by local governments and residents.
- A few respondents said that additional vehicles rerouting and diverting through their community will decrease property values.

TRAFFIC CONGESTION AND ROAD CONDITION OBSERVATIONS ON ALTERNATIVE ROUTES:

- Several respondents said that alternative routes are already congested, especially during rush hour, specifically the following:
  - I-5.
  - Willamette Drive (OR 43)/Oregon City Arch Bridge.
  - Trails End Highway (OR 213).
  - McLoughlin Boulevard (OR 99E).
  - Stafford Road.
  - Willamette Falls Drive.
  - Borland Road.
  - Schaeffer Road.
  - River Road.
  - Oatfield Road.

Comments about rerouting and diversion

"I am concerned that if you put a toll on the Abernathy bridge that it will cause a ton of congestion diverting before the bridge via the local West Linn and Oregon City exits and diverting traffic through downtown OC and across the very small OC-West Linn Bridge which already gets pretty congested during rush hour."

"It will cause me to drive farther to avoid tolls. Which I can do. And so will many more people. Causing congestion on 43 and 99E…"

"Have you calculated the added congestion and highway maintenance costs on these roads and neighborhoods?"

  - Salamo Road.
  - Rosemont Road.
- Some respondents said that many of the alternative routes do not have the capacity and/or are in need of repair and improvements, so additional rerouting and diversion will exacerbate these issues.

ANALYSIS AND MITIGATION OF IMPACTS CAUSED BY REROUTING AND DIVERSION:

- A few respondents said that rerouting and diversion and the subsequent impacts to local communities needs to be analyzed thoroughly in the environmental analysis.
- A few respondents said that the Project should incorporate mechanisms to limit access to local streets from I-205 or implement measures that discourage drivers from rerouting and diversion.

7.2.3 Fairness

Approximately 1,550 comment submittals addressed perceived fairness. These submittals were categorized as relating to fairness when they included comments on the existence of viable alternative routes, paying for highways that have already been built, fairness of user-pay systems, flexibility of personal schedule or travel patterns, and/or geographic effects on local communities.[25]

In general, comments on perceived fairness pertained to those who felt they would be adversely affected by the toll and taxes. Most comments expressed frustration at having to pay for roads that respondents felt were already paid for as well as a feeling that ODOT would be placing a hardship on local residents who would have to pay multiple tolls for going to and from work, school, or other destinations like the post office.

The following is a summary of the major themes from the comments received pertaining to fairness.

Comments about fairness

"We have already paid for these roads. How do you justify asking us to pay for them again?"

"This toll on limited stretch of I-205 will disproportionately affect the residents of Oregon City and West Linn. Toll should be exempted for the residents of this two cities..."

Those of us that have no options but to drive on tolls for routine commutes, grocery, doctors are at an unfair disadvantage as we don't have mass transit...

UNFAIR IMPACTS:

- Many respondents commented that they have already paid for existing roads and highways and should not have to pay again for these roads.
- Many respondents said the toll is an unfair burden to those who would have to pay to get to and from work or school.
- Several respondents said West Linn and Oregon City would have undue burden because of their proximity to the proposed tolled facility.

[25] Comments that addressed equity are discussed separately under Section 7.2.9.

- Some respondents commented that many people do not have flexibility for travel or commute times, so they would be overly burdened by a higher toll at peak hours.
- Some respondents commented that they would have to pay a toll every time they leave their house for local and short-distance trips.
- Some respondents said there is limited access out of or through the area with no viable alternatives.
- Some respondents asked why I-205 was selected for tolling but other roads or areas were not selected.
- A few respondents commented on the use of the word "freeway" to indicate the road should be free to use.
- A few respondents said they use I-205 to get to high school.
- A few respondents said they would be forced to move farther out to avoid paying the toll.
- A few respondents commented that they are being penalized for where they live.
- A few respondents commented that the toll is a barrier to access medical care.
- Some respondents who live in Washington state and work in Oregon expressed frustration with paying income taxes when they do not get to vote in Oregon.

7.2.4 Congestion Observation and Impacts

Approximately 1,120 comment submittals addressed congestion observations and impacts. These submittals included comments about current perceptions and observations of congestion changes and patterns, the primary causes of congestion in the Project area, how tolling will affect congestion, and how congestion affects people and travel behavior.[26]

There were differing opinions on what primary causes and solutions of congestion are in the section of I-205 where tolling is proposed: some respondents noted that traffic is caused because the three travel lanes narrow to two lanes in each direction on this stretch of the highway while others believed that congestion is caused by too many cars on the road and that there is a need for more multimodal transportation options. In addition, respondents disagreed about the severity of traffic on I-205. Some respondents

Comments about congestion observation and impacts

"If congestion is an issue now it may not always be so, especially as technology plays a greater role in vehicle operation and movement on major roads like the interstates."

"I really don't understand why only one short segment of I-205 is of interest as it is certainly not the worst traffic on the highway. I find that the farther north, the worse it gets. It seems to disproportionately affect Oregon city and west Linn residents..."

The reasons that there is congestion on I-205 in the stretch between Stafford Road and 213 is because there are hardly any reasonable alternatives to taking this route.

[26] Comments that addressed rerouting/diversion are discussed separately under Section 7.2.2.

think there is no congestion problem, while others believe congestion is an issue in this area, though tolling is not the solution to solve it.

The following is a summary of the major themes from the comments received pertaining to congestion.

CAUSES OF CONGESTION:

- Many respondents said congestion is caused because there are not enough lanes on I-205 (or the existing roadways are too narrow) to accommodate current volumes; three lanes of traffic merge into two lanes on this section of I-205.
- Some respondents suggested that freight traffic is a primary source of the congestion in this area. Many of these comments proposed solutions to encourage freight traffic to travel on alternate routes (during off-peak hours), or to create designated freight lanes. A smaller subset of the comments pointed out that heavy vehicles have trouble accelerating uphill, thus slowing traffic in those sections of the Project area.
- Several respondents said that congestion is caused by Washington state residents filling up Oregon roads.
- Several respondents said that congestion is caused by the incline on I-205 from OR 43 that requires vehicles to slow down.
- Some respondents said that congestion is caused by an increase in people moving to the area to escape the expense of living in Portland.

EFFECT OF TOLLING ON MANAGING CONGESTION:

- Many respondents said tolling will have no effect on [overall] congestion [in the area] because drivers will divert to other roads and move the congestion there.
- Many respondents said tolling will have no effect on congestion because more people are working from home and congestion is no longer an issue.
- Many respondents said tolling will increase congestion because of the assumption that delays would be caused by slowing down to pay a toll.
- Several respondents said tolling will not deter drivers because people will still need to drive the Project corridor route for work and routine errands.
- Some respondents expressed that tolls are needed as soon as possible to reduce congestion.
- Some respondents indicated that they would be willing to pay a toll for the benefit of reduced congestion.

LOCATIONS OF CONGESTION OUTSIDE OF THE PROPOSED TOLLING AREA ON I-205:

- Many respondents said that congestion is worse on I-5 and that tolling I-5 would get to the root of the problem.
- Several respondents said congestion is a major problem at the Washington state border.
- Several respondents said the congestion issue is a result of traffic on I-84, OR 43, or OR 99E.

- Some respondents said tolling will not have an impact on regional congestion since congestion will still be worse in other areas like I-5, I-84, and OR 43.
- Some respondents said Washington state drivers over the Glenn Jackson Bridge are a major source of congestion.

CONGESTION IMPACTS ON THE COMMUNITY:

- Many respondents said increased traffic on side roads due to tolling will disturb local communities like West Linn and Oregon City.
- Several respondents said they are concerned about the safety of pedestrians, children, and pets with increased traffic on side roads.
- Several respondents said the increased traffic will wear roads down and make them unsafe for driving, requiring increased maintenance on their vehicles.
- Several respondents said that the burden of a toll will cost the residents of West Linn and Oregon City more time, due to the increased traffic they will always have to endure.
- A few respondents said implementing a toll will make living in Oregon less desirable.
- A few respondents said that tolling is an effective way to dissuade people from driving.

7.2.5 Toll Implementation

Approximately 1,080 comments addressed toll implementation. These submittals included comments about toll costs or rates, tolling technology and payment systems, impacts to out-of-state drivers, and mitigation strategies.[27]

Most comments about toll implementation fell into three distinct categories: questions, ideas, and areas of concern. Respondents frequently had direct questions about tolling technology, billing and payment methods, physical implementation, rate setting, and the program construction timeline. Ideas about implementation from respondents focused on incentivizing certain types of use, discounts, or subsidies for certain users, or additional methods to achieve the goal of revenue generation or congestion reduction. Other respondents expressed concern or confusion about implementation of the tolling program.

The following is a summary of the major themes from the comments received pertaining to toll implementation.

Comments about toll implementation

"Monthly or yearly toll passes available for purchase to use 'pass-through' lane for regular users."

"If you insist on this strategy, signs should be clearly posted about the pricing, & variable pricing should be based more on time of day/day of week/holiday to limit surprise tolls if an accident /unforeseen condition occurs. The readerboards could be an option for price changes, but the pricing schedule should be posted on multiple standard road signs"

"transponders with reduced rates for residents and businesses of county"

[27] Comments that addressed revenue are discussed under Section 7.2.1, and the range of alternatives are discussed under Section 6.4.

FREQUENT QUESTIONS:

- How will out-of-state drivers be charged?
- How will rates be set?
- How will drivers know what the rates are in advance?
- Will there be fines or late fees for non-payment?
- Will the toll go away once the improvements are paid for?
- How much will the toll program cost to build and operate?
- How much of the revenue from tolls will go toward improvements?

TOLL COST:

- Many respondents suggested that some users should pay different rates (for example, locals and low-income drivers should pay less while higher-income, freight, and out-of-state drivers should pay more).
- Several respondents suggested that residents local to West Linn or Oregon City should be exempt from paying the toll.
- Some respondents proposed the use of an annual or monthly pass to cap the costs for frequent users or populations who would experience financial impacts.
- Some respondents suggested that certain trip purposes—such as shopping, commuting to school or work, or accessing medical care—should be discounted or exempt from paying the toll.
- A few respondents suggested that rates should be set based on the type or size of the vehicle, or the purpose of the trip.
- Some respondents expressed preferences for how variable-rate tolls would be assessed: income-based, need-based, trip length, trip purpose, vehicle type, or other criteria.
- Some respondents said that variable-rate tolls are too complex and difficult to understand. Some expressed a need for clarity on pricing in advance of their trip. Suggestions included advanced signage before the tolled segment or integration with navigation systems to include toll costs in route suggestions.
- Many respondents had concerns about the duration of the toll collection. Some expressed a preference for tolls to sunset after the roadway improvements are completed. Others expressed a concern that toll rates would continue to rise after implementation.
- Several participants expressed frustration with a lack of information on how much the tolls will cost, stating that it is difficult to provide comment without this information.
- A few commenters said freight should pay a higher toll rate based on weight, while others said existing freight fees should be reduced if tolls are implemented. Others said delivery drivers should receive an exemption.
- Other respondents expressed support for tolls as long as the tolls were inexpensive.

AREAS OF CONCERN:

- Many respondents shared disbelief in the idea that tolling would reduce congestion due to their assumption they would have to stop and pay at the toll booth.
- Some respondents were concerned about data privacy and sharing sensitive information with the government.
- A few respondents felt that highway tolls are overdue in Oregon.

IMPACTS TO OUT-OF-STATE DRIVERS

- Many comments proposed that drivers from out of state should be charged differently. Some proposed that the toll should target those traveling across state lines by tolling near the Columbia River on both the I-5 and I-205 bridges.
- Some respondents were concerned about the potential impacts to the available workforce. Others were concerned about low-income earners who have relocated from the Portland area to Vancouver for a lower cost of living.
- Several respondents were concerned about the ease of use for tourists and recreational or infrequent drivers.

MITIGATION STRATEGIES

- Most of the suggested mitigation strategies pertained to discounts or exemptions for groups of users, including the following:
  - Frequent users.
  - Infrequent users.
  - Local residents.
  - Out-of-state residents.
  - Students.
  - Employees of local business.
  - Low-income users.
  - Historically and currently excluded and underserved communities.
  - Electric vehicle or hybrid drivers.
  - Carpools.
  - Motorcycles and scooters.
  - Older adults.
  - Veterans.
- Some respondents had suggestions focused on mitigating the impacts to the surrounding neighborhoods including the following:
  - Building sound walls.
  - Using revenue for surface street improvements.
  - Designating local access roads.
  - Investing in transit options.
  - Investing in vanpools.
  - Installing public art.

- Some suggested that equity impacts could be mitigated by funneling revenue from the tolls back into the affected communities in the form of enhanced transit access, job training, or educational programs.
- Some respondents recommended that transit improvements should be implemented before the tolls go into effect.
- A few respondents called out the need for information on cost of the tolls needs to be available in multiple languages.

7.2.6 Accountability and Trust

Approximately 1,070 comment submittals addressed agency accountability and trust. These submittals include comments about trust in ODOT or the government more broadly, comments questioning the ability for tolling to reduce congestion, and comments questioning the legality of tolling.[28]

Of these comments, most respondents expressed a lack of trust in ODOT and other government agencies. In addition, respondents questioned the legality of tolling and of the Project overall. The following is a summary of the major themes from the comments received pertaining to accountability.

TRUST IN THE GOVERNMENT:

- Many respondents said ODOT does not manage revenue from existing sources well and cannot be trusted with additional revenue from tolling.
- Many respondents said tolling would not be necessary if ODOT spent taxpayer money responsibly.
- Several respondents said tolling will not reduce congestion in the area or achieve the stated goals and objectives.
- Several respondents said this Project is an attempt to take money from taxpayers.
- Some respondents said this Project is an attempt to reduce the budget deficit caused by inappropriate government spending.
- Some respondents said ODOT will not use revenue generated in the Project area to serve residents in the Project area specifically.
- A few respondents questioned ODOT's ability to complete projects on time.
- Some respondents said ODOT will expand tolling to other areas or roadways if this Project is implemented.

[28] Comments that addressed revenue and taxes are discussed in Section 7.2.1. Comments about effects to traffic congestion are discussed in Section 7.2.9. Comments about the public process are discussed in Section 7.2.11.

TOLLING AUTHORIZATION:

- Many respondents said tolling of new infrastructure is illegal or may require federal approval.
- Many respondents said tolling of any roadway requires voter approval.
- Some respondents said community members in affected neighborhoods could take legal action to prevent the implementation of tolling on I-205.

7.2.7 Expand Capacity

Approximately 990 comments addressed expanding roadway capacity (adding additional travel lanes, bridges or highways, for example). These submittals include comments about both expanding existing roadway capacity and adding additional roadways.[29]

Most of the respondents who commented about expanding capacity did so to provide an alternative to tolling. Rather than spending money on implementing a toll system, some respondents argued that the only logical solution is to either expand existing roadways and/or build new roads. A few respondents were against expanding capacity in any form and instead suggested that those funds be used to address climate change or invest in expanding transit instead.

The following is a summary of the major themes from the comments received pertaining to capacity.

Comments about expanding capacity

"If a new additional toll-lane was added and if the only way to do that was with a toll, then I would gladly pay a toll to reduce the gridlock."

"...I didn't see a statement about widening this section of 205 to three lanes. You need to explain how long the tolling would be in place and how long the construction project would take."

"Sadly none of the alternatives affirm adding a third lane in both directions which was needed 25 years ago."

ADDING NEW ROADWAYS:

- Many respondents suggested that new bridges should be built to cross both the Willamette River and Columbia River.
- Many respondents supported building new highways.
- Many respondents said that if tolling is going to be implemented, it should be implemented only on new roadways not existing ones.
- Several respondents advocated specifically for the construction of a metro area bypass that would allow trucks and non-local traffic to bypass Portland entirely.

[29] Comments that addressed other concurrent projects are discussed separately, under Section 7.2.16.

EXPANDING EXISTING ROADWAYS:

- Many respondents said lanes should be added to existing freeways including I-205, I-5, and OR 217.
- Many respondents said bridges should be repaired and widened, specifically the Abernethy Bridge.
- Many respondents said that lanes added to existing freeways should be toll lanes or high-occupancy vehicle lanes.
- Many respondents cited population growth as a driving factor for the need for expanding existing freeways.
- Several respondents said existing taxes should be used to fund the expansion of existing roadways.
- A few respondents said freeways should not be expanded, and that focus should be on climate action and expanding transit systems instead.
- A few respondents said adding another level to bridges and freeways (that is, a double-decked bridge) should be explored.

7.2.8 Multimodal Transportation

Approximately 840 comment submittals addressed multimodal transportation options. This includes comments about existing transit, bicycle and pedestrian options, and multimodal needs in the Project area. Comments focused on the safety, equity, connectivity, and travel time of multimodal travel. A few comments addressed how tolling and other revenue should be spent to fund these modes.

Many respondents observed that current transit service near I-205 in Clackamas County does not meet the needs of the traveling public; however, there were differing opinions regarding potential solutions. Some respondents emphasized the importance of providing accessible and frequent regional transit options in conjunction with tolling in the Project area. A few respondents stated that revenue should be diverted away from transit and invested in highway maintenance and expansion and bridge repair.

Comments regarding bicycle and pedestrian options primarily focused on the need for additional biking and walking infrastructure in the Project area as well as safety concerns from drivers taking routes to avoid tolls.

Comments about multimodal transportation

"Some of us live in one county and work in another. Transit is 6 hours to travel between those counties."

"By applying tolls, please also improve infrastructure to prioritize non-auto modes of travel, otherwise you will be inequitably penalizing those with less money."

"If the draft goals are sincere, then I really hope to see that major improvements are made to public transportation and walkability."

The following is a summary of the major themes from the comments received pertaining to multimodal transportation.

TRANSIT:

- Many respondents said that a tolling project needs to include viable transit options if tolls are going to be implemented on I-205 because there are not enough accessible and direct transit options in the Project area.
- Many respondents said that transit in the region needs to be improved to reduce travel times and increase connectivity.
  - Some respondents suggested transit-only lanes, express buses, and bus-on-shoulder lanes along I-205 in Clackamas County.
  - A few respondents suggested extending the MAX Orange Line to Oregon City and to other communities along the southern portion of I-205.
  - One respondent suggested a new light rail line from OR 217 to Lake Oswego and traveling east to Clackamas County.
  - A few respondents suggested express buses or light rail lines between Oregon City and Washington County, including Bridgeport Village, Tualatin, and Beaverton, and between Oregon and Washington state.
- Several respondents said that transit is a good alternative to widening roadways and can improve mobility, reduce congestion, and reduce greenhouse gas emissions.
- Some respondents said that transit investments are not balanced across the region. It is unfair to toll I-205 especially because the Project area has very few transit options.
- A few respondents said tolling is not an effective strategy to reduce congestion and that improved transit would be more effective at managing congestion.
- A few respondents said toll revenue should be used to fund transit.
- A few respondents indicated that toll revenue should not be used to fund transit and should instead be used to fund highway maintenance and expansion and bridge repair.
- A few respondents said the current transit system creates disproportionately negative impacts for low-income people and essential workers. Most people cannot afford to live close to downtown Portland and transit options in the suburbs are indirect and too time consuming.
- A few respondents said the transit system in Clackamas County feels unsafe and unhealthy.
- A few respondents said diversion from tolling on I-205 will negatively affect bus riders. Buses in the area will be delayed due to increased congestion on local roads.
- A few respondents said bus and transit riders should not be tolled.
- A few respondents said tolls are a critical tool to reduce overall dependence on vehicles.

BICYCLE AND PEDESTRIAN TRAVEL:

- Several respondents said there are not enough bicycle lanes and sidewalks in the Project area and providing other transportation options is important if a toll is added to I-205.
- Several respondents said biking and walking options reduce congestion and tolling roadways does not reduce congestion.
- Several respondents identified safety concerns for pedestrians and bicyclists as a result of increased driver diversion from I-205 to local roads.
- Some respondents said toll revenue should be spent on biking and walking investments.
- Some respondents said toll revenue should not be used to fund biking and walking investments and should instead be invested in roadway expansion.
- A few respondents said additional pedestrian infrastructure in the Project area would not be used because destinations are far apart.
- A few respondents said freeways should not be expanded and revenue should be invested in expanding biking and walking infrastructure.
- A few respondents said freeways should get additional lanes and revenue should not be invested in biking and walking infrastructure.

7.2.9 Equity

Approximately 830 comment submittals addressed equity. These submittals included comments about whether certain groups or communities will experience disproportionate outcomes and impacts from tolling. Those communities historically and currently excluded and underserved by the transportation system include Black, Indigenous, and People of Color, people experiencing low income, people living with disabilities, people who speak languages other than English, older adults, and children.[30]

Comments mentioning equity generally opposed tolling due to disproportionate effects on low-income households and seniors. Comments were largely related to how tolling would be an additional burden faced by low- and fixed-income individuals on top of other existing challenges like commuting to jobs with inflexible work schedules, medical needs, and/or family support required for senior care. Some comments indicated a need for equity to be explicitly defined and how it will be ensured for the Project.

Comments about equity

"Historically, under-served populations are promised equity in government projects; seldom in reality has that happened. If Advisory Boards are set up that include people of color, senior citizens, folks with physical disabilities and members who can support the developmentally disabled in the community, that will alleviate a lot of my fears."

"Remember folks are very limited in what they can afford, especially seniors having to visit Doctors and other medical appointments when using I-205 or locally in Oregon City, West Linn, Lake Oswego, etc."

"Do not charge people in low income brackets anything. They are barely surviving as is."

[30] Comments that address fairness are discussed separately under Section 7.2.2.

The following is a summary of the major themes from the comments received pertaining to equity.

ADVERSELY AFFECTED:

- Many respondents said tolls affect only low-income people and those already financially disadvantaged.
- Many respondents said tolls would create issues for seniors and elderly who are on fixed incomes.
- Several respondents commented that tolls would affect low-income individuals' ability to pay to travel to work and jobs, especially for those with less flexible work and commute schedules.
- Some respondents said tolling is racist as it disproportionately affects communities of color the most.
- A few respondents said electronic tolling is discriminatory against those without bank accounts.
- A few respondents commented on added expenses for students seeking higher education.

7.2.10 Personal Financial Impacts

Approximately 530 comment submittals addressed personal financial impacts of tolling. Comments included concerns over the ability to pay tolls, how the COVID-19 pandemic has negatively affected financial security, and how a toll could affect where people live and/or work. The following is a summary of the major themes from the comments received pertaining to financial impacts.

- Many respondents said they do not personally have the income necessary to pay tolls, including those on fixed incomes (for example, retirees) and households and individuals who are currently struggling to make ends meet.
- Several respondents cited additional economic hardships associated with the COVID-19 pandemic.
- Several said tolls would unfairly burden lower-income residents and shift workers who do not have the flexibility to alter their commute (either time of day or route).
- Some respondents said tolls would unfairly burden middle-class families, who would not be eligible for reduced toll rates.
- Some respondents said the tolls would adversely affect their property values, including concerns that they might have to move.

Comments about personal financial impacts

"This would have a negative economic impact on my family"

"Keep in mind that the students of Clackamas Community College are already on a tight budget. Students already can't afford bus fare or gas. Adding a toll would put mire of a financial burden on them."

"It seems to me that while the goals of the tolls are admirable, the end result will be a significant loss of income for those who can least afford to pay..."

- A few said people could lose their jobs if their wages did not cover the cost of tolls, or if their companies would not reimburse them.

7.2.11 Public Engagement and Decision Processes

Approximately 500 comment submittals addressed the public engagement process, including decision-making and schedule. This included comments about how tolls should be voted on by the public, public outreach that has occurred during this process, whose input should be accounted for, and how public input will be used.[31]

Most comments advocated for a vote to decide on tolling in Oregon. Many expressed the belief that if tolling were put to a vote, then it would be evident that the public does not support tolling. Respondents also expressed concern about how the online survey results would be used and if their input would make a difference. The following is a summary of the major themes from the comments received pertaining to the public engagement process.

> **Comments about public engagement and decision processes**
>
> "The survey to obtain opinions, comments, and suggestions should be offered in several ways and not only electronically.... if the information is offered in different languages, make sure it is accessible and easy to find."
>
> "What comes next after we get past this community input phase? If the recommendations are high-impact, is there another opportunity to engage as you figure out the mitigation?"

DECISION PROCESS:

- Many respondents said they believe that tolling is already decided, and they do not think their opinion will change that decision.
- Many respondents said that citizens should get to vote on tolling.
- Many respondents said that if people could vote on tolling, then most would vote against it.
- Some respondents said that voters from Clackamas County—specifically Oregon City, West Linn, and Tualatin—should decide if they want tolling in their communities.
- Some respondents said that they would vote against any politicians that support tolling.

PUBLIC ENGAGEMENT PROCESS:

- Many respondents said that the feedback gathered from this survey should be published and future outreach materials should reflect the public comments.
- Many respondents said that the online survey will have no impact because it was designed to support a toll decision, not to gather information.
- Several respondents said that it is important to gather public input despite challenges during the COVID-19 pandemic.
- Several respondents said that the outreach for this Project should reach more community members, and broader public engagement is necessary.

[31] Comments that addressed accountability and trust are discussed separately under Section 7.2.6.

- A few respondents said that this survey should be made more accessible by offering it in non-electronic formats and in multiple languages.
- A few respondents said they appreciated ODOT's communication and outreach efforts.

ADVISORY COMMITTEE:

- Many respondents said representation on the Equity and Mobility Advisory Committee should include commuters and residents of nearby communities.
- Some respondents said the advisory committee should be used to assess benefits and burdens associated with tolling.
- A few respondents questioned who is on the advisory committee and how to join the committee.

7.2.12 Environmental Impacts

Approximately 320 comment submittals addressed potential environmental impacts. These submittals included comments about environmental impacts from increased traffic on neighborhood surface streets due to vehicles avoiding tolls on I-205, the Project's impact on greenhouse gas emissions and climate change, and public health concerns from increased traffic and congestion. There were diverging opinions on whether tolling I-205 would reduce carbon dioxide emissions.

The following is a summary of the major themes from the comments received pertaining to environmental impacts.

ENVIRONMENTAL IMPACTS FROM DRIVERS REROUTING TO SURFACE STREETS:

- Many respondents said there would be an increase in air and noise pollution in surrounding communities due to an increase in traffic and vehicle exhaust on local roads.
- Some respondents said there would be impacts to natural areas, parks, waterways, and wildlife from increased traffic activity.

IMPACT ON CARBON DIOXIDE EMISSIONS AND CLIMATE CHANGE:

- Some respondents said that due to rerouting and diversion to avoid tolls on I-205, carbon dioxide emissions would increase from drivers taking longer routes, burning more gas, and increasing idling times.
- Some respondents said that tolling I-205 would not decrease carbon dioxide emissions because transit options in the area are limited and transit connections to other areas of the

Comments about environmental impacts

"When you think about equity and mobility for the tolling plan, remember that more cars on the road means more air pollution here, more pollution in the communities where the refineries are and more land taken away from being open space or housing."

"Under performance measures, environmental justice is mentioned, and it doesn't necessarily indicate how that will be measured..."

"Current and future generations are counting on us to get our transportation policies in line with the emerging climate crisis."

region are inefficient, forcing people to drive regardless of whether or not a toll is implemented.

- A few respondents said that tolling I-205 would help discourage driving and reduce the number of single-occupancy vehicles, which in turn would reduce carbon dioxide emissions.

PUBLIC HEALTH CONCERNS FROM INCREASED TRAFFIC AND CONGESTION:

- A few respondents said that tolling would move traffic off I-205 and closer to nearby sensitive receptors (that is, daycares, schools, elderly housing, hospitals, etc.).
- A few respondents said that congestion in general poses a public health concern due to increased and concentrated vehicle pollution.

7.2.13 Economic Impacts

More than 320 comment submittals addressed economic impacts. These submittals included comments about impacts to small businesses in Oregon City and West Linn, hindering regional economic growth as well as economic recovery from the COVID-19 pandemic, and impacts to interstate commerce and to the businesses and consumers who rely on shipped goods.[32]

The following is a summary of the major themes from the comments received pertaining to economic impacts.

IMPACTS TO LOCAL SMALL BUSINESSES:

- Many respondents said that business districts near I-205—such as commercial areas centered around Main Street in Oregon City and Willamette Falls Drive in West Linn—depend on vehicle commuters and would see a decrease in consumers.
- Several respondents said that they would take their shopping and other service needs outside of the community to avoid paying tolls.
- A few respondents said that tolling will lead to increased employment costs to Oregon City and West Linn businesses for employees who commute to work on I-205.

Comments about economic impacts

"I also don't see anything in this statement about managing the effects on small businesses & communities that will be most affected by these tolls."

"...if people have to pay a toll to either visit or work at those businesses and they have alternatives, they may save the hassle and $ and go somewhere else, impacting local business and employment in the area."

"Please keep in mind that those in West Linn don't have many shopping, eating, and entertainment options. We use I-205 to access these businesses as well as for work."

IMPACTS ON REGIONAL ECONOMIC GROWTH AND RECOVERY:

- Some respondents said that tolling this section of I-205 would hinder regional economic growth due to a decrease in commercial investment and housing development.

[32] Comments that addressed personal financial impacts are discussed separately under Section 7.2.10.

- Some respondents said that tolling would add additional hardship to businesses already struggling financially due to the COVID-19 pandemic and would slow the economic recovery for these businesses.

IMPACTS TO INTERSTATE COMMERCE AND SHIPPING COSTS:

- A few respondents said that tolling I-205 would burden interstate commerce and the free movement of goods through Oregon.
- Many of the freight-related comments focused on potential impacts to industry and the economy. Some called out that this will disproportionately affect small, independent freight drivers. Others articulated the potential impact to the cost of shipping and the resulting inflation that would be passed on to the consumer.
- A few respondents expressed concern that tolls could increase shipping costs and be passed on to Oregon businesses and consumers.
- A few respondents expressed concerns about freight access to the Port of Portland via I-205.

7.2.14 Other Congestion Management Ideas

Approximately 220 comment submittals addressed other congestion management ideas. These submittals included comments about alternatives to tolls to improve traffic flow and congestion.[33]

Many respondents expressed a general desire for ODOT to explore alternatives to congestion management without providing specific ideas. Other comments focused on specific congestion management methods, including non-vehicle alternatives, reducing population growth, planning future growth and highway construction, and incentivizing adjustments to business operations.

The following is a summary of the major themes from the comments about other congestion management ideas.

Comments about other congestion management ideas

"Promote low cost alternate solutions, give employers incentives to let their employees work from home whenever possible"

"There are a lot of transportation considerations including carpooling, telework, mode shift, and trips not taken that need to be considered..."

GENERAL IDEAS FOR CONGESTION MANAGEMENT:

- Many respondents said ODOT should seek to manage congestion using alternatives other than tolls.
- Some respondents said ODOT should consider ideas that reduce overall driving and refocus on non-vehicle alternatives.

[33] Comments that addressed the following are discussed separately under their respective sections: expand capacity (Section 7.2.7), multimodal transportation (Section 7.2.4), and proposed alternatives (Section 6.4).

SPECIFIC OPTIONS FOR CONGESTION MANAGEMENT:

- Some respondents said population growth is the greatest contributor to increasing congestion, and ODOT should consider working with planners to reduce the influx of new people and businesses into the area, possibly by incentivizing living and working outside of Multnomah County. Similarly, ODOT should work with planners to create more walkable and bikeable communities.
- Some respondents said ODOT should incentivize carpooling and shifting to alternative modes of travel.
- A few respondents suggested that ODOT should work with the business community to encourage remote-working options for employees or alternate working hours (that is, outside of peak commute times).
- A few respondents noted that ODOT should work with the State of Washington to levy an out-of-state vehicle-registration fee for Washington state drivers traveling in Oregon.

7.2.15 Other Tolling Systems

Approximately 200 comment submittals addressed other examples of tolling. These submittals included comments referencing existing tolls in other places, aspects of tolling in other places that are effective, and explanations of why tolling will not work in Portland specifically.[34]

Examples were cited across the United States and the world, including Seattle (Washington State Route (SR) 520, I-405, SR 167, SR 99 Tunnel), Los Angeles, Chicago, several northeastern states, France, Toronto, London, and many more. Other examples of tolling in Oregon specifically included the Hood River Bridge and Bridge of the Gods, and historic tolling of the Astoria Megler Bridge.

The following is a summary of the major themes from the comments received pertaining to other examples of tolling.

Comments about other tolling systems

"Using an established system such as California's FasTrack would help a lot of west-coasters"

"Looking at tolls on the east coast, there are entire roads where you get scanned when entering the highway, then when you exit. The total toll is based on the length of the trip. Why not toll all of I-205?..."

EXAMPLES OF TOLLING WITH NEGATIVE EFFECTS:

- Based on experiences driving in other cities, many respondents said tolling fails to decrease congestion and often increases it.
- Many respondents said they believed that tolling is unpopular wherever it is implemented and cited a number of other cities, states, and countries where this is the case (listed above).
- Some respondents said toll revenue is hardly ever invested in the maintenance of the roadway and cited Washington, D.C., as an example.
- A few respondents said tolling increases air pollution and the frequency of accidents.

[34] Comments that addressed other concurrent projects are discussed separately under Section 7.2.16.

- A few respondents said tolling is inequitable and discussed other cities where inequitable tolling systems are in place such as Bellevue, Wash., and Los Angeles.
- A few respondents said that once tolls are implemented in an area, they begin to be widely used and the cost of tolls increases over time and cited tolling systems in Washington, D.C., as an example.

CHARACTERISTICS OF OTHER TOLLING SYSTEMS THAT SHOULD BE SEE CONSIDERED FOR I-205:

- Several respondents said they would like to see a single tolled lane similar to the system on I-405 in Seattle or roadways in Washington, D.C., and Atlanta rather than a toll for the entire roadway.
- Several respondents said they would like to see electronic tolling systems that do not slow traffic and use a bill-by-mail option.
- Some respondents said tolls should be implemented in conjunction with expanding freeway capacity.
- A few respondents provided examples, such as the turnpike system in Connecticut, where a toll is implemented to pay for a new project or road construction and once it is paid for, the toll ceases.

7.2.16 Safety

Approximately 180 comment submittals addressed safety. These submittals included comments about current and future safety for alternate modes of travel, anticipated increases in traffic accidents, and the impacts that traffic diversion will have on roadway safety.[35]

In general, comments on safety pertained to the impacts of diversion of traffic onto neighborhood streets on safety and the safety of alternate modes of travel. The following is a summary of the major themes from the comments received pertaining to safety.

Comments about safety

"I'd rather see ODOT enforce traffic laws and find ways to make our roads safer..."

"The safety of residential streets in West Linn will be impacted greatly with tolling of I205."

IMPACTS OF REROUTING ON SAFETY:

- Many respondents expressed general concern for how diverted traffic due to tolls will lead to increased congestion, travel speeds, and collisions on neighborhood roadways.
- Some respondents expressed concern about the potential for diverted traffic to cause an increase in vehicle-pedestrian accidents.
- A few respondents said that traffic from diversion will cause safety issues with emergency vehicle transport or personal travel for emergencies.

[35] Comments that addressed other aspects of rerouting and diversion are discussed separately under Section 7.2.2.

- A few respondents noted that increased traffic will deteriorate the quality of neighborhood roadways, further contributing to safety concerns. A few comments noted that this causes an increased financial burden on local municipalities.

SAFETY OF ALTERNATE MODES OF TRAVEL:

- Many respondents said that tolls will make transportation for people walking and biking less safe.
- Several respondents expressed concern for specific groups, including children (especially around schools), older adults, and those who may be transit dependent.
- Some respondents said that bike, pedestrian, and transit infrastructure are limited, especially noting the lack of sidewalks on neighborhood roadways in the Project vicinity.
- A few respondents indicated that walking, biking, and using transit is already unsafe, so driving and paying the tolls is the only option.

7.2.17 Other Concurrent Projects

About 90 comment submittals addressed other concurrent projects. This included comments about other existing projects and their relative importance compared with the I-205 Toll Project.[36]

Comments about other concurrent projects

"Eliminate the bottle neck at the Rose Quarter."

"Fix the I5 bridge first!"

"Retrofit Abernethy Bridge for quake survivability."

Overall, respondents indicated that it is important to complete planned projects on I-5 before implementing tolls on I-205. Some respondents indicated that the I-5 Bridge Replacement Project should be completed first, while others indicated that the I-5 Rose Quarter Improvement Project should be prioritized for construction. A few respondents expressed dissatisfaction with the I-5 Rose Quarter Improvement Project and indicated that funding for that project should be diverted to support improvements to the Abernethy Bridge.

The following is a summary of the major themes from the comments received pertaining to other concurrent projects:

- Several respondents said that the I-5 Bridge Replacement Project should be completed before implementing tolls on I-205.
- A few respondents said the bottleneck at the I-5/Rose Quarter area should be eliminated before tolling is implemented on I-205.

[36] Comments that addressed other congestion management ideas are discussed separately under Section 7.2.9.

- A few respondents said the funds for the I-5 Rose Quarter Improvement Project should be diverted to improve the Abernethy Bridge.
- A few respondents wondered about the relationship between this Project and the I-205 Improvements Project.
- Some respondents discussed the relationship between pricing and transportation demand. Some suggested that the road-widening project should not happen until after tolling is implemented. Some suggested that tolls should be high enough to discourage unnecessary trips.
- A few respondents said that the projects proposed as part of Metro's Get Moving 2020 bond measure do not address capacity or congestion.
- A few respondents recommended ODOT include impacts from converting the Arch Bridge to a bike-and-pedestrian-only bridge in the analysis for the Project.
- A few respondents noted that policies and decisions made for tolling on I-205 could serve as the foundation upon which other tolling projects in the region or state would be built.

8 RESULTS: AGENCY AND TRIBAL COMMENTS

This section describes comments received from agencies and tribes during this engagement.

8.1 Agency Comments

Letters from agencies were received during the comment period; Attachment D includes copies of these letters. In addition, agencies also provided comments through the participating agency coordination meeting (Section 3.1.1), Project working group meetings (Section 3.1.2), public meetings (Section 4.1.1), and the online survey (Section 4.1.1), all of which are also documented in Attachment D.

The following sections provide a summary of the input provided by each agency during this engagement.

8.1.1 Clackamas County

ODOT received comment letters from the Clackamas County Board of County Commissioners and the Clackamas County Coordinating Committee (C4). ODOT also received comments at meetings with staff from the Clackamas County Diversion Committee (7/13/20) and the C4 TAC (9/22/20). In addition, Clackamas County provided a letter accepting the invitation to serve as a Participating Agency.

Comments from Clackamas County include the following:

- Clarify the desired outcomes of the study and potential implementation of tolling.
- Prepare a financial analysis of the I-205 Improvements Project that justifies tolling and demonstrates that it cannot be completed without toll funding.
- Tolling on I-205 should not be implemented before system-wide tolling is applied.
- Oregon Transportation Commission should clarify its policy for funding major highway improvements in the region.
- Toll revenue should be kept in the Project area, but the Project area needs to be defined.
- Current levels of diversion off of I-205 are not acceptable and should not be the baseline.
- Alternatives to study in the NEPA process should include the following:
  - A No-Build Alternative with full 6-lane improvement without tolling.
  - Alternatives 3, 4, and 5.
  - An alternative with the Arch Bridge restricted to bicycles and pedestrians only; also an alternative with this restriction and a new vehicle bridge over the Willamette River.
  - An alternative in which the tolled area of I-205 is extended west of the Stafford Road interchange and north of the OR 212 interchange.
  - Evaluate tolling on the entirety of I-5 and I-205, consistent with House Bill 2017.

- Requests for additional modeling:
  - Model 2018 no-toll/no-construction baseline and 2018 no-toll/added-capacity scenarios.
  - Use Metro's 2040 travel demand model to assess long-term rerouting of traffic.
  - Apply traffic simulation to understand impacts of increased diversion.
  - Model each alternative with tolls implemented on I-5.
  - Quantify the impacts of traffic rerouting on major roadways regionwide.
  - Analyze peak-hour performance on all major roads.
- Assess health and equity impacts in the Environmental Assessment
  - The NEPA process should inform how ODOT remedies impacts of tolling diversion where there are transportation gaps, including a need for improved transit alternatives, improved pedestrian accommodations, and additional river crossings.

8.1.2 City of Canby

ODOT received a comment letter from the Mayor of the City of Canby. In addition, ODOT received comments at a Canby City Council meeting (9/2/20). Comments from Canby include the following:

- Implementing tolling would shift congestion to other highway facilities.
- Alternatives 3 and 4 generate the greatest diversion impacts on OR 99E; an alternative that results in less diversion through central Clackamas County, including OR 99E, should be included.
- The project purpose does not acknowledge regional commute patterns do not operate in a vacuum. This project is being considered separately from potential toll projects, thus the modeling does not reflect the true outcomes of implementing multiple projects.
- Identify localized mitigation strategies and projects to address local impacts on OR 99E and the roads that connect it to I-5.
- Mitigation should be built into the Project, not dependent on future revenue generated by tolls.
- Toll revenue should stay in the communities affected by the Project.
- Impacts of tolling on OR 99E are concerning; this roadway is already stressed due to growth; there are not a lot of alternatives through Canby.
- How can Canby part of the process throughout development of the Project?
- The problem statement on revenue is not clear. What is revenue needed for? Would it be used in the region or specifically in Clackamas County?
- The additional lanes on I-205 are needed; tolls alone will not solve congestion problems; if the tolls are going to pay for these lanes, this needs to be clearly communicated to the public.

- Transit options in the Project area are very limited; ODOT should be working with TriMet to develop transit alongside tolling.
- The biggest diversion impacts are on the access roads from I-205 and I-5 to 99E; the worst location is getting off I-5 at Aurora to access OR 99E.
- Clarify if the tolls would be implemented in perpetuity or if they would sunset.

8.1.3 City of Gladstone

ODOT received a comment letter from the City of Gladstone City Council. In addition, ODOT received comments at a Gladstone City Council meeting (8/11/20). Comments from Gladstone include the following:

- Tolling will hurt the local economy, reduce the quality of life for residents, and negatively impact businesses and families.
- Gladstone has a high proportion of seniors and disabled residents that will be affected.
- Many Gladstone residents work outside of the city and would have to pay the toll daily.
- Traffic diversion is already a problem in Gladstone; additional diversion could contribute to traffic delays, accidents, and delays in emergency response.
- The City of Gladstone is opposed to tolls and instead supports the No-Build (no toll) alternative; tolls are the worst way to solve the transportation funding deficit.
- Tolls unfairly impact low-income individuals; many Gladstone residents do not have an option to telecommute or the flexibility in their schedule and must drive to work.
- Data privacy is a concern.
- How much has ODOT spent studying tolls since House Bill 2017 was passed?
- The Project materials do not reflect that most people oppose tolling.
- Clarify the relationship between tolls and the I-205 Improvements Project.
- Clarify how and where toll revenue will be spent and who will distribute the funds.

8.1.4 City of Lake Oswego

ODOT received a comment letter from the City Manager of Lake Oswego. In addition, the City of Lake Oswego provided an email accepting the invitation to serve as a Participating Agency. Lake Oswego also contributed to the I-205 Cities' letter (see Section 8.1.16). Comments from Lake Oswego include:

- The need to reduce congestion goes beyond the stretch of I-205 between Stafford Road and OR 213.
- Freight and interstate travel on I-205 may divert onto I-5 to avoid the toll, further increasing congestion on that corridor until a similar tolling mechanism is implemented.

- A financial analysis of the I-205 Improvements Project should be performed to demonstrate that the project cannot be completed without tolling.
- Tolling should also be considered as a funding mechanism for other highway improvements in the region, such as I-405 and OR 217, not just on I-205.
- Toll revenue collected on I-205 should be invested within the corridor to improve safety and travel along the tolled stretch and to mitigate impacts related to tolling.
- Tolling on I-205 will increase diversion onto local roadways, specifically Stafford Road and OR 43, making them more congested and reducing the safety of pedestrians and bicyclists. Identified pathway improvements on Stafford Road are unfunded and would require significant land acquisition and mitigation of impacts to sensitive areas. The safety issue at OR 43/A Avenue would be further exacerbated.
- Thoroughly analyze traffic impacts resulting from tolling I-205 between Stafford Road and OR 213, including diversion, operation, and safety of local roadways.
- Study impacts on alternative transportation; evaluate improvements that would make alternative modes a safe and viable option.
- Analyze region-wide congestion pricing – including I-5, the rest of I-205, OR 217, Highway 26, and I-84.
- Evaluate the equity impacts of tolling on historically marginalized communities.

8.1.5 City of Oregon City

ODOT received a comment letter from the City Commission of Oregon City. In addition, ODOT received comments at a City Commission meeting (8/19/20). Oregon City also contributed to the I-205 Cities' letter (see Section 8.1.16). Comments from Oregon City include:

- Prepare a financial analysis of the I-205 Improvements Project that justifies tolling and demonstrates that it cannot be completed without toll funding.
- Oregon Transportation Commission should clarify its policy for funding major highway improvements in the region.
- Tolling should be applied equitably to all major highway improvements; Oregon City and Clackamas County should not be required to shoulder major infrastructure project costs.
- Toll revenue should be kept in the Project area.
- Disproportionate burdens to Oregon City:
  - Impacts of tolls would be contrary to the City Commission goal on livability.
  - Additional diversion will impact deteriorating infrastructure, decrease local reliability and efficient movement of people and goods; result in safety issues; hamper economic growth; increase air pollution on local roadways.
  - Lack of alternative transportation options will cause more diversion on local streets; ODOT needs to allow buses/shuttles along the shoulder of I-205.

  - Oregon City has economically distressed areas, and a high population of people with a disability.
  - Many people accessing health and social services in Oregon City will have to pay a toll.
  - A toll will make Oregon City a less desirable place to live.
- A bicycle and pedestrian option across the Willamette River is needed.
- Goals and objectives:
  - Look at the micro-level burdens and benefits for adjacent areas, especially Oregon City.
  - Objectives do not adequately address the local impacts, especially quality of life impacts.
  - Objectives on safe travel, air quality, movement of people and goods, and travel-time reliability should include local streets impacted by diversion.
  - Agree with goal that alternatives should provide a toll system that can be expanded in scale, integrated with tolling on other roadways and adapted to future toll systems.
  - Need to address how increased congestion affects travel efficiency and transit reliability.
- Modeling:
  - Model 2018 no-toll/no-construction baseline and 2018 no-toll/added-capacity scenarios.
  - Use Metro's 2040 travel demand model to assess long-term rerouting of traffic.
  - Apply traffic simulation to understand impacts of increased diversion.
  - Quantify the impacts of traffic rerouting on major roadways regionwide.
  - Analyze peak-hour performance on all major roads.
  - Traffic modeling cannot adequately model human behavior for a toll project.
- Alternatives to study in the NEPA process should include the following:
  - A No-Build Alternative with full 6-lane improvement without tolling.
  - Alternatives 3, 4, and 5.
  - An alternative with the Arch Bridge restricted to bicycles and pedestrians only; also an alternative with this restriction and a new vehicle bridge over the Willamette River.
  - An alternative in which the tolled area of I-205 is extended west of the Stafford Road interchange and north of the OR 212 interchange.
  - Evaluate tolling on the entirety of I-5 and I-205, consistent with House Bill 2017.
- Assess health and equity impacts in the Environmental Assessment.
- The NEPA process should inform how ODOT addresses the impacts of tolling, including transit alternatives, improved pedestrian accommodations, and adequate bicycle and pedestrian options across the Willamette River.

- Clarify the relationship of the I-205 Toll Project to the I-205 Improvements Project; the I-205 Improvements Project website does not contain any information about tolling; the I-205 Improvements Project must be completed for tolling to resonate with the community.

8.1.6 City of Tigard

ODOT received comments at a Tigard City Council meeting (8/18/20). Comments from Tigard include the following:

- The City of Tigard commends ODOT on the outreach work to obtain community feedback.
- Clarify the impacts of tolling on truck commerce.

8.1.7 City of Tualatin

ODOT received a comment letter from the Mayor of Tualatin on behalf of the City Council. In addition, ODOT received comments at a Tualatin City Council meeting (7/27/20). Tualatin also contributed to the I-205 Cities' letter (see Section 8.1.16). Tualatin also provided an email accepting the invitation to serve as a Participating Agency. Comments from Tualatin include the following:

- Clarify that revenue gained from tolls on I-205 will be invested in the I-205 corridor.
- The NEPA analysis needs to assess quality of life impacts of diversion, including impacts on transportation reliability, access, public health, air quality, economics, and safety.
- Identify a funding plan for equity-informed improvements to increase transportation options and programs that serve lower income and historically marginalized populations.
- The I-205 corridor, particularly Borland Road, lacks safe bicycle and pedestrian facilities.
- Modeling:
  - Run the model with tolling on I-5 tolling.
  - Run the model with a 2040 horizon.
  - Incorporate post-COVID 19 transportation patterns into the assessment.
- Clarify how goals and objectives will be addressed and incorporated into the Project.
- Alternatives:
  - Advance Alternatives 3, 4, and 5.
  - Add an alternative where the tolled area extends from a location west of Stafford Road to a location north of the OR 212.
  - Consider tolling at a regional scale to address chokepoints at Boone Bridge and the Columbia River, rather than "spot tolling" where unequal impacts result.
- Equity should be referenced in the Project's draft Purpose and Need Statement.
- Provide cost, source of funding, and authorization for studying tolling on I-205.
- Lack of transit connecting cities on the I-205 corridor is a concern.

- Clarify if tolling would sunset after construction of the I-205 Improvements Project.
- Clarify the percentage of toll revenue that covers administration.
- Tolling should be used to provide people with a travel alternative; there is not another alternative in the I-205 corridor where people would not have to pay the toll.
- People from outside the Portland metro area should pay a toll instead of local residents.
- The increase in traffic on local roadways shown under Alternative 4 is not acceptable; local roads are already overwhelmed.
- Diversion onto Borland Road is concerning; it has schools, hospitals, and a large church.
- ODOT should reach out to communities that might not participate, including immigrants.
- Clarify how the tolling endpoints were identified.
- Clarify what mitigation will include and how it will be paid for.

8.1.8 City of West Linn

ODOT received a comment letter from the West Linn City Council. In addition, ODOT received comments at a West Linn City Council meeting (9/8/20). West Linn also contributed to the I-205 Cities' letter (see Section 8.1.16). Comments from West Linn include the following:

- The Project would disproportionately burden local residents.
- The Project upends precedent of how major infrastructure projects are paid for.
- Input and opposition from West Linn and other local residents have not been considered.
- Diversion is already a problem on local roads; the I-205 Improvements Project must be considered completed for tolling to resonate with local communities.
- ODOT should prioritize securing immediate state and federal funding and beginning construction of the I-205 Improvements Project.
- A regionwide dialogue on tolling is needed with simultaneous and regionwide tolling approach on all major highways.
- ODOT should extend the length of any tolling to different endpoints to minimize diversion.
- Toll revenue must be spent in the tolled area.
- Tolls should be done in collaboration with a private company with only one tolled lane.
- Clarify if tolls would be collected electronically or with toll booths.
- Tolls should be applied at the Glenn Jackson Bridge (state border); people from Washington do not pay for their use of Oregon roads.
- ODOT should look at tolling in Downtown Portland to pay for the I-5 Rose Quarter Project.

8.1.9 City of Wilsonville

ODOT received a comment letter from the City of Wilsonville Mayor. ODOT also received comments at a Wilsonville City Council meeting (8/17/20). The comment letter from Wilsonville implied acceptance to the invitation to serve as a Participating Agency. Wilsonville also contributed to the I-205 Cities' letter (see Section 8.1.16). Comments from Wilsonville include the following:

- Tolling just this segment of highway would neither raise sufficient revenue nor provide region-wide congestion relief. The NEPA analysis should be expanded to look at tolling regionally on I-5 and I-205.
- Prepare a financial analysis of the I-205 Improvements Project that justifies tolling and demonstrates that it cannot be completed without toll funding.
- Oregon Transportation Commission should clarify its policy for funding major highway improvements in the region. Tolling should be applied equitably to major highway improvements in the region.
- Tolls imposed on I-205 should not pay for improvements elsewhere. Toll revenue should be kept in the Project area.
- Metro's 2040 travel-demand model should be used to asses long-term re-routing patterns that would result from tolling this segment of I-205.
- Study the economic and quality-of-life impacts on communities impacted by tolling.
- Study the change in number of vehicles diverting to local roads and state highways (including OR 99E, OR 212, OR 43, and OR 213) and the impact of those roads.
- A toll location west of Stafford Road has the potential for a substantial increase in traffic at the I-5/Elligsen Road interchange. ODOT should look at potential mitigation strategies.
- Look at changes in traffic patterns throughout the Portland metro area.
- Study tolling on the entirety of I-5 and I-205 should be studied.
- Study alternative transportation and public transit options to remedy impacts of tolling; an assessment of impacts on transit-dependent populations is needed.
- Assess health and equity impacts of each alternative; incorporate health and equity performance measures, perform an equity analysis, and partner with the Oregon Health Authority.
- Rural roads in Wilsonville already experience a high level of diversion.
- Tolls could affect property values of adjacent lands.
- Clarify if dynamic pricing would be applied.
- Clarify the relationship with the I-205 Improvements Project and if tolls will provide increased capacity.
- Clarify how revenue if revenue collected on the corridor will stay in the corridor.

8.1.10 City of Vancouver

ODOT received a comment letter from the City of Vancouver Mayor. In addition, ODOT received comments at a Vancouver City Council meeting (8/24/20). Vancouver sent an email accepting the invitation to serve as a Participating Agency. Comments from Vancouver include the following:

- Policies emerging from the Project will have regionwide implications and applications; for the City of Vancouver to support the Project it must provide equitable distribution of impacts and benefits and reflect principles identified in the City's Congestion Pricing Policy Framework.
- Consider the cumulative impacts of multiple tolling projects.
- Consider the geographic equity of tolls on north-south roads versus other funding for east-west corridors.
- Analysis of alternatives should include detail about users who would pay the toll.
- Goals and objectives:
  - Add an objective about increasing access to jobs and employment centers regionwide.
  - Add an objective about increased transit options and frequency in the Project area.
- Define and address the implementation and operations criterion and how it is evaluated with regards to the entire system of tolling as presently known.
- Mitigation strategies must be applied regionwide; low-income residents of Washington must be able to access program discounts and subsidies and increased transit options.
- Prior to toll implementation, regulatory barriers to using toll revenues to fund transit operations and geographic limitations must be remedied.
- Impacts must be evaluated system-wide, including local streets systems and highways, not just limited to the area immediately adjacent to the toll.
- A full analysis of a priced system (Portland Metro Area Value Pricing Feasibility Analysis, Concept C) is needed.
- Improvements should be tied to the corridor in which the revenue is generated; toll revenues should support capacity improvements identified in adopted regional plans.
- Engagement:
  - The City appreciates the communication from ODOT to-date.
  - The Project timeline must provide sufficient time for meaningful participation.
  - Continue to engage with Southwest Washington policymakers and residents.
  - All toll projects should have a high level of transparency and comprehensive risk management strategy, and be phased to contain disruptions to small areas.
- Consider how transportation choices are different by gender and for single parents.
- Support use of the term "tolling" for clarity.

8.1.11 Metro

Oregon Transportation Commission received a comment letter from Metro Council. ODOT received a copy of the letter to Oregon Transportation Commission and a letter from the Metro Planning and Development Deputy Director. In addition, Metro provided a letter accepting the invitation to serve as a Participating Agency. Comments from Metro include the following:

- Metro supports a comprehensive tolling strategy for the Portland metro area.
- The term "corridor" should be defined comprehensively to allow a range of solutions specific to each corridor (I-205 and I-5).
- Oregon Transportation Commission should continue to engage Metro Council, Joint Policy Advisory Committee on Transportation, and the public on all major project decisions; ODOT should continue to solicit input from the community.
- Implement tolling on I-205 and I-5 simultaneously to maximize efficiency of the regional system and reduce greenhouse gases.
- Transportation demand management:
  - Tolling can be used to manage demand in place of adding capacity.
  - Transportation demand management should be included in the draft Purpose and Need Statement.
  - Add objective about tolls for efficient use of infrastructure and reducing peak-hour trips.
- Equity:
  - Implement the Project with an equity lens.
  - Equitable distribution of benefits should be included in the need statement.
  - Add an objective on expanding travel options for those most impacted by a toll.
  - Metro applauds ODOT for establishing the Equity and Mobility Advisory Committee.
  - Project alternatives should include special considerations for those already marginalized by the transportation system; consider which geographies are most affected.
- Alternatives:
  - Alternative 5 performed best on transportation demand management and should be moved forward into the NEPA process.
  - Alternatives 3 and 4 should be modified to improve their transportation demand management performance.
  - The screening analysis should take place at the scale of the regional Mobility Corridors.
  - Diversion and multimodal travel need to be taken into account for each alternative.
- Performance Measures:
  - Include a measure on person throughput on I-205 between Stafford Road and OR 213.
  - Include an evaluation criterion about affordability for disadvantaged groups and a performance measure related to discounts and exemptions.

8.1.12 Portland Bureau of Transportation

ODOT received two comment letters from the Commissioner-in-Charge of Portland Bureau of Transportation and its Director, as well a letter from the Director with feedback on the Draft Agency Coordination Plan. The bureau agency also provided a letter accepting the invitation to serve as a Participating Agency. Comments from the bureau include the following:

- The Project presents an opportunity to use tolling to advance equity, climate, safety, and demand management goals adopted in the Regional Transportation Plan.
- Participating agencies should come together to discuss concerns and opportunities, especially as the Project relates to future tolling projects throughout the region.
- The Joint Policy Advisory Committee on Transportation should be given opportunities to provide input into the Project.
- The Project team should try to hear from as many voices as possible outside of government agencies and especially from Black, Indigenous, and People of Color and Slavic community members.
- Draft Purpose and Need Statement:
  - The purpose statement should be revised to state the Project will manage demand in a manner that is safe, reliable, equitable, and cost-effective and that maximizes efficient use of roadway capacity; and that it will generate revenue to improve regional access and mobility.
  - The need statement should reflect needs for additional transit service, increased pedestrian and bicycle facilities, and advancement of racial and social equity.
- Goals and objectives:
  - Should clearly articulate which populations have been "historically underserved or underrepresented or negatively impacted by transportation projects".
  - Should explicitly state that the Project will be designed to reduce and eliminate fatal and serious crashes on I-205 and other roadways affected by the Project.
  - Should reference reduction of vehicle air pollutants and greenhouse gas emissions through shifts to other modes and higher occupancy vehicles.
- Alternatives:
  - Alternative 5 performs best for transportation demand management and should be advanced for further consideration.
  - Alternatives 3 and 4 should be modified to better support transportation demand management.
- Modeling of alternatives should include tolling on I-5 for a comprehensive understanding of the regional system.
- Use the Regional Transportation Plan's Mobility Corridors Framework.
- Apply an equity lens to the alternatives screening analysis.

- The screening analysis appears to prioritize revenue generation over transportation demand management.

8.1.13 Port of Portland

ODOT received a letter from the Port of Portland accepting the invitation to serve as a Participating Agency. In that letter, the Port also included the following comments:

- The Port supports tolling as a strategy to achieving goals related to traffic and revenue.
- Decisions on how to implement tolling on I-205 will inform the public narrative on tolling and the ultimate success of other projects.
- I-205 is an important facility as the primary route between Portland International Airport and shippers in other parts of the state; it is also important to airport travelers and workers.

8.1.14 Port of Vancouver

ODOT received a comment letter from the Port of Vancouver, which contained the following comments:

- Any successful tolling alternative should, at a minimum, preserve freight mobility.
- Reduce cost impacts to businesses and works by reducing off-peak toll rates and limiting the number of tolls charged per vehicle per day.
- Opportunities to improve freight mobility through this Project should be fully vetted.
- Funds raised in the I-205 corridor must be reinvested into maintenance and improvements in the same corridor.
- The ability to sustain needed funding to ensure reliability and efficient mobility of freight is critical to the success of tolling.

8.1.15 Southwest Washington Regional Transportation Council

ODOT received a comment letter from the Regional Transportation Council. ODOT also received comments at a Regional Transportation Council Board of Directors meeting (9/1/20). In addition, the council provided a letter accepting the invitation to serve as a Participating Agency. Comments from the council include the following:

- Relationship to I-205 Improvements Project:
  - Clarify the relationship between the I-205 Toll Project and the I-205 Improvements Project in the draft Purpose and Need Statement.
  - Clarify if the I-205 Improvements Project is dependent on toll revenues.
  - If there is independent utility between the projects, it should be demonstrated.
- Impact analysis:
  - Traffic and user equity impacts should be evaluated and mitigated at the regional scale of the metropolitan planning area.

  - Evaluate congestion relief projects to be funded by tolls in cumulative impact assessment.

- Equity:
  - Consider the geographic equity of tolls on north-south corridors versus other funding for east-west corridors.
  - Bi-state equity is a concern; this is not reflected in the goals and objectives.
- Alternatives:
  - Analysis of alternatives should include detail about users who would pay the toll.
  - Evaluate tolling without the I-205 Improvements Project.
  - Evaluate the I-205 Improvements Project without tolling (a No-Toll alternative).
  - Advance Alternative 5 for further consideration.
  - Clarify the "Implementation and Operations" criterion further before eliminating any alternatives based on that criterion; evaluate for the entire system of tolls (as planned).

8.1.16 The I-205 Cities

The Oregon Transportation Commission received a comment letter from the Mayors of Lake Oswego, Milwaukie, Oregon City, Tualatin, West Linn, and Wilsonville, who collectively identified their cities as "The I-205 Cities." Comments from this group include the following:

- Study the long-term impacts of tolling on surrounding communities and increases in traffic diversion on local roads.
- Analyze tolling impacts on congestion and revenue generation for the regional highway system. Tolling on I-205 and I-5 should be implemented simultaneously. Tolling just this segment of highway would neither raise sufficient revenue nor provide region-wide congestion relief.
- Study alternative transportation and public transit options with an equity lens for mobility.
- The alternatives should provide specific alternative transportation and public transit improvements and show how inequitable impacts on lower-income communities will be addressed.
- Toll revenue should be invested in the corridor on which it was collected.

8.1.17 Washington County

ODOT received a comment letter from the Board of County Commissioners. In addition, ODOT received comments at meetings with the Washington County Board of Commissioners (8/11/20), Washington County Coordinating Committee (8/17/20), and the Coordinating Committee's TAC (8/6/20). Washington County also provided a letter accepting the invitation to serve as a Participating Agency. Comments from Washington County include the following:

- Washington County supports the Project's dual purpose of congestion management and funding congestion relief projects.
- Need to understand the extent of diversion in order to identify adequate mitigation.

- This phase should plan for the future implementation of tolling on both I-5 and I-205.
- Keep equity in the forefront of Project planning and implementation.
- Toll revenue should be prioritized for the I-205 Improvements Project and mitigation of diversion impacts; beyond that, revenue should be dedicated to modernizing the regional freeway system and support transit.
- Clarify if performance measures are weighted or prioritized.
- Clarify how toll rates were used in the comparison of screening alternatives.
- Request that ODOT compile questions from other jurisdictions and share.
- Clarify why Alternative 5 is not recommended for further consideration.
- Reduction of greenhouse gas emissions should be in goals and objectives rather than the need statement.
- There is already severe congestion on local roads that parallel I-205.
- The regional model may not be sufficient for modeling congestion.
- The combined impact of tolling on both I-5 and I-205 on additional traffic diversion has not been studied.
- There is concern about a lack of congruity in the timelines of the I-205 Improvements Project and tolling.
- Analysis may take more time than anticipated for the toll program.
- Take time to develop a plan to address equity; there is concern for diversion of traffic into lower-income neighborhoods and increasing safety risks for pedestrians and bicyclists.
- Clarify where and how toll revenues will be allocated.

8.1.18 Washington State Department of Transportation

ODOT received a letter from the Washington State Department of Transportation accepting the invitation to serve as a Participating Agency and providing the following comment:

- Implementation of tolls should bring direct benefits to those paying the toll.

8.1.19 Other Agency Letters and Emails

In addition to the agencies listed previously, the following agencies provided emails or letters accepting the invitation to serve as Participating Agencies, but without comments on the Project:

- Clark County.
- City of Gresham.
- City of Happy Valley.
- City of Milwaukie.
- Oregon Department of Environmental Quality.
- Oregon State Historic Preservation Office.

The U.S. Environmental Protection Agency provided a letter declining the Participating Agency invitation.

8.2 Tribal Comments

No comments were received from tribes during this engagement. The Confederated Tribes of the Grand Ronde Community of Oregon sent a letter declining the invitation to serve as a Participating Agency but requesting initiation of government-to-government consultation.

9 RESULTS: INPUT FROM HISTORICALLY AND CURRENTLY EXCLUDED AND UNDERSERVED COMMUNITIES

During this engagement, ODOT intentionally sought to engage people who have historically been and are currently excluded in transportation planning processes and underserved by the transportation system.

Tolling provides benefits such as improved travel reliability and improvements in the transportation system. However, tolling could affect some populations more due to the potential for proportionally higher transportation costs, more limited-transportation options in lower-cost housing areas, limited schedule flexibility, and additional traffic rerouting through their neighborhoods by drivers attempting to avoid tolls.

The Equity Framework[37] describes the Oregon Toll Program's commitment to minimizing burdens and maximizing benefits to historically and currently excluded and underserved communities. The Equity Framework was drafted to be consistent with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

ODOT is working with the Equity and Mobility Advisory Committee to provide input on the mobility and equity strategies throughout the environmental review process. Specifically, the committee will consider the following:

- Availability of transit and other transportation options.
- Transportation needs of, and benefits for, People of Color and people experiencing low income, and people with limited-English proficiency or disabilities who live near or travel through the Project area.
- Better understanding of neighborhood benefits and impacts for the communities near the tolled facilities (for example, changes to cut-through traffic, pedestrian and bicycle options, transit access).

Impacts to historically and currently excluded and underserved communities will be considered during the environmental review process.

This section describes input received specifically from communities who have been historically and currently excluded and underserved by transportation projects. Comparisons are made between input received from people in these communities and respondents as a whole.

[37] The Oregon Toll Program's Equity Framework is available online: https://www.oregon.gov/odot/tolling/Documents/Toll_Projects_Equity_Framework_with_AppendixA.pdf

9.1 Identification of Historically and Currently Excluded and Underserved Communities

Based on the Equity Framework, people from historically and currently excluded and underserved communities include, but are not limited to the following:

- People experiencing low-income[38] or economic disadvantage.
- Black, Indigenous, and People of Color communities.
- Older adults and children.
- People who speak languages other than English, especially those with limited English proficiency.
- People living with a disability.

9.2 Sources

Input from historically and currently excluded and underserved communities is drawn from the online survey, which had demographic questions related to race/ethnicity, age, gender, and income. In addition, surveys responses received in languages other than English were considered in this analysis. Input received via email, voicemail, letter, and during webinars and presentations is not included because demographic questions were not included in these formats.

9.3 Methodology

9.3.1 Online Survey

Using the demographic questions in the online survey, a cross-tabulation analysis was conducted for the responses to multiple-choice questions and open-ended questions. Table 9-1 includes the communities identified in the survey and responses analyzed.

[38] For purposes of the Project, "low-income" will be defined as 200 percent of the federal poverty level to be consistent with data available through the U.S. Census Bureau, to be aligned with regional stakeholder definitions of low-income, and to be more inclusive of the costs of living above and beyond food costs.

Table 9-1. Historically and Currently Excluded and Underserved Communities Identified in the Online Survey

Community	Question	Responses
Black, Indigenous, and People of Color[1]	How do you identify your race/ethnicity? (select all that apply)	• Any responses indicating the following were categorized as Black, Indigenous, and People of Color: African, African American/Black, American Indian or Alaska Native, Asian, Hispanic/Latin American, Indigenous Central or South American, Middle Eastern, and/or Native Hawaiian or Pacific Islander. • Eighty (80) respondents self-identified as Slavic. Of these 72 completed the survey in Russian and are first generation immigrants who were encouraged to participate by a community engagement liaison. In some cases, this group was combined with other historically and currently excluded communities in reporting on responses from the Black, Indigenous, and People of Color grouping – as noted in this report. • Any responses indicating only White/Caucasian were excluded. Responses indicating White/Caucasian and one or more of the above responses were included.
Older adults	Age	• 65 or older
People experiencing low-income or economic disadvantage	Annual household income	• Up to $49,999 per year[2]

Note: The online survey did not include any question asking respondents to identify if they experience a disability.
[1] Black, Indigenous, and People of Color includes African/African-American, American India, Asian/Pacific Islander, and Hispanic/Latin American respondents. In some figures and tables, the acronym "BIPOC" is used to collectively represent these populations.
[2] The federal poverty guideline in the Portland area is $26,200 for a household of four. The Oregon Toll Program is using a guideline of 200% of the federal level, similar to other transportation projects in the region. Survey questions did not ask for household size. Larger households with incomes greater than $49,999 per year could be considered as experiencing low income but are not analyzed here.

Respondents who selected "Prefer not to answer" or "Prefer to self-describe" are not included in this analysis. One respondent provided a self-description that aligned with White/Caucasian and was moved into that group. The other 229 respondents who self-described did not provide relevant answers and were marked as "Refused."

Multiple-choice and open-ended responses were submitted to Research Dataworks Inc. for cross-tabulation analysis to examine results for different demographic groups (see Attachment C). Cross-tabulation analysis illustrates how different demographic groups respond to multiple-choice questions. For responses to open-ended survey questions, the comments were organized by theme and any differences by demographic group are displayed. (See Section 4.2.2 for more details about analysis of written comments received in response to the open-ended questions.) Comments were then reviewed by demographic group to assess the intensity of key themes.

For the purposes of analysis and to create larger and more reliable demographic groups, several race/ethnicity categories were combined. This is a common practice with few responses in some racial/ethnic categories that are similar but still distinct from other larger groups (for example, African and African American/Black). These categories are used in the charts and graphs throughout this section using the colors identified in Table 9-2. The colors for older adults and people experiencing low income are also included in this table.

Table 9-2. Combined Categories for Analysis

Combined Category	Race/Ethnicity	Number of Respondents
African/African American	• African • African American/Black	122
American Indian	• American Indian or Alaska Native	87
Asian/Pacific Islander	• Asian • Native Hawaiian or Pacific Islander	247
Hispanic	• Hispanic/Latin American • Indigenous Central or South American	173
Slavic	• Slavic	80
White/Caucasian	• White/Caucasian	1,990
Black, Indigenous, and People of Color (and Slavic) *Note: Slavic was included in this grouping because the majority of these respondents are Russian-language speakers and recent immigrants.*	• African • African American/Black • American Indian or Alaska Native • Asian • Native Hawaiian or Pacific Islander • Hispanic/Latin American • Indigenous Central or South American • Slavic	651
65+	• 65 or older	467
<$50K	• Up to $49,999 per year	552

Some respondents selected multiple responses to the race and ethnicity demographic question. As a result, there could be some double counting in responses among concerns sorted by race and ethnicity. More than 900 of the 4,600 survey respondents chose not to provide demographic information, so they could not be included in the analysis.[39]

[39] The survey and comment period were open to anyone who wanted to participate. Respondents do not represent a random sampling of households in Clackamas County or the Portland metro area and therefore are not statistically representative of the population as a whole.

Section 9.5 highlights key themes of comments from different demographic groups and areas where specific group responses were different from overall survey responses.

9.3.2 In-Language Surveys

As described in Section 4.1.1, the Project team provided in-language Project information to communities in the Project area through nine community engagement liaisons who connected with their community in preferred languages. The liaisons distributed in-language survey links (each language had a separate link) using telephone calls, video calls, social media platforms, text, and email. Some liaisons distributed paper surveys and then entered the paper survey responses manually using their specific in-language link. Some in-language surveys were submitted directly through the Spanish translation of the entire online open house and survey.

The Project team submitted the in-language survey responses for translation and then incorporated those responses into the overall online survey analysis (see Sections 6 and 7). In-language survey responses were read and reviewed separately from the rest of the online survey results to examine input from people who speak languages other than English, especially those with limited-English proficiency.[40] See Attachment D to review all closed- and open-ended survey responses.

Comments in languages other than English

(These responses have been translated into English from their original language.)

"It is too much information to make a decision to agree or disagree." (Spanish)

"Low-income groups who use I-205 every day will have a heavy burden." (Chinese)

"I go to work every day, 5 days per week, do I have to pay toll for 5 days?" (Vietnamese)

Surveys returned by those who speak languages other than English were part of the overall cross-tabulation analysis but were not analyzed separately via cross tabulation. Instead, responses to multiple-choice questions from the translated surveys were manually counted and open-ended responses were reviewed for any differences from the overall key themes as described in the following section.

9.4 Translated Survey Responses

9.4.1 Translated Surveys

Comments were received in Spanish, Vietnamese, Russian, and simplified and traditional Chinese. Table 9-3 shows the number of translated surveys by language. Out of the more than 4,600 comment submittals received, 329 (7%) were in a language other than English.

[40] In-language responses do not necessarily indicate limited-English proficiency. People who speak languages other than English may have submitted survey responses in English; therefore, those are not included here.

Table 9-3. Number of Surveys Received by Language

Comment Source	Number of Comment Submittals
Spanish online survey	79
Vietnamese online survey	68
Russian online survey	72
Simplified and Traditional Chinese surveys	110
Total translated comment submittals received	**329**

9.4.2 Key Themes

Responses submitted in languages other than English were not substantially different from overall responses. A few key themes arose from analyzing the multiple-choice and open-ended comments as listed below.

- For the multiple-choice questions about the draft purpose and draft need, goals and objectives, and alternatives, responses in another language were much more likely to mark "no opinion" or "neither agree nor disagree."
- The more than 300 respondents who submitted surveys in another language expressed much less concern with minimizing negative diversion to local streets compared to all respondents. "Providing alternative, non-tolled driving routes" was the top concern identified by those completing the survey in another language, and "reducing traffic congestion" was the second most important concern.
- Surveys from speakers of languages other than English frequently included comments about the state of the economy and its impact on unemployment, as well as the personal financial impacts of tolls.
- Many of the open-ended survey responses suggest that the concerns of limited-English speakers are very similar to the concerns of respondents experiencing low income.
- Similar to overall survey responses, many comments in a language other than English expressed opposition to tolling. Themes in the responses to the open-ended survey questions focused on how current tax revenue is collected and spent as the basis for opposition. Comments focused on different types of taxes (that is, car registration and license plate tags; federal, state, and local taxes; gas tax; arts tax; transit tax; etc.) and how those should be sufficient to pay for roadway improvements.

9.5 Catalog/Summary of Responses

The following subsections describe how both multiple-choice and open-ended survey questions were answered by respondents who self-identified in one of the historically and currently excluded and underserved demographic groups described in Section 9.3.1. Responses are compared to those from all respondents as described in Sections 5, 6, and 7.

9.5.1 Key Themes

- Like the overall survey responses, the majority of commenters from historically and currently excluded and underrepresented communities expressed opposition to tolling on I-205. However, Asian and Pacific Islander, and in some cases Hispanic, respondents expressed more support for the Project purpose and need and goals and objectives than other racial groups, such as Black and Indigenous respondents.
- There were many differences in responses among racial groups. People from African American/Black and American Indian and Alaska Native communities indicated opposition toward tolls in greater numbers than other racial groups and survey respondents as a whole.
- For closed-ended questions about agreement with the draft Purpose and Need Statement, Project goals and objectives, and recommended alternatives, Black, Indigenous, and People of Color survey respondents and Slavic respondents were much more likely to strongly disagree. Even higher percentages of African American/Black and American Indian and Alaska Native respondents strongly disagreed. Asian/Pacific Islander, Hispanic/Latin American, Slavic, and White/Caucasian had more respondents select "somewhat disagree" but the plurality of respondents from these communities still strongly disagreed.
- Typically, people experiencing low income responded similarly to the overall survey respondents with a few key exceptions:
  - 52% of respondents experiencing low income identified the need to "minimize the impact of tolls on people of low income." The same percentage of respondents also identified the need to "provide alternative, non-tolled driving routes." These rates are much higher rates than survey respondents as whole, where 36% indicated the need to "minimize the impact on people of low income" and 41% indicated the need to "provide alternative, non-tolled routes."
  - In the multiple-choice responses, about a quarter of the people experiencing low income (26%) expressed concerns about rerouting and diversion at a similar rate as overall survey respondents (31%), but less than respondents with higher incomes (38%).
  - About 13% of all respondents shared comments about equity topics,[41] highlighting concerns about whether certain groups or communities are more likely to experience disproportionate outcomes and impacts from tolling. Comparatively, 23% of the people experiencing low income shared comments on equity.

[41] "Equity" related comments were those that discussed whether certain groups or communities will experience disproportionate outcomes and impacts from tolling. They were differentiated from topics of "fairness," which included comments on the existence of viable alternative routes, paying for highways that have already been built, fairness of user-pay systems, flexibility of personal schedule or travel patterns and geographic effects on local communities.

- Older adults who responded to the survey, like those respondents with higher incomes and White/Caucasians, expressed greater concern with minimizing negative diversion to local streets compared to survey respondents as a whole.

9.5.2 Multiple-Choice Questions

DRIVING FREQUENCY

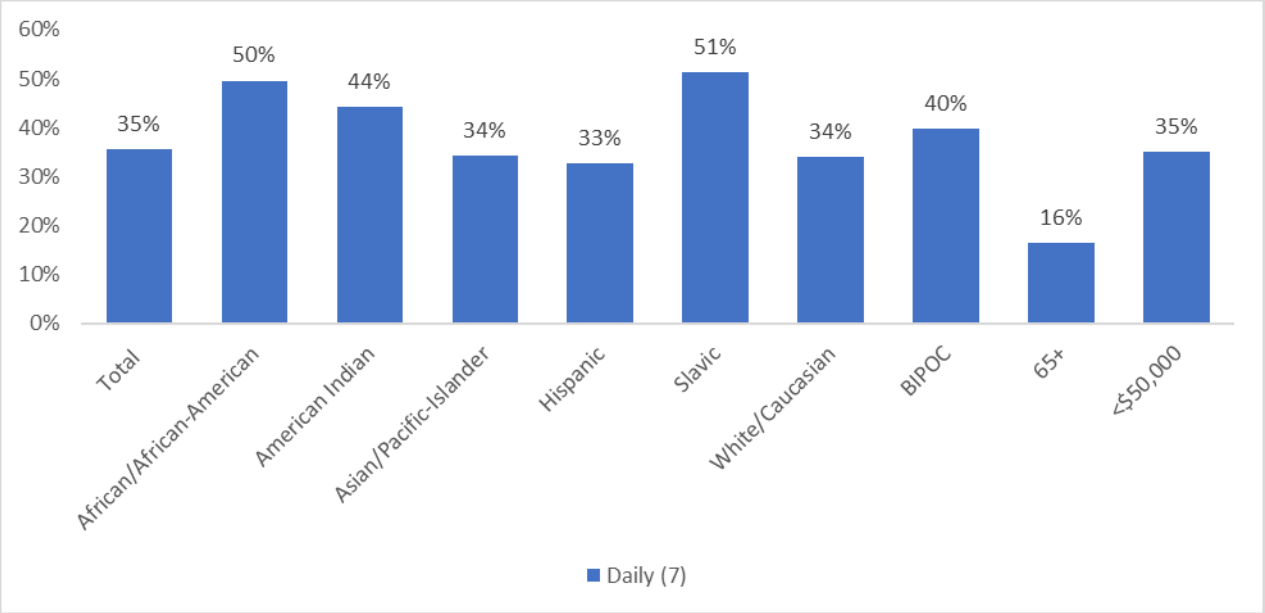
About one-third (35%) of all survey respondents at all income levels are daily drivers on I-205. A higher percentage of African American/Black (50%), American Indian and Alaska Native (44%), and Slavic (51%) respondents are daily drivers compared to overall survey respondents.

Older adults are typically not daily drivers on I-205, with only 16% so indicating this level of frequency.

Results to the following question are shown in Figure 9-1.

How often do you drive on I-205?

Figure 9-1. Percentage of Historically and Currently Excluded and Underserved Groups Who are Daily Drivers on I-205



Note: "Total" refers to all survey respondents and in this figure the BIPOC column represents the combination of all Black, Indigenous, People of Color and recent Slavic immigrants.

CONCERNS AND OPPORTUNITIES WITH TOLLS

Question 2 of the survey asked about top concerns and opportunities with tolls. Respondents could select any option that applied and answers varied by race/ethnicity, age, and income. While there was variation in order of importance, the top concerns remained consistent. Key variations include the following:

KEY CONCERNS AND OPPORTUNITIES WITH TOLLS

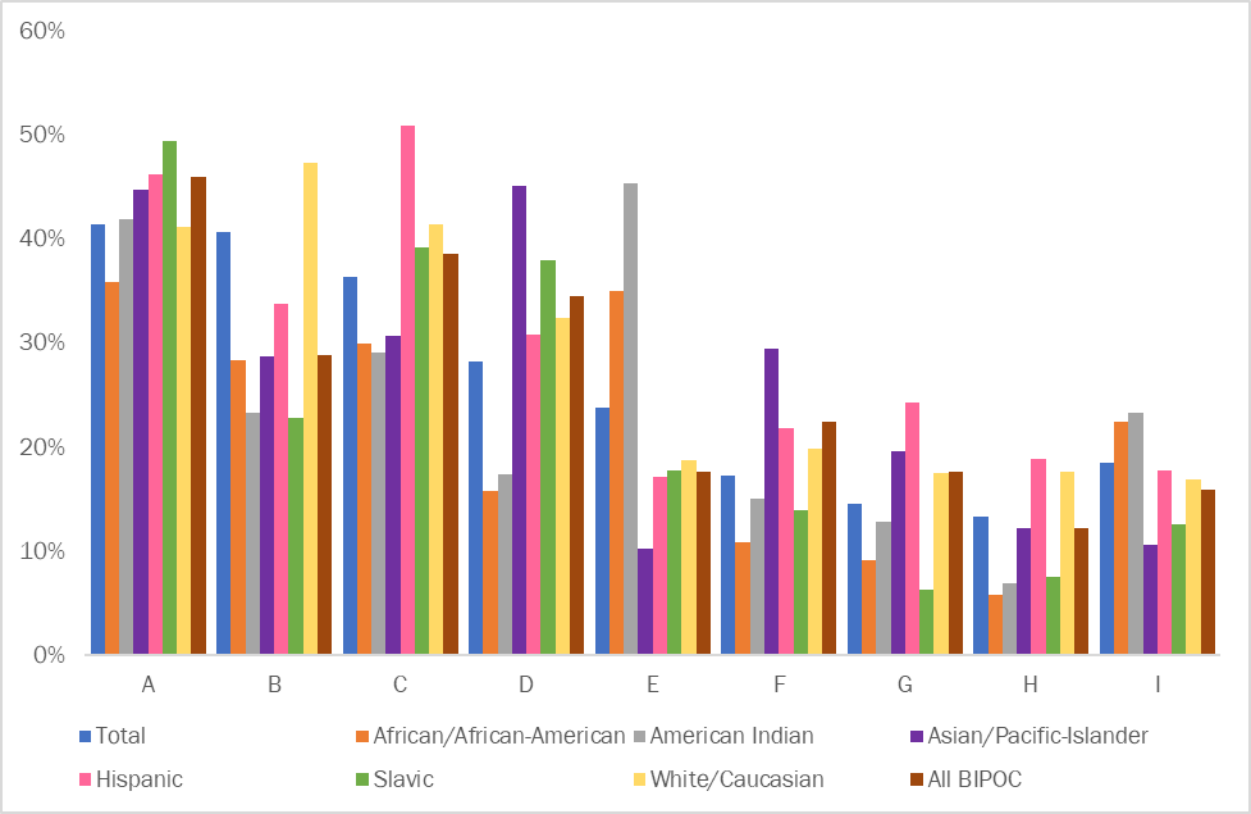
- ❖ Older adults, people with higher incomes and White/Caucasian people were concerned with **minimizing negative diversion.**
- ❖ Younger people, people experiencing low income and Black, Indigenous, and People of Color and Slavic respondents were concerned with **providing alternative routes** and **minimizing impacts to people experiencing low income**.

- Respondents experiencing low income indicated that providing alternative, non-tolled driving routes was of greater importance than overall respondents. Minimizing the impact of tolls on people experiencing low income was also of much higher importance to people experiencing low income and Hispanic individuals.
- The desire to reduce traffic congestion varied greatly among different racial groups. African American/Black and American Indian and Alaska Native respondents marked reducing traffic congestion as a top concern much less frequently, while Asian and Slavic respondents marked it more frequently, than the average for all respondents. Older adult respondents also selected "minimizing traffic congestion" more frequently than survey respondents as a whole—even though older adult respondents also said they drive less frequently.
- Asian and Hispanic respondents and older adult respondents expressed a greater desire for ensuring that the pricing system is easy to understand and use.
- Asian and Hispanic respondents are also more concerned than other groups with ensuring that revenue is used to benefit historically and currently excluded and underserved communities.
- The top concern among White/Caucasian respondents, older adults, and people with incomes greater than $90,000 per year was minimizing negative diversion to local streets. All other racial groups and people experiencing low income were much less concerned with diversion.
- Overall, 24% of all survey respondents added a write-in option to state their opposition to tolls in Question 2. It is very unusual to receive a consistent write-in response from such a large group of respondents. Typically, write-in responses are limited in number and do not contain a consistent response or theme. This concern was uneven among racial groups, with more than a third of African American/Black (35%) and nearly half of American Indian and Alaska Native (45%) respondents writing in this option much more frequently and other demographic groups, including Asian (10%), Hispanic/Latin American (17%), Slavic (18%), and White/Caucasian (19%), writing in much less frequently.

Figure 9-2 and Figure 9-3 shows the results to the following question about concerns and opportunities.

The community has identified some concerns and opportunities with tolls. Which do you feel is most important to address? (Check all that apply)

Figure 9-2. Top Concerns and Opportunities by Race/Ethnicity



Note: "Total" refers to all survey respondents and in this figure the BIPOC column represents the combination of all Black, Indigenous, People of Color and recent Slavic immigrants.

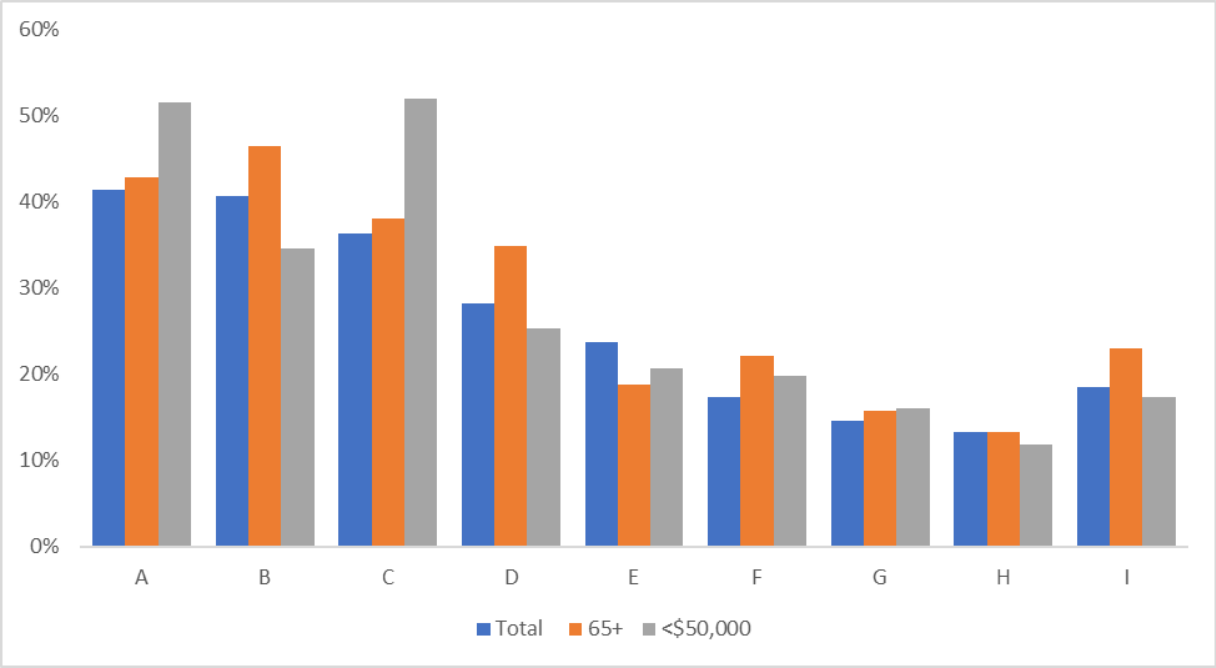
Concerns and Opportunities Key:

A Provide alternative, non-tolled driving routes.
B Minimize negative diversion to local streets.
C Minimize the impact on people experiencing low income or are otherwise underserved.
D Reduce traffic congestion.
E No tolls (created as a new category from the "Other – Write In" responses).
F Make the pricing system easy to understand and use.
G Make sure revenue is used is used to provide benefits to those historically and currently excluded and underserved by the transportation system.
H Provide more transit, bicycle, and walking options.
I Will divert traffic to other roads.
J Other - Write In.

Table 9-4. Top Concerns and Opportunities by Race/Ethnicity

	Total	African/ African-American	Native America/ American Indian	Asian/ Pacific Islander	Hispanic/ Latino	Slavic	White/ Caucasian
Provide alternative, non-tolled driving routes	41%	36%	42%	45%	46%	49%	41%
Minimize negative diversion to local streets	41%	28%	23%	29%	34%	23%	47%
Minimize the impact on people of low income or otherwise underserved	36%	30%	29%	31%	51%	39%	41%
Reduce traffic congestion	28%	16%	17%	45%	31%	38%	32%
No tolls	24%	35%	45%	10%	17%	18%	19%
Make the pricing system easy to understand and use	17%	11%	15%	30%	22%	14%	20%
Make sure revenue is used is used to provide benefits to those historically and currently excluded and underserved by the transportation system	15%	9%	13%	20%	24%	6%	18%
Provide more transit, bicycle and walking options	13%	6%	7%	12%	19%	8%	18%
Will divert traffic to other roads	2%	4%	1%		1%	1%	2%
Other - Write In:	17%	18%	22%	11%	17%	11%	15%

Figure 9-3. Top Concerns and Opportunities by Age and Income



Note: "Total" refers to all survey respondents.

Concerns and Opportunities Key:

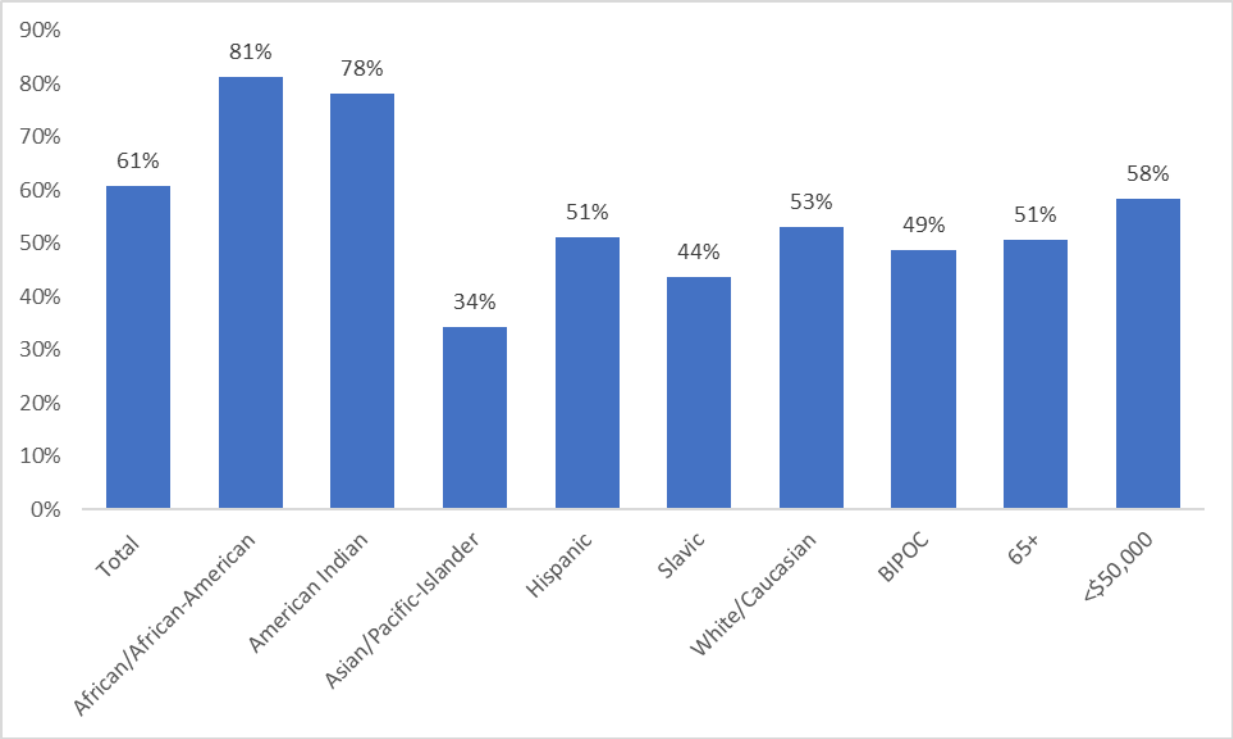
A Provide alternative, non-tolled driving routes.
B Minimize negative diversion to local streets.
C Minimize the impact on people experiencing low income or are otherwise underserved.
D Reduce traffic congestion.
E No tolls (created as a new category from the "Other – Write In" responses).
F Make the pricing system easy to understand and use.
G Make sure revenue is used is used to provide benefits to those historically and currently excluded and underserved by the transportation system.
H Provide more transit, bicycle, and walking options.
I Other - Write In.

PURPOSE AND NEED

Many respondents stated that they strongly disagree (61% of all respondents) with the draft purpose and draft need, as described in Section 6.2.1. A much greater percentage of African American/Black (81%) and American Indian and Alaska Native (78%) respondents strongly disagreed, while a much lower percentage of Asian (34%), Hispanic/Latin American (51%), and older adults (51%) strongly disagreed. Figure 9-4 shows the results for those who strongly disagreed with the draft purpose and draft need question.

Please indicate your level of agreement with this statement: "The draft purpose and draft need for the I-205 Toll Project reflects problems in the I-205 corridor and the reasons for moving forward with the project."

Figure 9-4. Strong Disagreement with Draft Purpose and Draft Need by Race/Ethnicity, Age, and Income



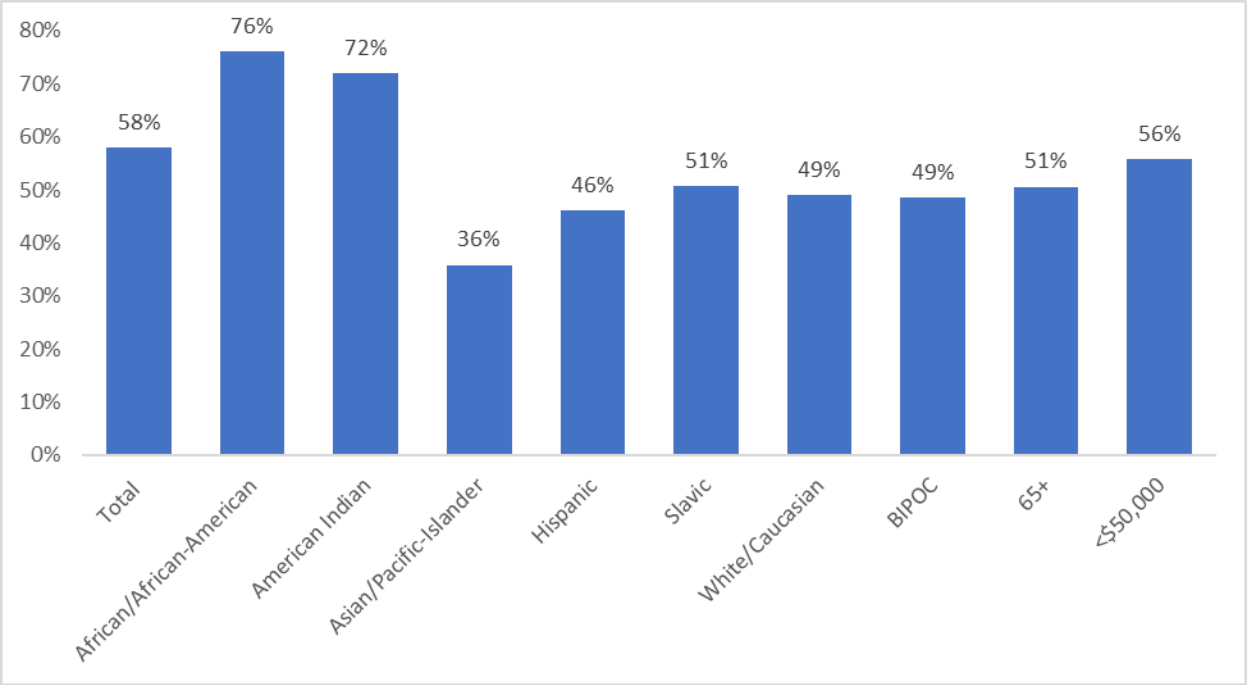
Note: "Total" refers to all survey respondents and in this figure the BIPOC column represents the combination of all Black, Indigenous, People of Color and recent Slavic immigrants.

GOALS AND OBJECTIVES

Many survey respondents indicated strong disagreement (58% of all respondents) with the draft Project goals and objectives presented as described in Section 6.3.1. A much greater percentage of African American/Black (76%) and American Indian and Alaska Native (72%) respondents strongly disagreed, while a much lower percentage of Asian (36%), Hispanic/Latin American (46%), and older adults (51%) strongly disagreed. Figure 9-5 shows the results for those who strongly disagreed to the following question.

Please indicate your level of agreement with this statement: "The project's draft goals are right for the I-205 Toll Project and they describe the desirable outcomes that the project should strive to achieve."

Figure 9-5. Strong Disagreement with Project's Goals and Objectives by Race/Ethnicity, Age, and Income



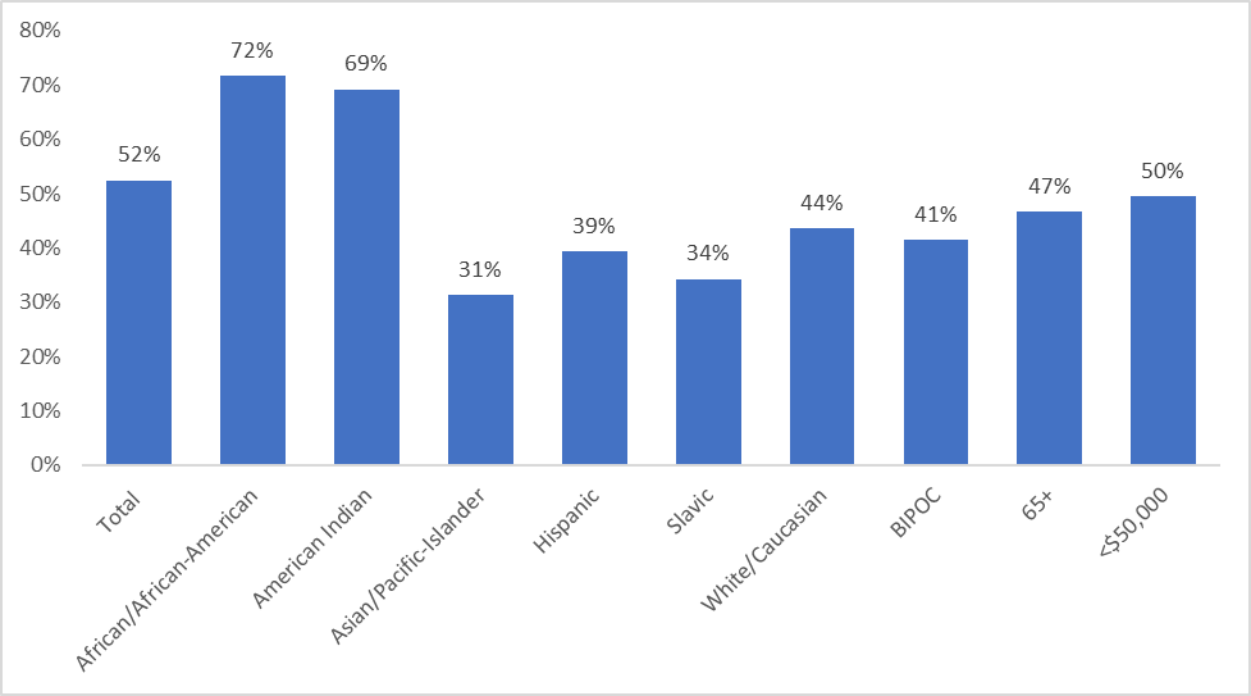
Not3e: "Total" refers to all survey respondents and in this figure the BIPOC column represents the combination of all Black, Indigenous, People of Color and recent Slavic immigrants.

RECOMMENDED ALTERNATIVES

Many respondents strongly disagreed (52% of all respondents) with the draft alternatives recommended to move forward for further analysis as described in Section 6.4.1. A much greater percentage of African American/Black (72%) and American Indian and Alaska Native (69%) respondents strongly disagreed, while a much lower percentage of Asian (31%), Hispanic/Latin American (39%), Slavic (34%), older adults (47%), and people experiencing low income (50%) respondents strongly disagreed. Figure 9-6 shows the results for those who strongly disagreed to the following question.

Please indicate your level of agreement with this statement: "The recommended alternatives provide satisfactory options to study in-depth in the environmental review."

Figure 9-6. Strong Disagreement with Recommended Alternatives by Race/Ethnicity, Age, and Income



Note: "Total" refers to all survey respondents and in this figure the BIPOC column represents the combination of all Black, Indigenous, People of Color and recent Slavic immigrants.

9.5.3 Open-Ended Questions

This section describes the responses to online survey questions that provided opportunities for people to write in responses. This includes both questions where respondents were asked to indicate why they expressed their level of disagreement with the draft purpose and draft need, goals and objective, and recommended alternatives, as well as Question 3 ("What should we consider to address the concerns and opportunities you checked above?") and Question 10 ("What else would you like the Project team to know or consider when planning the I-205 Toll Project?). See Sections 6 and 7.2. for detailed categorization results from all respondents.

Older adults, people experiencing low income and combined responses from all racial groups submitted comments within the same top four categories of comments, but nuances are apparent across categories.

Overall, the content of comments from historically and currently excluded and underserved communities were not substantively different from overall survey responses, described in Sections 6 and 7.2. This analysis outlines key categories for these groups and areas where the intensity of comments varied from the overall survey responses.

RESPONSES TO OPEN-ENDED SURVEY QUESTIONS ABOUT DRAFT PURPOSE AND DRAFT NEED, GOALS AND OBJECTIVES, AND RECOMMENDED ALTERNATIVES

In addition to the multiple-choice survey questions described in Section 9.5.2, respondents were also offered an opportunity to respond to the statement "If you selected disagree or strongly disagree tell us why" for the three multiple-choice questions about level of agreement with the draft purpose and draft need, goals and objectives, and recommended alternatives. Many of the responses to the prompts did not directly respond to the question posed. Overall, comments on these topics from historically and currently excluded and underserved communities were similar to the overall survey responses on the draft purpose and draft need, goals and objectives, and recommended alternatives, as described in Section 6.

General comments from Black, Indigenous, and People of Color respondents, Slavic respondents, older adults, and people experiencing low income were similar across demographic groups and included the following:

- Disagreement that tolls would solve congestion issues.
- Concerns that adding tolls would create additional burden for community members.
- Concern about increased congestion in local communities, including Oregon City and West Linn.
- Concerns about rising costs of living in the Project area.
- Lack of trust that tolls would be spent on congestion management or road improvement projects.
- Observation that increased population in the Project area has led to congestion.
- Observation that regional congestion is not limited to I-205 and occurs on other regional corridors.
- Observation that residents already pay a variety of taxes and perception that paying tolls would be an unfair additional burden. Some respondents specifically noted that tolls are not equitable.
- Lack of trust with State of Oregon employees.
- Sentiment that community members were not able to provide meaningful input on whether to add tolls to I-205.
- Concern about fairness with tolling residents of Clackamas County and not residents of Multnomah County.
- Comment that revenue could be raised from taxing electric vehicles to offset loss gas tax revenue.
- Comment in support of additional multimodal transportation to the corridor.
- Observation that residents already pay a variety of taxes and that the state government should be able to fund roadway projects through existing taxes. Some commenters noted specific concerns about the COVID-19 pandemic and the state of the economy.

A few key differences stood out among specific racial and ethnic groups, including the following:

- Some comments from Asian respondents did not support tolls generally but made suggestions about where tolls should be located.
- Comments from Hispanic respondents often focused on financial impacts to people experiencing low income.

Some of the responses addressed the questions posed, especially about draft recommended alternatives, and included the following:

- Some support the goals, while expressing that tolls are not the right approach to address the goals.
- Concerns about how the goals will be implemented, specifically siting a lack of trust with State of Oregon employees.
- Commenters support the goal to add additional multimodal transportation options to the corridor, noting that transit and bike facilities are inadequate to support a tolled route.
- Observation that all recommended alternatives include tolling, and a related request to add "do not toll" as a Project alternative.
- Concern about the metrics used to evaluate the recommended alternatives.
- Sentiment that reviewing the identified alternatives are not a good use of tax dollars.
- Concern that tolling is not equitable across all income levels.
- Among the few comments that expressed a preference, Alternative 1 or Alternative 5 were preferred.
- Sentiment that other alternatives should be considered for raising revenue than tolls.
- Suggestion that public transportation should be improved before further analysis of toll alternatives.
- Sentiment that no additional funds should be provided for public transportation until congestion is improved for people who drive.
- Concern that tolls are designed to penalize those who drive electric cars.
- Suggestion that a tax credit should be provided for those who drive electric vehicles.
- Concern that people who rely on driving on I-205 are unable to choose another alternative route.
- Some disagreement with the scoring results for the alternatives and comments about the question itself being confusing.
- Comment expressing support for how thoroughly the issues were studied.
- Frustration that tolls have already been selected as the solution and lack of trust that public input will influence the decision.

Below are the responses to questions about key concerns and opportunities.

REVENUE AND TAXES

Revenue and taxes was the most frequently mentioned topic among all survey respondents. This topic was of particular concern to African American/Black, American Indian and Alaska Native, and Slavic respondents. Other racial groups, older adults, and people experiencing low income mentioned this topic less frequently. See Section 7.2.1 for a summary of comments about revenue and taxes for the overall survey.

REROUTING/DIVERSION

Similar to concerns and opportunities with tolls (see Section 9.4.2), respondents from White/Caucasian communities and with higher incomes expressed more concern with rerouting and diversion onto local streets compared to respondents experiencing low income or respondents of color. However, rerouting/diversion remains a top concern among all respondents. There is no marked difference for older adults, but it is still their third-most mentioned concern. See Section 7.2.2 for a summary of comments about rerouting and diversion for the overall survey.

FAIRNESS

Fairness was identified as the top concern among Hispanic respondents. Comments about fairness focus on the existence of viable alternative routes, paying for highways that have already been built, fairness of user-pay systems, flexibility of personal schedule or travel patterns, and geographic effects on local communities. Overall results for Black, Indigenous, and People of Color communities, Slavic respondents, older adults, and people experiencing low income are similar to the overall results. See Section 7.2.2 for a summary of comments about fairness for the overall survey.

OTHER KEY DIFFERENCES AMONG CATEGORIES

Other categories typically showed consistent results across demographic groups, but a few key differences stood out:

- African American/Black and Slavic respondents said that expanding capacity on new or existing roadways was a key concern. Both groups indicated that expanding capacity was more important than rerouting and diversion and fairness; respondents who identified as Slavic also said it was more important than their opposition to tolling. In their comments on the open-ended survey questions, these groups indicated that tolls would not improve congestion and that freeway expansion was a better proposed solution.
- American Indian and Alaska Native respondents indicated accountability and trust as a top concern in their comments. Comments from this group expressed concern for how state government was currently managing funds or would manage toll revenue in the future.
- Comments from Asian and Pacific Islander respondents were more focused on toll implementation than diversion or fairness. Many Asian and Pacific Islander respondents

mentioned that if tolls were implemented, toll cost and location and other strategies needed to be considered to make tolls work for their community.

- Equity and personal financial impacts were of greater importance to people experiencing low income than other historically and currently excluded and underserved groups.

10 RESPONSES TO COMMENTS ON TOPICS FOR PUBLIC AND STAKEHOLDER REVIEW

This section provides ODOT's response to the overall sentiments expressed and requests received in comments on the specific topics related to meeting the following NEPA requirements: purpose and need, goals and objectives, and recommended alternatives as summarized in Section 6. Many requests were also highlighted in comments from agencies outlined in Section 8.

10.1 Overall Sentiment

ODOT acknowledges that most commenters who provided input during the comment period opposed the Project and tolling in general. ODOT is committed to transparently and equitably involving the community and agencies as the Project is developed. ODOT also commits to clarifying the Project purpose and constraints, potential benefits and impacts, how impacts could be addressed, and future decision processes. This section and Section 11 provide responses related to specific topics and issues raised.

10.2 Draft Project Purpose and Need

The following are requests related to the Project's draft purpose and need as described in Section 2.2.1.

10.2.1 Request: Clarify the relationship between the I-205 Toll Project and the I-205 Improvements Project.

Response: Phased construction of the I-205 Improvements Project is planned, and the financial plan is being developed. ODOT has determined that toll revenue could be used to fund portions of the improvements for a safer and less congested I-205 corridor, pending the results of the I-205 Toll Project environmental assessment. Additional funding sources may also be identified for the improvements. The I-205 Improvements Project would upgrade or replace the Abernethy Bridge and eight other bridges on I-205 in order to withstand a major earthquake, provide interchange improvements, and build the missing third lane in each direction.

10.2.2 Request: Add equity into the purpose and/or need statements.

Response: As directed by the Oregon Transportation Commission's Strategic Action Plan, equity is one of three central, guiding tenets for ODOT. The Oregon Toll Program has created the Equitable Toll Report, a new overarching policy document that will guide the Oregon Toll Program as it moves forward.

ODOT has also elevated equity by adding new language to the goals and objectives to better align the document with the equity performance measures and the Equity Framework developed by the Equity and Mobility Advisory Committee. Equitable solutions to the distribution of benefits will come through an iterative process based on engaging and learning from historically and currently excluded and underserved communities through an evaluative process. ODOT will continue to incorporate equity into the Project development process in measurable ways.

The Project goals and objectives are what most directly inform the engagement and evaluative process. Based on comments received from the public, agencies, the Equity and Mobility Advisory Committee, and specific outreach to historically and currently excluded and underserved communities, ODOT has updated the following goals and objectives that are specifically related to equity. Goals and objectives related to equity are intended to apply to both individuals that live near the I-205 corridor and/or roadways affected by tolling, as well as those that travel on the corridor that may live elsewhere.

PRIMARY EQUITY-RELATED GOAL AND OBJECTIVES

- Goal: Provide benefits for historically and currently excluded and underserved communities.
  - Maximize benefits and minimize burdens associated with implementing tolling.
  - Support equitable and reliable access to job centers and other important community places, such as grocery stores, schools, and gathering places.
  - Support equitable and reliable access to health promoting activities (for example, parks, trails, recreation areas) and health care clinics and facilities.
  - Design the toll system to support travel options for people experiencing low incomes.

OTHER EQUITY-RELATED GOAL AND OBJECTIVES

- Goal: Limit additional traffic diversion from tolls on I-205 to adjacent roads and neighborhoods.
  - Design the toll system to limit rerouting from tolling.
  - Design the toll system to minimize impacts to quality of life factors, such as health, noise, safety, job access, travel costs, and environmental quality for local communities from traffic rerouting.
- Goal: Support safe travel regardless of mode of transportation.
  - Enhance vehicle safety on I-205 and local roadways affected by tolling by reducing congested conditions.
  - Support safe multimodal travel (for example, pedestrians, bicycles, and transit) options on roadways in the Project area.
- Goal: Improve air quality and reduce contributions to climate change effects.
  - Reduce vehicle air pollutants and greenhouse gas emissions through reducing congestion, resulting in more consistent vehicle speeds, less vehicle idling, and fewer overall motor vehicle emission hours on I-205 and on local roadways affected by tolling.
  - Reduce localized air pollutants through reduced congestion and improved travel efficiency, particularly in community areas where pollutants may be concentrated due to traffic congestion.
- Goal: Support multimodal transportation choices.

  - Support shifts to higher occupancy vehicles (including carpooling) and other modes of transportation (transit, walk, bike, telework).
  - Collaborate with transit providers to support availability and enhancements to transit and other transportation services in the I-205 corridor, especially for historically and currently excluded and underserved communities.
- Goal: Support regional economic growth.
  - Provide for reliable and efficient regional movement of goods and people through the I-205 corridor.
  - Provide for reliable and efficient movement of goods and people on local roadways affected by tolling.
  - Improve regional access to jobs and employment centers, especially for historically and currently excluded and underserved communities.

As directed by the Oregon Transportation Commission, equity strategies will be incorporated into the Project through various goals and objectives, as well as the Equity and Mobility Advisory Committee. Once impacts are identified, this committee will help to identify mitigation measures for historically and currently excluded and underserved communities.

10.2.3 Request: Include travel or transportation demand management in the purpose and need statements.

Response: Through the Oregon Transportation Commission Strategic Action Plan and Comprehensive Congestion Management and Mobility Plan, ODOT and the Oregon Toll Program are dedicated to promoting equity, reducing greenhouse gas emissions, managing congestion, and contributing to sustainable funding. Designing a toll system to improve efficient use of roadway infrastructure and improve travel reliability is a key aspiration of the Oregon Toll Program.

Where implemented around the United States or internationally, tolling has shown to decrease single-occupancy vehicle use.

The Project will incorporate transportation demand management strategies through the goals and objectives for diversion, multimodal, transit, and safety, as well as working with the Project's Transit and Multimodal and Modeling Working Group and the Equity and Mobility Advisory Committee to develop transportation demand management strategies.

Transportation demand management encompasses a broad range of strategies that may not be tied directly to the Project's dual purpose of congestion management and revenue generation.[42]

[42] As noted on the FHWA's website: "Traditionally, TDM has been narrowly defined as commuter ridesharing and its planning application restricted to air quality mitigation (conformity analysis), development mitigation (reducing trip generation rates and parking needs), or efforts to increase multi-

The Project purpose can be accomplished with variable-rate tolling, which is commonly recognized as a transportation demand management strategy. Variable-rate tolling (with higher tolls during peak travel hours and lower tolls during off-peak travel hours) incentivizes travel during less congested times. Other transportation demand management strategies, such as supporting connections to transit, may be considered as the Project is developed in support of the identified goals and objectives.

10.3 Draft Project Goals and Objectives

The following are requests related to the draft goals and objectives identified for the Project, as described in Section 2.2.1, and the performance measures that would be used to compare how well each alternative performs for each objective.

10.3.1 Request: Define "underserved and underrepresented populations" in the goals and objectives.

Response: Based on direction from the Equity and Mobility Advisory Committee, ODOT is now using "historically and currently excluded and underserved" to better characterize the communities this term is intended to include. This is explained in the glossary of the Equity Framework document; a reference to that glossary has been added to the goals and objectives portion of the Purpose and Need Statement.

10.3.2 Request: Modify goals and objectives to acknowledge quality of life impacts to near/adjacent communities.

Response: ODOT prioritizes quality of life for local communities. The goals and objectives have been updated to include objectives that pertain to quality of life under both the equitable benefits and limiting additional diversion goals; and performance measures have been identified to assess potential changes in quality of life, such as changes in air quality, noise levels, and access to jobs and health-promoting activities. The quality of life objectives include the following:

- Goal: Provide benefits for historically and currently excluded and underserved communities.
  - Maximize benefits and minimize burdens associated with implementation of tolling.
- Goal: Limit additional traffic diversion from tolls on I-205 to adjacent roads and neighborhoods.

modalism in transportation plans. A more contemporary definition of TDM consists of maximizing travel choices, as stated in the definition provided in an FHWA report on TDM: Managing demand is about providing travelers, regardless of whether they drive alone, with travel choices, such as work location, route, time of travel and mode. In the broadest sense, demand management is defined as providing travelers with effective choices to improve travel reliability."

  - Design the toll system to minimize impacts to quality of life factors, such as health, noise, safety, job access, travel costs, and environmental quality for local communities from traffic rerouting.

ODOT will continue coordinating and engaging with communities and jurisdictions close to the Project area to understand their concerns and ensure that they are informed throughout the process. ODOT is committed to ongoing information sharing and dialogue with local communities through the following methods:

- Providing briefings at public meetings throughout the region.
- Working with the Community Engagement Liaisons program to engage in-language with Spanish, Russian, Vietnamese, and Chinese communities.
- Having open houses.
- Updating eNews
- Providing updates to the Project website.

ODOT will also continue to meet with the Regional Partner Agency Staff group to share Project updates and seek input.

10.3.3 Request: Modify the goal about economic growth to add language about increasing access to jobs and employment centers throughout the region.

Response: ODOT added the following objective to the economic growth goal:

- Goal: Support regional economic growth.
  - Improve regional access to jobs and employment centers, especially for historically and currently excluded and underserved communities.

Additionally, ODOT will continue to coordinate with the Transit and Multimodal Working Group to help identify strategies to enhance access to jobs and employment centers via multimodal travel.

10.3.4 Request: Modify the goal on supporting multimodal transportation choices to add language about supporting increased transit options and frequency of transit service in the Project area.

Response: ODOT modified the following objective (under the multimodal transportation goal) to reflect this request:

- Goal: Support multimodal transportation choices.
  - Collaborate with transit providers to support availability and enhancements to transit and other transportation services in the I-205 corridor, especially for historically and currently excluded and underserved communities.

Additionally, ODOT will continue to coordinate with the Transit and Multimodal Working Group (as described in Section 3.1.2), as well as the Equity and Mobility Advisory Committee

(described in Section 4.1.1), to help identify strategies on how to integrate transit and multimodal travel into the Project. The Transit and Multimodal Working Group includes representatives from the entire Portland metro area and Southwest Washington.

10.3.5 Request: Assess health and equity impacts.

Response: ODOT updated the following objectives under the Project's equity and diversion goals to specifically call out health as a factor to address.

- Goal: Provide benefits for historically and currently excluded and underserved communities.
  - Support equitable and reliable access to health-promoting activities (for example, parks, trails, recreation areas) and health care clinics and facilities.
- Goal: Limit additional traffic diversion from tolls on I-205 to adjacent roads and neighborhoods.
  - Design the toll system to minimize impacts to quality of life factors, such as health, noise, safety, job access, travel costs, and environmental quality for local communities from traffic rerouting.

ODOT will be working with the Equity and Mobility Advisory Committee to further identify measures related to equity. These performance measures will be used to help identify the Preferred Alternative. In addition, the Equity and Mobility Advisory Committee will identify potential equity and mobility strategies to address impacts to community health.

One such tool for evaluation could be the Oregon Health Authority's transportation impacts estimator. ODOT will determine if this tool can help inform the analysis in the environmental assessment.

10.3.6 Request: Add performance measures for disadvantaged groups

Response: Currently, the following preliminary performance measures include affordability for disadvantaged groups:

- Change in travel costs as a percentage of household income.
- Vehicle travel time savings: overall and for environmental justice communities.
- Value of travel time savings.

The Equity and Mobility Advisory Committee may identify additional measures related to affordability. Additionally, the Equity and Mobility Advisory Committee will identify potential equity and mobility strategies to address potential impacts to disadvantaged groups. The Oregon Transportation Commission will ultimately set policies for the Oregon Toll Program, including strategies to mitigate costs, such as discounts or exemptions.

ODOT will share the Environmental Justice and Social/Communities Methodology Memos with participating agencies. These memos include performance measures on impacts and benefits to disadvantaged groups.

10.3.7 Request: Add performance measures for peak-hour performance on all major roads.

Response: ODOT will share the Transportation Technical Report Methodology Memo with participating agencies. This memo includes a list of preliminary performance measures, including measures for peak-hour performance that would be used to identify the Preferred Alternative.

10.3.8 Request: Add performance measures for person throughput.

Response: ODOT will share the Transportation Technical Report Methodology Memo with participating agencies. This memo includes a list of preliminary performance measures, including measures for person throughput that would be used to identify the Preferred Alternative.

10.3.9 Request: Assess freight mobility.

Response: ODOT will share the Transportation Technical Report Methodology Memo with participating agencies so they can better understand the approach to assess potential impacts and benefits to freight. This memo includes a list of preliminary performance measures, including measures for to assess freight mobility, that would be used to identify the Preferred Alternative.

10.3.10 Request: Evaluate implementation and operations at the regional scale.

Response: ODOT will share the Transportation Technical Report Methodology Memo with participating agencies so they can see how changes in regional travel patterns will be assessed in the environmental assessment. This memo includes a list of performance measures, including regional performance measures for vehicle-hours traveled, vehicle-miles traveled, mode shift, and qualitative measures to assess scalability to a larger regional toll system.

ODOT is pursuing a system-wide approach to address concerns about fairness, diversion, equity, climate, and congestion management. This system-wide tolling approach will begin with a "pre-NEPA" (PEL or Planning and Environmental Linkages) process to evaluate congestion pricing for the I-5 corridor through the Portland metro area and the extensions of I-205 south and north of the current I-205 Toll Project. The I-205 Toll Project between Stafford Road and OR 213 will continue to move forward in the NEPA process as a separate project. ODOT will develop messaging and communication strategies to clarify this plan for the regional system and the schedules for both projects.

The PEL study will help to identify the parameters for a regional tolling system and will model tolling on I-5 and I-205, taking into account tolling from Stafford Road to OR 213 as proposed in the I-205 Toll Project. The PEL process analysis will include the I-205 Toll Project as a baseline condition.

Although a PEL-level of modeling analysis will occur after the modeling for the I-205 Draft Environmental Assessment is complete, the following will be used to understand the regional impact of tolling on I-205:

- Data and feedback gained during the Value Pricing Feasibility Analysis, specifically Concept C. Analysis performed during the Value Pricing Feasibility Analysis indicated that tolling on I-5 would not necessarily affect the Project alternatives recommendations or identification of potential impacts related to traffic rerouting (diversion) off I-205 near the Project area.
- Input from regional engagement efforts associated with the I-205 NEPA process.
- Coordination with Metro on their regional travel demand model and evaluating regional tolling concepts that could include tolls on I-5 in their Regional Congestion Pricing Study.

10.3.11 Request: The cumulative impact analysis should consider how populations will be affected by multiple tolling projects.

Response: ODOT will share the Transportation Technical Report Methodology Memo with participating agencies so they can see how cumulative impacts will be assessed in the environmental assessment. Coordination with other major projects, such as the Interstate Bridge Replacement Project, will be used to develop a consistent approach in identifying projects considered "reasonably foreseeable" for this analysis.

ODOT is pursuing a system-wide approach to address concerns about fairness, diversion, equity, climate, and congestion management. This system-wide tolling approach will begin with a "pre-NEPA" (PEL or Planning and Environmental Linkages) process to evaluate congestion pricing for the I-5 corridor through the Portland metro area and the extensions of I-205 south and north of the current I-205 Toll Project.

Although a PEL-level of modeling analysis will occur after the modeling for the I-205 Draft Environmental Assessment is complete, the following will be used to understand the regional impact of tolling on I-205:

- Data and feedback gained during the Portland Metro Area Value Pricing Feasibility Analysis, specifically Concept C. Analysis performed during the Value Pricing Feasibility Analysis indicated that tolling on I-5 would not necessarily affect the Project alternatives recommendations or identification of potential impacts related to traffic rerouting (diversion) off I-205 near the Project area.
- Input from regional engagement efforts associated with the I-205 NEPA process.
- Coordination with Metro on their regional travel demand model and evaluating regional tolling concepts that could include tolls on I-5 in their Regional Congestion Pricing Study.

10.3.12 Request: Define what the entire system is (as known now), and describe and address the criterion being used for evaluating implementation and operations, as they relate to possible expansion of tolling, as part of the impact assessment.

Response: ODOT is pursuing a system-wide approach to address concerns about fairness, diversion, equity, climate, and congestion management. This system-wide tolling approach will begin with a "pre-NEPA" (PEL or Planning and Environmental Linkages) process to evaluate congestion pricing for the I-5 corridor through the Portland metro area and the extensions of I-205 south and north of the current I-205 Toll Project.

The Value Pricing Feasibility Analysis showed the viability of a regional tolling system; the PEL process will build off that analysis to refine the vision for a regional system. The I-205 Toll Project between Stafford Road and OR 213 is moving forward in the NEPA process as the first piece of the regional tolling system. ODOT will develop messaging and communication strategies to clarify this plan for the regional system.

Although a PEL-level of modeling analysis will occur after the modeling for the I-205 Draft Environmental Assessment is complete, the following will be used to understand the regional impact of tolling on I-205:

- Data and feedback gained during the Value Pricing Feasibility Analysis, specifically Concept C. Analysis performed during the Value Pricing Feasibility Analysis indicated that tolling on I-5 would not necessarily affect the Project alternatives recommendations or identification of potential impacts related to traffic rerouting (diversion) off I-205 near the Project area.
- Input from regional engagement efforts associated with the I-205 NEPA process.
- Coordination with Metro on their regional travel demand model and evaluating regional tolling concepts that could include tolls on I-5 in their Regional Congestion Pricing Study.

10.4 Recommended Alternatives

The following are requests related to the recommended alternatives to be studied in the NEPA process, as described in Section 2.2.2, and how they will be assessed through traffic modeling.

10.4.1 Request: Consider a No-Build (no toll) Alternative.

Response: The NEPA process requires that ODOT consider a No-Build Alternative. A No-Build Alternative enables comparison of existing and future conditions without and with the Project.

10.4.2 Request: Include widening to six lanes as the baseline for the No-Build Alternative, considering the I-205 Improvements Project as complete, independent of tolling.

Response: ODOT is currently examining whether the I-205 Toll Project No-Build Alternative will assume two lanes in each direction along I-205 (existing conditions), or include some or all of the improvements planned in the I-205 Improvements Project.

ODOT acknowledges that the I-205 Improvements Project is assumed to come online in 2027, per the Regional Transportation Plan's financially constrained project list. Before a Finding of No Significant Impact could be issued, the Regional Transportation Plan would be amended to include the I-205 Toll Protect.

10.4.3 Request: Assess tolling on the entirety of I-5 and I-205.

Response: As directed by the Oregon Transportation Commission, ODOT is implementing the Comprehensive Congestion Management and Mobility Plan that includes evaluating a regional, system-wide toll system. This system will contribute to promoting equity, reducing greenhouse gas emissions, managing congestion, and contributing to sustainable funding.

ODOT is pursuing a system-wide approach to address concerns about fairness, diversion, equity, climate, and congestion management. This system-wide tolling approach will begin with a "pre-NEPA" (PEL or Planning and Environmental Linkages) process to evaluate congestion pricing for the I-5 corridor through the Portland metro area and the extensions of I-205 south and north of the current I-205 Toll Project. The I-205 Toll Project between Stafford Road and OR 213 will continue to move forward in the NEPA process as a separate project. ODOT will develop messaging and communication strategies to clarify this plan for the regional system and the schedules for both projects.

Although a PEL-level of modeling analysis will occur after the modeling for the I-205 Draft Environmental Assessment is complete, the following will be used to understand the regional impact of tolling on I-205:

- Data and feedback gained during the Value Pricing Feasibility Analysis, specifically Concept C. Analysis performed during the Value Pricing Feasibility Analysis indicated that tolling on I-5 would not necessarily affect the Project alternatives recommendations or identification of potential impacts related to traffic rerouting (diversion) off I-205 near the Project area.
- Input from regional engagement efforts associated with the I-205 NEPA process.
- Coordination with Metro on their regional travel demand model and evaluating regional tolling concepts that could include tolls on I-5 in their Regional Congestion Pricing Study.

10.4.4 Request: Extend east/west endpoints of I-205 alternatives.

Response: The endpoints for study in the Project NEPA process coincide with the extents of the planned improvements between Stafford Road and OR 213. Toll revenue could fund portions of the I-205 Improvements Project. In addition to the I-205 Toll Project, ODOT is pursuing a system-wide approach to address concerns about fairness, diversion, equity, climate, and congestion management. This system-wide tolling approach will begin with a "pre-NEPA" (PEL or Planning and Environmental Linkages) process to evaluate congestion pricing for the I-5 corridor through the Portland metro area and the extensions of I-205 south and north of the current I-205 Toll Project.

10.4.5 Request: Evaluate a toll-only alternative.

Response: The I-205 Toll Project between Stafford Road and OR 213 is moving forward in the NEPA process as the first piece of the regional tolling system. Toll revenue collected on I-205 could help fund portions of the I-205 Improvements Project. In addition to the I-205 Toll Project, ODOT is pursuing a system-wide approach to address concerns about fairness, diversion, equity, climate, and congestion management.

10.4.6 Request: Advance Alternative 5 to the NEPA analysis.

Response: ODOT understands that Alternative 5 performed fairly well in regional measures during the initial screening analysis and that some jurisdictions may be interested in this alternative because it spreads the toll over the longest extent on I-205. However, this type of tolling structure does not scale well to the regional structure as it tends to create concentrated rerouting patterns that could result in significant impacts to communities located near the toll area (or zone) boundaries. ODOT is looking at refinements to Alternative 4 to better achieve the regional benefits offered by Alternative 5, including reduced diversion and rerouting impacts at the regional scale.

In addition to the I-205 Toll Project, ODOT is pursuing a system-wide approach to address concerns about fairness, diversion, equity, climate, and congestion management. This system-wide tolling approach will begin with a "pre-NEPA" (PEL or Planning and Environmental Linkages) process to evaluate congestion pricing for the I-5 corridor through the Portland metro area and the extensions of I-205 south and north of the current I-205 Toll Project. It is important that the I-205 Toll Project would integrate well with a future regional toll system. Further, advancing study of the regional system may address the desire to spread tolls over a longer extent. At this time, ODOT does not recommend carrying Alternative 5 into the NEPA process.

10.4.7 Request: Model all alternatives with tolling on I-5 to better understand regional impacts.

Response: The Project modeling does not include projects that are not identified in the adopted financially constrained Regional Transportation Plan. Tolling on I-5 is currently undefined and is not included in the Regional Transportation Plan, which is the required basis for modeling evaluation through the regional travel demand model.

ODOT is pursuing a system-wide approach to address concerns about fairness, diversion, equity, climate, and congestion management. This system-wide tolling approach will begin with a "pre-NEPA" (PEL or Planning and Environmental Linkages) process to evaluate congestion pricing for the I-5 corridor through the Portland metro area and the extensions of I-205 south and north of the current I-205 Toll Project. The I-205 Toll Project between Stafford Road and OR 213 will continue to move forward in the NEPA process as a separate project. ODOT will develop messaging and communication strategies to clarify this plan for the regional system and the schedules for both projects.

The PEL study will help to identify the parameters for a regional tolling system and will model tolling on I-5 and I-205, taking into account tolling from Stafford Road to OR 213 as proposed in the I-205 Toll Project. The PEL process analysis would include the I-205 Toll Project as a baseline condition.

Although a PEL-level of modeling analysis will occur after the modeling for the I-205 Draft Environmental Assessment is complete, the following will be used to understand the regional impact of tolling on I-205:

- Data and feedback gained during the Value Pricing Feasibility Analysis, specifically Concept C. Analysis performed during the Value Pricing Feasibility Analysis indicated that tolling on I-5 would not necessarily affect the Project alternatives recommendations or identification of potential impacts related to traffic rerouting (diversion) off I-205 near the Project area.
- Input from regional engagement efforts associated with the I-205 NEPA process.
- Coordination with Metro on their regional travel demand model and evaluating regional tolling concepts that could include tolls on I-5 in their Regional Congestion Pricing Study.

10.4.8 Request: Modify Alternatives 3 and 4 to improve transportation demand management performance.

Response: Project alternatives and technical assumptions that will be used in the NEPA analysis are continuing to be refined. The toll rate schedule for each alternative will be evaluated and adjusted to improve performance at the regional scale. Potential examples of toll rate schedule adjustments may include changing the peak and off-peak toll rates.

Where implemented around the United States or internationally, tolling has shown to decrease single-occupancy vehicle travel, thus tolling is a transportation demand management strategy. The Project will incorporate transportation demand management strategies through the goal and objectives for diversion, multimodal, transit, and safety, as well as working with the I-205 Toll Project Transit and Multimodal and Modeling Working Group and the Equity and Mobility Advisory Committee to develop transportation demand management strategies.

Transportation demand management encompasses a broad range of strategies that may not be tied directly to the Project's dual purpose of congestion management and revenue generation. The Project purpose can be accomplished with variable-rate tolling, which is commonly recognized as a transportation demand management strategy. Variable-rate tolling (with higher tolls during peak travel hours and lower tolls during off-peak travel hours) incentivizes travel during less congested times. Other transportation demand management strategies, such as supporting connections to transit, may be considered as the Project is developed in support of the identified goals and objectives.

10.4.9 Request: Model an alternative where the Arch Bridge is bike/pedestrian only and another scenario in which a new vehicle bridge over the Willamette River is also constructed.

Response: The Project modeling does not include projects that are not identified in the adopted financially constrained project list in the Regional Transportation Plan. Any other projects would be included in the Project's modeling and analysis only after they are added to the Regional Transportation Plan. The potential for closing the Arch Bridge to vehicle traffic would be analyzed further if such a scenario is advanced as a preferred option through the Oregon City-West Linn Pedestrian and Bicycle Concept Plan. This plan assumes that if the Arch Bridge is closed to vehicle traffic, no new crossing would be built for vehicles. The concept plan is considering five different alignments for a pedestrian/bicycle crossing over the Willamette River; any of those alternatives could potentially affect traffic patterns and thus modeling for the Project.

Within ODOT, Project staff and staff working on the Oregon City-West Linn Pedestrian and Bicycle Concept Plan have been coordinating on project updates and lessons learned on modeling, measured impacts to the community, and community feedback. The concept plan is scheduled for completion in mid-2021 and will be considered in identifying complementary strategies to the Project. The relationship of the Project to all potential improvements for active travel will be a determined in coordination with the Transit and Multimodal Working Group.

10.4.10 Request: Include as much detail as possible about toll users in the alternatives analysis. User considerations should include 1) Freight, commercial, and private-vehicle toll payers; 2) Income and other socioeconomic information of toll payers; and 3) Resident location of toll payers—local (within x miles of the tolled facility)—by city, county, and state of residence.

Response: An I-205 Corridor User Analysis is being prepared; this will describe current travel patterns on the corridor, including trip origins, local and regional routing patterns on the I-205 mainline, and existing diversion off I-205 during congested peak hours. In addition, the Transportation Technical Report will provide additional analysis of truck and auto travel patterns, while the Environmental Justice and Economic Technical Reports will consider other performance measures related to the impacts of tolling on different corridor users, including those historically and currently excluded and underserved communities.

10.4.11 Request: Identify an alternative with markedly less diversion impacts in central Clackamas County, including Highway 99E.

Response: 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; therefore, the endpoints for study in the I-205 Toll Project NEPA process coincide with the extents of the I-205 Improvements Project (Stafford Road and OR 213). The preliminary alternatives identified in the alternatives screening report represent a reasonable range of alternatives within these extents. Project alternatives and technical assumptions that will be advanced in the NEPA analysis will continue to be refined and strategies will be explored to achieve the Project goal of limiting additional traffic diversion from I-205 to adjacent roads and neighborhoods.

10.4.12 Request: Perform additional modeling without tolls to better understand existing diversion.

Response: ODOT will continue to discuss needed modeling efforts with partner agencies that participate in the Regional Modeling Group. These modeling efforts will include data and modeling tools and assumptions needed to understand existing (baseline) conditions and current diversion patterns and what traffic patterns would look like under the No-Build (no toll) Alternative as compared with the tolling alternatives.

10.4.13 Request: Use modeling to understand increases in diversion and impacts created as a result of additional diversion.

Response: Modeling tools for the Project will continue to be refined to better understand changes in traffic patterns, including potential diversion to local roadways. ODOT has shared modeling data with partner agencies and will continue to do so. ODOT will share the Transportation Technical Report Methodology Memo with participating agencies so they can see how changes in travel on local roadways and impacts will be assessed in the environmental assessment. One of the goals for the Project is to limit additional diversion caused by tolling. As mitigation needs are identified, ODOT will work with agency partners to review projects in local transportation system plans to determine if any would be appropriate mitigation options for incorporation into the Project.

10.4.14 Request: Quantify impacts of rerouting through the Portland metro area.

Response: ODOT will share the Transportation Technical Report Methodology Memo with participating agencies so they can see how changes in regional travel patterns will be assessed in the environmental assessment.

10.4.15 Request: Consider diversion and multimodal travel.

Response: As directed by the Oregon Transportation Commission, developing equity and mobility strategies that examine the availability of transit and other transportation options will be incorporated into the Project through various goals and objectives, as well as the Transit and Multimodal Working Group and Equity and Mobility Advisory Committee. Once impacts are identified, these groups will help to identify mitigation and enhancement options.

In addition, ODOT will share the Transportation Technical Report Methodology Memo with participating agencies so they can see how diversion and impacts to multimodal travel will be assessed in the environmental assessment.

10.4.16 Request: Incorporate post-COVID-19 pandemic driving conditions.

Response: The Project will be evaluated for long-term impacts through the 2045 planning horizon. Long-range transportation forecasts rely on historical trends and current behavioral patterns to understand future conditions and areas of uncertainty. It is important to observe patterns over a significant period of time in order to reveal long-range trends and avoid misinterpreting short-term phenomena—such as business cycles or random shocks to the system (wildfires, COVID-19)—as changes in long-range behavior. Permanent changes in household and business behavior due to the COVID-19 pandemic are unknown. By the end of

2020, statewide weekday traffic volumes were about 11% below volumes compared to the previous year.

10.4.17 Request: Model future conditions for 2040.

Response: The alternatives analysis in NEPA will analyze potential impacts for 2027 and 2045. The Transportation Technical Report Methodology Memo documents this analysis approach, which will be shared with participating agencies.

The Draft Comparison of Screening Alternatives Report relied on initial modeling data for the 2027-time horizon to identify which of the five preliminary alternatives should be studied (and modeled) in greater detail for the environmental assessment. The exclusion of 2040 or 2045 from the previous communication on the Project was not to mislead a commitment to performing modeling for a long-term (20-year) time horizon.

11 RESPONSES TO COMMENTS ON KEY CONCERNS AND OPPORTUNITIES

This section provides responses to comments received on key topics described in Chapter 7 and a list of actions that ODOT will take in response to these comments.

Table 11-1. Response to Comments on Key Topics: Revenue and Taxes

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
Respondents requested greater clarity and commented about existing taxes, how tax revenue is being spent, how revenue generated through tolling will be spent, what types of projects could (or would) be funded with tolling revenue, and the location of potential projects. In addition, respondents suggested that the toll be discontinued after sufficient revenue has been generated to fund the I-205 Improvements Project.	• Too many taxes are being paid and this is another form of tax. • Existing revenue from taxes and vehicle-registration fees is sufficient to fund transportation improvements, but the funding is being ineffectively used or allocated to the wrong projects. • There should be an increase in taxes as opposed to a toll, such as an increase in the gas tax or a new tax on electric vehicles. • State and federal funding for the I-205 Improvements Project should be pursued. • Certain user groups should pay more in taxes or tolls, such as freight-trucking industries or out-of-state commuters. • Clarification is needed on the types of projects that could be funded with the toll revenue. • Revenue should not be used for non-vehicle transportation projects. • Revenue should be used to improve pedestrian, cycling, and transit opportunities. • Revenue should be used to fund projects only in the I-205 corridor. • Revenue should be used to fund other projects in the Portland metro area, such as the I-5 Bridge Replacement Project.	Available funding for transportation has not kept pace with the cost of maintaining or improving our transportation system. The federal gas tax has not been adjusted since October 1993 and the share of federal contributions to state transportation projects has greatly decreased. On the state level, escalating expenditures to maintain aging infrastructure, the need for seismic upgrades to bridges, and rising construction costs have greatly increased financial needs. Tolls are a user fee so that only those who use the highway facility are paying for the improvements, compared to a tax imposed on everyone or specific vehicle types. The Oregon Constitution (Article IX, Section 3a) specifies that revenues collected from the use or operation of motor vehicles (including tolls) are spent on roadway projects, which could include construction or reconstruction of travel lanes, as well as bicycle and pedestrian facilities or transit improvements in or along the roadway. In fall 2020, the Oregon Transportation Commission made a policy concept decision that tolls will be spent on projects within the corridor in which they are collected. Tolls collected on I-205 could finance portions of the I-205 Improvements Project, which includes seismic upgrades to the Abernethy Bridge and eight other bridges on I-205 and the extension of a third lane in each direction. ODOT is committed to an ongoing dialogue with agencies,	• **Share information on transportation funding.** Create and distribute additional information through websites, the media and community outreach to enhance understanding of how transportation projects and ongoing maintenance and operations are funded. Demonstrate the need for tolling to provide a sustainable source of transportation funding. • **Communicate what tolls could pay for.** Provide clarification on how toll revenue could be used. Explain the Oregon Transportation Commission's policy decision to keep tolls within the corridor on which they are collected and that toll revenue collected on I-205 could be used to help fund portions of the I-205 Improvements Project. • **Demonstrate transparency in the use of tolls.** Establish a system to communicate transparently how funds collected through tolling are used.

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
	• Concern that toll revenue might be used inappropriately by government officials and/or agencies for non-transportation purposes. These comments indicate that the public would like to know more about where and how ODOT is spending transportation funds. • The toll should be discontinued after sufficient revenue has been generated to fund the I-205 Improvements Project. • Tolls are necessary to create sustainable transportation infrastructure, especially bridges. • Support for tolls citing that tolls ensure that those who use the roads are paying for them.	stakeholders, and members of the public to communicate transparently about how funds are and will be used. At this time, it has not been determined whether toll rates would change or be discontinued at some time in the future. As the toll authority, the Oregon Transportation Commission will set toll rates, policies (including discounts and exemptions) for user groups, and escalation rates. Representative toll rate options will be tested during the NEPA process and subsequent, more-detailed study on toll revenue generation (Level 2 Traffic and Revenue study). These analyses incorporate recommendations from the Equity and Mobility Advisory Committee and Region 1 Area Commission on Transportation.	

Table 11-2. Response to Comments on Key Topics: Rerouting and Diversion

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
Comments included concerns about potential impacts to local communities and streets near I-205, observations about existing traffic congestion and road conditions, and thoughts about how to analyze and mitigate potential impacts from rerouting and diversion through the environmental review process and Project implementation.	• Increased traffic on local streets would create additional inconveniences for residents accessing schools, shops, jobs, and medical facilities. • Increased traffic on local streets would create additional safety risks for pedestrians and bicycles, as well as slower response times for emergency services. • Increased rerouting and diversion off of I-205 would lead to increased deterioration of local streets, with additional maintenance costs borne by local governments and residents. • Additional vehicles rerouting and diverting through their community will decrease property values. • Alternative routes are already congested, especially during rush hour, specifically the following: – I-5. – Willamette Drive (OR 43)/Oregon City Arch Bridge. – Trails End Highway (OR 213). – McLoughlin Boulevard (OR 99E). – Stafford Road. – Willamette Falls Drive. – Borland Road. – Schaeffer Road. – River Road. – Oatfield Road. – Salamo Road. – Rosemont Road.	The Project's goals and objectives reflect desired outcomes beyond the Project purpose; these include limiting additional diversion from I-205 to local streets. The preliminary alternatives were developed to try to limit diversion in local communities and this continues to be a priority for ODOT as the Project is developed.	• **Recognize the importance of assessing potential diversion impacts to local communities.** Add an objective and associated performance measure(s) related to protecting quality of life for local communities. • **Study existing diversion patterns along the corridor.** Illustrate examples of existing diversion patterns along the study corridor in the Corridor User Analysis to help assess how these patterns could change with implementation of tolling. • **Evaluate potential impacts to local communities from additional diversion caused by tolls.** Evaluate quality of life impacts, including how diversion could affect air quality, noise, community cohesion, business operations, and safety, as well as whether changes in traffic patterns could affect local property uses and values in the environmental assessment. • **Identify potential mitigation measures for adversely affected routes.** Highlight potential measures in the environmental assessment that could be implemented by ODOT to mitigate unavoidable rerouting impacts (if any) to other roadways that could result from tolling.

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
	• Many of the alternative routes do not have the capacity and/or are in need of repair and improvements, so additional rerouting and diversion will exacerbate these issues. • Rerouting and diversion and the subsequent impacts to local communities needs to be analyzed thoroughly in the environmental analysis. • The Project should incorporate mechanisms to limit access to local streets from I-205 or implement measures that discourage drivers from rerouting and diversion.		

Table 11-3. Response to Comments on Key Topics: Fairness

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
Comments on perceived fairness pertained to those who felt they would be adversely affected by the toll and taxes, including frustration at having to pay for roads that respondents felt were already paid for as well as a feeling that ODOT would be placing a hardship on local residents who would have to pay multiple tolls for going to and from work, school, or other destinations like the post office.	• Existing roads and highways have already been paid for and should not have to be paid for again. • The toll is an unfair burden to those who would have to pay to get to and from work or school. • West Linn and Oregon City would have undue burden because of their proximity to the proposed tolled facility. • Do not have flexibility for travel or commute times, so would be overly burdened by a higher toll at peak hours. • A toll would have to be paid every time people leave their house for local and short-distance trips. • There is limited access out of or through the area with no viable alternatives. • Why was I-205 was selected for tolling but other roads or areas were not selected? • The use of the word "freeway" indicates the road should be free to use. • I-205 is used to get to high school.	The Project purpose is to manage congestion and raise revenue for congestion relief projects, such as the I-205 Improvements Project. Available funding for transportation has not kept pace with the cost of maintaining or improving our transportation system. The federal gas tax has not been adjusted since October 1993 and the share of federal contributions to state transportation projects has greatly decreased. On the state level, escalating expenditures to maintain aging infrastructure, the need for seismic upgrades to bridges, and rising construction costs have greatly increased financial needs. Tolls collected on I-205 could finance portions of the I-205 Improvements Project, which includes seismic upgrades to the Abernethy Bridge and eight other bridges on I-205 and extension of a third lane in each direction. ODOT is committed to an ongoing dialogue with agencies, stakeholders, and members of the public to communicate transparently about how funds are and will be used. This Project is one in a larger, regional toll program to manage congestion across the Portland metro area. Tolling in the region will be phased and this is one of the initial phases; however, this is not the only area in the region that will have tolls.	• **Share information on transportation funding.** Create and distribute additional information through websites, the media and community outreach to enhance understanding of how transportation projects and ongoing maintenance and operations are funded. Demonstrate the need for tolling to provide a sustainable source of transportation funding. • **Clarify Oregon Transportation Commission's role in the Project.** Create and provide additional informational materials to enhance understanding of the Oregon Transportation Commission as the toll authority that will set toll rates, policies (including discounts and exemptions), and escalation rates and clarify the timing of when these decisions are anticipated. • **Evaluate potential impacts to local residents.** Assess whether the Project would result in disproportionate impacts to local users of I-205 in the environmental assessment, including local residents often using I-205 to travel to work, school, health care facilities, and other community facilities.

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
	• The toll would force people to move farther out to avoid paying the toll. • This penalizes people for where they live. • The toll is a barrier to access medical care. • Washington state residents who work in Oregon expressed frustration with paying income taxes when they do not get to vote in Oregon.	The Oregon Transportation Commission is the toll authority that will set toll rates, policies (including discounts and exemptions), and escalation rates. In fall 2020, the Oregon Transportation Commission made a policy concept decision that tolls will be spent on projects within the corridor in which they are collected. Representative toll rate options will be tested during the NEPA process and subsequent, more-detailed study on toll revenue generation (Level 2 Traffic and Revenue study), incorporating recommendations from the Equity and Mobility Advisory Committee and Region 1 Area Commission on Transportation.	• **Identify potential mitigation measures for local residents.** Highlight potential measures in the environmental assessment that could be implemented by ODOT to mitigate unavoidable disproportionate impacts (if any) to local residents.

Table 11-4. Response to Comments on Key Topics: Congestion Observation and Impacts

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
Comments included current perceptions and observations of congestion changes and patterns, the primary causes of congestion in the Project area, how tolling will affect congestion, and how congestion affects people and travel behavior.	• Congestion is caused because there are not enough lanes on I-205 (or the existing roadways are too narrow) to accommodate current volumes; three lanes of traffic merge into two lanes on this section of I-205. • Freight traffic is a primary source of the congestion in this area. Many of these comments proposed solutions to encourage freight traffic to travel on alternate routes (during off-peak hours), or to create designated freight lanes. A smaller subset of the comments pointed out that heavy vehicles have trouble accelerating uphill, thus slowing traffic in those sections of the Project area. • Congestion is caused by Washington state residents filling up Oregon roads. • Congestion is caused by the incline on I-205 from OR 43 that requires vehicles to slow down. • Congestion is caused by an increase in people moving to the area to escape the expense of living in Portland. • Tolling will have no effect on [overall] congestion [in the area] because drivers will divert to other roads and move the congestion there. • Tolling will have no effect on congestion because more people are working from home and congestion is no longer an issue. • Tolling will increase congestion because of the assumption that delays would be caused by slowing down to pay a toll. • Tolling will not deter drivers because people will still need to drive the Project corridor route for work and routine errands.	ODOT will be performing analyses on existing travel patterns, including origins and destinations of trips on the corridor, to better understand the main sources of congestion in the region. Variable rate tolling aims to improve mobility, travel times, and reliability by charging higher prices during peak traffic demand periods and lower prices at off-peak lower demand times. The higher toll times of day, which typically coincide with times of increased transit service, encourage some drivers to consider using other travel options such as carpooling or transit, or changing their travel time to other, less congested times of the day when the toll is lower. A small percentage of highway users choose another travel mode or time that reduces traffic congestion for those who cannot modify their trip plans, and results in improved traffic flow for the entire system.	• **Observe how COVID-19 has temporarily affected travel patterns.** Continue to monitor regional and national trends related to short-term and long-term changes in commute travel patterns and congestion levels due to COVID-19. • **Study existing travel patterns along the Project corridor.** Study existing travel patterns, including origins and destinations of trips on the corridor, in the Corridor User Analysis. • **Perform travel modeling and traffic analysis.** Perform in-depth travel modeling and traffic analysis for the Project alternatives in the environmental assessment; use this data to identify areas of existing and future congestion and develop mitigation strategies.

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
	• Tolls are needed as soon as possible to reduce congestion. • willingness to pay a toll for the benefit of reduced congestion. • Congestion is worse on I-5 and that tolling I-5 would get to the root of the problem. • Congestion is a major problem at the Washington state border. • Congestion is a result of traffic on I-84, OR 43, or OR 99E. • Tolling will not have an impact on regional congestion since congestion will still be worse in other areas like I-5, I-84, and OR 43. • Washington state drivers over the Glenn Jackson Bridge are a major source of congestion. • Increased traffic on side roads due to tolling will disturb local communities like West Linn and Oregon City. • Concern about the safety of pedestrians, children, and pets with increased traffic on side roads. • Increased traffic will wear roads down and make them unsafe for driving, requiring increased maintenance on their vehicles. • The burden of a toll will cost the residents of West Linn and Oregon City more time, due to the increased traffic they will always have to endure. • Implementing a toll will make living in Oregon less desirable. • Tolling is an effective way to dissuade people from driving.	Tolls serve two objectives to varying degrees: to manage demand to reduce congestion and to generate revenue for transportation improvements. Tolls collected on I-205 could finance portions of the I-205 Improvements Project, which includes seismic upgrades to the Abernethy Bridge and eight other bridges on I-205 and extension of a third lane in each direction. These improvements will help to alleviate the bottleneck on the existing 4-lane segment of I-205 (2 lanes each direction), which is a major source of congestion. This Project is one in a larger, regional toll program to manage congestion across the Portland metro area. Tolling in the region will be phased and this is one of the initial phases; however, this is not the only area in the region that will have tolls to manage congestion. All toll collection will be electronic, using transponders and license plate scanners, to keep traffic moving; there will be no stopping or slowing to pay tolls	

Table 11-5. Response to Comments on Key Topics: Toll Implementation

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
Comments about toll implementation fell into three distinct categories: questions, ideas, and areas of concern. Respondents frequently had direct questions about tolling technology, billing and payment methods, physical implementation, rate setting, and the program construction timeline.	• Some users should pay different rates (for example, locals and low-income drivers should pay less while higher-income, freight, and out-of-state drivers should pay more). • Residents local to West Linn or Oregon City should be exempt from paying the toll. • Use an annual or monthly pass to cap the costs for frequent users or populations who would experience financial impacts. • Certain trip purposes—such as shopping, commuting to school or work, or accessing medical care—should be discounted or exempt from paying the toll. • Rates should be set based on the type or size of the vehicle, or the purpose of the trip. • Preference expressed for how variable-rate tolls would be assessed: income-based, need-based, trip length, trip purpose, vehicle type, or other criteria. • Variable-rate tolls are too complex and difficult to understand. Some expressed a need for clarity on pricing in advance of their trip. Suggestions included advanced signage before the tolled segment or integration with navigation systems to include toll costs in route suggestions. • Concern about the duration of the toll collection. Some expressed a preference for tolls to sunset after the roadway improvements are completed. Others expressed a concern that toll rates would continue to rise after implementation.	At this time, it has not been determined whether toll rates would change or be discontinued at some time in the future. This is a policy decision that the Oregon Transportation Commission would make in the future. As the toll authority, the Oregon Transportation Commission will set toll rates, policies, (including discounts and exemptions) for user groups, and escalation. Representative toll rate options will be tested during the NEPA process and subsequent, more-detailed study on toll revenue generation (Level 2 Traffic and Revenue study), incorporating recommendations from the Equity and Mobility Advisory Committee and Region 1 Area Commission on Transportation. If tolling is approved, the Oregon Transportation Commission will ultimately set toll rates at levels sufficient to meet all financial commitments for tolls. The toll rate setting process will begin as early as 2022 for the Project. The toll rate for I-205 will be finalized in 2024 . If approved, tolling on I-205 could begin as early as 2024. ODOT will update the public as these decisions are made.	• **Share information on transportation funding.** Create and distribute additional information through websites, the media and community outreach to enhance understanding of how transportation projects and ongoing maintenance and operations are funded. Demonstrate the need for tolling to provide a sustainable source of transportation funding. • **Share information on the tolling system.** Create and distribute additional informational materials to enhance understanding of how the toll system will work for users and projected timelines of the system. • **Clarify Oregon Transportation Commission's role in the Project.** Create and provide additional informational materials to enhance understanding of the Oregon Transportation Commission as the toll authority that will set toll rates, policies (discounts and exemptions), and escalation rates and clarity

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
	• Frustration with a lack of information on how much the tolls will cost, stating that it is difficult to provide comment without this information. • Freight should pay a higher toll rate based on weight, while others said existing freight fees should be reduced if tolls are implemented. Others said delivery drivers should receive an exemption. • Support for tolls as long as the tolls were inexpensive. • Disbelief in the idea that tolling would reduce congestion due to their assumption they would have to stop and pay at the toll booth. • Concern about data privacy and sharing sensitive information with the government. • Highway tolls are overdue in Oregon. • Drivers from out of state should be charged differently. Some proposed that the toll should target those traveling across state lines by tolling near the Columbia River on both the I-5 and I-205 bridges. • Concern about the potential impacts to the available workforce. Others were concerned about low-income earners who have relocated from the Portland area to Vancouver for a lower cost of living. • Concern about the ease of use for tourists and recreational or infrequent drivers. • Mitigation strategies pertained to discounts or exemptions for groups of users, including the following: • Frequent users • Infrequent users	Fees will be collected electronically so drivers do not have to stop. Most electronic tolling systems use a transponder pass, which is a device that mounts to a vehicle windshield that is read by antenna in the roadway when the vehicle travels, linking it to a customer account for collecting the toll. License plate recognition technology can be used in lieu of a transponder for a customer with an account, or to mail a toll bill to the vehicle's registered owner for a customer without an account. Both payment options will likely be adopted for the Portland metro area, though the exact details will be determined at a later stage. Options for individuals without bank accounts will be studied to provide access to all. The Equity and Mobility Advisory Committee is working to help identify strategies to improve outcomes and access to travel choices for all demographics. Strategies could include reduced or free transponders, cash payment options for un-banked individuals, credits or discounts for different income levels, and integrating benefits between travel modes, such as transit passes that accumulate toll credits. ODOT will continue to seek feedback from these communities and from the Equity and Mobility Advisory Committee throughout the Project planning process and after tolling is implemented to monitor and adjust tolls as needed.	the timing of when these decisions are anticipated. • **Continue to engage the community on toll policies and the design of the toll system.** Continually engage the community throughout the Project planning process regarding major Project updates, system design decisions, and policy decisions from the Oregon Transportation Commission. Community engagement will continue after tolling is implemented.

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
	• Local residents • Out-of-state residents • Students • Employees of local business • Low-income users • Historically and currently excluded and underserved communities • Electric vehicle or hybrid drivers • Carpools • Motorcycles and scooters • Older adults • Veterans • Suggestions focused on mitigating the impacts to the surrounding neighborhoods including the following: • Building sound walls. • Using revenue for surface street improvements. • Designating local access roads. • Investing in transit options. • Investing in vanpools. • Installing public art. • Equity impacts could be mitigated by funneling revenue from the tolls back into the affected communities in the form of enhanced transit access, job training, or educational programs. • Transit improvements should be implemented before the tolls go into effect. • Need for information on cost of the tolls needs to be available in multiple languages.		

Table 11-6. Response to Comments on Key Topics: Accountability and Trust

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
Respondents expressed distrust in ODOT or government in general. Comments included questions about the ability for tolling to reduce congestion, the legality of tolling, and the project in general.	• ODOT does not manage revenue from existing sources well and cannot be trusted with additional revenue from tolling. • Tolling would not be necessary if ODOT spent taxpayer money responsibly. • Tolling will not reduce congestion in the area or achieve the stated goals and objectives. • This Project is an attempt to take money from taxpayers. • This Project is an attempt to reduce the budget deficit caused by inappropriate government spending. • ODOT will not use revenue generated in the Project area to serve residents in the Project area specifically. • Questioning of ODOT's ability to complete projects on time. • ODOT will expand tolling to other areas or roadways if this Project is implemented. • Tolling of new infrastructure is illegal or may require federal approval. • Tolling of any roadway requires voter approval. • Community members in affected neighborhoods could take legal action to prevent the implementation of tolling on I-205.	In 2017, the Oregon Legislature approved House Bill 2017, which directed the Oregon Transportation Commission to pursue and implement tolling I-5 and I-205 in the Portland metro area to provide additional traffic management tools to further manage congestion and generate revenue for transportation improvements. This Project is one in a larger, regional toll program to manage congestion across the Portland metro area. Tolling in the region will be phased; this is one of the initial phases. ODOT is committed to an ongoing dialogue with agencies, stakeholders, and members of the public to communicate transparently about how funds are and will be used. Tolling has been effective at reducing congestion in many cities in the United States. The use of variable rate tolls manages traffic flow and improves roadway efficiency by charging higher prices during peak traffic demand periods and lower prices during off-peak lower demand periods. ODOT is learning from successful toll projects and technical experts across the United States.	• **Demonstrate transparency in the use of tolls.** Establish a system to communicate transparently how funds collected through tolling are used. • **Share information on transportation funding.** Create and distribute additional information through websites, the media and community outreach to enhance understanding of how transportation projects and ongoing maintenance and operations are funded. Demonstrate the need for tolling to provide a sustainable source of transportation funding. • **Communicate what tolls could pay for.** Provide clarification on how toll revenue could be used. Explain the Oregon Transportation Commission's policy decision to keep tolls within the corridor on which they are collected and that toll revenue collected on I-205 could be used to help fund portions of the I-205 Improvements Project.

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
		The Oregon Transportation Commission adopted a policy concept that toll revenues will be expended on improvements/projects within the corridor in which they are collected. Tolls collected on I-205 could finance portions of the I-205 Improvements Project, which includes seismic upgrades to the Abernethy Bridge and eight other bridges on I-205 and extension of a third lane in each direction. These improvements will help alleviate the bottleneck on the existing 4-lane segment of I-205 (2 lanes each direction), which is a major source of congestion.	

Table 11-7. Response to Comments on Key Topics: Expand Capacity

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
Respondents suggested adding new roadways or expanding existing roadway capacity (for example, adding additional travel lanes, bridges, or highways) as an alternative to tolling.	• New bridges should be built to cross both the Willamette River and Columbia River. • Support for building new highways. • If tolling is going to be implemented, it should be implemented only on new roadways not existing ones. • Advocating specifically for the construction of a metro area bypass that would allow trucks and non-local traffic to bypass Portland entirely. • Lanes should be added to existing freeways including I-205, I-5, and OR 217. • Bridges should be repaired and widened, specifically the Abernethy Bridge. • Lanes added to existing freeways should be toll lanes or high-occupancy vehicle lanes. • Population growth as a driving factor for the need for expanding existing freeways. • Existing taxes should be used to fund the expansion of existing roadways. • Freeways should not be expanded, and that focus should be on climate action and expanding transit systems instead. • Adding another level to bridges and freeways (that is, a double-decked bridge) should be explored.	Adding capacity is not an effective long-term solution to managing congestion and often results in similar or greater levels of congestion as demand expands to fill the available capacity. If the number of highway lanes increases, congestion temporarily decreases until more drivers see that the route is free flowing and choose to drive or choose that route over others. Eventually, more cars use the route, and the benefits of the additional capacity erode and congestion occurs again. Tolling offers a way to make sure that capacity improvements remain sustainable by charging users to avert over-consumption of the roadway during peak periods. Tolls collected on I-205 could finance portions of the I-205 Improvements Project, which includes seismic upgrades to the Abernethy Bridge and eight other bridges on I-205 and extension of a third lane in each direction. These improvements will help to alleviate the bottleneck on the existing 4-lane segment of I-205 (2 lanes each direction), which is a major source of congestion. Currently, there are no other sources of funding identified for the Project.	• **Share information on the long-term ineffectiveness of expanding capacity for addressing congestion.** Create and distribute informational material that explains why adding capacity is not a sustainable, effective long-term solution, including examples from around the United States where this approach was used. • **Communicate what tolls could pay for.** Provide clarification on how toll revenue could be used. Explain the Oregon Transportation Commission's policy decision to keep tolls within the corridor on which they are collected and that toll revenue collected on I-205 could be used to help fund portions of the I-205 Improvements Project.

Table 11-8. Response to Comments on Key Topics: Multimodal Transportation

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
Respondents commented about existing transit, bicycle and pedestrian options, and multimodal needs in the Project area. Comments focused on the safety, equity, connectivity, and travel time of multimodal travel. Respondents observed that current transit service near I-205 in Clackamas County does not meet the needs of the traveling public. A few comments addressed how tolling and other revenue should (or should not) be spent to fund these modes.	• A tolling project needs to include viable transit options if tolls are going to be implemented on I-205 because there are not enough accessible and direct transit options in the Project area. • Transit in the region needs to be improved to reduce travel times and increase connectivity. • Transit-only lanes, express buses, and bus-on-shoulder lanes along I-205 in Clackamas County. • Extending the MAX Orange Line to Oregon City and to other communities along the southern portion of I-205. • A new light rail line from OR 217 to Lake Oswego and traveling east to Clackamas County. • Express buses or light rail lines between Oregon City and Washington County, including Bridgeport Village, Tualatin, and Beaverton, and between Oregon and Washington state. • Transit is a good alternative to widening roadways and can improve mobility, reduce congestion, and reduce greenhouse gas emissions. • Transit investments are not balanced across the region. It is unfair to toll I-205 especially because the Project area has very few transit options.	The need to improve transit and provide transportation choices is a priority for ODOT as the Project is developed. It was one of the key concerns identified during the Value Pricing Feasibility Analysis and has shaped the direction of the Project. ODOT is working with agency partners, including transit agencies, throughout the development of the Project so that tolling can support transit and be part of a larger integrated transportation system. The Oregon Constitution (Article IX, Section 3a) specifies that revenues collected from the use or operation of motor vehicles is spent on roadway projects—which could include construction or reconstruction of travel lanes, as well as bicycle and pedestrian facilities or transit improvements in or along the roadway—but effectively prohibits tolls from being spent directly on transit service or projects, though there may be creative solutions to addressing these needs. For example, toll revenue from the I-95 expressway in Miami was used to fund part of the I-95 express bus routes within the I-95 corridor. The I-1-/I-110 ExpressLanes project in Los Angeles created an ExpressLanes Net Toll Revenue Re-Investment Grant Program that provides toll revenues for enhanced transit operations, demand management, transportation systems management, and active transportation. Ultimately, the	• **Seek input and guidance from the Transit and Multimodal Working Group.** Utilize the Transit and Multimodal Working Group for supporting strategies for transit, bicycle, and pedestrian facilities and users as well potential mitigation measures for unavoidable impacts (if any) to transit, bike, and pedestrian facilities and users from the Project. • **Actively seek feedback and elevate voices from historically and currently excluded and underserved communities and the Equity and Mobility Advisory Committee during project decision making.** Continue to seek feedback from these communities and from the Equity and Mobility Advisory Committee to enhance understanding of how the current transit system creates disproportionately negative impacts for low-income populations and communities of color. • **Evaluate potential benefits and impacts to multimodal transportation.** Assess projected benefits and impacts from the implementation of tolling to multimodal transportation modes and users in the environmental assessment.

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
	• Tolling is not an effective strategy to reduce congestion and that improved transit would be more effective at managing congestion. • Toll revenue should be used to fund transit. • Toll revenue should not be used to fund transit and should instead be used to fund highway maintenance and expansion and bridge repair. • The current transit system creates disproportionately negative impacts for low-income people and essential workers. Most people cannot afford to live close to downtown Portland and transit options in the suburbs are indirect and too time consuming. • The transit system in Clackamas County feels unsafe and unhealthy. • Diversion from tolling on I-205 will negatively affect bus riders. Buses in the area will be delayed due to increased congestion on local roads. • Bus and transit riders should not be tolled. • Tolls are a critical tool to reduce overall dependence on vehicles. • There are not enough bicycle lanes and sidewalks in the Project area and providing other transportation options is important if a toll is added to I-205.	Oregon Transportation Commission will also decide how toll revenues collected on I-205 and elsewhere throughout the region are used.	

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
	• Biking and walking options reduce congestion and tolling roadways does not reduce congestion. • Safety concerns for pedestrians and bicyclists as a result of increased driver diversion from I-205 to local roads. • Toll revenue should be spent on biking and walking investments. • Toll revenue should not be used to fund biking and walking investments and should instead be invested in roadway expansion. • Additional pedestrian infrastructure in the Project area would not be used because destinations are far apart. • Freeways should not be expanded and revenue should be invested in expanding biking and walking infrastructure. • Freeways should get additional lanes and revenue should not be invested in biking and walking infrastructure.		

Table 11-9. Response to Comments on Key Topics: Equity

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
Comments mentioning equity generally opposed tolling due to the potential for disproportionate effects on low-income households and seniors. Comments were related to how tolling would be an additional burden faced by low- and fixed-income individuals on top of other existing challenges like commuting to jobs with inflexible work schedules, medical needs, and/or family support required for senior care. Respondents indicated a need for equity to be explicitly defined and how it will be incorporated into the Project.	• Tolls affect only low-income people and those already financially disadvantaged. • Tolls would create issues for seniors and elderly who are on fixed incomes. • Tolls would affect low-income individuals' ability to pay to travel to work and jobs, especially for those with less flexible work and commute schedules. • Tolling is racist as it disproportionately affects communities of color the most. • Electronic tolling is discriminatory against those without bank accounts. • Added expenses for students seeking higher education.	A priority for Project development is advancing equity and avoiding negatively affecting people experiencing low incomes and those historically and currently excluded or underserved by transportation projects. It was one of the key concerns identified during the Value Pricing Feasibility Analysis and has shaped the direction of the Project. ODOT is working with agency partners, including transit agencies, throughout the development of the Project so that tolling is part of a larger integrated transportation system. ODOT is committed to engaging historically and currently excluded and underserved communities through the development of the Project to better understand community needs and concerns. This includes working with local and national equity leaders to create a framework for developing ODOT's toll projects so that the toll system benefits historically and currently excluded and underserved communities that have traditionally been disproportionately negatively affected by transportation decisions. The Equity and Mobility Advisory Committee is working to help identify strategies to improve outcomes and access to travel choices.	• **Prioritize equity.** Continuously seek opportunities to advance this Project through the multistep process outlined in the adopted Equity Framework. At each step of Project development, actively acknowledge past harms and seek opportunities to develop this Project with a different approach that leads to equitable outcomes. • **Clarify what "Equity" means.** Create and distribute information regarding how ODOT is defining "equity" for purposes of the Project and how equity will be assessed by process and outcome performance measures. • **Actively seek feedback and elevate voices from historically and currently excluded and underserved communities and the Equity and Mobility Advisory Committee during project decision making.** Meaningfully engage these communities throughout the Project design, development, implementation, monitoring, and evaluation processes. For example, work with Community Engagement Liaisons to engage people in different languages and in places where they feel comfortable. Directly involve the Equity and Mobility Advisory Committee in identifying strategies to advance equity. • **Assess process and outcome equity.** Develop measures to assess both equitable engagement (for example, participation in Project development) and equitable outcomes (for example, affordability, regional access, and community health).

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
			• **Evaluate potential impacts to historically and currently excluded and underserved communities.** Assess whether the Project would result in disproportionate impacts to historically and currently excluded and underserved communities in the environmental assessment. • **Learn from equitable strategies implemented elsewhere.** Explore equitable strategies used in other parts of the country, including reduced or free transponders, cash payment options for un-banked individuals, rebates or discounts for different income levels, and integrated benefits between travel modes, such as transit passes that accumulate toll credits. • **Acknowledge existing inequities in our transportation systems and identify potentials ways to address these in the toll program design.** Adopt measures to prevent historically excluded and underrepresented communities from bearing the burden of negative effects of the toll projects, as well as measures that seek to improve transportation affordability, access to opportunity, and community health. • **Collaborate with partners agencies to support affordable transportation options.** Work with the Transit and Multimodal Working Group to support availability and enhancements to transit service in the Project corridor, especially for those who have been historically and currently excluded and underserved.

Table 11-10. Response to Comments on Key Topics: Personal Financial Impacts

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
Comments included concerns over the ability to pay tolls, how the COVID-19 pandemic has negatively affected financial security, and how a toll could affect where people live and/or work.	• Do not personally have the income necessary to pay tolls, including those on fixed incomes (for example, retirees) and households and individuals who are currently struggling to make ends meet. • Additional economic hardships associated with the COVID-19 pandemic. • Tolls would unfairly burden lower-income residents and shift workers who do not have the flexibility to alter their commute (either time of day or route). • Tolls would unfairly burden middle-class families, who would not be eligible for reduced toll rates. • Tolls would adversely affect their property values, including concerns that they might have to move. • Jobs could be lost if wages did not cover the cost of tolls, or if companies would not reimburse them.	The Project team will engage with historically and currently excluded and underserved communities, including low-income communities to better understand community needs and concerns. ODOT will explore equitable strategies, including reduced or free transponders, cash payment options for un-banked individuals, rebates or discounts for different income levels, and integrating benefits between travel modes, such as transit passes that accumulate toll credits. In addition, ODOT will explore equitable strategies used in other parts of the country, including reduced or free transponders, cash payment options for un-banked individuals, rebates or discounts for different income levels, and integrating benefits between travel modes, such as transit passes that accumulate toll credits. COVID-19 has had significant financial impacts on households across the Portland metro area, creating hardships for many families and individuals. If approved, tolling on I-205 could being as early as 2024 after the region has had a chance to recover from the effects of the pandemic.	• **Clarify the Oregon Transportation Commission's role in the Project.** Create and provide additional informational materials to enhance understanding of the Oregon Transportation Commission as the toll authority that will set toll rates, policies (including discounts and exemptions), and escalation rates and clarity the timing of when these decisions are anticipated. • **Evaluate potential impacts to low-income communities.** Assess whether the Project would result in disproportionate impacts to low-income communities in the environmental assessment. • **Evaluate potential financial impacts to local homeowners from tolls.** Evaluate whether tolls and the resulting changes in traffic patterns could affect local property uses and values in the environmental assessment. • **Identify potential mitigation measures for low-income communities.** Highlight potential measures in the environmental assessment that could be implemented by ODOT to mitigate unavoidable disproportionate impacts (if any) to low-income communities.

Table 11-11. Response to Comments on Key Topics: Public Engagement and Decision Process

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
Respondents addressed the public engagement process, including how tolls should be voted on by the public, public outreach that has occurred during this process, whose input should be accounted for, and how public input will be used. Respondents had questions about members of the Equity and Mobility Advisory Committee, the interests that they represent and their decision-making role on the project.	• Belief that tolling is already decided, and they do not think their opinion will change that decision. • Citizens should get to vote on tolling. • If people could vote on tolling, then most would vote against it. • Voters from Clackamas County—specifically Oregon City, West Linn, and Tualatin—should decide if they want tolling in their communities. • Would vote against any politicians that support tolling. • The feedback gathered from this survey should be published and future outreach materials should reflect the public comments. • The online survey will have no impact because it was designed to support a toll decision, not to gather information. • It is important to gather public input despite challenges during the COVID-19 pandemic. • The outreach for this Project should reach more community members, and broader public engagement is necessary. • The survey should be made more accessible by offering it in non-electronic formats and in multiple languages. • Appreciated ODOT's communication and outreach efforts.	House Bill 2017 directed the Oregon Transportation Commission to pursue and implement tolling on I-5 and I-205 in the Portland metro area to help manage traffic congestion. ODOT is now assessing how to best implement tolling in the Portland metro area; the Project is the piece of a regional tolling system. ODOT is committed to an ongoing dialogue with agencies, stakeholders, and members of the public, a public process with transparency, and publicize how comments received were used. ODOT conducted an evaluation of the summer-fall engagement. Feedback gained during this period will inform future phases of engagement and which alternatives will be studied further, mitigation strategies, and recommendations to the Oregon Transportation Commission.	Action • **Update the public involvement plan using feedback from Equity and Mobility Advisory Committee and equity advisors.** Update the public involvement plan to outline engagement strategies for historically and currently excluded and underserved communities and to communicate broadly and transparently with all potentially affected parties. • **Continue to provide Project updates and seek community input throughout the development of the Project.** Continually engage the community throughout the Project planning process by sharing information, soliciting feedback and hosting community dialogues. Report back on how community input was used and influenced project decisions. • **Continue to work with community engagement liaisons.** Continue to work with community engagement liaisons to engage hard-to-reach communities such as non-English speaking populations.

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
	• Representation on the Equity and Mobility Advisory Committee convened for the I-5 and I-205 Toll Projects should include commuters and residents of nearby communities. • The advisory committee should be used to assess benefits and burdens associated with tolling. • Questioning of who is on the advisory committee and how to join the committee.	The Equity and Mobility Advisory Committee includes individuals with professional or lived experience in equity and mobility. They will advise the Oregon Transportation Commission on how tolls on I-205 and I-5 freeways, in combination with other demand management strategies, can include benefits for populations that have been historically and currently excluded and underserved by transportation projects. The committee also is advising on equitable engagement strategies.	

Table 11-12. Response to Comments on Key Topics: Environmental Impacts

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
Comments about environmental impacts included increased traffic on neighborhood surface streets due to vehicles avoiding tolls on I-205, the Project's impact on greenhouse gas emissions and climate change, and public health concerns from increased traffic and congestion. There were diverging opinions about whether tolling I-205 would reduce carbon dioxide emissions.	• There would be an increase in air and noise pollution in surrounding communities due to an increase in traffic and vehicle exhaust on local roads. • There would be impacts to natural areas, parks, waterways, and wildlife from increased traffic activity. • Due to rerouting and diversion to avoid tolls on I-205, carbon dioxide emissions would increase from drivers taking longer routes, burning more gas, and increasing idling times. • Tolling I-205 would not decrease carbon dioxide emissions because transit options in the area are limited and transit connections to other areas of the region are inefficient, forcing people to drive regardless of whether or not a toll is implemented. • Tolling I-205 would help discourage driving and reduce the number of single-occupancy vehicles, which in turn would reduce carbon dioxide emissions. • Tolling would move traffic off I-205 and closer to nearby sensitive receptors (that is, daycares, schools, elderly housing, hospitals, etc.). • Congestion in general poses a public health concern due to increased and concentrated vehicle pollution.	The Project's goals and objectives reflect desired outcomes beyond the Project purpose; these include improving air quality and climate change effects. Tolls have been proven to help reduce congestion and increase traffic flow, thereby reducing vehicle emissions and improving air quality. The environmental assessment will study benefits and impacts from the Project on various environmental systems.	• **Evaluate potential environmental benefits and impacts resulting from the implementation of tolling and resulting changes in traffic patterns.** Potential benefits and impacts will be assessed across a range of topic areas in the environmental assessment and associated technical reports, including energy and greenhouse gases, environmental justice, air quality, social resources and communities, public health, and noise. • **Identify potential mitigation measures for environmental impacts.** Highlight potential measures in the environmental assessment that could be implemented by ODOT to mitigate unavoidable environmental impacts (if any).

Table 11-13. Response to Comments on Key Topics: Economic Impacts

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
Comments on economic impacts included concerns about impacts to small businesses in Oregon City and West Linn, hindering regional economic growth as well as economic recovery from the COVID-19 pandemic, and impacts to interstate commerce and to the businesses and consumers who rely on shipped goods.	• Business districts near I-205—such as commercial areas centered around Main Street in Oregon City and Willamette Falls Drive in West Linn—depend on vehicle commuters and would see a decrease in consumers. • Would take their shopping and other service needs outside of the community to avoid paying tolls. • Tolling will lead to increased employment costs to Oregon City and West Linn businesses for employees who commute to work on I-205. • Tolling this section of I-205 would hinder regional economic growth due to a decrease in commercial investment and housing development. • Tolling would add additional hardship to businesses already struggling financially due to the COVID-19 pandemic and would slow the economic recovery for these businesses. • Tolling I-205 would burden interstate commerce and the free movement of goods through Oregon. • Freight-related comments focused on potential impacts to industry and the economy. Some called out that this will disproportionately affect small, independent freight drivers. Others articulated the potential impact to the cost of shipping and the resulting inflation that would be passed on to the consumer. • Concern that tolls could increase shipping costs and be passed on to Oregon businesses and consumers. • Concerns about freight access to the Port of Portland via I-205.	The Project's goals and objectives reflect desired outcomes beyond the Project purpose; these include supporting regional economic growth. COVID-19 has had significant financial impacts on businesses across the Portland metro area. If approved, tolling on I-205 could begin as early as 2024, after the region has had a chance to recover from the effects of the pandemic.	• **Targeted outreach to businesses and industries.** Actively engage local businesses, major employers, business and industry groups, and the shipping industry to enhance understanding of the economic concerns surrounding the Project. This outreach will inform the potential impacts assessed in the economic technical report and environmental assessment. • **Evaluate potential impacts to the economy.** Assess potential economic impacts in the economic technical report and environmental assessment. Topics will include impacts to local business areas, freight, changes in traffic patterns, and where people access shopping and services. • **Identify potential mitigation measures for economic impacts.** Highlight potential measures in the environmental assessment that could be implemented by ODOT to mitigate unavoidable impacts (if any) to the regional economy and commerce.

Table 11-14. Response to Comments on Key Topics: Other Congestion Management Ideas

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
Respondents expressed a general desire for ODOT to explore non-tolling alternatives to congestion management, including non-vehicle alternatives, reducing population growth, planning future growth and highway construction, and incentivizing adjustments to business operations.	• ODOT should seek to manage congestion using alternatives other than tolls. • ODOT should consider ideas that reduce overall driving and refocus on non-vehicle alternatives. • Population growth is the greatest contributor to increasing congestion, and ODOT should consider working with planners to reduce the influx of new people and businesses into the area, possibly by incentivizing living and working outside of Multnomah County. Similarly, ODOT should work with planners to create more walkable and bikeable communities. • ODOT should incentivize carpooling and shifting to alternative modes of travel. • ODOT should work with the business community to encourage remote-working options for employees or alternate working hours (that is, outside of peak commute times). • ODOT should work with the State of Washington to levy an out-of-state vehicle-registration fee for Washington state drivers traveling in Oregon.	Tolls serve two objectives: to manage demand to reduce congestion and to generate revenue. Tolling has been effective at reducing congestion in many cities in the United States. Variable- rate tolls manage traffic flow and improve roadway efficiency by charging higher prices during peak traffic demand periods and lower prices during off-peak, lower demand periods. The Project's goals and objectives reflect desired outcomes beyond the Project purpose; these include supporting multimodal transportation choices, supporting transportation demand management, and supporting safe travel regardless of mode, as well as interoperability with other transportation systems.	• **Continue working with agency partners and transit agencies.** Throughout the development of the Project, ODOT will continue to work with agency and transit partners so that tolling can support and be part of a larger integrated transportation system that aims to manage congestion. • **Seek input and guidance from the Transit and Multimodal Working Group.** Utilize the Transit and Multimodal Working Group to support strategies for integrating tolling into the larger transportation system and to identify non-vehicle transportation improvements.

Table 11-15. Response to Comments on Key Topics: Other Tolling Systems

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
Respondents included comments referencing existing tolls in other places, aspects of tolling in other places that are effective, and explanations of why tolling will not work in Portland specifically.	• Based on experiences driving in other cities, tolling fails to decrease congestion and often increases it. • Tolling is unpopular wherever it is implemented and cited a number of other cities, states, and countries where this is the case. • Toll revenue is hardly ever invested in the maintenance of the roadway and cited Washington, D.C., as an example. • Tolling increases air pollution and the frequency of accidents. • Tolling is inequitable and discussed other cities where inequitable tolling systems are in place such as Bellevue, Wash., and Los Angeles. • Once tolls are implemented in an area, they begin to be widely used and the cost of tolls increases over time and cited tolling systems in Washington, D.C., as an example. • Would like to see a single tolled lane similar to the system on I-405 in Seattle or roadways in Washington, D.C., and Atlanta rather than a toll for the entire roadway. • Would like to see electronic tolling systems that do not slow traffic and use a bill-by-mail option. • Tolls should be implemented in conjunction with expanding freeway capacity. • Examples were provided, such as the turnpike system in Connecticut, where a toll is implemented to pay for a new project or road construction and once it is paid for, the toll ceases.	Tolling has been effective at reducing congestion in many cities in the United States. Variable-rate tolls manage traffic flow and improve roadway efficiency by charging higher prices during peak traffic demand periods and lower prices during off-peak, lower demand periods. ODOT is learning from successful toll projects and technical experts across the United States. For example, the SR 520 Bridge Replacement and HOV Program in the Seattle area is using tolling to help pay for a new bridge and other improvements to expand a 7-mile corridor from 4 to 6 lanes while managing congestion with variable pricing. Tolls collected on I-205 could finance portions of the I-205 Improvements Project, which includes seismic upgrades to the Abernethy Bridge and eight other bridges on I-205 and extension of a third lane in each direction. These improvements will help to alleviate the bottleneck on the existing 4-lane segment of I-205 (2 lanes each direction), which is a major source of congestion. All toll collection will be electronic through transponders and license plate scanners to keep traffic moving at the traveling speed; there will be no stopping or slowing to pay tolls so cars are not idling on the freeway.	• **Share information on successful tolling examples.** Create and distribute informational material that highlights successful tolling programs from around the United States that are similar in scope to the Project.

Table 11-16. Response to Comments on Key Topics: Safety

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
Respondents included comments about current and future safety for alternate modes of travel, anticipated increases in traffic accidents, and the impacts that traffic diversion will have on roadway safety.	• General concern for how diverted traffic due to tolls will lead to increased congestion, travel speeds, and collisions on neighborhood roadways. • Concern about the potential for diverted traffic to cause an increase in vehicle-pedestrian accidents. • Traffic from diversion will cause safety issues with emergency vehicle transport or personal travel for emergencies. • Increased traffic will deteriorate the quality of neighborhood roadways, further contributing to safety concerns. A few comments noted that this causes an increased financial burden on local municipalities. • Tolls will make transportation for people walking and biking less safe. • Concern for specific groups, including children (especially around schools), older adults, and those who may be transit dependent. • Bike, pedestrian, and transit infrastructure are limited, especially noting the lack of sidewalks on neighborhood roadways in the Project vicinity. • Walking, biking, and using transit is already unsafe, so driving and paying the tolls is the only option.	The Project's goals and objectives reflect desired outcomes beyond the Project purpose; these include supporting safe travel regardless of mode and supporting multimodal transportation choices. The environmental assessment will study potential impacts to safety on I-205 and in the surrounding communities.	• **Study existing travel patterns along the Project corridor to observe where safety concerns may exist.** Study existing travel patterns, including origins and destinations of trips on the corridor, in the Corridor User Analysis. • **Perform travel modeling and traffic analysis.** Perform in-depth travel modeling and traffic analysis for the Project alternatives in the environmental assessment and associated transportation technical report; use this data to identify changes in traffic patterns, including rerouting/diversion onto local roadways. • **Evaluate potential safety impacts.** Assess potential safety impacts in the environmental assessment, including potential impacts to children, seniors, transit-dependent individuals, bicyclists, and pedestrians. • **Identify potential mitigation measures for safety impacts.** Highlight potential measures in the environmental assessment that could be implemented by ODOT to mitigate unavoidable safety impacts (if any).

Table 11-17. Response to Comments on Key Topics: Other Current Projects

Summary of Comments	Comment Themes	ODOT Response (Information and Action)	
		INFORMATION	ACTION
Respondents commented about other existing projects and their relative importance compared with the Project and indicated that it is important to complete planned projects on I-5 before implementing tolls on I-205.	• The I-5 Bridge Replacement Project should be completed before implementing tolls on I-205. • The bottleneck at the I-5/Rose Quarter area should be eliminated before tolling is implemented on I-205. • Funds for the I-5 Rose Quarter Improvement Project should be diverted to improve the Abernethy Bridge. • Curiosity about the relationship between this Project and the I-205 Improvements Project. • The relationship between pricing and transportation demand. Some suggested that the road-widening project should not happen until after tolling is implemented. Some suggested that tolls should be high enough to discourage unnecessary trips. • The projects proposed as part of Metro's Get Moving 2020 bond measure do not address capacity or congestion. • Recommending that ODOT include impacts from converting the Arch Bridge to a bike-and-pedestrian-only bridge in the analysis for the Project. • Policies and decisions made for tolling on I-205 could serve as the foundation upon which other tolling projects in the region or state would be built.	ODOT acknowledges that effective congestion management requires a toolbox of strategies. Tolling is just one of many transportation demand management strategies that are planned to be used to manage congestion. Toll revenue from the Project could be used to help fund portions of the planned improvements for the I-205 Improvements Project. Toll rates and revenue have a direct relationship to how travel demand management is managed; the Oregon Transportation Commission will be setting toll rates and determining how toll revenue is used. The Project is the first in a larger, regional toll program to manage congestion across the Portland metro area. Tolling in the region will be phased; this is one of the initial phases. The region's transportation priorities are described in the adopted Statewide Transportation Improvement Program and Metro's Regional Transportation Plan and include projects that manage transportation demand. Several major projects are underway in the Portland metro area, including the I-5 Interstate Bridge Replacement and Rose Quarter projects. These are separate projects that are part of the larger transportation system.	**Share information on major regional ODOT projects.** Create and distribute additional informational materials to enhance understanding of major ODOT projects in the region, including project backgrounds, funding sources, prioritization of projects, and any interconnectedness between projects.

12 REFERENCES

U.S. Census Bureau. 2014–2018 American Community Survey 5-Year Estimates Data Profiles for Clackamas County, Oregon.

U.S. Census Bureau. 2014–2018 American Community Survey 5-Year Estimates Data Profiles for Clark County, Washington.

U.S. Census Bureau. 2014–2018 American Community Survey 5-Year Estimates Data Profiles for Columbia County, Oregon.

U.S. Census Bureau. 2014–2018 American Community Survey 5-Year Estimates Data Profiles for Marion County, Oregon.

U.S. Census Bureau. 2014–2018 American Community Survey 5-Year Estimates Data Profiles for Multnomah County, Oregon.

U.S. Census Bureau. 2014–2018 American Community Survey 5-Year Estimates Data Profiles for Skamania County, Washington.

U.S. Census Bureau. 2014–2018 American Community Survey 5-Year Estimates Data Profiles for Washington County, Oregon.

U.S. Census Bureau. 2014–2018 American Community Survey 5-Year Estimates Data Profiles for Yamhill County, Oregon.