

Regional Mobility Pricing Project

Engagement and Comment Summary for the Scoping Period: November 2022 – January 2023

April 2023



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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
I-5	Interstate 5
I-205	Interstate 205
CBO	Community-based Organization
CEL	Community Engagement Liaison
EMAC	Equity and Mobility Advisory Committee
FWHA	Federal Highway Administration
HB	House Bill
NEPA	National Environmental Policy Act
ODOT	Oregon Department of Transportation
PEL	Planning and Environment Linkages
Project	Regional Mobility Pricing Project
RMG	Regional Modeling Group
RTAC	Regional Toll Advisory Committee
STRAC	Statewide Toll Rulemaking Advisory Committee
VMT	Vehicle Miles Traveled

Executive Summary

In November 2022, the Oregon Department of Transportation (ODOT) and Federal Highway Administration (FHWA) initiated a 50-day scoping period for the Regional Mobility Pricing Project (Project) Environmental Assessment. Due to the multiple holidays that fell within the scoping period, ODOT provided a longer comment period than is typical. ODOT and FHWA invited participating agencies, consulting tribes, and the public to give their input at the beginning of the environmental analysis, called “scoping.” The purpose of scoping is to invite public, tribal, and other stakeholder input on the range—or “scope”—of community and environmental issues to study.

This report summarizes scoping input received from nearly 4,500 comments from November 18, 2022, to January 6, 2023. Scoping input will inform updates to the Draft Purpose and Need Statement and Proposed Action. ODOT and FHWA will also consider scoping input to shape the specific approaches for how they will study community and environmental topics during the environmental analysis and project development.

About the Project

The Regional Mobility Pricing Project would manage travel demand and traffic congestion on I-5 and I-205 in the Portland metropolitan area through congestion pricing. Congestion pricing is a key tool in ODOT’s urban mobility strategy to reduce traffic jams and provide safer and more predictable trips for travelers. Through planning, public input, and analysis over the past several years, ODOT and FHWA developed a [draft Purpose and Need](#) for the Project as well as a project concept, or [Proposed Action](#).

Engagement Approach

During the scoping period, the Project Team shared Project background materials, conducted outreach, and participated

Figure ES-1 Map of the Regional Mobility Pricing Project and I-205 Toll Project



WHAT IS CONGESTION PRICING?

The term "congestion pricing" describes a type of variable-rate tolling that improves mobility, travel times, and reliability by charging a higher price during peak traffic periods and at congested locations. The higher fee (or “toll”) encourages some drivers to use other travel options such as carpools or transit or change their travel time to other less congested times of the day or to not make the trip at all. Even a small percent of drivers choosing not to drive during rush hour allows for faster and more reliable travel. Congestion pricing is in use around the United States and the world as an effective congestion management tool.

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in public meetings and events to share information about the Project and comment opportunities. These activities provided an opportunity for the public, tribes, and agencies to provide their input on the following:

- The [Draft Purpose and Need Statement](#), which includes the Project goals and objectives.
- The [Proposed Action](#), which describes the congestion pricing concept to be studied.
- The [community and environmental resources](#) to be evaluated in the upcoming environmental analysis.
- [Other planning studies and supporting documents](#) that were developed during the initial planning phase of the Project in 2021 and 2022.

Methods and outcomes for outreach and engagement are summarized in Table ES-1. The table includes the number of people engaged throughout the scoping period (November 18 – January 6), unless otherwise noted. During the scoping period, the Project Team also applied strategies to inform and involve historically and currently excluded and underserved communities, as summarized in Section 4, including a continued partnership with community engagement liaisons and translation and interpretation.

Table ES-1 Engagement Activities by the Numbers

Activity	Total Engagement <i>(approximate)</i>
Public Outreach	
Public webinar viewers ¹	288
Scoping webpage visits	7,223
People engaged at briefings ²	108
People engaged at tabling events ³	185
Project video views ⁴	801
Project fact sheets views	113
Partner Agency Outreach	
Participating Agencies invited to participate and comment	33
Tribes invited to participate and comment	8
Partner agency webinar participation	55
Advertising and Notification	
ODOT social media post views	155,289
Print and online advertising impressions	347,803
Recipients of project email updates	26,551
Recipients of outreach toolkits	300
Project-related media stories	15

Key Takeaways

These outreach and engagement activities resulted in nearly 4,500 comments submitted during the scoping period through the scoping comment form, the Oregon Tolling online comment form, email,

¹ Includes participants in the webinar, livestream views, and views of the webinar recordings.

² Includes briefings in the months prior to the scoping period when scoping information was shared.

³ Includes events from the months prior to the scoping period when scoping information was shared.

⁴ Includes total views through February 2023.

voicemail, and letters.⁵ Many commenters provided broader feedback about the Project or the Oregon Toll Program in general. A few commenters, particularly Participating Agencies, provided specific feedback on Project elements or the environmental analysis.

More general comment themes include:

- Concerns about the proposed Project and requests for more detailed information, including anticipated rates.
- Doubt that the Project would effectively reduce congestion and is the right solution to raise revenue.
- Skepticism and questions about the need for, and plans to use, Project revenue.
- Concerns about financial and economic impacts from congestion pricing.
- Concerns with traffic rerouting off I-5 and I-205 and potential impacts to local communities.
- Questions and concerns about how people experiencing low incomes may be more heavily impacted by congestion pricing compared to middle- and high-income earners.
- Belief that the proposed Project would have disproportionate impacts on communities that rely on I-5 and I-205 and may affect certain groups more than others.
- Questions and concerns about the decision-making process to date and how public input has or would meaningfully shape the proposed Project.

Key themes specific to Project elements and the environmental analysis include:

- **Project Purpose and Need.** Some agencies and stakeholders expressed interest in modifying the Project purpose to be focused on reducing vehicle miles traveled and managing travel demand.
- **Proposed Action.** Many commenters expressed an interest in not implementing congestion pricing. Some commenters also requested that the Project not price all lanes and that congestion pricing be implemented on key locations on I-5 and I-205 rather than the entire lengths of these roadways.
- **Community and Environmental Topics to Study in the Environmental Analysis.** Commenters expressed interest in a robust analysis on several topics, including financial and economic impacts, rerouting impacts, and equity, greenhouse gas, and air quality.

Next Steps

The purpose of this report is to summarize and document all comments received during the Project scoping period. ODOT and FHWA are reviewing and considering these comments to inform the environmental analysis. Specific changes ODOT and FHWA are making include the following:

- Addressing input from commenters, including Participating Agencies, that the project needs to encourage reductions in vehicle miles travelled in the region. Revisions to the **Purpose and**

⁵ Letters included written documents sent electronically that were on formal letterhead.

Need Statement will clarify the intent of the project to manage travel demand and congestion and that a successful outcome of this would be a reduction in vehicle miles traveled.

- Addressing comments that the project, as currently proposed, is overly complicated as well as skepticism that it will effectively manage traffic congestion. Revisions to the **Proposed Action** include adding more detail on the congestion pricing fee structure that will be used in the upcoming NEPA analysis. These details are intended to provide greater transparency and make it easier to explain how the project will effectively manage traffic and how people would experience the project once implemented. Adding details on the fee structure also addresses comments that said pricing locations should focus on the most congested segments of the interstate highways.

ODOT and FHWA are also developing **environmental study methods** to incorporate a variety of feedback on how to analyze project benefits and adverse effects for the Environmental Assessment. For example, ODOT and FHWA are developing comprehensive transportation study methods that examine safety and rerouting in response to concerns about diversion to local streets and the associated effects in local communities. The Project Team will share information about the specific ways they have considered and incorporated comments into the project later this year and through publication of the environmental document. ODOT will also share responses to other common questions and concerns to help explain what they have heard from the public and stakeholders, what information is available, and the process for analysis and decision-making on these topics.

ODOT and FHWA will analyze the effects of the proposed project and publish the results for review and comment in an Environmental Assessment, expected in late 2023. Solutions, or mitigations, will be proposed as needed to address impacts. The Environmental Assessment is an important step to meet the requirements of the National Environmental Policy Act (NEPA) and obtain a federal decision about congestion pricing on I-5 and I-205. As the Regional Mobility Pricing Project moves forward, the Project Team will continue to share Project updates, host outreach and engagement activities, and provide opportunities for feedback.

1 Report Purpose

The Regional Mobility Pricing Project (the Project) would manage travel demand and traffic congestion on I-5 and I-205 in the Portland metropolitan area through congestion pricing. Following a Planning and Environment Linkages (PEL), or pre-National Environmental Policy Act (NEPA) planning process, the Oregon Department of Transportation (ODOT) and Federal Highway Administration (FHWA) began an environmental analysis process under NEPA in November 2022 to identify the Project's potential benefits and impacts. ODOT and FHWA invited public and stakeholder input on the range—or "scope"—of community and environmental issues to study. This report documents and summarizes agency, tribal, and public input received during the scoping period. It also provides an overview of information and engagement activities for the Project and the scoping period.

ODOT and FHWA requested scoping input during a 50-day period from November 18, 2022, to January 6, 2023, and received nearly 4,500 comments through online comment forms, email, voicemail, and letters.

Scoping input from the public, participating agencies, and tribes will inform updates to the Draft Purpose and Need Statement and Proposed Action. ODOT and FHWA will also consider scoping input to shape the specific approaches for how they will study community and environmental topics during environmental analysis and project development.

1.1 Project Overview

The Project would use congestion pricing on all lanes of I-5 and I-205 to manage travel demand and traffic congestion on these roadways in the Portland metropolitan area in a manner that would generate revenue for transportation system investments (see the [Draft Purpose and Need Statement](#)). The proposed Project or "Proposed Action," as described below, was informed by planning, public input, and analysis over the past several years:⁶

- **Congestion pricing on all lanes of I-5 and I-20**

Congestion pricing on all lanes, instead of a single express lane, would provide congestion relief and keep costs lower for all drivers. The current study area includes I-5 between the Columbia River and Boone Bridge in Wilsonville and on I-205 from the Columbia River to where I-205 intersects with I-5 in Tualatin. The Project boundaries may be adjusted during or after the environmental analysis.

WHAT IS CONGESTION PRICING?

The term "congestion pricing" describes a type of variable-rate tolling that improves mobility, travel times, and reliability by charging a higher price during peak traffic periods and at congested locations. The higher fee (or "toll") encourages some drivers to use other travel options such as carpools or transit or change their travel time to other less congested times of the day or to not make the trip at all. Even a small percent of drivers choosing not to drive during rush hour allows for faster and more reliable travel. Congestion pricing is in use around the United States and the world as an effective congestion management tool.

⁶ The draft Proposed Action uses the term "tolling" and "tolls." However, ODOT is updating to "congestion pricing" and "fees" to align with the definitions in the recently approved Oregon Highway Plan Tolling and Congestion Pricing Policy Amendment.

- **Congestion pricing based on a set schedule.** Drivers would know the fee in advance. A set schedule allows drivers to determine the cost of their trip ahead of time and to plan their travel accordingly.
- **Congestion pricing based on location and time of day.** Fees would vary based on time of day and location, known as a “variable rate.” Drivers would be charged higher fees at congested locations during morning and afternoon rush hours and lower fees at less congested locations during other times of day. Drivers would only pay for the portions of I-5 and I-205 they use.
- Drivers would pay a congestion pricing fee through an **all-electronic collection system**—drivers would not stop or slow down to pay.
- **Rates would be monitored and adjusted after congestion pricing begins.** The Oregon Transportation Commission, the State’s tolling authority, will set rates for congestion pricing.

Figure 1-1 Map of the Regional Mobility Pricing Project and I-205 Toll Project



The [Proposed Action Technical Memorandum](#) provides a full description of the Proposed Action.

1.2 Project History

The State of Oregon began to explore tolling in 2017 when the Oregon Legislature approved House Bill (HB) 2017, known as “Keep Oregon Moving.” In 2021, the Legislature adopted another bill, HB 3055, which clarified and reinforced the transportation direction from HB 2017. As part of this comprehensive package to manage traffic congestion and improve the transportation system statewide, the bills directed the Oregon Transportation Commission to pursue and implement congestion pricing on I-5 and I-205 in the Portland metropolitan area for traffic congestion management and funding transportation improvements. In 2018, ODOT completed a feasibility study, with substantial public input, and concluded that congestion pricing could help meet priority goals.

Transportation planning for the Regional Mobility Pricing Project started in 2021 with early technical studies and engagement. The public, stakeholders, and agency partners were engaged in [Summer 2021](#) and [Spring 2022](#) to help inform the Project’s draft Purpose and Need and the scope of the Proposed Project. This planning was conducted in accordance with federal guidelines for a PEL process, consistent with the requirements of 23 U.S.C. 168. The technical studies and engagement reports from this transportation planning phase were posted on the Project website and shared as part of the Environmental Assessment scoping period in November 2022.

2 Scoping Period Overview

2.1 Purpose of Engagement

ODOT and FHWA began an extensive communications and engagement program through the environmental review process to meet the requirements of NEPA, ODOT guidelines, and community and agency interests. The goal of this engagement was two-fold: 1) to involve the public, agencies, tribes, and other stakeholders in shaping the Project and 2) to continue building public awareness and understanding of the Project and its role in ODOT's larger strategy to make travel safer and more predictable in the Portland metropolitan area.

The start of the environmental review process is called “scoping,” an opportunity to invite public, tribal, and stakeholder input on the range of community and environmental issues to study. During the 50-day scoping period, ODOT and FHWA invited input on the following topics to inform the environmental analysis:

- The [Draft Purpose and Need Statement](#), which includes the Project goals and objectives.
- The [Proposed Action](#), which describes the congestion pricing concept to be studied.
- The [community and environmental resources](#) to be evaluated in the upcoming environmental analysis.
- [Other planning studies and supporting documents](#) that were developed during the transportation planning phase of the Project in 2021 and 2022.

2.2 Ways to Provide Scoping Comments

The Project Team offered several ways to comment to account for different communications preferences, language needs, and those with limited access to the internet or technology:

- **Scoping Online Comment Form.** The online comment form was intended to describe the purpose of the scoping period, provide context and resources to inform comments, and offer a convenient way to share comments. It was linked through the Project website, email notifications, news release, and news articles. It contained two open-ended questions about the Proposed Action and the community and environmental resources to be evaluated. The online comment form was available in five languages: English, Spanish, Russian, Vietnamese, and Simplified Chinese. See the Engagement Tools and Performance Appendix for details on the form.
- **Oregon Tolling Online Comment Form.** The Oregon Tolling website provides an [online form](#) for general public comments. Comments are welcome at any time. The form is linked on the homepage and website sidebar.
- **Email.** Commenters who preferred to send an email or provide attachments could email ODOT directly at oregontolling@odot.oregon.gov.
- **Mail.** ODOT also invited written comments via mail at: Oregon Department of Transportation, Attn: Oregon Tolling Team – Scoping Comment, 123 NW Flanders Street, Portland, Oregon, 97209.
- **Voicemail.** As an alternative to online or written options, commenters could also provide verbal comment by voicemail at: 503-837-3536.

3 Agency and Public Engagement and Information

The Project Team developed materials, conducted outreach, and participated in public meetings and events to share information and answer questions during the scoping period.

3.1 Public Webinars

The Project Team hosted two 1-hour public webinars to share information about the scoping period and answer questions about the proposed Project and environmental analysis. The webinars also provided an overview of the environmental analysis and key community and environmental issues to be evaluated, how to comment, and next steps. The Project Team held the first webinar on November 29, 2022, at 11 a.m. and the second webinar on November 30, 2022, at 4 p.m.

The webinars were virtual and were hosted over Zoom. To ensure accessibility, the webinars were live-streamed onto YouTube and included closed captions. The webinar held on November 30 included Spanish interpretation. Recordings of the webinars were accessible on the website for anyone who wanted to view them.

Each webinar presented the same information. The agenda included presentations by the Project Team, followed by a facilitated session for questions and answers. During the Q&A session, attendees were invited to pose questions using the Zoom Q&A function, with the Project Team responding to questions live during the webinar.

A total of 63 people participated in the two webinars via Zoom, and 225 people watched the livestream or recordings of the webinars on YouTube. Key topics of interest during both webinars included:

- Minimizing rerouting on local streets and monitoring the impacts on neighborhoods.
- Interest in low-income discounts and other discounts under consideration.
- How transponder equipment and payments would work.
- Congestion pricing rates for freight.
- How people with limited internet or cell phone access would pay fees.
- Whether other pricing projects are being considered on other routes in the Portland region or Eugene.
- Interest in whether other options were considered other than congestion pricing for congestion relief or revenue generation.

Meeting materials and recordings of the meetings are also available through [the Oregon Tolling website](#).

3.2 Scoping Information

The Project Team shared the resources and information described below during the scoping period.

Oregon Tolling website updates: The website included banner graphics linking to the scoping webpage, information about the public webinars, links to all scoping materials, and a brief description of the scoping period with a link to a new scoping webpage. Advertising and notifications also linked to the new scoping webpage. The scoping webpage included information about how to comment and participate

in the webinars; a description of the Project purpose and related projects; information about the Proposed Action and the environmental analysis and decision-making process; and links to fact sheets and technical documents. During the 50-day scoping period, there were 7,223 visits to the scoping landing page, 1,677 visits to the Project webpage, and 19,763 visits to the Oregon Tolling website. See the Engagement Tools and Performance Appendix for an image of the Scoping webpage.

Project fact sheets and technical memorandums: A series of fact sheets provided a reader-friendly resource during the scoping period. The materials included a [Scoping fact sheet](#), [Proposed Action fact sheet](#), and [Community and Environmental Resources fact sheet](#). All materials were posted online and available in English, Spanish, Russian, Vietnamese, and Simplified Chinese. The fact sheets received 113 views on the website during the scoping period.

Additionally, several technical memorandums were posted to the website during the scoping period, including:

- [NEPA Proposed Action Technical Memorandum](#)
- [Draft NEPA Purpose and Need Statement](#)
- [Community and Environmental Resources to be Evaluated in the Environmental Assessment](#)
- [Greenhouse Gas Emissions Assessment Approach](#)
- [I-5 and I-205 Corridor User Analysis](#)
- [Value Pricing Feasibility Analysis Decisions Advanced](#)
- [Equity Framework Step 1 Memo](#)

Video: The Project Team developed a 2-minute video to help describe what an all-electronic congestion pricing system could look like on I-5 and I-205. The video shares information about the proposed Project as well as how drivers would be charged on the highway and how they would interact with payments. The video was posted on [YouTube](#) and on the Oregon Tolling website and was used during Project briefings. The video had received 801 views on YouTube through February 2023.

3.3 Direct Outreach and Outreach Toolkits

The Project Team developed an outreach toolkit as a resource for community partners to share information about the Project and the scoping period comment opportunity with their organizations and communities. The outreach toolkit included a brief introduction, draft email, and social media content that could be used to promote the webinars and scoping period, and links to additional project resources including fact sheets and videos. The Project Team sent the outreach toolkit to Participating Agencies, regional agency staff and communicators, key stakeholders, Equity and Mobility Advisory Committee (EMAC) members, community engagement liaisons, and community-based organizations across the Portland metropolitan area. The list of community-based organizations focused on groups that work with historically and currently underrepresented communities, including culturally specific organizations, health and social service agencies, non-profits, neighborhood groups, and faith-based organizations.

The Project Team distributed the outreach toolkits to approximately 300 agency contacts and stakeholders.

3.4 Briefings

ODOT continuously engages on congestion pricing with stakeholders through briefings with local groups and committees as well as by tabling at public events. Project Team members participated in several briefings (listed in Table 3-1) during the scoping period to share information about the proposed Project,

environmental analysis, and how to learn more and comment by visiting the scoping webpage. Each briefing included an opportunity for questions and comments. The Project Team engaged 108 people at these briefings. The briefings will continue through 2023.

Table 3-1. Scoping Related Project Briefings

Briefing	Date	Number of attendees
Rotary Club of Tigard	11/10/2022	8
Hamlet of Beaver Creek	11/16/2022	13
Rotary Club of West Columbia Gorge Briefing	12/1/2022	8
Washington County Coordinating Committee Technical Advisory Committee Briefing	12/1/2022	18
Washington County Coordinating Committee Briefing	12/12/2022	17
ODOT Rail Advisory Committee Briefing	12/20/2022	31
East Portland Rotary Briefing	1/5/2023	13

3.5 Tabling Events

The Project Team held five tabling events, listed in Table 3-2, that promoted the scoping period in locations selected to reach and hear from diverse communities. During the tabling events, Project Team members encouraged community members to take fact sheets and share comments or ask questions. In advance of the scoping period, the Project Team distributed a handout identifying all upcoming engagement opportunities for ODOT Urban Mobility Strategy projects, including the Regional Mobility Pricing Project. Approximately 185 people were engaged at five tabling events.

Table 3-2. Scoping Related Tabling Events

Event	Date	Number of People Engaged (Approximate)
Oregon City Farmers Market	8/20/2022	50
Portland Sunday Parkways	8/21/2022	60
Indigenous Marketplace	9/11/2022	20
Hillsdale Farmers Market	10/2/2022	30
Lents International Farmers Market	11/20/2022	25

3.6 Oregon Toll Committees

Public advisory committees and regional partner groups provide guidance and direction on the Oregon Toll Program, including the Regional Mobility Pricing Project. During the scoping period, these groups were informed about project materials and opportunities to comment. These groups are:

- Regional Toll Advisory Committee (RTAC):** RTAC advises the ODOT Director to develop congestion pricing projects in the Portland metropolitan area. Committee meetings provide a forum to provide feedback to ODOT leadership in advance of toll-related decisions by the Oregon Transportation Commission or ODOT. The Committee is composed of approximately 25 members representing a variety of interests and perspectives and is appointed by the ODOT Director. Project Team members presented an overview of the scoping period and engagement opportunities at the third RTAC meeting, on December 5, 2022. A recording of the meeting is

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available through [the website](#). RTAC meetings are open to the public and include an opportunity for public comment.

- **Equity and Mobility Advisory Committee (EMAC):** EMAC prioritizes equity and mobility in designing the I-205 Toll Project and the Regional Mobility Pricing Project. 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 congestion pricing on I-205 and I-5, in combination with other traffic demand management strategies, can include benefits for populations that have historically and currently been underrepresented or underserved by transportation projects. Project Team members presented an overview of the scoping period, environmental analysis, and engagement opportunities at the EMAC meeting on December 7, 2022. A recording of the meeting is available through the [Equity and Mobility website](#). EMAC meetings are open to the public and include an opportunity for public comment.
- **Regional Modeling Group (RMG):** The Regional Modeling Group (RMG) is composed of partner agency staff members with a technical understanding of transportation modeling to provide input on the modeling approach for the Project. Project Team members presented an overview of the scoping period at the RMG meeting on December 15, 2022.

4 Equitable Engagement and Outreach

The Oregon Toll Program is committed to minimizing burdens and maximizing benefits to communities historically and currently excluded or underserved by the transportation system. The Project Team implemented the efforts described in this section during the scoping period to inform and involve historically and currently excluded and underserved communities.

4.1 Translation and Interpretation

The Project Team provided key materials for the scoping period in Spanish, Russian, Vietnamese, and Simplified Chinese based on translation guidelines for the Project. The Project Team posted the translated versions of all three fact sheets and the comment form online. The Project video was also narrated in each of these languages and posted on the website. These materials were shared with community engagement liaisons, agencies, and community-based organizations.

The public webinar on November 30, 2022, provided simultaneous interpretation in Spanish. Using the Zoom interpretation feature, participants who preferred hearing the information in Spanish could join a separate room where a Spanish translator interpreted the presentation. Participants were able to submit questions in Spanish, which could then be translated and submitted to the presenters during the Q&A portion of the webinar. Project Team members shared links to the Spanish-language fact sheets and the Spanish-language comment form in the chat.

4.2 Partnership with Community Engagement Liaisons

From 2021 to 2022, the Project Team partnered with the Community Engagement Liaisons (CELs) Program to host 14 discussion groups with historically and currently underserved and excluded communities and conduct grassroots outreach to invite input through a series of surveys. The input received during Project planning will inform the environmental analysis, including the Draft Purpose and Need Statement and the community and environmental resources to be evaluated.

During the scoping period, Project Team members continued to work with CELs to invite feedback on the engagement approach and raise awareness about the comment period with historically and currently excluded and underserved groups. Using the translated fact sheets, trusted leaders from various communities used multilingual tools and flexible, accessible methods to reach individuals or groups who identify as Latin American, Russian/Slavic, Chinese, Vietnamese, Native American, or Black/African-American. The community liaisons used outreach toolkits and in-language materials to share Project information and to encourage people to provide comments using the scoping comment form.

4.3 Direct Outreach

To help encourage more awareness and outreach with historically and currently excluded and underserved groups, the Project Team reached out to community-based organizations throughout the Portland metropolitan area and provided them with tools to help spread information about the Project. The Project Team developed a list of 65 organizations that work directly with historically and currently excluded and underserved communities, including culturally specific organizations, health and social service agencies, non-profits, and faith-based organizations. The Project Team sent these groups an outreach toolkit that provided context, information, and resources to easily share through their channels, as described in Section 3.3. The Project Team also fulfilled a request from a community-based organization to provide language for the draft email in Simplified Chinese.

Prior to and during scoping, the Project Team also connected with community members at tabling events to reach historically and currently excluded and underserved communities, including:

- Northeast Cully Sunday Parkways
- Indigenous Marketplace
- Lents International Market

4.4 Advertising

The Project Team advertised the November 30, 2022, webinar and scoping period among Spanish-speaking audiences because Spanish is the most common language spoken in the region other than English. The advertisements included a Spanish-language Facebook ad targeted to reach Spanish-speaking Facebook users and a Spanish-language advertisement published in *El Latino de Hoy* with a link to the scoping webpage. A section of the scoping webpage was translated into Spanish, including webinar information. An online ad was also published in *The Skanner*, an African-American newspaper covering the Pacific Northwest.

4.5 Accessibility

The Project Team used several strategies to make sure that all engagement materials and activities were accessible to people who are blind, visually impaired, deaf, or hard of hearing. All scoping documents posted online are compliant with the requirements of Section 508 of the Rehabilitation Act of 1973. This means materials are optimized for screen reader software in order for visually impaired users to review written information through speech. During the webinars, closed captioning was available through both the YouTube livestream and the Zoom platform.

The Project Team also considered access needs for community members with limited access to the internet. As part of the outreach toolkit, the Project Team offered partners, community-based organizations, and the community engagement liaisons printed copies of the fact sheets and the scoping comment form at no cost. The webinar also had a call-in number that attendees could use to listen to the webinar on a phone if they had limited internet access.

5 Stakeholder and Public Notification

The Project Team notified community members about the scoping period through several different channels to encourage people to visit the website and learn more about the Project, webinars, and ways to comment. This included paid advertising through regional and multicultural publications and through ODOT information channels, including the Oregon Tolling Program website, email newsletters, and social media. ODOT also encouraged EMAC, regional agency staff, CELs, and CBOs to share information about the informational webinars and comment opportunities with their networks. See the Engagement Tools and Performance Appendix for more details on these activities.

5.1 Social Media: Paid and Organic Posts

ODOT promoted the scoping period and informational webinars through Facebook, Instagram, and Twitter. The Facebook post was boosted to reach Facebook users in the Portland metropolitan area north to Clark County. ODOT also posted a Facebook ad in Spanish. On Instagram, ODOT used the “Instagram Story” feature to promote the comment form organically, with an embedded link option for users to comment, as shown in Figure 5-1. Table 5-1 provides details about these social media engagement postings.

Figure 5-1. Instagram Story

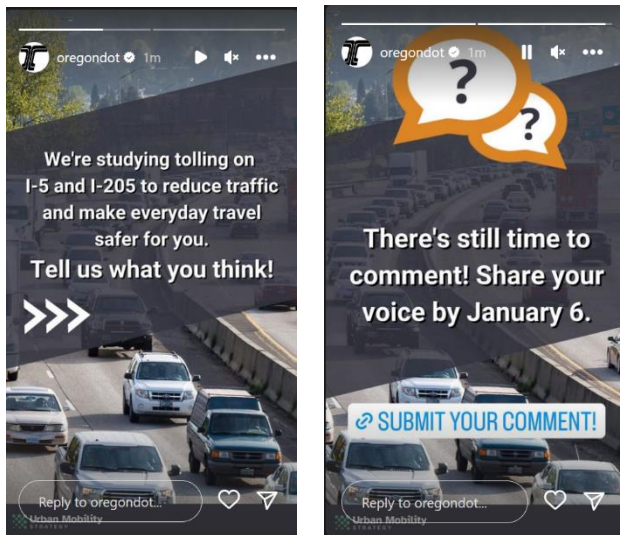


Table 5-1. Social Media Engagement for Posts during the Scoping Period

Activity	Views	Clicks
Facebook boosted post	62,842	282
Instagram Story – Nov 18, 2022	851	44
Instagram Story – Jan 3, 2023	4,080	155
Twitter Post – Nov 18, 2022	4,475	24
Twitter Post – Jan 3, 2023	6,658	61
Facebook Spanish Ad	76,383	Not Applicable

5.2 Paid Advertising in Regional and Multicultural Publications

The Project Team placed print and digital advertisements in four regional and multicultural publications in the Portland metropolitan area. These publications included *The Columbian*, *Portland Tribune*, and *The Skanner*, with translated advertisements printed in *El Latino de Hoy* (Figure 5-2).

Figure 5-2. Spanish Language Advertisement for Latino del Hoy



¡Infórmese y comparta su opinión!

Estamos estudiando cobrar un peaje en la I-5 y la I-205 para **reducir el tráfico** y **hacer más seguros los desplazamientos diarios**. Díganos lo que piensa.

Seminarios informativos en línea el **29 y 30 de noviembre**.
Interpretación simultánea en español el 30 de noviembre.

Comente antes del **6 de enero del 2023**



Escanéame




5.3 Email and Web Notifications

The Project Team raised awareness and invited comments during the scoping period through broadcast emails and a newsletter update. ODOT promoted the scoping period and webinars in the November 15, 2022, edition of ODOT’s Urban Mobility Strategy newsletter and in an email press release to the Oregon Toll Program email list on November 18, 2022, with a reminder notice in the January 3, 2023, edition of ODOT’s Urban Mobility Strategy newsletter. In addition to email notifications, ODOT posted a banner graphic with a link to the scoping comment form on the OregonTolling.org homepage during the comment period, and a banner graphic, link, and description were included on the Regional Mobility Pricing Project homepage with links to the scoping comment form in five languages. Table 5-2 summarizes these engagement methods.

Table 5-2. Webpage and Email Engagement during the Scoping Period

Activity	Engagement
Scoping Webpage views	7,223
Regional Mobility Pricing Project Webpage views	1,677
Oregon Tolling Webpage views	19,763
Toll Program Email Update recipients	11,645
Urban Mobility Office November Newsletter recipients	14,671
Urban Mobility Office January Newsletter recipients	14,906

5.4 Media Engagement

On November 18, 2022, ODOT sent a news release promoting the 50-day scoping period and informational webinars to the full Oregon Toll Program email list, which includes many media contacts. The Project Team also hosted a media briefing to share information and answer questions about the Project and scoping period. Media engagement resulted in several news stories about the Regional Mobility Pricing Project during the scoping period. Table 5-3 includes a list of media stories that were published during this time.

Table 5-3. Media Stories Published during the Scoping Period

Date	Publication	Headline
11/17/2022	The Oregonian	ODOT seeks public comments on Rose Quarter, freeway tolls
11/18/2022	Pamplin Media	5 things to know about tolling in Oregon
11/18/2022	KGW	Tolling is coming, and ODOT wants your input
11/20/2022	The Oregonian	Opinion: Tolling won't solve our epidemic of traffic deaths
11/20/2022	The Oregonian	Readers respond: Tolling shifts problems to neighborhoods
11/26/2022	KGW	Tolls are coming to I-205 and I-5 around Portland. It's just a matter of time.
11/26/2022	OPB	ODOT plans to toll Portland freeways, but first they want to hear from you
11/28/2022	Roads & Bridges	ODOT wants to toll Portland freeways
11/30/2022	KOIN	ODOT tolling plans open for public comment
12/6/2022	Landline Media	Oregon exploring tolls on I-5, I-205 in Portland
12/6/2022	KGW	How are people supposed to commute around Portland when the I-5 and I-205 tolls arrive?
12/7/2022	KGW	Here's what ODOT has in mind for low-income commuters once tolling starts
12/8/2022	KPIC	ODOT planning for low-income tolling options in Portland metro area
12/21/2022	OPB	Planned Tolling for I-5 and I-205 Aims to Reduce Congestion in Portland Metro
1/2/2023	Willamette Weekly	ODOT Wants to Know What You Think About Paying to Drive on I-5 and I-205

6 Tribal and Participating Agency Engagement and Notification

Since 2021, ODOT has engaged tribes and Participating Agencies in the Regional Mobility Pricing Project as part of the transportation planning process in accordance with the PEL process.

6.1 Tribes

Invitations to participate in government-to-government consultation were sent in September 2021 to the following tribes identified as potentially interested or affected:

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

These consulting tribes are also considered to be Participating Agencies.

ODOT and FHWA initiated formal government-to-government consultation with tribes that requested meetings. Additionally, beginning in November 2022, ODOT started holding quarterly intertribal meetings regarding congestion pricing and tolling projects in Oregon.

ODOT notified tribes of the scoping period through a series of emails. This included several emails in advance of the scoping period, and then a formal announcement at the launch of the scoping period with information about the web resources, comment form, and webinars. ODOT shared a reminder about the deadline for scoping input in mid-December.

6.2 Participating Agencies

ODOT and FHWA identified 58 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. In January 2022, FHWA sent an invitation letter to agencies with interests likely to be affected by congestion pricing on I-5 and I-205, accompanied by a Project fact sheet and the Discussion Draft Purpose and Need Statement. A total of 33 agencies accepted the invitation to serve as Participating Agencies. (In addition, ODOT and FHWA consider the eight tribes listed above to be Participating Agencies.)

ODOT notified the Participating Agencies about the Project scoping period through a series of emails, including several emails to provide advance notification of the scoping period, and then issued a formal announcement at the launch of the scoping period with information about the web resources, comment form, and webinars. ODOT shared a reminder about the deadline for comments in mid-December.

During the scoping period, ODOT and FHWA invited Participating Agencies to attend a webinar on November 30, 2022, at 2 p.m. The purpose of the Participating Agency webinar was to share an update

Engagement and Comment Summary for the Scoping Period: November 2022 – January 2023

on the Project and the environmental analysis, review the role of Participating Agencies in scoping, address questions, and announce opportunities for the public to learn more and share input during scoping. The presentation for the meeting was similar to the presentation for the public webinars. A total of 55 representatives from at least 30 agencies attended the webinar.

7 Key Takeaways

This section summarizes overarching themes from comments received during the scoping period. Many of the themes from the nearly 4,500 comments are similar to themes from previous engagement efforts on congestion pricing projects, as summarized in the [Regional Mobility Pricing Project Spring 2022 Engagement Report](#) and the [I-205 Toll Project Summer-Fall 2020 Engagement Report](#).

- **Concerns about the proposed Project and requests for more detailed information, including anticipated rates.** Overall, most commenters said that roadway pricing projects should not move forward because of concerns and fears they had about the potential Project impacts. Some commenters made assumptions about the rates that are under consideration or that rates had already been determined.
- **Doubt that the Project would effectively reduce congestion and is the right solution to raise revenue.** Many commenters questioned how the proposed Project would effectively achieve the stated goals. Many commenters expressed concern that the Project would not be successful in reducing traffic and recommended other solutions, such as building more lanes or roadways, or improving public transit with more routes or frequencies so that it is a viable alternative to driving on congested roadways. Some noted that many people do not have significant flexibility in their schedules to change the time they are traveling. Some commenters acknowledged that the Project may reduce traffic on the priced roadways but thought that the traffic would just shift to other roadways in the region. Additionally, some suggested other ways to raise revenue, such as increasing registration fees, raising the gas tax, assessing taxes on electric vehicles, and using more state or federal legislative funding.
- **Skepticism and questions about the need for, and plans to use, Project revenue.** Many commenters referred to the Project as a new “tax” and expressed frustration that they were being “double taxed” for something they felt they had already paid for through other tax revenues. Many commenters wrote that they deserved more information and transparency about ODOT management and use of existing revenue, the Project’s revenue goal, and use of future revenue.
- **Concerns about financial and economic impacts from congestion pricing.** Additional financial burden to commenters or their household from congestion pricing was described many times. Commenters often noted that paying fees would be an added cost at a time when their budgets are already affected by inflation, increased food prices, high state taxes, and an overall high cost of living. Many commenters also expressed concern that the Project would negatively affect small businesses and the regional economy. Commenters also said that pricing would have an unfair impact on middle- and working-class drivers, since they may not be eligible for a low-income discount but often have less flexibility in their schedules and job location compared to high-income workers.
- **Concerns with traffic rerouting off I-5 and I-205 and potential impacts to local communities.** Many commenters expressed concern that while congestion pricing may reduce traffic on I-5 and I-205, high fees would shift traffic to local streets instead. Commenters expressed concerns about the rerouting impacts on local traffic, air quality, safety, and access. Comments about rerouting most often referenced areas around the I-205 Toll Project, including Oregon City and West Linn.
- **Questions and concerns about how people experiencing low incomes may be more heavily affected by congestion pricing compared to middle- and high-income earners.**

Some commenters said that the Project is inherently “regressive” and would have inequitable impacts on community members experiencing lower incomes. While many commenters acknowledged that there would be a low-income discount program, commenters noted a lack of details related to the program and asked questions and shared concerns about who would qualify and how this program would be administered.

- **Belief that the proposed Project would have disproportionate impacts on communities that rely on I-5 and I-205 and may affect certain groups more than others.** Many commenters said that there was little choice in their travel decisions and limited alternatives to driving on priced routes, and that they would not be able to avoid paying fees. Commenters, especially from communities that rely on I-5 and I-205, said that they would be disproportionately affected. These comments frequently referenced areas in the southern part of the Portland metropolitan area, such as Oregon City, West Linn, Wilsonville, and other parts of Clackamas County. Many of these comments were specific to the I-205 Toll Project, illustrating, as with previous engagement efforts, that people in the region might not yet be as aware of the Regional Mobility Pricing Project as they are of the I-205 Toll Project.
- **Questions and concerns about the decision-making process to date and how public input has or would meaningfully shape the proposed Project.** Many commenters said they did not understand why the Project is moving forward since many people are opposed to the Project. Some commenters asked why the Project had not been put up for a public vote, while others called for a public vote. Several commenters voiced frustration that the opportunity to comment seems disingenuous because it appears the decision to implement congestion pricing has already been made and would not change in response to public input.

The focus of the scoping period was to gather input related to the Project’s Draft Purpose and Need, Proposed Action, and community and environmental topics to study through the environmental analysis. Most of this specific feedback came from agency partners and non-governmental organizations. Overall themes in this subset of comments included:

- **Project Purpose and Need.** Some agencies and stakeholders expressed interest in modifying the Project Purpose and Need statement to be focused on reducing vehicle miles traveled (VMT) and managing travel demand. Some commenters wanted more definition in the “transportation system improvements” on what congestion pricing revenues would be used for; some commenters wanted revenue to be used exclusively for multimodal improvements, while others wanted it to be used exclusively for roadway improvements.
- **Proposed Action.** Many commenters expressed an interest in not implementing congestion pricing. Some commenters also requested that the Project not price all lanes and that congestion pricing be implemented on key locations on I-5 and I-205 rather than the entire lengths of these roadways.
- **Community and Environmental Topics to Study in the Environmental Analysis.** Some agencies and stakeholders express interest in a robust analysis of the Project’s economic impacts and rerouting impacts, including providing specific locations to study. Agencies also shared feedback to inform the equity, greenhouse gas, and air quality analysis.

Sections 8 through 11 of this report provide additional detail on the input received from the public, tribes, and agency partners.

8 Overview of Input

8.1 Total Comments

During the 50-day scoping period, ODOT and FHWA received nearly 4,500 comments, as shown in Table 8-1. Most commenters used the online scoping comment form to submit comments.

Table 8-1. Comments by Response Type

Response Type	Count of Comments
Scoping comment form submissions	2,178
Oregon Tolling comment form submissions	1,425
Emailed comments	789
Voicemails	38
Letters ⁷	29
Total Comments	4,459

8.2 Geographic Distribution of Commenters

In both the scoping comment form and the Oregon Tolling comment form, commenters had the option to submit their ZIP codes to help identify the geographic distribution of comments. A total of 3,388 of the 4,459 comments, or 76%, included ZIP code information. The ZIP codes shared by commenters are grouped by county in Table 8-2. A heat map showing the relative concentration of commenters by ZIP codes is shown in Figure 8-1, in which the darker colors indicate ZIP codes with higher concentrations of commenters. Similar to previous engagement efforts, Clackamas County, and particularly the communities directly around the I-205 Toll Project, represented a higher proportion of commenters compared to other areas in the Portland metropolitan area population.

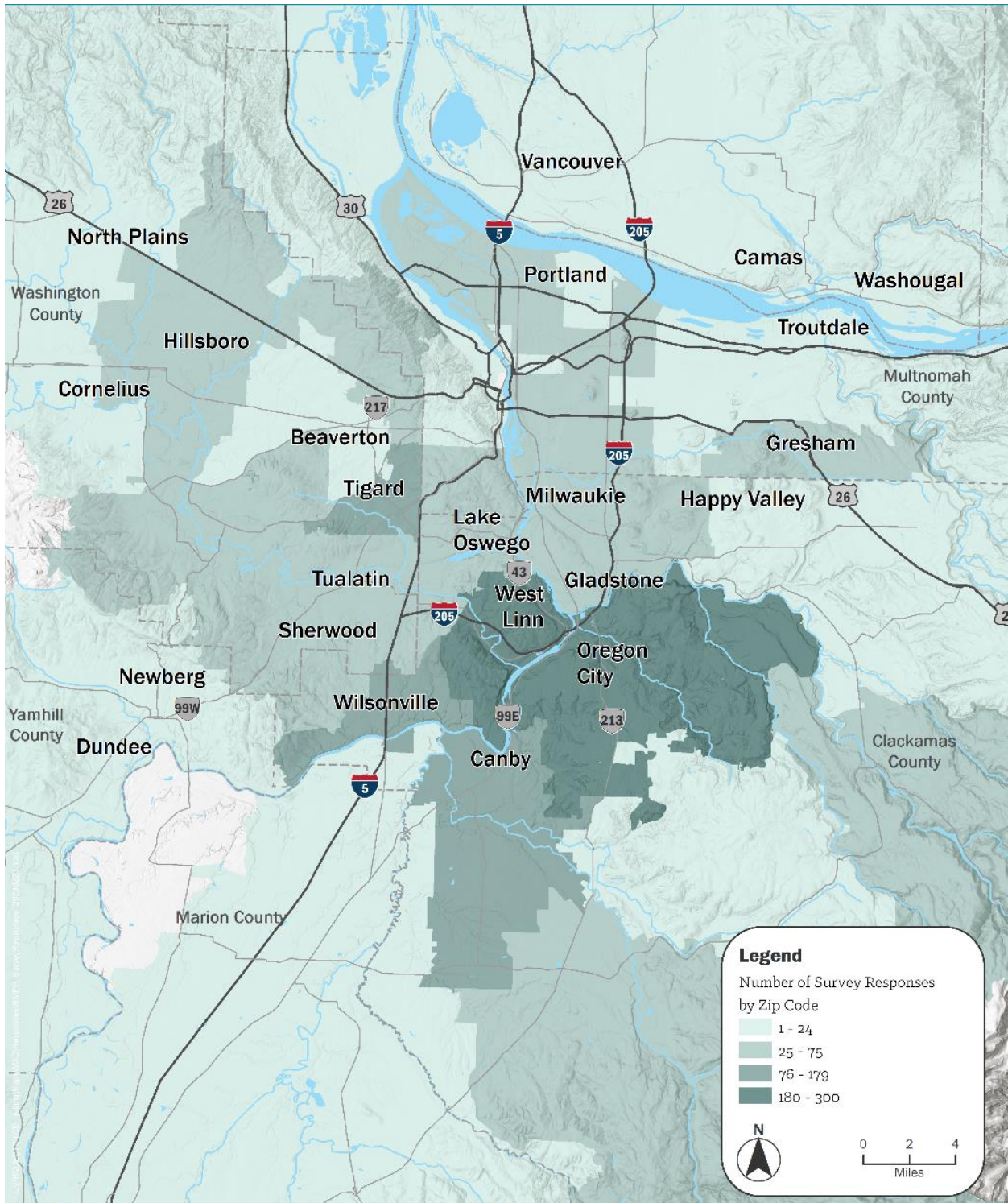
Table 8-2. Geographic Distribution for Scoping Period Commenters⁸

County	Number of Commenters	Percentage of Commenters	Percentage of Portland Metro Area Population
Multnomah County	863	28%	35%
Clackamas County	1,255	37%	18%
Washington County	497	13%	26%
Clark County	154	4%	22%
All Other Counties	619	18%	N/A
Total Responses	3,388	100%	N/A

⁷ Letters were defined as written documents sent electronically that were on formal letterhead.

⁸ ZIP code boundaries do not align perfectly with county boundaries. The number of survey commenters are generalizations based upon where the centroid (i.e., center point) of a zip code boundary falls within a County boundary.

Figure 8-1. Geographic Distribution of Scoping Period Commenters by ZIP Code



Note: Darker colors indicate ZIP codes with higher concentrations of commenters.

8.3 Demographics of Commenters

In the scoping comment form, commenters were asked several optional demographic questions to help the Project Team understand who was commenting. The Project Team asked commenters to self-report demographic data, including income and ethnicity information, travel patterns, and disability status. Some commenters answered all, while others just answered one or two questions. Answers to these questions ranged from 1,600 to 1,900 responses, or about 35% to 42% of the total commenters. The following list summarizes the responses to demographic questions asking commenters to share information on their income level, race/ethnicity, disability status, use of I-5 and I-205, and most frequent travel mode:

- Of the commenters who identified their income level, households earning \$50,000 or less made up 22% of total respondents, while 31% of households earn \$50,000 or less in the Portland metropolitan area.
- Of the commenters who identified their race/ethnicity, a slightly lower proportion identified themselves as White, Hispanic, Black or African-American, or Asian compared to the Portland metropolitan area as a whole. A slightly higher proportion of commenters identified themselves as Native Hawaiian or other Pacific Islander and some other race, ethnicity, or origin sample compared to the region as a whole.
- Of the commenters who identified their disability status, 20% said they identify as a person living with a disability. By comparison, 12% of the population in the Portland metropolitan area identifies as living with a disability.
- Of the commenters who identified their travel patterns, 44% shared that they use I-5 or I-205 frequently, four or more days per week.
- Of the commenters who identified their travel mode, 76% shared that they primarily drive their own vehicle for travel in the Portland metropolitan area.

It is important to note that since less than half of all commenters provided demographic information, it is hard to draw definitive conclusions about how well the commenters represent the region.

8.4 Comments by Comment Code

The Project Team combined the results from the English, Russian, Simplified Chinese, Spanish, and Vietnamese versions of the scoping comment form as a complete set of data (total responses). Project Team members then reviewed each comment and identified a set of key words, or codes, that best represented the themes and sentiments of the comments. Comments were categorized by as many codes as were applicable. Table 8-3 lists how many comments were coded into each topic category. More detailed descriptions of comments related to each code are provided in Section 9.

Table 8-3. Count of Scoping Period Comments by Topic

Topic	Number of Comments ⁹
Proposed Action and No Action Alternative	2,100
Revenue and Taxes	1,410
Household Impacts	1,300
Rerouting/Diversion	1,150
Fairness	1,080
Trust and Accountability	1,030
Purpose and Need, Goals, and Objectives	950
Equity	700
Toll Implementation	620
Congestion Observation and Impacts	500
Public Engagement/Process	400
Business, Freight, and Economic Impacts	400
Other Community and Environmental Topics to Study	340
Safety	330
Other Examples of Tolling	260
Expand Capacity	250
Greenhouse Gas Emissions, Climate Change	210
Multimodal Transportation	170

⁹ Each comment could be tagged with multiple topic codes.

9 Comment Themes by Topic

This section includes summaries of key themes (as listed in Table 8-3) from the approximately 4,500 scoping comments received between November 18, 2022, and January 6, 2023, via scoping comment form, email, web comment form, and voicemail. Project Team members reviewed all comments in each of the codes and identified key themes. For the purpose of indicating the frequency of key themes and messages, the Project Team used the terms “many,” “several,” “some” and “few.”¹⁰ Comments could be coded under multiple topics.¹¹

9.1 Proposed Action and No Action Alternative

About 2,100 comments addressed the Proposed Action and the No Action Alternative. These included comments related to elements of the Proposed Action, such as the number of lanes and the Project extents. It also included comments that favored a No Action Alternative. Overall, most comments in this topic expressed opposition to the Proposed Action. Some commenters provided changes or alternatives to the Proposed Action, including different locations or roadways to toll, number of lanes, and suggestions for alternative funding sources.

The following summarizes the major themes from the comments received relating to the Proposed Action and the No Action Alternative.

9.1.1 No Action Alternative

Many commenters stated opposition to the Project. Reasons included:

- Some commenters said that ODOT is mismanaging its funding and that existing taxes are sufficient to fund transportation improvements in the region.
- Some commenters said that the implementation of tolling would result in drivers diverting onto local streets, leading to unsafe conditions, traffic, and negative environmental impacts in neighborhoods.
- Some commenters said that tolling is inequitable and would disproportionately affect certain communities, such as low-income, seniors, workers who are unable to change their schedules or route, and those with limited or no access to alternative modes of transportation.

EXAMPLES OF COMMENTS ABOUT PROPOSED ACTION AND NO ACTION ALTERNATIVE

“I oppose tolling on all lanes of both I-5 and I-205. There should be some lanes left free to travel.”

“Toll the bridges, toll the outskirts of town. Do not toll the city center. Traffic must pass through the city center in order to maintain safe passage and efficient flow.”

“I support tolls and think that they are long needed. Private automobiles do not scale as a transit method. Do not widen freeways or add more high capacity roadways. We need better active transportation infrastructure and better public transit.”

¹⁰ “Many” is used to indicate that a theme was expressed in more than 50% of the comments within a topic area, “several” indicates 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.

¹¹ Project materials during the scoping period used the terms “tolling” and “tolls.” The Project Team now uses the terms “congestion pricing” and “fees” to align with the definitions in the recent amendments to the Oregon Highway Plan Tolling and Congestion Pricing Policy Amendment. For this section, we use the terms “tolling” and “tolls” to best reflect the language used by the vast majority of commenters.

Engagement and Comment Summary for the Scoping Period: November 2022 – January 2023

- Some commenters said that tolling would create an additional financial burden for them and their families, especially considering other financial worries such as inflation, high state taxes, and increasing cost of living.
- Some commenters said that they would be unfairly affected because they do not have access to alternative routes and because active transportation modes such as biking, walking, and transit are not viable alternatives to driving.
- A few commenters said that tolling would not meet the goal of decreasing congestion and instead would create more traffic.

9.1.2 Proposed Action and Other Proposed Alternatives

- Some commenters said that tolls should not be applied to all lanes and that the roadways should include a free option.
- Some commenters suggested alternative tolling locations, such as only tolling bridges between Oregon and Washington and I-84 and US 26.
- A few commenters shared support for the Project.
- A few commenters said that tolling should end after specific projects had been funded with the revenue.
- A few commenters expressed support for an increased gas tax as an alternative to implementing tolling.
- A few commenters expressed support for a rate structure that would charge a fee by distance traveled.

9.2 Revenue and Taxes

Approximately 1,410 comment submittals addressed revenue and taxes. These submittals included comments about existing taxes (income tax, gas tax), perspectives on how tax revenue is being spent and how revenue generated through tolling will be spent, and suggestions of alternate revenue sources. Overall, many commenters felt that current taxes are too high and a toll would be another form of tax imposed on them. Although ODOT has a transportation funding gap,¹² many commenters believed that current taxes are high enough to cover the costs of transportation improvements and that tolls are unnecessary.

Comments diverged 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 and road maintenance, while other commenters felt that revenue should be used to expand access to other modes of transportation (pedestrian, bicycle, transit). In addition,

COMMENTS ABOUT REVENUE AND TAXES

“No one wants tolls. The roads have been paid for years and all the gas taxes collected for road improvements should be going toward widening roads and not costing taxpayers more money to drive.”

“We already pay for our roads in gas taxes, in vehicle registration, and our property taxes. Learn to manage with the money you already get from us all.”

“The purpose of this project should be to control congestion and not to generate revenue.”

¹² [Oregon Department of Transportation: Achieve Sufficient Funding](#)

commenters disagreed on whether revenue should be used solely within the Portland metropolitan area and surrounding communities or whether it should be used to fund other projects throughout the region and state.

The following sections summarize the major themes from the comments received pertaining to revenue and taxes.

9.2.1 Current Taxes and Use of Existing Revenue

- Many commenters expressed concern that they are already paying high taxes and see a toll as another tax.
- Many commenters said that a toll would be a “double tax” and should not be imposed on public highways that were already paid for by tax revenue.

9.2.2 Suggested Alternate Revenue Sources

- Several commenters said that other methods should be used to fund transportation projects, such as raising existing taxes and fees (gas tax, vehicle registration), implementing new taxes (carbon emissions, vehicle mileage, electric vehicles), or reallocating tax revenue from existing sources (cigarettes, liquor, and marijuana sales).
- A few commenters said that funding for transportation improvements in Oregon should come from federal funding, such as the recent federal infrastructure bill.

9.2.3 Use of Future Toll Revenue

- Many commenters wanted more information about the types of projects that would be funded with the toll revenue.
- Some commenters said toll revenue should be used only for highway and roadway improvements for vehicles, including expanding highways and roadways and maintaining and repairing existing highways and roadways.
- Some commenters said that toll revenue should be used only to improve pedestrian, bike, and transit infrastructure.
- A few commenters said that tolls should only occur within a project area that includes new improvements, and toll revenue should directly pay for those improvements.

COMMENTS ABOUT HOUSEHOLD IMPACTS

“Oregonians are already overtaxed. Increasing the tax burden, especially for those that are poorer, having to commute long distances to work in the bigger cities is just going to make it more difficult for them to make a living and provide for their families.”

“This will also increase the price of everything we buy since our trucking industry has no choice but to drive these roads to deliver goods to stores, again increasing the burden on citizens who are already financially strapped.”

9.3 Household Impacts

Approximately 1,300 comment submittals addressed the personal and household economic impacts of tolling. Overall, respondents commented on the negative impacts that paying to drive on a tolled facility would have on personal/household budgets and increased costs of goods and services due to tolling. They also noted that tolling would cause additional financial challenges when the cost of living is already high due to other factors, such as inflation.

9.3.1 Direct Impacts to Household Budgets

- Many respondents expressed concern that tolls would negatively affect their personal or household budgets because a portion of their budget would be spent on tolling costs for travel and use of the tolled facilities.
- Many respondents said that tolling would add an additional financial burden to households that are already struggling from inflation, increased food prices, high state taxes, and an overall high cost of living.
- Several respondents said that tolls would have a significant financial impact on low-income households.

9.3.2 Indirect Impacts to Household Budgets

- Several respondents said that they would be negatively affected by increased costs of goods and services, because businesses would pass any toll costs incurred from shipping and operations to consumers.
- A few respondents commented that they would move out of the region, either because they felt they were being priced out or to avoid paying to use the toll facilities.
- A few respondents, particularly in the Charbonneau neighborhood, expressed concern that property values would be negatively affected.

9.4 Rerouting/Diversion

Approximately 1,150 comment submittals addressed rerouting/diversion. Many commenters expressed the concern that tolls would push traffic from the tolled roadways onto side streets. Commenters expressed frustration that ODOT was not reducing congestion but simply moving it onto roads that can't accommodate the expected increased traffic volumes.

The following list summarizes the major themes from the comments received pertaining to rerouting/diversion:

- Many commenters expressed concern that tolling would not stop people from driving and that, instead, people would reroute onto neighborhood streets.
- Many commenters expressed particular concern about increases in rerouting and diversion adjacent to I-205 in Clackamas County.
- Some commenters said that they would change their travel behavior and take side streets instead of the tolled roadways to avoid a toll.
- Some commenters expressed concern that surface streets and neighborhood roads are not built to

COMMENTS ABOUT REROUTING/DIVERSION

"It makes no sense to essentially surround West Linn, access to Oregon City with tolls. It is more likely to simply force traffic on to surface streets and backroads rather than reduce traffic."

"I am against tolls in Oregon. The expense will push traffic into residential areas not equipped to handle the traffic. It is also an unfair TAX that will target specific populations. If you need a new tax for roads, call it a tax and get it approved properly."

"I am a contractor. I travel the same roads multiple times per day. This is going to force me to use surface streets (less safe for residents) and avoid tolls."

handle the increased traffic volumes that would result from rerouting onto these roads.

9.5 Fairness

About 1,080 comments addressed perceived fairness. These included comments related to disproportionate impacts on groups or communities that are not classified as historically and currently excluded or underserved. (For comments related to historically and currently excluded and underserved communities see Section 9.8, Equity.)

Overall, many commenters shared concern regarding disproportionate impacts on communities that are more reliant on the proposed tolled roadways to get around as well as disproportionate impacts on those who are perceived to have less flexibility in how often and when they use the tolled roadways. Many commenters also said that it would be unfair to pay for roadways that they thought they were already paying for through other taxes.

The following list summarizes the major themes from the comments received pertaining to fairness:

- Many commenters expressed concern that certain communities would face greater impacts. Particular locations that were named include West Linn, Oregon City, Clackamas County, and Wilsonville.
- Many commenters expressed concern that tolls would unfairly burden those who have little to no flexibility in where or when they need to travel, or who have limited or no access to other routes or transit.
- Many commenters said that the roads have already been paid for or are currently being paid for through existing taxes.
- Several commenters noted other issues, such as rising housing costs, are affecting affordability in the region and expressed concern that tolls would make it harder to afford to live in the Portland metropolitan area.
- Some commenters said that all users should pay the same toll rate, and that discounts or other credits would be unfair.
- Some commenters said that tolls are a regressive form of taxation that would mostly affect the working class and middle class because they would not qualify for a low-income discount.
- Some commenters expressed concern that the benefits of tolling, such as reduced travel times and investment in road improvements, would be unfairly distributed to those with higher incomes.
- A few commenters said that tolling is a fairer way to raise revenue because those who use highway infrastructure more are paying for it.
- A few commenters expressed concern about the fairness of any mitigation efforts and how mitigations could increase costs.

COMMENTS ABOUT FAIRNESS

"This is a very regressive tax. You are severely penalizing the people who can afford it the least, especially since your variable rate pricing means that the very times people HAVE to travel the roads are precisely the time when it will cost them the most."

"It's wrong to charge people money to use the system they already paid for."

"The real-world impact of tolling punishes those of us who have no choice but to live outside of Portland and commute. Everything I have seen of tolling demonstrates disproportionate benefits for wealthy individuals at the cost of families like mine."

9.6 Trust and Accountability

About 1,030 comments addressed trust and accountability. Comments summarized included trust in ODOT or government more broadly and questions regarding whether tolling is legal. Overall, many commenters expressed concern about the management of ODOT's existing funds and questioned why additional money was needed. They expressed concern that ODOT was not managing existing funds effectively. Many commenters also expressed distrust about the overall purpose and effectiveness of the Project.

COMMENTS ABOUT TRUST AND ACCOUNTABILITY

"The public needs to vote on tolling."

"I adamantly oppose the proposed tolling plans. This is a regressive tax, and the electronic reading of license plates is an invasion of privacy."

The following list summarize the major themes from the comments received pertaining to trust and accountability:

- Many commenters expressed concern that ODOT is not being honest that the primary goal of the Project is to raise revenue rather than manage congestion.
- Many commenters expressed concern that the existing funds that go to ODOT are not being managed effectively.
- Some commenters expressed concern that the Project was a form of social engineering and disagreed with the concept of congestion pricing.
- Some commenters said that they believe charging tolls on these roadways is illegal.
- Several commenters expressed concern that future toll revenues would not be managed efficiently and effectively.
- A few commenters expressed concern that the Project's equity goals were not genuine.
- A few commenters expressed concerns about privacy from an electronic toll system and license plate readers.
- A few commenters felt that ODOT has not been honest about project costs with higher-than-expected costs on other ODOT projects.
- A few commenters said that there should be an audit of ODOT's existing revenues and expenses to ensure accountability in the agency's finances.

9.7 Purpose and Need, Goals, and Objectives

Approximately 950 comment submittals were related to the Project's purpose and need, goals, and objectives. These included comments that were specific to the Project's Purpose and Need Statement, as well as more general comments about the Project purpose, goals, and objectives.

Overall, many commenters expressed skepticism that the Project would achieve its stated purpose of reducing congestion. Commenters also shared alternative ways to achieve the Project purpose. Some commenters provided specific edits or changes that they wanted to see in the Project Purpose and Need Statement.

The following sections summarize the major themes from the comments received pertaining to purpose and need, goals, and objectives.

9.7.1 Project Purpose and Goals

- Many commenters expressed doubt that tolling would reduce congestion at all, citing a lack of viable alternatives and a lack of flexibility in many people’s trip schedules.
- Many commenters expressed concern that the Project’s goal of reducing congestion on I-5 and I-205 would simply shift congestion to other routes.
- A few commenters said that ODOT should align the Oregon Toll Program goals with the 2023 Regional Transportation Plan.

9.7.2 Alternative Ways to Meet the Project Purpose and Goals

- Some commenters proposed alternative methods for achieving the Project’s purpose of reducing congestion, including:
 - Building more lanes
 - Building additional highways
 - Improving the public transportation system
 - Using technology improvements in traffic lights
 - Increasing enforcement of traffic laws
 - Building better merging lanes
 - Creating incentives for businesses to vary in-office schedules for employees
- Some commenters proposed alternative methods for achieving the Project’s goal of raising revenue, including:
 - Registration fees
 - Raising the gas tax
 - Higher fees for trucks
 - State legislative funding
 - Better enforcement (such as expired registrations or unpaid traffic tickets)

COMMENTS ABOUT PURPOSE AND NEED, GOALS, AND OBJECTIVES

“The Regional Mobility Pricing Project should be about reducing vehicle miles traveled (VMT) and congestion, not about revenue for more roadway expansion.”

“I cannot see how placing tolls will alleviate congestion in any way unless it is a way to get people to just stay at home and vegetate. Where I live there is NO public transportation so that is not an option (even if it were safe, which it is not).”

9.7.3 Changes to the Project Purpose Statement

- Several commenters said that the primary purpose of the Project should be to reduce VMT.
- Several commenters said that the purpose of the Project should not include generating revenue for transportation system investments.
- Several commenters said that the Project purpose should be more explicit about how revenue would fund “transportation system improvements”:
 - Some commenters said revenue should be used exclusively for transit, biking, and walking improvements.
 - Some commenters said revenue should be used exclusively for roadway maintenance and improvements.

- Some commenters said that revenue should be used exclusively for improvements and maintenance on the tolled roadways.
- A few commenters said that revenue should be used to address equity issues.

9.8 Equity

Approximately 700 comment submittals addressed equity. These included comments about how tolling would affect historically and currently excluded and undeserved communities. Overall, most comments were related to impacts on low-income communities, including financial and other impacts. There were some comments related to older adults as well.

The following list summarizes the major themes from the comments received pertaining to equity:

- Many commenters expressed concern about the economic impact of tolling on low-income communities, calling it a “poor tax” or a “regressive tax”.
- Some commenters expressed concern that pushing traffic to side streets would have negative impacts on air pollution in low-income neighborhoods.
- Some commenters expressed concern that environmental impacts of tolling would disproportionately harm residents experiencing low incomes.
- Some commenters expressed concern that tolling would disproportionately affect senior citizens and older adults because many of them are on fixed incomes.

COMMENTS ABOUT EQUITY

“Congestion pricing will most impact low-middle class workers who don’t have the option to change their work hours. These people won’t be captured by the low-income programs (which are just another hoop to jump through for low-income people).”

“This is a toll on the working class that will only negatively impact lower to medium-income households. Until you drastically improve our public transportation system, both in efficiency and safety, this will not work. I do not support this.”

9.9 Toll Implementation

Approximately 620 comments addressed tolling implementation. These submittals included comments about toll rates and structures, credits and exemptions, toll collection, and toll infrastructure.

Overall, commenters expressed interest in understanding how ODOT would implement the toll program. Commenters shared ideas for how to minimize the financial impacts of tolling on residents. Several commenters suggested various toll rate and system structures and generally supported lower costs. Some commenters expressed concern that tolling would be too expensive, and some commenters expressed concern for how tolls would be collected.

The following sections summarize the major themes from the comments received pertaining to toll implementation.

COMMENTS ABOUT TOLL IMPLEMENTATION

“I also hope you will consider inter-agency compatibility for toll tags—making toll readers and tags interoperable with FasTrak in CA and GoodToGo in WA.”

“I think it will be best to set up tolls to only read license plates. Have locals/frequent users register their license plate online for a lower toll fee, similar to Seattle’s system.”

9.9.1 General Toll Implementation

- A few commenters said that tolling should be implemented prior to any roadway expansion projects.
- A few commenters expressed concern about the cost of implementing tolling, noting anticipated high costs to set up and maintain the toll program.

9.9.2 Toll Rates

- Many commenters said that people experiencing low incomes should pay a lower toll rate or no rate at all.
- Several commenters said that \$2 for congested areas is too expensive, especially if users are tolled for traveling to and from their destination.
- Several commenters said that there should be a discount for senior citizens.
- Several commenters said that there should be a discount for certain neighborhoods that are particularly reliant on the tolled roadways, for example Charbonneau in Wilsonville.
- Several commenters proposed higher toll rates for out-of-state drivers and freight drivers.

9.9.3 Toll Technology

- Some commenters said that they would like tolling technology to have interagency compatibility with other toll programs, such as Washington State and California.
- Some commenters said that they would like to have an alternative to paying the toll online.

9.9.4 Toll Enforcement

- Several commenters expressed a lack of trust in enforcement systems such as license plate readers and sticker scanners.
- A few commenters asked how ODOT would enforce toll collection from people who drive illegally without license plates.

9.10 Congestion Observations and Impacts

Approximately 500 comment submittals addressed congestion observations and impacts. These comments included commenters' observations of existing congestion in the Portland metropolitan area, as well as the impacts of that congestion. Many commenters said that they already see rerouting on their neighborhood roads and expressed concern that tolling would increase congestion beyond existing levels. Some commenters expressed dissatisfaction with current levels of congestion in the region, and a few commenters identified specific areas of concern.

COMMENTS ABOUT CONGESTION OBSERVATIONS AND IMPACTS

"The planned tolls on I-5 and I-205 will force drivers onto city streets in Tualatin, which already has local traffic issues and congestion. The infrastructure needs to be upgraded prior to the tolls or else we'll have our quality of life impacted for years in Tualatin until the upgrades happen after the fact."

"I live on Boones Ferry Road. When congestion forms on I-5 (frequently), traffic simply moves to other surface roads like mine. Tolling will have the same effect—not reducing congestion (and increasing emissions) by simply moving the traffic elsewhere to roads that aren't designed to handle the volume."

The following list summarizes the major themes from the comments received pertaining to multimodal transportation:

- Many commenters said that they already experience rerouting on neighborhood streets and expressed concern that tolling would make rerouting worse.
- Some commenters said that they are dissatisfied with the amount of time that they spend in traffic.
- A few commenters shared specific locations in the Portland metropolitan area that are traffic bottlenecks.
- A few commenters said that they were in favor of tolling if it relieves existing bottlenecks.

9.11 Business, Freight, and Economic Impacts

Approximately 400 comment submittals addressed business, freight, and economic impacts. These submittals included comments about the impacts of tolling on the business community, freight and auto-oriented industries, and overall economic impacts.

Respondents commented that tolling would increase business costs, decrease consumer spending, and put a strain on the local workforce. Additionally, some respondents commented that the increased costs would have a negative impact specifically on freight and other auto-oriented industries (i.e., self-employed, tradespeople, rideshare).

The following sections summarize the major themes from the comments received pertaining to business, freight, and economic impacts.

9.11.1 Small Businesses

- Many respondents said the increased cost of tolling to business operations would have negative impacts on small businesses.
- Several respondents said rerouting to local roads would have negative impacts on local businesses, especially businesses in downtown Oregon City.

9.11.2 Auto-Oriented Industries

- Some respondents commented that increased costs from tolling would have a negative impact on auto-oriented and trade industries (i.e., freight, ride-share, and self-employed tradespeople) in particular.
- A few respondents commented that freight truck drivers already pay high fees for driving and tolling would have a negative impact because those costs would be increased to use the highway during business hours.

COMMENTS ABOUT BUSINESS, FREIGHT, AND ECONOMIC IMPACTS

“I am a self-employed farmer, who has delivery trucks on the road almost every day on the roads you want to toll. As if being in business in Oregon isn’t hard enough, sounds like it’s going to get worse with tolling.”

“The economy in the Portland metro area is more than commercial trucking. People driving to work, shopping, or reaching key services are all important on maintaining a thriving economy. The tolling of the interstate may have a negative impact on the economy as some people may not travel to some businesses (either for work or commercial activity) if a toll is involved.”

9.11.3 Regional Economic Impacts

- Several respondents commented that there would be negative impacts on the workforce because people would need to pay a toll to travel to work. A few respondents added to this point to say that this would increase the burden on small business operations retaining a consistent workforce.
- Some respondents said that tolling would have a negative impact on the local economy because consumers would be less likely to travel to and spend money within the affected area, which could cause businesses to close or relocate.

9.12 Public Engagement/Process

Approximately 400 comments addressed the Project’s decision-making process and public engagement. Overall, many commenters were not aware that the State has tolling authority, and some said that there should be a public vote to determine whether to implement tolling. Commenters expressed concern that the Project was moving forward despite community concerns. Additional themes included comments on the decision-making process, suggestions for engagement with key stakeholders, comments on opportunities and ways to provide input, and questions and suggestions on Project information to date.

The following sections summarize the major themes from the comments received pertaining to the decision-making process and public engagement.

9.12.1 Public Input in Decision-Making Process

- Many commenters said that the Project should not move forward without a public vote.
- Several commenters expressed concern that ODOT is not listening to public input and that the opportunity to comment is disingenuous because the Project is continuing to move forward in light of public concerns.
- Several commenters indicated that implementing a toll was taxation without representation.
- A few commenters said the Project should reflect the concerns and recommendations of EMAC.
- A few commenters suggested that alternatives to tolling should be presented for public input or a vote.
- A few commenters asked about the decision-making process for specific elements of a toll program, such as the Low-Income Toll Program, toll funding allocations, toll zones, and rates.
- A few commenters commented on the legal considerations regarding tolling and whether it would stand up to a legal challenge.

COMMENTS ABOUT PUBLIC ENGAGEMENT/PROCESS

“The fact that public sentiment is overwhelming negative but ODOT has decided to move forward despite this is bewildering to me. I have no idea why you would reach out for public opinion if you have no intention at all of listening to it or making any adjustments.”

“This significant tax revenue source (tolling) was never put a public vote in this state and violates resident’s rights and trusts in state government.”

9.12.2 Public Engagement and Communications

- A few commenters shared suggestions or concerns about the need to involve specific stakeholders in the Project. Suggestions included:

- Local employers
- Clackamas County's Congestion planning team
- Marion and Yamhill Counties
- Tigard, Tualatin, Lake Oswego, West Linn, Wilsonville, Charbonneau, and Canby
- A few commenters suggested ways to engage the community, such as community meetings with local mayors, travel surveys of the general public, and focus groups with historically and currently excluded and underserved communities.
- A few commenters indicated that ODOT should provide more clarity and transparency in response to key questions, including expected rates, use of revenue, and potential impacts.

9.13 Other Community and Environmental Topics to Study

Approximately 340 comment submittals addressed other community and environmental topics to study. These included comments related to cumulative impacts as well as impacts on the natural environment, noise, air quality, social and community resources, and land use.

The following sections summarize the major themes from the comments received pertaining to environmental impacts.

9.13.1 Cumulative Impacts

- A few commenters requested the preparation of a comprehensive Environmental Impact Statement for all ODOT Urban Mobility Projects, including the Regional Mobility Pricing Project, to better analyze overall benefits and impacts.

COMMENTS ABOUT ENVIRONMENTAL IMPACTS

“The implementation of tolling will cause car and truck traffic to divert off the freeway to our rural roads, greatly increasing noise and air pollution in our wildlife-dependent ecosystem.”

“How is adding further congestion in Tualatin going to affect livability, air quality, and safety for those who will be directly affected by the tolling?”

9.13.2 Noise Impacts

- A few commenters expressed concern that vehicles diverting from tolled facilities would lead to noise pollution in surrounding neighborhoods.

9.13.3 Air Quality Impacts

- Several commenters expressed concern that vehicles diverting from tolled facilities would increase emissions due to more trips and stop-and-go traffic on local streets.
- A few commenters noted the importance of evaluating impacts on air quality.
- A few commenters said that congestion pricing can help reduce emissions and improve air quality.
- A few commenters suggested that the analysis should account for reduced emissions due to electric vehicles and increased fuel efficiency.

9.13.4 Social Resources and Communities

- Some commenters expressed general concerns about how the proposed Project would reduce the quality of life and livability for residents in the Portland region.
- A few commenters said that the Project would separate and isolate communities in areas that would only be accessible by tolled roadways.
- A few commenters said that tolling would limit access to essential services, community resources, and medical services.

9.13.5 Land Use, Acquisition, and Displacement

- A few commenters said that home values and real estate sales would be negatively affected by tolls as neighborhood side streets become alternative routes.

9.13.6 Natural Environment

- Some commenters expressed general concerns that the Project would result in adverse impacts on the environment.
- A few commenters said that vehicles diverting from tolled facilities onto local streets would increase impacts on vegetation and wildlife.

9.14 Safety

Approximately 330 comment submittals addressed safety. These included comments safety impacts as a result of people rerouting off of the freeway to avoid paying a toll, particular concern for children and other vulnerable road users, and concern that riding transit is not safe, citing recent reports of violence on transit.

The following list summarizes the major themes from the comments received pertaining to safety:

- Many commenters expressed concern that rerouting would significantly decrease safety on neighborhood roads as drivers shift trips onto these roads. Commenters expressed specific concern for children as well as people taking transit, walking, and riding bikes.
- A few commenters said that they would not take public transportation because they feel that it is unsafe.
- A few commenters expressed concern that residents experiencing low incomes would be more likely to take neighborhood roads to avoid tolls, and thus would be at a higher risk for collisions on these roads.

COMMENTS ABOUT SAFETY

"This should be stopped. This will shift traffic to side roads and cause increased delays and accidents. Use the taxes on gas to pay for it. That's why the gas tax is in place."

"There are no real alternatives to travel in Portland. You'll be diverting traffic to adjacent communities, creating more traffic, damaging more roads, creating more unsafe situations for bikers, pedestrians. Why are you doing this? Fund the infrastructure through taxes."

9.15 Other Examples of Tolling

About 260 comments addressed other examples of tolling, including comments about tolling in places other than the Portland metropolitan area. Overall, commenters expressed both negative and positive observations of tolling based on experiences in other areas and offered other specific planning or design considerations for tolling that should be modeled from other systems.

The following sections summarize the major themes from the comments received pertaining to other examples of tolling.

9.15.1 General Observations About Tolling in Other Areas

- Many commenters expressed concerns about tolling I-5 and I-205 based on experience in other areas, with specific mentions of issues with rerouting financial impacts, congested highways, pollution, impacts on people experiencing low incomes and working-class people, accidents, and frequency of tolls.
- Many commenters said that tolling works well in other areas, and that ODOT should move forward with tolling, with a few specifically noting it helps to manage congestion.

9.15.2 Planning or Design Suggestions from Other Toll Projects

- Many commenters said that there should be some tolled lanes and some free travel lanes similar to the East Coast, California, or the Seattle area.
- Several commenters said to avoid tolling both I-5 and I-205 and instead provide an alternate route or highway that is not tolled like other states with toll roads.

COMMENTS ABOUT OTHER EXAMPLES OF TOLLING

“I wouldn’t mind if it modeled Seattle, where you can pay for the fast lane or bypass. I think there would be a lot of pushback if every user had to pay a toll for using I-5.”

“As someone who is a transplant from Chicago, I have seen the pros and cons of a toll system. Yes, they help with congestion, but the high toll fees that have been proposed only hinder those within the community as it adds another fee to the already expensive world we live in.”

9.16 Expand Capacity

Approximately 250 comments addressed expanding capacity. These submittals included comments about adding capacity to existing roadways, such as by constructing new bridges, highways, and bypasses. Overall, commenters expressed interest in ODOT expanding existing freeways as an alternative to implementing a toll program. Some commenters said that new, expanded infrastructure should be complete before tolls are implemented.

The following list summarizes the major themes from the comments received pertaining to expand capacity:

- Many commenters expressed interest in ODOT adding lanes to existing highways instead of

COMMENTS ABOUT EXPANDING CAPACITY

“No tolling without increased freeway capacity. Let’s pay for some new roads to decrease congestion.”

“No toll, period. Infrastructure needs to be built that can handle the current and projected traffic. It’s not right to tax the only routes out of the north end of the state.”

implementing a toll. These comments argued that widening highways would lessen congestion and eliminate the need for tolling.

- Some commenters said that additional lanes or highways need to be built prior to tolling. Some of these commenters said that ODOT could toll new roads but not existing infrastructure.
- Some commenters suggested that ODOT construct a new interstate bridge or additional bridges and overpasses. Some of these commenters suggested tolling the new interstate bridge.
- A few commenters said that expanding capacity would not reduce congestion but would encourage the use of more vehicles, resulting in worse traffic.

9.17 Greenhouse Gas Emissions and Climate Change

Approximately 210 comments addressed greenhouse gas emissions and climate change. These submissions included comments about transportation-related impacts on emissions in the region as well as comments related to local, regional, and state climate goals. Overall, commenters varied in their sentiments regarding the effectiveness of tolling as a means to reduce greenhouse gas emissions. Some comments offered alternative strategies for reducing emissions.

The following list summarizes the major themes from the comments received pertaining to greenhouse gas emissions and climate change:

- Some commenters said that toll revenue should be used to build infrastructure that supports transit and other low emission modes.
- Some commenters offered strategies other than tolling to reduce greenhouse gas emissions by reducing VMT.
- Some commenters said that they agree with the decision to toll because it is necessary for reducing emissions through reducing VMT.
- Several commenters expressed concern that greenhouse gas emissions would increase as a result of people diverting off of the tolled roadways in order to avoid a toll.
- A few commenters said that they do not believe tolls are an effective way to reduce emissions and greenhouse gases.

COMMENTS ABOUT GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE

“There will be a substantial number of drivers that will drive surface streets to avoid tolling. This will have a negative impact on carbon emissions, especially in neighborhoods adjacent to the tolled freeways.”

“Yes, toll roads are the best way to fund roads and transport, reduce carbon pollution, and reduce congestion.”

9.18 Multimodal Transportation

Approximately 170 comments submittals addressed multimodal transportation. These submissions included comments about the effectiveness of transit ideas for whether or not more active transportation or freeway capacity should be built.

The following list summarizes the major themes from the comments received pertaining to multimodal transportation:

- Some commenters said that public transit in the Portland metropolitan area is not a viable alternative to driving due to the increased travel time and concerns about personal safety.
- A few commenters said that transit and other active transportation infrastructure needs to be expanded to provide alternatives to paying a toll.
- A few commenters said that money spent on bicycle and pedestrian improvements should instead be spent on repairing or expanding roadways.
- A few commenters said that tolls should be accompanied by improved infrastructure for people biking, walking, and taking transit.
- A few commenters said that toll revenue should be spent on improving access to biking, walking, and transit options.

COMMENTS ABOUT MULTIMODAL TRANSPORTATION

“Wanting to add tolls to an area struggling with a severe cost-of-living crisis is despicable. People are having to live farther and farther away to afford housing and the public transportation isn’t good enough to use instead of driving, often doubling the travel time over driving if it’s even feasible. This plan will target the people least able to afford the extra tolls.”

“Public transit in the Portland Metro Area is a joke. Walking or riding a bike to work for most people is not feasible. More housing is being squeezed into existing areas without infrastructure expansion.”

10 Summary of Tribal and Participating Agency Comments

10.1 Tribal Scoping Input

As noted in Section 6.1, ODOT and FHWA invited tribes to submit comments during the 50-day scoping period and held government-to-government consultation with one tribe at their invitation. No tribes submitted formal comments.

10.2 Participating Agency Input

As noted in Section 6.2, ODOT and FHWA engaged agencies in several ways during the scoping period and encouraged them to submit comments. A total of 21 agency comments were received during the 50-day comment period as shown in Table 10-1. .

Table 10-1. List of Agencies that Submitted Scoping Comments

Agency Type	Agency
Federal	U.S. Environmental Protection Agency
State	Washington State Department of Transportation
	Oregon Department of Environmental Quality
Regional	Metro
	Southwest Washington Regional Transportation Council
	TriMet
County	Clackamas County
	Clackamas County Coordinating Committee
	Clark County
	Multnomah County
	Washington County
	Yamhill County
City	City of Canby
	City of Hillsboro
	City of Lake Oswego
	City of Oregon City
	City of Portland
	City of Tigard
	City of Tualatin
	City of Vancouver
	City of Wilsonville

10.2.1 Key Themes from Participating Agency Comments

Below is a brief summary of key themes from the Participating Agency letters.

10.2.1.1 Purpose and Need Statement

- **Purpose:** Several agencies had suggestions for revising the Project's Purpose statement:
 - There were requests to modify the Purpose language to include managing travel demand or, more explicitly, reducing VMT or reducing travel demand. Additional comments were made in reference to the goals and objectives related to reducing travel demand.

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- Some agencies suggested reframing the Purpose statement to address topics presently included in the Need statement, particularly around supporting efforts to address equity, access to transit, climate change, and greenhouse gas emissions.
- Some agencies wanted to add “multimodal” to the Purpose statement phrase “generate revenue for transportation system investments” or otherwise indicate that congestion pricing revenues would directly or primarily fund or expand transit and active transportation.
- **Need:** Several agencies had suggestions for revising the Need statement to include “Our regional transportation system must reduce greenhouse gas emissions by managing congestion” to clarify that congestion management is one tool of many in use to address greenhouse gas emissions, including managing travel demand, reducing VMT, and supporting transit and multimodal investments.
- **Goals and Objectives:** There were multiple comments related to the Project’s goals and objectives, especially around the following topics:
 - **Diversion/Rerouting:** Requests that goals and objectives are more specific about limiting rerouting and should provide long-term monitoring and mitigation to evaluate and address rerouting from the priced routes.
 - **Multimodal Investment:** Requests to clearly indicate that the goals and objectives should be for revenue to fund multimodal and transit project investments or that a portion of the revenues should be dedicated for these investments and not only to maintain or modernize existing roadway infrastructure.
 - **Economic Impacts:** Requests to clarify goals and objectives to indicate that economic impacts on local businesses will be considered and addressed.

10.2.1.2 Proposed Action

- **Revenue Allocation/Use:** Several agencies expressed a desire for more information on how any net revenues from the Project would be allocated.
- **Effects on Specific Geographic Communities:** Several agencies expressed concern about separating or isolating specific communities, specifically Washington state residents, the Hayden Island community, and the Charbonneau district in Wilsonville.

10.2.1.3 Scope of Environmental Analysis

- **Diversion/Rerouting:** Many agencies expressed that there should be a robust analysis of diversion and rerouting, and some provided specific locations that they felt should be included in the environmental analysis.
- **Costs and Benefits:** Several agencies indicate that the environmental document should include analysis of the potential regional benefits of the Project or incorporate a cost-benefit analysis for users of the priced interstates.
- **Equity:** Several agencies indicated the need to include a well-developed program in the analysis to address users experiencing low incomes and that the analysis needs to address people in Oregon and southwest Washington who are already most burdened and least benefited by the existing transportation system, particularly environmental justice communities and people who do not have access to a private vehicle for transportation. Agency commenters specified that the environmental justice analysis should include evaluations of changes in travel time, access to

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community resources and jobs, community health, and safety on roads that could experience rerouting from the priced routes.

- **Greenhouse Gas Emissions:** Several agencies provided input on the data used to evaluate potential increases and decreases in emissions, including comparing changes in emission on and off the priced interstates, calculating changes in VMT regionally and per capita, and considering shifts from single-occupancy vehicles to other modes of travel.
- **Air Quality:** A few agencies noted that the air quality analysis should include a discussion of how rerouting could affect air quality, including how the Project could reduce or increase air pollutant emissions, particularly in environmental justice areas.
- **Cumulative Effects:** A few agencies noted that the cumulative analysis should consider the effects of multiple roadway pricing programs in development, including road usage charge program, Interstate Bridge Replacement, and the I-205 Toll Project.

11 Next Steps

ODOT and FHWA are conducting a detailed environmental analysis of the potential benefits and impacts of congestion pricing on I-5 and I-205 in 2023. This section summarizes the next steps in the process after the scoping period.

11.1 How Scoping Input Will Inform the Environmental Analysis

ODOT and FHWA are reviewing and considering scoping period comments to inform the environmental analysis. Specific changes ODOT and FHWA are making include the following:

- Addressing input from commenters, including Participating Agencies, that the project needs to encourage reductions in vehicle miles travelled in the region. Revisions to the **Purpose and Need Statement** will clarify the intent of the project to manage travel demand and congestion and that a successful outcome of this would be a reduction in vehicle miles traveled.
- Addressing comments that the project, as currently proposed, is overly complicated as well as skepticism that it will effectively manage traffic congestion. Revisions to the **Proposed Action** include adding more detail on the congestion pricing fee structure that will be used in the upcoming NEPA analysis. These details are intended to provide greater transparency and make it easier to explain how the project will effectively manage traffic and how people would experience the project once implemented. Adding details on the fee structure also addresses comments that said pricing locations should focus on the most congested segments of the interstate highways.

ODOT and FHWA are also developing **environmental study methods** to incorporate a variety of feedback on how to analyze project benefits and adverse effects for the Environmental Assessment. For example, ODOT and FHWA are developing comprehensive transportation study methods that examine safety and rerouting in response to concerns about diversion to local streets and the associated effects in local communities. The Project Team will share information about the specific ways they have considered and incorporated comments into the project later this year and through publication of the environmental document.

ODOT and FHWA will analyze the effects of the proposed project and publish the results for review and comment in an Environmental Assessment, expected in late 2023. Solutions, or mitigations, will be proposed as needed to address impacts.

11.2 Addressing Broader Questions about the Toll Program

As described in this report, there are concerns and questions related to the details of the Project as well as how the Project may benefit and affect our communities. The Regional Mobility Pricing Project is part of the larger Oregon Toll Program, and there are many different processes and groups involved in decision-making about the elements of congestion pricing and tolling. Table 11-1 is a high-level guide to how key topics of interest will be addressed in the coming years. Later this year, ODOT will share more detailed responses to the common questions and concerns to help explain what they have heard from the public and stakeholders, what information is available, and the process for analysis and decision-making on these topics.

Table 11-1. Next Steps to Address Key Topics

Topic	Process	Timeframe
Rates/fees	The Project Team is currently developing conceptual rates to help estimate or “model” potential benefits and impacts of the proposed Project on traffic on I-5 and I-205 and adjacent roadways. ODOT and FHWA will share the results in the Environmental Assessment. The Oregon Transportation Commission is ultimately responsible for setting rates. These rates will be informed by guidance from the Statewide Toll Rulemaking Advisory Committee (STRAC) and based on congestion relief goals, revenue needs, and public input.	<ul style="list-style-type: none"> • 2023: Share study rates and include as part of the Environmental Assessment. • 2025: The Oregon Transportation Commission will set final rates about 6 months before congestion pricing begins.
Congestion benefits	Once modeling assumptions are determined, the Project Team will evaluate how these rates influence traffic patterns in the Project area. This work will form the basis of the environmental analysis.	<ul style="list-style-type: none"> • Mid-2023: Complete traffic modeling and share initial results. • Late 2023: Provide detailed traffic modeling results in the Environmental Assessment.
Expected revenue	ODOT will conduct a preliminary estimate of the Project’s net revenue in a report called a Level 2 Traffic and Revenue Study. This report will form the basis of a more detailed Level 3 Traffic and Revenue Study that ODOT will conduct prior to implementing congestion pricing on I-5 and I-205.	<ul style="list-style-type: none"> • Late 2023: Publish Level 2 Traffic and Revenue Study. • 2025: Approximately 6 months before the system is live, publish Level 3 Traffic and Revenue Study.
How revenue will be used	Initial guidelines for the use of revenue from congestion pricing are included in the Oregon Highway Plan. ODOT will also gather input on criteria that can be used for allocating revenue. This process will include regional agencies, toll committees, and community input. The Oregon Transportation Commission will ultimately decide how revenue is allocated.	<ul style="list-style-type: none"> • 2023: The Regional Toll Advisory Committee will recommend criteria to guide revenue allocations. • The Oregon Transportation Commission is the tolling authority for the state and will be responsible for policy decisions.
Priority transit projects to provide alternatives to priced routes	ODOT is working with regional partner agencies to co-create an equitable Public Transportation Strategy for the Portland Metropolitan and southwest Washington area. The strategy will identify near- and long-term projects and services that are complementary to a congestion pricing system on I-5 and I-205. The final strategy will be presented to RTAC for consideration, with the opportunity for public input.	<ul style="list-style-type: none"> • Late 2023: RTAC is anticipated to endorse a strategy.
Economic and financial impacts	Through the environmental analysis, the Project Team will look at the Project’s financial impacts on households and the regional economy. The potential benefits and impacts will be included in the Environmental Assessment for public review and comment.	<ul style="list-style-type: none"> • Late 2023: Share economic and financial impacts in the Environmental Assessment.
Impacts of and mitigation for rerouting/diversion	The Project Team will identify diversion impacts through traffic modeling. In coordination with regional partner agencies, the Project Team will discuss and refine these impacts and develop potential mitigation strategies that work for our region. Diversion impacts and draft mitigation strategies will be included in the Environmental Assessment. Following this step, the Project Team will develop plans to implement and monitor the effectiveness of these strategies.	<ul style="list-style-type: none"> • Late 2023: Share diversion impacts and draft mitigation strategies in the Environmental Assessment. • Mid-2024: Develop a performance monitoring framework and mitigation plans.

Topic	Process	Timeframe
Equity	Working in partnership with EMAC, ODOT is using an Equity Framework to guide the Project. The Equity Framework is intended to gain better outcomes for historically underserved communities and to engage these communities in solutions. Additionally, the Project Team will work with EMAC to develop performance indicators related to equity and will also assess how the Project would affect historically underserved communities. The potential benefits and impacts will be included in the Environmental Assessment for public review and comment.	<ul style="list-style-type: none"> Spring 2023: EMAC and the Project Team develop performance indicators. Late 2023: Share equity impacts in the Environmental Assessment.
Low-Income Toll Program	ODOT is developing a Low-Income Toll Program based on recommendations from the Low-Income Toll Report published in September 2022. The STRAC will recommend program details to the Oregon Transportation Commission. Rulemaking will include a public hearing.	<ul style="list-style-type: none"> Late 2023: The STRAC recommendation will be presented to the Oregon Transportation Commission.

11.3 Project Timeline

The process to implement congestion pricing requires substantial analysis, public input and consultation with tribes and partner agencies, construction, testing, and driver education before the system can be operational. The earliest congestion pricing could begin under the Regional Mobility Pricing Project is late 2025, as shown in Figure 11-1.

Figure 11-1. Timeline for the Oregon Toll Project Projects



11.4 Opportunities for Future Involvement

As the Regional Mobility Pricing Project moves forward, ODOT will continue to share project updates and provide opportunities for feedback. Planned ongoing engagement opportunities will include the following:

- Collaboration with Oregon Toll Program committees, including the [EMAC](#), Regional Toll Advisory Committee (RTAC), and Statewide Toll Rulemaking Advisory Committee (STRAC).
- Engagement opportunities to continue to develop a Low-Income Toll Program based on the recommendations from the [Low-Income Toll Report](#).

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- Equitable and focused engagement with communities that have been historically excluded and underserved by transportation projects.
- Broad public and community outreach through engagement events and online tools.
- Briefings and discussions with existing regional policy groups (for example, Joint Policy Advisory Committee on Transportation, Oregon Transportation Commission Area Commissions on Transportation, County Coordinating Committees).
- Engagement with technical work groups of regional partner agency staff to review study methods, technical data, and environmental analyses.
- Ongoing use of the Oregon Toll Program website, email, and voicemail for comments and questions.

Stay connected! Follow ODOT on Twitter, Instagram, and Facebook for project updates and ways to get involved. Questions and comments can be submitted at any time to the Project Team.

- **Web:** OregonTolling.org
- **Sign up for eNews:** OregonTolling.org. Click on “Contact Us.”
- **Email:** oregontolling@odot.oregon.gov
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