

August 13, 2020

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

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

Dear Director Broussard:

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,



Chair Jim Bernard  
C4 Co-chair



Mayor Brian Hodson  
C4 Co-chair

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