



CITY OF West Linn

September 15, 2020

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

RE: I-205 NEPA Alternatives Comment Period

Dear Ms. Broussard,

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

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

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

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

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

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



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

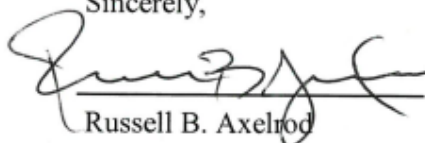
We know that ODOT understands the dire situation facing the Abernethy Bridge, and the serious safety incidents which occur almost daily along I-205. This stretch of federal highway cries out for an immediate fix. The design work is practically completed, and construction needs to begin. Yet, a "tolling-only"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

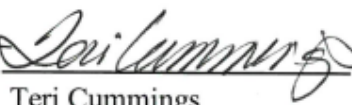
Instead, we urge the Department and the Oregon Transportation Commission to consider a plan which:

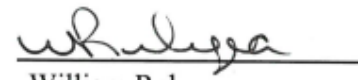
- A) Prioritizes securing immediate funding from the state legislature and any potential federal infrastructure package (the tried and proven approach that has worked for every single state highway project in the state since the 1970s);
- B) Suggests tolling only once a comprehensive, **regionwide**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

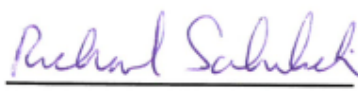
We stand ready to join arms in support of a revised ODOT plan, and ready to get to the business of upgrading this important stretch of highway which runs through the middle of West Linn and our neighboring communities.


Sincerely,


Russell B. Axelrod
Mayor


Teri Cummings
Council President


William Relyea
Councilor


Richard Sakelik
Councilor


Jules Walters
Councilor