



CITY OF
West Linn

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Dear Director Strickler and Ms. Putney,

On behalf of the residents of West Linn, I am writing to express deep concern about the survey that has been distributed to community members and local governments regarding the proposed “options” for the Regional Mobility Pricing Project.

At the outset, both the term “regional tolling” and the project name “Regional Mobility Pricing Project” are misnomers that should be altered for transparency purposes. Tolls are not proposed for the Portland Metro region as a whole. Interstates 84 and 405 and Highways 26 and 217 are exempt from tolls under the current so-called “regional” plan. **Consider the equity implications of that policy: for a typical daily commute into Downtown Portland, residents of West Linn, Oregon City, Wilsonville or Tualatin, using I-205 and I-5, might pay 6-8 tolls per day, while residents of Hillsboro, Beaverton or Gresham, making a similar trek to Portland, using Highway 26 or I-84, respectively, would pay zero tolls.**¹ Many residents of the Metro region will not pay their fair share into the transportation system while others in my community and neighboring communities are disproportionately impacted in their daily commutes and lives. Compounding the inequity is the fact that the highly congested Highway 217 corridor received significant financial investment from the State for safety projects that were fully funded without tolling. The inequities in the plan are unacceptable and run afoul of the basic concept of equity.

The survey distributed by ODOT appears to represent an attempt by ODOT to manipulate public input in order to receive only positive feedback for ODOT’s plan to institute the Regional Mobility Pricing Project. As detailed below, my constituents and I have several serious concerns about the distributed survey and overall process. Corrective action should be taken to ensure that this survey yields accurate results that reflect the wishes of the public for the sake of legitimacy.

¹ This calculation assumes 3-4 tolls in the morning commute and 3-4 tolls in the evening commute as contemplated by the current options in the RMPP survey.



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A. Survey Questions Lack Context that is Necessary for Public Understanding and Contain Dubious Assumptions that are Misleading.

For example, in Question 8 ODOT asks, “Is it reasonable to pay a few dollars to drive on I-5 and I-205 to have a faster trip?” ODOT itself acknowledges that it is not known how much the toll rates would cost as rates have not been set. It could very well end up costing more than just a few dollars for folks, depending on travel patterns and what rates are actually adopted in 2025. It is important to note that a few dollars means a lot to the people who would be impacted most by this tolling plan. Accordingly, presupposing that costs to users would be a mere “few dollars” to elicit supportive responses is inappropriate.

Additionally, the use of the word “faster” introduces bias and lacks context. What constitutes “faster” in a way that is meaningful to the public? Projections produced by ODOT show that travel times on I-205, for example, may only decrease by 3 minutes in total for the I-205 freeway with congestion pricing implemented.² A question like, “Is it reasonable to possibly pay several dollars to drive on I-205 for only a 3-minute reduction in travel time?” would likely elicit a much different ratio of positive to negative responses. This speaks volumes to the validity of the survey. Special care should be given to ensure that questions are not biased and provide full information.

B. The Key Questions and Multiple-Choice Answers Do Not Allow for Meaningful Public Dissent from the State’s Tolling Plans.

Perhaps recognizing that public support for tolling in general is low throughout the Portland region, questions in the ODOT survey regarding the proposed “three options” do not allow for any meaningful dissent or expressions of disapproval of the three tolling options or the concept of tolling. This issue was brought to my attention by my constituents. Several constituents pointed out that the survey did not allow them to accurately represent their views on tolling. Attached to this letter is a copy of comments received from constituents on the City Facebook page as an example. I then viewed the survey and wholeheartedly echo their serious concerns.

How can the results of the survey be taken as valid public input if ODOT does not allow for dissent in the responses? In the survey, ODOT asks how difficult each of the proposed tolling options are to “understand.” ODOT also lists policy preferences for people to select with no choice to not support the tolling concepts and asks people to select from two statements in

² See [Regional Mobility Pricing Project Options: Modeled Findings and Trade Offs Evaluation Document](#) dated September 11, 2023, Page 3, Row 1 (showing I-205 travel times decreasing by 3-5 minutes in total.)



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support of a “tolling system.” **Notably absent from the responses to that question is an answer choice that allows community members to state that they do not prefer a tolling system.**

Leading questions are a well-documented form of survey bias that casts doubt on the validity of the results. ODOT can take responses to the aforementioned questions and then say that a large percentage of respondents support a particular tolling system and lay claim to what toll system the public wants, but an option to not support tolling was not presented. Serious flaws are detailed in the preceding paragraphs regarding the one question that allows respondents to answer negatively as to whether paying “a few dollars” for a “faster trip” is reasonable. In summary, allowing members of the public and participating local governments to dissent in surveys and providing contextual information must occur for a survey to pass muster and give meaningful results as to what the public wants on the topic.

C. The Three Options Have Not Been Analyzed with Sufficient Rigor to Allow Local Governments and Members of the Public to Comment.

The three options for the RMPP that have been presented for review and comment by the public and local governments contain major differences. According to the documents, the first option contains tolls at on-ramps. The second option contains a tolled section of freeway between Stafford Road and Exit 6 and includes Wilsonville’s section of I-5, while the third option would toll the I-205/I-5 Interchange and exempt Wilsonville’s stretch of I-5. Each of these options would likely drastically alter driver diversion patterns and impact local communities differently in ways that are unknown at this time.

Creating a tolled section between Stafford Road and West Linn’s Exit 6, as the second option contemplates, would present an obvious detour for drivers to reroute over to Borland Road/Willamette Falls Drive to avoid those tolls. Drivers might then logically extend their freeway detour all the way over the Arch Bridge, which would successfully avoid the Abernethy Bridge toll as well. The third option, exempting Wilsonville and tolling the I-205/I-5 Interchange, would likely encourage diversion onto city and county roads as well, starting in Wilsonville. ODOT has not forecasted diversion on a local scale as part of its analysis, instead choosing to model it at the “regional” level. Accordingly, ODOT claims that diversion will increase “1-3% overall” in the Metro region.³ What does this mean to our local roads? How many more cars will divert onto Willamette Falls Drive under the different scenarios? Remember that the Environmental Assessment for the I-205 Project with tolling set up between Stafford Road and

³ See [Regional Mobility Pricing Project Options: Modeled Findings and Trade Offs Evaluation Document](#) dated September 11, 2023, Page 3, Row 3 (showing range of “1-3% increase” for daily VMT change on local roads across the three scenarios.)



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Exit 6 showed traffic increasing on Borland Road/Willamette Falls Drive by up to 100%, not 1-3%.⁴ Diversion is a key issue that my constituents and fellow local leaders are deeply concerned about. The public cannot be expected to provide opinions without understanding the impacts on a localized level.

Conclusion

I am writing to highlight serious, fundamental concerns with ODOT's approach to public opinion surveying with the hope that corrective action will be taken. Allowing negative opinions to be shared is an essential part of democracy. It is the only way to ensure that public survey results honestly represent public sentiments on the topic. The survey presented to the public quashes dissent and some questions lack essential context and lead members of the public to select answers that represent conclusions that they may not wish to support. ODOT should reconsider the approach to these public input surveys that do not allow dissent and appear to manipulate public opinion towards ends that benefit the agency. Receiving true public opinion on these topics would allow honest, frank discussions among State policymakers about which options have support from the people.

Key data detailing localized diversion in the different scenarios is also missing, thereby precluding local governments and residents from expressing informed opinions on the options. While toll collection has been paused until 2026, the State continues to barrel down the path of inequitable tolling that is not regional and will result in some residents paying drastically more than others solely based on where people live in the region and their activities in daily life. If equity truly is the central tenet of the ODOT process, as is always talked about by officials and key legislators, the current tolling plan and approach cannot move forward.

Respectfully,

Rory Bialostosky
Mayor of West Linn

⁴ See [I-205 Environmental Assessment](#) Page 48 of 192, stating that parallel routes to I-205 including Borland Road and Willamette Falls Drive may experience up to a 100% increase in traffic volume with tolls compared to no tolls.



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City of West Linn Facebook Page Regarding Tolling Survey Sample Comments from September 26-27, 2023

Comment A

“Unfortunately the multiple choice questions don’t provide any options that align with my desired responses and no place to put written feedback.”

Comment B, replying to the above: “my thoughts, exactly 😞”

Comment C

I thought I'd already commented... I am a professional researcher who has done survey research for over 30 years. This survey was designed to get respondents' feedback on 3 tolling schemes. There is one spot where you can indicate concern about diversion into local roads - nothing about whether or not to toll. And nothing about "congestion pricing" and the ridiculous assumption that commuters can control their work hours to avoid busy times. Gee, they do look at no tolls overnight...

Comment D

This survey is so poorly written I couldn’t decide if it was worse to answer or not answer. What a shit way to hear the public.

Comment E

Wow, so this survey should read, "How would you like this toll project inserted into your body?"

1. Sideways
2. Upside down

Comment F

The survey doesn't ask for alternative ideas and doesn't ask what the impact would be on you as an individual.



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Comment G

This is a terrible survey because it doesn't allow any input, just programmed answers to help them out! We voted tolls down, so there is no reason whatsoever for them to be an option for ODOT!!! The people have spoken, and you already take one of the highest gas taxes in the country, so it's done!

Comment H

No tolls. Stop.

Comment I

NO TOLLS, PERIOD.

Comment J

Holy biased survey...
total trash and trying to sell their own agenda