



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 Director Broussard:

On behalf of the Clackamas County Board of Commissioners, 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.

***Before doing so, the Clackamas County Board of Commissioners would like to be clear that this letter is not an endorsement or acceptance of any proposal to implement tolling on I-205.***

**First, the desired outcome(s) of this study remains unclear.** Is the goal to toll for the purpose of generating revenue to construct the I-205 Widening and Seismic Improvements Project, or is the intention to implement value pricing for the purpose of managing congestion? We respectfully request clarity on the desired outcome(s) of this study and the potential implementation of tolling.

**Second, 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. We 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.

**Third, should tolling be implemented in the future, we reject the idea that tolling could be implemented on I-205 before system-wide tolling or congestion pricing is applied.**

Clackamas County should not be forced to bear the burden of tolling or congestion pricing, with all of the potential associated impacts, before a system wide approach is applied. It is unfair and unacceptable. 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 these I-205 improvements as well as other proposed improvements on I-5, I-84, I-405, and OR 217.

**Fourth, we are concerned about a lack of clarity around the intentions and policies regarding toll revenue allocation.** At the August 13<sup>th</sup> OTC meeting, ODOT Urban Mobility Office staff asked the OTC to consider a revenue policy. We support tolling staff's request that revenue generated in tolling project areas remain in those tolling project areas to help fund capital projects and diversion mitigations.

We also ask for clarification on the definition of project area vs. corridor. Should tolling be implemented, the Clackamas County Board supports the concept that revenue generated from tolling on I-205 be used to fund capital projects on I-205 and mitigations on the adjacent facilities to accommodate the diversion anticipated by the implementation of tolling. Please clarify the definition of corridor or project area relating to the revenue discussion – where, specifically, will the revenue generated be allowed to be spent?

**Finally, we are concerned that this study assumes that the current level of diversion off I-205 onto the surrounding street network is the baseline that will be maintained.** The current level of diversion is not acceptable, our local networks are over capacity, and we believe that much of the traffic is actually existing diversion from a heavily congested I-205. The proposed environmental analysis does not include an analysis of the current level of diversion. To better understand the current level of traffic diversion from I-205 we request that ODOT undertake two additional model runs. The first model run should be an untolled 2018 build scenario that includes the increased capacity proposed for the I-205 project (an additional lane in each direction on I-205 between OR99E and the Stafford Road interchange). The second model run should be an untolled 2018 base scenario model run that does not include the proposed capacity increases proposed for the I-205 project. A comparison of these two model runs will show the amount of diversion that occurred in 2018 and the locations that were impacted in the surrounding communities. Once the level of existing diversion has been analyzed, it will be possible to better analyze the traffic impacts of the future year alternatives, and better understand the additional diversion that will be experienced due to tolling.

The Board of Commissioners supports C4's comments and requests as listed below -

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 eastward 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 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,

**CLACKAMAS COUNTY BOARD OF COMMISSIONERS**

A handwritten signature in blue ink that reads "Jim Bernard". The signature is written in a cursive style with a large, looped initial "J".

Jim Bernard, Chair  
On Behalf of the Clackamas County Board of Commissioners