

Mandy Putney
ODOT Urban Mobility Office
18277 SW Boones Ferry Road
Tualatin, OR 97224

April 21, 2023

Dear Ms Putney:

TriMet believes that the I-205 Toll Project will be a transformational project that will better manage limited highway resources and improve regional infrastructure for the future. While TriMet is supportive of the project, the diversion of freeway traffic to local streets resulting from pricing will negatively impact regional transit services that operate on surface roads near the toll project, particularly along OR43, Main Street in Oregon City, and OR 99E.

As TriMet works to increase and improve transit service in Clackamas County and the I-205 project area, transit reliability and travel time will be key considerations for riders to choose transit. Transit priority roadway and signal treatments, as well as transit service improvements will be essential to ensure that transit is a competitive and viable alternative to traveling on a priced highway facility. Additionally, any impacts of the toll project to transit travel time must be mitigated through this project. Please consider our more specific comments for mitigations below.

Transit Travel Time Impacts

TriMet views any increase in travel time as an adverse effect on transit operations, particularly as the state and region work to decrease VMT and increase transit mode share to reduce greenhouse gas emissions and minimize the effects of human-caused climate change. The following is a summary of the expected negative transit travel time impacts resulting from implementation of the I-205 Toll Project that are stated in the Environmental Analysis (EA).

- Increase of approximately 3 minutes in travel time on OR 43 in the southbound AM, which would impact TriMet Bus Line 35.
- Increase of approximately 8 minutes in travel time on Main Street for 9 regional transit routes serving the Oregon City Transit Center.
- Increase of approximately 3 minutes in travel time for 5 transit routes operating on OR 99E.

TriMet considers any increases in transit travel times of 25% or more for over a ½ mile or more as significant if not mitigated. Given the potential impacts and uncertainty in estimating the diversion impacts of I-205 tolling on TriMet operations in the area, TriMet requests that for the first three years following the start of toll operations these impacts should be re-evaluated on an annual basis to consider additional or adjusted mitigation measures. To better evaluate transit travel time impacts, we suggest the following metric to be used: **Any actual increases in transit travel times of 25% or more for over a ½ mile or more are significant if not mitigated.**

Required Mitigation Measures

TriMet agrees with the transit-related mitigation measures outlined in the I-205 Toll Project Environmental Assessment at the locations listed below, and seeks to ensure that these mitigation measures will be funded as part of the I-205 Toll Project:

- OR 99E/North of Dunes Dr. – Widen to provide SB queue lane for buses. We support this mitigation if the advance green light for transit is added.
- OR 99E/Dunes Dr. – Implement Next Generation Transit Signal Priority (TSP) for transit. Next-generation TSP will enable traffic signals to prioritize transit travel, improving on time performance for transit vehicles and riders.
- OR 99E/I-205 Southbound Ramps – Implement TSP for transit and provide NB bus pocket and advance green light.
- OR 99E/14th St (in Oregon City) – Implement TSP for transit
- OR 99E/12th St (in Oregon City) – Implement TSP for transit
- Main St/10th St (in Oregon City) – Implement TSP for SB left turn transit. We support this if a traffic signal is added at this intersection. If a traffic signal is not added, ODOT should advance an alternate mitigation that adds a southbound bus lane on Main St between 12th and 11th St to mitigate delays to multiple transit routes accessing the Oregon City Transit Center.

In addition to the above, the I-205 Toll Project should incorporate and commit to funding as part of the project the following additional transit-related street mitigation measures:

- OR 99E/I-205 Northbound Ramps – Add a southbound bus lane from the I-205 southbound ramp to 14th St to mitigate OR 99E delays for multiple TriMet routes. This solution was previously discussed with ODOT engineer Andrew Bastasch in January 2023 – shown by dashed red line:



- I-205 ramps at 10th St – In coordination with TriMet, add new concrete bus pads and sidewalks to allow an extension of Line 76 on I-205 to serve local stops on on/off-ramps.
- OR 43 between A Ave and McVey Ave – Add transit signal priority at intersections where there is a projected impact to the Multimodal Level of Service (MMLoS) to mitigate impacts of delays on Line 35 or consider alternative mitigation to improve transit performance at any time of day or direction of travel exceeding TriMet’s aforementioned consideration of a significant impact.

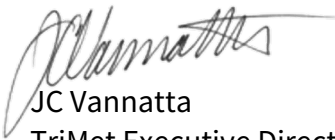
Additional comments and questions:

- Table 3-11 of the EA asserts that overall transit MMLOS would be better under the Build Alternative than the No Build Alternative. We don't understand this finding because negative impacts on transit travel time have been identified on OR43, Main Street, and OR 99E highlighted above. Does this analysis consider the number of buses per hour for TriMet's planned transit network and estimated travel time delays/savings on each transit line? We request to see the analysis and justification for this rating.
- TriMet and ODOT are in discussions regarding an extension of Line 76 service between Tualatin and Oregon City to help mitigate the diversion impacts of the I-205 Toll Project. TriMet has also identified the following additional service improvements that may be needed to further mitigate the diversion impacts of the I-205 Toll Project, should additional ODOT funding be available in the future to support transit improvements beyond TriMet's planned and budgeted service. TriMet suggests the I-205 Toll Project consider additional travel forecasting modeling to identify the mitigating benefits of these additional transit service improvements impacting the I-205 Toll Project area.

Transit Service	Improvement
Line 33-McLoughlin/King Rd.	Upgrade to 12-minute headways
Line 35-Macadam/Greeley (OR43)	Upgrade to 15-minute headways between Oregon City & Portland
Line 79-Clackamas/Oregon City (82 nd Dr.)	Upgrade to 15-minute headways
Line 145: Jennings Rd (future line)	Provide new service at 30-minute headways

Thank you for your consideration of these comments.

Sincerely,



JC Vannatta
TriMet Executive Director of Public Affairs