



July 10, 2018

Commissioner Tammy Baney, Chair
Oregon Transportation Commission
Oregon Department of Transportation
355 Capitol Street NE, MS11
Salem, OR 97301-3871
Attn: Commission Assistant

RE: Portland Metro Area Value Pricing Feasibility Analysis

Dear Chair Baney and Members of the Commission:

On behalf of Clackamas County, we are pleased to offer you our position on the recommendations of the Portland Metro Area Value Pricing Feasibility Analysis. Representing communities and residents that are directly impacted by one of the state's most congested freeway segments, we have closely followed the development of the Value Pricing Study stemming from HB 2017.

The interstate system in the Portland region has locations in which congestion due to lack of capacity is so severe that it is impacting our quality of life, air quality, and economic competitiveness. Most notably, these areas include the I-5 Rose Quarter and the two-lane segment of I-205 between Stafford Road and Oregon 99E. Both segments contain significant bottlenecks that are of statewide significance. It is, therefore, no surprise that the Value Pricing Policy Advisory Committee (PAC) recommended further study of tolling in both of these sections.

The Board of County Commissioners urges the OTC to be mindful of some fundamental challenges that are unique to our local Clackamas County community:

- **Safety Concerns Caused By Diversion:** Currently there are thousands of trips every day that are being diverted off of I-5 and I-205 onto rural County roads. These diverted trips on to the County road system are impacting the livability of our communities and the safety of our residents and the traveling public, resulting in more crashes on the County system.
- **Lack of Parallel Systems/Routes:** An issue unique to the southern I-205 corridor is a lack of a developed grid system due to its topography, rivers, and rural location. This limits the route alternatives, especially to low-income populations that cannot afford tolls.
- **Shortage of Transit Alternatives:** There is a lack of transit along the I-205 corridor between I-5 and Oregon City. As emphasized by the recommendation from the PAC, the necessity to provide reasoned transit alternatives as a part of this project are imperative to ensure traveling options.

Should the OTC decide to move forward with value priced tolling, the Board's position is as follows:

- Concept E should include at least one lane that is not priced to accommodate low-income populations that cannot afford tolls, have limited or no access to transit, and have no feasible alternative routes available.
- Concept B should be studied in conjunction with Concept E. If either I-5 or I-205 is tolled, then both must be to avoid unwanted diversion between the two corridors.
- Emphasis should be placed on ensuring revenues from these Concepts be focused on growing capacity to increase freeway throughput, near and long term, in the region.
- Revenues spent to mitigate the impacts of these Concepts should only be spent in areas experiencing direct impacts from diversion.

While we are supportive of advancing an analysis of these pricing alternatives, we are mindful that tolling is one of a number of tools to help address the region's congestion challenges. Specifically, value pricing is a tool but not a silver bullet in our efforts to meet the needs of our transportation system.

Lastly, the aforementioned I-205 bottleneck is currently on track to be shovel ready for construction in 2020, yet the project lacks necessary funding for final design and construction. It is imperative to seek remaining project design funding from the 2019 state legislature to keep the project on its current timeline while awaiting future toll revenues for construction. Should the OTC pursue tolling, it should be implemented in such a way as to ensure that the project can be built as expeditiously as possible. Should tolling ultimately prove infeasible or not timely for funding the I-205 project, Clackamas County would stress the need for the state legislature to identify alternative funding to move construction of the project forward.

We have appreciated the participation of Commissioners Simpson and O'Hollaren on the PAC. Thank you for your consideration of our comments on this very important subject, and we look forward to continuing to work with you in this process.

Sincerely,

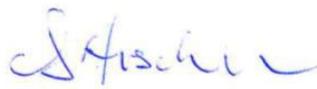
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cc: Joint Committee on Transportation
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