



600 NE Grand Ave.
Portland, OR 97232-2736
oregonmetro.gov

April 21, 2023

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

Subject: I-205 Toll Project Public Comments

Dear Ms. Putney:

The Metro Council appreciates the opportunity to review and comment on the I-205 Toll Project Environmental Assessment (EA). Our Regional Congestion Pricing Study found that tolling, when done right, can manage congestion while helping to meet our region's goals on climate, equity, and safety. However, both Metro Council and staff have concerns about whether the I-205 project can be successful in achieving these goals as it is described in the EA.

In April 2022, as part of the Regional Transportation Plan amendment for the I-205 Toll Project, ODOT made a series of commitments relating to both the I-205 Toll Project and the Regional Mobility Pricing Project (RMPP), as outlined in a Letter of Agreement dated April 25, 2022. Metro Council has reviewed these commitments in light of the draft Environmental Assessment for the project and found several disparities between the promises made and current direction of the I-205 Toll Project.

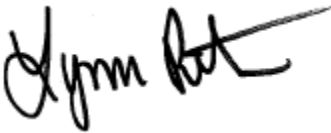
1. **Center equity in our process and outcomes.** The draft EA does not meaningfully address or include low-income toll strategies, despite adoption by the OTC of the Low-Income Toll Report. Given these commitments that a Low Income Toll Report will inform the NEPA process and that ODOT would implement equitable income-based toll strategies prior to assessing a toll, Metro Council needs to see the project's EA reflect such strategies in its analysis of the build alternative.
2. **Monitor diversion and fund projects that address diversion impacts.** It is not clear in the draft EA that ODOT is committed to fully funding projects that will manage diversion impacts from the I-205 Toll Project, as specified in the amendments made to the 2018 Regional Transportation Plan. The Metro Council would like to see specific commitments to funding diversion management projects.
3. **Local input on the direction of tolling revenue.** Allocation of tolling revenue, both for the I-205 toll project and the RMPP, continues to be of concern to Metro Council. ODOT has not been transparent about the allocation of revenue throughout the RTP update process. While they did create the Regional Tolling Advisory Committee (RTAC) to involve local stakeholders, they also created a separate committee, the Statewide Tolling Rulemaking Advisory Committee (STRAC), to make decisions on rule making and rate setting policies, including a low-income program. The

Metro Council does not see this as a good-faith effort to put local elected leaders at the helm of decision-making for revenue allocation.

4. ***I-205 integration into RMPP.*** While the Metro Council appreciates efforts by ODOT staff to incorporate regional input into the adopted OHP amendment and the 2023 RTP update, the Council is disappointed that current proposals shared with the Regional Toll Advisory Committee (RTAC) do not meaningfully narrow the implementation gap between the two projects.

ODOT continues to make empty promises. This draft EA reflects ODOT's continued disregard for commitments made throughout the process. We will continue to work in good faith with ODOT; however, if ODOT does not honor the agreement, Metro may need to reconsider its approach to this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Lynn Peterson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Lynn Peterson
Metro Council President

A handwritten signature in black ink, appearing to read "Christine Lewis". The signature is cursive and somewhat stylized, with a prominent loop at the end.

Christine Lewis
Metro Councilor District 2

cc: Kris Strickler, ODOT
Bob Van Brocklin, OTC Chair
Brendan Finn, ODOT
Margi Bradway, Metro