



April 20, 2023

*Submitted via email to
I205TollEA@odot.oregon.gov*

Brendan Finn, Director, Urban Mobility Office
Mandy Putney, Project Director, I-205
Oregon Department of Transportation
Attn: I-205 EA Comment
ODOT Urban Mobility Office
18277 SW Boones Ferry Road
Tualatin, OR 97224

RE: I-205 Toll Project EA Comment

Dear Directors Finn and Putney:

The City of Wilsonville appreciates the opportunity to provide comment on the Oregon Department of Transportation's (ODOT) I-205 Toll Project Environmental Assessment (EA).

As a participating agency in the I-205 Toll Project Draft Agency Coordination Plan, the City of Wilsonville has significant interest in this project that could carry major ramifications for both highway traffic and local-area streets congestion. The City's South Metro Area Regional Transit (SMART) Director also participates on the Equity and Mobility Advisory Committee and the Tolling-Transit Work Group.

As a city with a residential population over 27,000 that hosts over 20,000 jobs, thousands of workers commute daily to Wilsonville from every corner of the Portland metro region and North Willamette Valley. Approximately half of these jobs (10,000) are in manufacturing and wholesale distribution where both commuting workforce mobility and the timely movement of freight are crucial for Oregon's continued economic development. Of these 20,000 jobs, 90% are held by commuting workers who live outside of Wilsonville. Thus, public transit mobility options such as those offered by the City's South Metro Area Regional Transit agency are key to reducing vehicle miles traveled and associated traffic congestion.

The City shares concerns about the EA that are raised in letters of comment by:

- The Clackamas County Board of County Commissioners dated April 19, 2023, and the attached technical Comments on the I-205 Toll Project Environmental Assessment dated April 12, 2023.
- The Clackamas County Coordinating Committee (C4) dated April 10, 2023.

The EA raises additional issues of concern for the City, as noted following.

1. EA API analysis area is too small to capture accurately the potential traffic impacts of tolling:

Footnote 12 on page 3-1 of the EA indicates that “A relatively small portion of I-5 was included within the API because most sections of I-5 would not experience substantial differences in traffic volumes between the No Build and Build Alternatives.”

The API size appears to focus on too small of an area and does not focus on interchanges or road segments, like Stafford Road south of Mountain Road, that need to be analyzed to understand full impact of diversion on local roads.

The EA shows an overall daily decrease in traffic on Stafford Road; however, the EA indicates that 2045 PM peak data shows a 40%-50% increase in volumes north and south of Mountain Road under the Build scenario, directly attributed to I-205 tolling diversion. This increase in PM peak traffic could have significant impacts to roadways and intersections south of Mountain Road, specifically the 65th/Stafford/Elligsen roads intersection, that are outside of the API and not documented in the EA. Already the 65th/Stafford/Elligsen roads intersection is failing to meet standards during the PM peak hour. The API should be extended west and south, incorporating Stafford Road, Elligsen Road, Boeckman Road and Wilsonville Road through Wilsonville, to document PM peak traffic impacts on additional routes until those impacts are negligible. EA should analyze these key routes and intersections, which handle extensive PM peak hour traffic from major employers in Tualatin and Wilsonville, as well as impacting routes through existing neighborhoods.

2. The EA fails to address adequately mitigation measures for intersections that fail to meet standards under the Build Alternatives.

EA page 3-21 states that in “2027, five intersections would meet standards under the No Build Alternative but would not meet them under the Build Alternative during the AM and/or PM peak hour.” Table 3-7 illustrates the number of intersections that “Meets Standards with No Build, but Not with Build.”

This raises the question of What is the mitigation for the intersections not meeting standards under the Build scenario? The EA indicates that mitigation measures are needed, but does not address what these measures should be. The EA should provide one or more mitigation measures for each intersection that fails to meet standards.

3. The EA fails to analyze fully traffic diversion impacts onto I-5 from traffic that seeks to avoid the I-205 tolls.

EA pages 3-80 to 3-81 state that “Two Tualatin intersections (I-5 northbound ramps and Nyberg Street and I-5 southbound ramps and Nyberg Street) would meet standards under the No Build Alternative and *not meet standards under the Build Alternative* during the

PM peak hour in 2027. The Build Alternative would have longer delays (by less than 10 seconds at the I-5 northbound ramps and about 20 seconds at the I-5 southbound ramps) than the No Build Alternative. These differences could have an impact on people and public service providers, such as emergency vehicles, traveling to nearby social resources, including medical facilities, parks, and shopping centers. The southbound ramps intersection is in a geographic area with a higher percentage of low-income populations, minority populations, and people experiencing a disability than Clackamas County as a whole.” Emphasis added.

While Table 3-49, Present Actions and Reasonably Foreseeable Future Actions, indicates that Metro RTP Project ID 11304, I-5 South Operational Improvements, and Project ID 11402, I-5 Northbound: Auxiliary Lane Extension Nyberg to Lower Boones Ferry, appears to indicate that these projects are a mitigation measure, the EA does not describe how this measure would mitigate the traffic impacts.

This issue also raises concerns raised in Item 1 above, that the EA API analysis area is too small to capture accurately the potential traffic impacts of tolling. The EA appears to conclude that traffic diversion onto I-5 from drivers seeking to avoid I-205 tolls is only minimal, with increased traffic during the PM peak hour. Again, however, such a small API analysis area may be failing to capture the true, regional impact of I-205 tolls on the interstate highway system and adjacent local roads.

4. Failure to analyze the cumulative impacts of tolling all of I-205 and Metro-area I-5 as proposed in the Regional Mobility Pricing Project (RMPP) provides insufficient data to fully understand tolling impacts of the I-205 Toll Project.

The City agrees with the finding of the Clackamas County Board of County Commissioners letter of comment, pages 6-7, that indicates:

“ODOT/FHWA anticipate completing the environmental review of the RMPP within the year and implementing the RMPP within one year of I-205. This analysis cannot be deferred to the RMPP environmental review process. Our review of initial modeling results from the RMPP indicates that there will be additional impacts to diversion onto local roads, possibly at different levels and in different locations than disclosed in the EA.

“Without this cumulative assessment, the public and County have been deprived of the ‘big picture’ in terms of real-world implications, environmental consequences, viable alternatives, and mitigation solutions. The impacts and mitigation associated with the projects are interconnected and the full impact of both projects has not been discussed or disclosed in the I-205 Toll Project EA. The analysis of the two projects combined could completely alter the nature and severity of impacts and mitigation analyzed for I-205. As stated in our September 15, 2022 comments on the Draft Transportation Technical Report (TTR): ‘Traffic diversion will be different for I-205 versus I-205 and I-5. The traffic analysis is inherently flawed without looking at the

broader tolling context as impacts may shift to other roads, worsen or make some current improvements unneeded.’

“Either the RMPP should be evaluated in the cumulative analysis of the I-205 Toll EA or, ideally, ***ODOT/FHWA should prepare an EIS that fully evaluates both components of the Portland Metro Area Value Pricing Project. Analysis of both projects together will allow for a more comprehensive review of feasible alternatives, diversion impacts, and mitigation planning.***” Emphasis added.

5. Lack of detailed study of public transit alternatives and capital improvement projects to support mobility options.

The EA acknowledges the various public transit “providers in the API include the Tri-County Metropolitan Transportation District of Oregon (TriMet), Canby Area Transit, South Clackamas Transportation District, and South Metro Area [Regional] Transit. In addition, Clackamas Community College operates a shuttle service between its Oregon City campus and Clackamas Town Center. There are three park-and-ride lots in the API.” Page 3-5.

The EA also enunciates a number of worthy goals and objectives, including:

“Goal: Support safe travel regardless of mode of transportation.

- Enhance vehicle safety on I-205 by reducing congested conditions.
- Support safe multimodal travel options (e.g., pedestrians, bicycles, transit, automobiles) on roadways affected by tolling.

“Goal: Support multimodal transportation choices.

- Support shifts to higher occupancy vehicles (including carpooling) and other modes of transportation (e.g., transit, walk, bike, telework).

“Collaborate with transit providers to support availability and enhancements of transit and other transportation services along I-205, especially for historically and currently excluded and underserved communities.” Page 1-7, emphasis in original.

However, the EA fails to propose sufficient public transit alternatives and capital improvement projects to support mobility options. The EA states that:

“The Build Alternative is projected to have a relatively small effect on travel mode choice in the region, with the trend indicating slightly fewer single-occupancy vehicle trips and slightly more high-occupancy vehicle, transit, and active transportation trips, as shown in Table 3-2. These changes in mode would likely be due to the lower travel costs compared to one person in a car paying the full toll.” Page 3-11, emphasis added.

The Build Alternative should be robust in design such that it has a ***significant effect on travel mode choice in the region.*** The data table on page 3-11 indicates that Transit trips

increase by only 800 trips or 0.11% — barely one percent increase in transit trips. This hardly perceptible increase in transit utilization fails to meet the objectives of the EA goals for Transit.

“Future transit ridership levels in the API would be similar between the No Build Alternative and the Build Alternative.” Page 3-26, emphasis added.

Table 3-2. Comparison of Trips by Travel Mode in 2045: Build Alternative to No Build Alternative

Travel Mode	No Build Trips	Build Trips	Difference (Build minus No Build)
Single-Occupancy Vehicle	5,248,000	5,245,000	-3,000
High-Occupancy Vehicle	4,307,000	4,309,000	+2,000
Transit	696,500	697,300	+800
Active	1,276,600	1,276,800	+200
Total	11,528,100	11,528,100	0

Source: Appendix C, I-205 Toll Project Transportation Technical Report (Section 5.3.1)

+800 = 0.11% increase in Transit trips

In examining the “Mitigation Type: Transit projects” for the primary six areas of the API, the EA proposes that only 27% of all projects relate to transit improvements. **This data demonstrates that the EA has failed to advance a sufficient number and quality of transit-related mitigation measures to make a meaningful, significant impact to increase transit utilization that is a primary objective of the EA Build Alternative.**

Table No. – Proposed Mitigation Area	Total No. of Mitigation Projects	No. of Transit Mitigation Projects	Percent Transit of All Mitigation Projects
Table 3-12. Proposed Mitigation for OR 99E/Gladstone/Oregon City Area	18	8	44%
Table 3-13. Proposed Mitigation for OR 99E/Canby Area	6	1	17%
Table 3-14. Proposed Mitigation for Willamette Falls Drive/West Linn Area	3	0	0%
Table 3-15. Proposed Mitigation for SW Stafford Road and SW Borland Road Area	5	0	0%
Table 3-16. Proposed Mitigation for OR 43/Lake Oswego Area	2	1	50%
Table 3-17. Proposed Mitigation for the Tualatin Area	3	0	0%
TOTALS	37	10	27%

To support the EA’s stated goals to “Support safe travel regardless of mode of transportation” and “Support multimodal transportation choices,” considerable greater investments in

transit mitigation measures are required. Thus, the EA should be revised to place a much greater emphasis on improving public transit utilization as a realistic mobility option that reduces the impacts of tolls and vehicle miles traveled by sponsoring more and better transit mitigation projects that provide a greater effect on travel choices favoring transit use.

The City appreciates state and federal transportation officials taking into account the City's issues of concern that we share with other local jurisdictions and members of the public. Thank you for your efforts to create a more complete and resilient transportation system for the benefit of our region.

Sincerely,

A handwritten signature in blue ink that reads "Julie Fitzgerald". The signature is written in a cursive, flowing style.

Julie Fitzgerald, Mayor
City of Wilsonville

cc: Oregon Transportation Commission (OTC): OTCAdmin@odot.state.or.us
ODOT Region 1 Area Commission on Transportation: Region1ACT@odot.state.or.us
Joint Policy Advisory Committee (JPACT), Metro: transportation@oregonmetro.gov
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