April 21, 2023

Mandy Putney
ODOT Urban Mobility Office
19277 SW Boones Ferry Road
Tualatin, OR 97224

Sent via email: I205TollEA@odot.oregon.gov

Dear Director Putney,

Thank you for the opportunity to provide technical review and public comment on the Environmental Assessment of the Interstate 205 Toll Project (I-205 Project).

The City of Lake Oswego has continued to pose questions and concerns about the I-205 Project and the impacts it will have on not only our community but a significant portion of Clackamas County. We have provided feedback in the technical spaces with staff, as well as policy with our elected officials. These efforts and requests for collaboration to address these concerns have been ignored. Further, it is evident in the Environmental Assessment our mitigation concerns have not been adequately responded to, nor have appropriate mitigation measures been proposed to offset the expected impacts of the project. The City of Lake Oswego urges further analysis with an Environmental Impact Statement (EIS) for this project, in alignment with the Regional Mobility Pricing Project (RMPP), to address the deficiencies and issues of the I-205 Project. Our comments further echo the unified voice of Clackamas County cities, as well as the Clackamas County Board of Commissioners.

The comments that follow contain a reiteration of issues that we have brought forward before, specific examples of technical shortfalls that we found in the most recent review, and our request for moving forward.

Lake Oswego's recommendations were not incorporated into the Environmental Assessment

The Public Agency engagement opportunities were very limited and lacked adequate time to review materials. Only two meetings were held to engage participating agency staff personnel, and the results and concerns raised in those meetings did not produce satisfactory outcomes.

Appendix C-1, I-205 Toll Project Mitigation Workshop Summaries does not adequately reflect the local agency concerns, and the proposed mitigations did not reflect meeting our recommendations

After the 2nd meeting in November 2022, Lake Oswego reiterated the concern that none of the proposed mitigation within our jurisdiction would alleviate congestion either in the current state or with the proposed increase in diversion. We strongly recommended that the diversion be mitigated by providing improvements at minimum improve local access across or on to the impacted system. Instead, the proposed mitigations shown in Table 3-15 and 3-16 in the Environmental Assessment (pages 3-40 and 3-41) are pedestrian improvements that will not improve conditions. These proposed improvements will cause more congestion at the Stafford/Rosemount roundabout. Additionally, some of the proposed mitigations are implementations of signal coordination that have previously been denied by the Oregon Department of Transportation (ODOT) and have been proven to not be possible given current conditions on State Street/Hwy 43.

In response to the mitigation meetings, the City sent a letter on January 5, 2023 (Attachment A) to ODOT specifically recommending mitigation that would have some worth and help offset the impacts of diversion. Our requests from that letter are reiterated in summary below:

State Street

The City requests that ODOT improve the safety for active transportation users along the entire corridor that is being impacted, beyond the two intersections. This also includes constructing bike facilities and ADA improvements, which is a standard practice for our transportation system improvements to provide multi-modal transportation options and accessibility. Understanding that the coordination of the signal system will increase traffic delays for those wishing to access commercial areas along the corridor, the City requests that ODOT carefully consider the delays to the minor-street approaches when adjusting the timing of signals.

Stafford Road Corridor

Since Stafford Road is a critical emergency access route serving Lake Oswego, West Linn, and Stafford-Hamlet, the City would not recommend installing raised crosswalks at the roundabout, as they would delay emergency response vehicles. Also, since pedestrian infrastructure only exists on the northern leg of the roundabout, the City would not recommend installing a Rectangular Rapid Flashing Beacon (RRFB) on the east leg until a sidewalk is provided south of the roundabout. The City would accept improved street lighting and crosswalk markings, as well as the installation of an RRFB on the northern leg to improve safety for pedestrians crossing between Atherton Drive and Rosemont Road.

The City would recommend the following additional improvements on the Stafford Road/McVey Avenue corridor to allow drivers, bikers, and walkers to safely and efficiently use the roadway with the additional traffic diverting to and from Interstate 205:

- *Stafford Road at Bergis Road*: A traffic signal has been identified in the City's Transportation System Plan (Project #141) and is projected to be warranted at the Stafford Road/Bergis Road intersection prior to 2027. The traffic signal would ensure access for residents on Bergis Road to use Stafford to travel to/from their destination and would improve pedestrian connectivity across Stafford Road. Project may need to be completed with realignment of Bergis Road (Project #223).

- *McVey Avenue at South Shore Boulevard*: Pedestrian crossing improvements should be provided at this major intersection that includes access to a major commercial area in the neighborhood.

- *McVey Avenue at Cornell Street*: A traffic signal has been identified in the City's Transportation System Plan (Project #63). A signal in this location would ensure residents south of McVey Avenue could still use the corridor to travel to/from their destinations and would improve pedestrian safety at this popular crossing location.

- *McVey Avenue*: Pedestrian and bicycle connectivity is limited along McVey Avenue between South Shore Boulevard and State Street. With the additional diversion expected in this area, improvements would be needed to ensure pedestrians and bicyclists are able to safely use the roadway in this stretch.

Childs Road

The City of Lake Oswego supports the City of Rivergrove's concerns and recommends that ODOT make safety improvements to pedestrian crossings at major intersections along this diversion route. Improvements to signing and striping, as well as possible enhancements to the common crossing areas, would ensure pedestrians can remain safe when additional traffic unfamiliar with the area is introduced to the streets.

Lake Oswego's Review of the Environmental Assessment has identified numerous technical concerns

Several inconsistencies and concerns were found during the review of the Environmental Assessment, the Transportation Technical Report, and the other appendices that call into question the accuracy of the analysis for the I-205 Project. It was very difficult to review thousands of pages to confirm consistency and identify modifications that may have been made

from previous drafts. Because of the significant number of concerns (not all of which are identified in this section), the City reiterates the request to pause the I-205 Toll Project until it can be aligned with the Regional Mobility Pricing Program and conduct an analysis showing the full impacts of regional tolling on the overall transportation system prior to implementing tolling on any one segment. This request is in solidarity with cities throughout Clackamas County, Clackamas County, and partner agencies.

Due to the fact that the I-205 Project is overseen by ODOT and that it will have significant effects to facilities under their jurisdiction, the analysis would be expected to follow the guidelines and procedures of ODOT's Analysis Procedures Manual[1] (APM). Departure from the methodologies presented in the APM may significantly understate the impacts of the project to facilities adjacent to the interstate as well as within neighboring jurisdictions**. Some examples of where the analysis departs from recommended procedures are as follows:**

- All turning movement counts were limited to a two-hour collection period. Page 3-12 in the Analysis Procedures Manual recommends collecting counts within a three-hour period to capture the peak period. While the study's identified AM peak hour (7:45am to 8:45am) would have likely been captured in the counts collected between 7:00am and 9:00am, there is a possibility the PM peak hour (5:00pm to 6:00pm) could have extended beyond the identified counting period between 4:00pm and 6:00pm.

- While the analysis did make slight adjustments to account for impacts of the COVID pandemic, there is no discussion of any adjustment to the existing turning movement counts to reflect 30th highest hour volumes or evidence supporting the analysis accounted for any seasonal variations (although page 14 identifies consideration of seasonal variations was included in the approach). Chapter 5 of the Analysis Procedures Manual provides directions on developing existing year volumes and states "traffic counts alone should not be used for design or operational analysis of projects." The analysis should provide discussion or evidence that the analysis volumes reflect ODOT's general requirements for analysis.

- Several intersections were observed to have been incorrectly evaluated with the analysis software. Per page 3-35 in the Analysis Procedures Manual, "outside the Portland, Salem and Eugene MPO urban areas the unadjusted saturation flow rate is 1750 passenger cars per hour of green per lane." As one example, the intersection of Stafford Road/I-205 Northbound Ramps (#2), which falls outside the Portland Metro service area, was analyzed in all scenarios with an ideal flow rate of 1,900 passenger cars per hour per lane. The report should use the appropriate flow rates or provide a saturation flow rate study to defend the use of a higher rates at the intersections where they are used.

[1] Oregon Department of Transportation, *Analysis Procedures Manual Version 2*, November 2022.

- Similar to above, some intersections had improper values in the "Total Lost time" field. Per Appendix 12/13A of ODOT's Analysis Procedures Manual, this field can be adjusted based on values for the yellow and all-red times. An example of where the analysis failed to adjust the "Total Lost time" include the values for the eastbound approach to the intersection of Stafford Rd/Ek Rd.

Outside of not following the guidelines from ODOT's Analysis Procedures Manual, issues identified in a review of the Transportation Technical Report are as follows:

- On page 9 of the Transportation Technical Report, the report states that a small portion of Interstate 5 was included in the analysis because most sections of I-5 did not meet the three criteria for including them in the Area of Potential Impact (API). While there is analysis of the Nyberg/I-5 Ramp intersections, there is no segment analysis of Interstate 5 between Interstate 205 and Nyberg Road or of the segment south of Interstate 205. Analysis of these two segments is important to see the impacts of traffic choosing to remain on Interstate 5 instead of using Interstate 205.

- In Table 5-10 on page 83 of the Transportation Technical Report, it is shown that the project on Interstate 205 will cause five segments of I-205 to fail to meet ODOT's volume-to-capacity (v/c) mobility standard in the northbound direction. In Table 5-11 on page 87, it is shown that the project will cause six segments of I-205 to fail the appropriate v/c mobility standard. Without the project, only one segment in the southbound direction would be reported to fail the appropriate standard. While the report continues to explain that the interstate would operate with less congestion with the project, hours of congestion and level of service are not the appropriate standard that ODOT uses to evaluate their facilities (the Highway Design Manual uses volume-to-capacity ratio as the standard).

- In Table 5-14 on page 106 of the Transportation Technical Report, the intersection of Stafford Road/I-205 Northbound Ramps is shown to fail the appropriate mobility standards during the AM peak hour in 2045 due to the impacts of the I-205 Project (going from a volume-to-capacity ratio of 0.65 in the No Build Alternative to a 0.80 in the Build Alternative when ODOT's Highway Design Manual requires the ramp to operate at less than 0.75 following the project). This is not referenced in the Environmental Assessment and no potential mitigation is identified.

- Analysis results for multiple intersection operations are not realistic. For instance, the analysis for Stafford/Borland shows the intersection operating at 0.61 volume-to-capacity under 2021 PM peak hour conditions before it decreases to 0.60 in the 2027 No Build Alternative, even though it is expected to have approximately 350 more vehicles (volume) with no increase in capacity.

- The Transportation Technical Report provides details on page 110 regarding how PM peak hour delays were estimated at intersections near the Stafford Road/I-205 Ramps using VISSIM. Delay and level of service are not the appropriate mobility standard for the interstate ramps (or the Clackamas County intersections). In review of the analysis, the I-205 project causes volumes for both the northbound and southbound I-205 ramps to exceed the allowable capacity during the PM peak hour (going from a volume-to-capacity ratio of 0.45 in the No Build Alternative to a 1.19 in the Build Alternative for northbound ramps and from 0.57 to 0.78 for southbound ramps when ODOT requires both ramp intersections to operate at less than 0.75). Additionally, the VISSIM results for this intersection were not included in the technical appendix for review.

- Table 5-17 on page 116 shows that the I-205 Project will cause the intersection of OR 43/A Avenue to fail to meet ODOT's mobility standards during the AM Peak Hour in 2027 (going from a volume-to-capacity ratio of 0.98 to a 1.01 when the standard is 0.99); however this is not shown in Figure 5-30 on page 155 in the Technical Report or on Figure 3-7 on page 3-23 in the Environmental Assessment (it is indicated that it fails in both the No Build and Build Alternatives in 2045 only). Page 115 of the Technical Report explains that the Build Alternative only increases the v/c ratio by 0.03 during this period; however, this amount would be sufficient to cause it to fail to meet the appropriate ODOT standards and it should be identified accordingly.

- No queuing analysis was conducted for either the intersection of OR 43/A Avenue or OR 43/McVey Avenue. The City of Lake Oswego would want to ensure queues at these intersections won't block other streets or accesses and lead to safety issues for other drivers, bicyclists, and pedestrians.

- Observing that the Transportation Technical Report highlights significant impacts at the intersections of Stafford/Rosemont and OR 43/McVey Avenue as well as at OR 43/A Avenue, the City of Lake Oswego would request analyzing impacts at major intersections that fall between these locations. This would include intersections at Overlook Drive, Bergis Road, South Shore Boulevard, and Cornell Street along the Stafford/McVey corridor and the intersections of Middlecrest Road/Wilbur Street, North Shore Road, Foothills Road, B Avenue, and Terwilliger Boulevard along OR 43.

Other issues identified in a review of the appendices to the Transportation Technical Report include:

- The appendix for the technical analysis of the I-205 Project did not include several key items identified in Section 3.4 in the Transportation Technical Report. For instance, the referenced tube counts were not included in the appendix and could have been used to support the selected peak hours for analysis. Additionally, the timing worksheets for each

of the signalized intersections were also not included for reference and could have been used to verify the timing for traffic signals when evaluating impacts.

- There are inconsistencies in the software and analysis methodologies used to evaluate multiple intersections. For instance, the intersection of Stafford Road/Borland Road was evaluated using Synchro 10 (HCM 6th Edition) for existing 2021 conditions during the AM peak hour, Synchro 10 (HCM 6th Edition) and VISSIM for existing 2021 conditions during the PM peak hour, and SIDRA Intersection 8.0 for 2027 and 2045 conditions for AM and PM peak hours. It is unknown which methodology was used for the SIDRA evaluation, as it has access to HCM 6th Edition and SIDRA analysis methodologies. Section 3.5 of the Transportation Technical Report only describes the use of Synchro 10 to analyze intersections (and VISSIM in the case of case of Stafford near the I-205 ramps) and did not provide mention of SIDRA, which can provide different results when compared to Synchro 10.

- To determine a critical intersection volume-to-capacity (v/c) ratio per Section 13.4.4 of ODOT's Analysis Procedure Manual, a value needs to be calculated in post-processing by referencing both HCM 6th Edition and HCM 2000 outputs. The appendix is missing some outputs for several intersections from either the HCM 2000 or HCM 6th Edition, but includes reference to the sheets in the calculation spreadsheet. The data should be provided in the appendix to verify correct critical movement values are used.

- Some intersections had volumes assigned to movements that did not have the appropriate lane in the model. For instance, the analysis of the Stafford Road/Ek Road intersection for the AM Peak under 2021 conditions assigned 10 vehicles to an eastbound right-turn movement, but the model only assumes vehicles can turn left or proceed through the intersection. This is similar to the westbound approach having 50 vehicles assigned to the westbound left-turn movement, but only showing a right-turn or through movement available. Having improper lanes identified in the analysis model can significantly impact the report of the intersection's operation.

- Some traffic volume adjustments gathered from the model and used in the analysis were not realistic. For instance, the eastbound approach at OR 43/McVey Avenue only increased by 5 vehicles between the 2021 AM peak hour conditions and the 2045 AM peak hour conditions. It would be expected that volumes would increase by significantly more than 0.03% per year rate based on historic growth rates. Also, it was observed that the I-205 project would lead to more people visiting a public park during the AM peak hour.

In review of the safety analysis in both the Environmental Assessment and the Transportation Technical Report, the following concerns were identified:

- ODOT's Top 5% and Top 10% Safety Priority Index System (SPIS) crash locations along the interstate shown in Figure 3-3 on page 3-8 of the Environmental Assessment were largely in approximately nine areas that have exiting or merging traffic (I-5/I-205 interchange, near the OR 43 ramps, and where traffic weaves between OR 213 and 82nd Drive). No segments on I-205 were shown to be within the Top 5% or Top 10% of SPIS sites. Conversely, around 43 locations and 2 segments in the neighboring communities were identified within either the Top 5% or Top 10% of SPIS sites. This fact demonstrates that the higher crash areas are largely within communities rather than on the interstate.

- Crashes on the interstate were largely identified as "failing to avoid the vehicle ahead" or rear-end collisions. These crashes do not often result in serious injuries or fatalities. Crashes in the neighboring communities (as seen above to have more high-crash areas) can often be more serious in nature or include vulnerable users such as bicyclists or pedestrians. Increasing traffic volumes in these areas would be expected to increase the frequency of crashes and would be potentially more serious than those that occur on the interstate system. This is supported in Tables 5-37, 5-38, and 5-39 showing 19 of the 50 intersections studied having an increase in injury/fatality rates with the Build Alternative in 2045. Table 5-40 on page 144 also shows 4 of 6 corridor segments having an increase in injury/fatality rates. Comparatively, Table 5-41 shows the project not having any effect on reducing predicted fatal crashes on Interstate 205 in 2045.

- In the Environmental Assessment, the Area of Potential Impacts for Land Use is not consistent with other analysis areas. Diverted traffic due to the project would be expected to have significant effects on the land use of neighboring jurisdictions beyond 100 feet from Interstate 205 and this was not evaluated in full. The area of impact for land use does not correspond to the area of impact from diversion, and this does not seem adequate or appropriate.

The Broader Regional Tolling Program must be considered

The Regional Mobility Pricing Project is a reasonably foreseeable project that needs to be analyzed prior to making decisions regarding tolling on I-205. The regional approach to tolling is most impactful and needs to be done in a strategic manner. Leaving this out of consideration, just because it isn't in Metro's Regional Transportation Plan (RTP), is disingenuous and loses sight of the holistic view of the impacts to the overall transportation system. In *Appendix B: I-205 Toll Project Performance Measures*, one of the goals noted in the table is "maximize integrations with future toll systems". The RMPP was identified within the

cumulative impact report; however, it was not included because “impacts cannot be reliably qualified or quantified at this time”. Of note, the I-205 Tolling project was not part of Metro’s RTP until recently when it was forced to be added.

Mitigation of traffic impacts must be funded and implemented prior to the start of tolling.

The I-205 Project cannot result in a Finding of No Significant Impact (FONSI) because the mitigation measures are unlikely to be completed at the time of tolling implementation, or possibly within the studied period. Additionally, no commitment by ODOT has been made to implement any of the mitigation either in a timely manner to align with constructing and implementing tolling, or at all. Section 3.1.4 Avoidance, Minimization, and/or Mitigation Measures does not provide concrete commitment to the mitigation. All of the statements refer to “potential mitigation strategies”, or “monitoring programs”. There is not a commitment of funds or timing associated with any of the mitigation strategies.

It is also confusing to state that “any mitigation proposed to address near-term impacts that is determined to also help alleviate pre-completion tolling impacts could be implemented before tolling begins.” What is this unidentified mitigation work, and what are the costs associated with it? How could this happen before late 2024 when the tolling is expected to start? There are conflicting timing statements throughout this section.

The Revised Environmental Assessment needs to be reviewed and coordinated with local agencies and the public.

There is no discussion or commitment from ODOT that leaves the City with the expectation that there will be further opportunity to comment on the Revised Environmental Assessment when it is released.

Due to the amount of concerns and issues identified in the review of the Environmental Assessment by the City and other partner agencies, the City believes that ODOT will not be able to address all the inconsistencies or errors to provide an accurate analysis of the impacts resulting from the I-205 Project. Accordingly, the City requests that ODOT continue to work with partner agencies following the release of the Revised Environmental Assessment and that another comment period be provided to ensure all parties impacted are comfortable with the final product.

Additionally, due to the extensive amount of documentation that is needed to be reviewed in this process, the City requests that a change log or red-lined version of the Environmental Assessment and appendices be provided to simplify and hasten the review of additional reports.

Partnering Agencies are all asking for the same approach in moving forward.

The City of Lake Oswego, in solidarity with sixteen other local agencies and service providers, sent a letter to the State's Joint Committee on Transportation on April 5, 2023, urging legislative action to address concerns of I-205 Toll Project (Attachment B). Our position on the issue surrounding the I-205 Project remains that the impacts are too significant, and that future regional decisions need to be part of this process in order for the proper assessment to be completed and mitigation measures identified. Therefore, we reiterate here, the four key requests:

1. Pause the I-205 Toll Project until it can be aligned with the Regional Mobility Pricing Program and conduct an analysis showing the full impacts of regional tolling on the overall transportation system prior to implementing tolling on any one segment;

2. Schedule a public hearing in the Joint Committee on Transportation to provide a venue for the public to share impacts and concerns about the I-205 Toll Project, RMPP, and how ODOT plans to achieve its vision;

3. Create the Regional Toll Advisory Committee (RTAC) in statute to directly advise the Oregon Transportation Commission, as well as a technical committee comprised of regional technical staff to advise RTAC;

4. Develop a formula that allocates a portion of tolling revenues directly to impacted jurisdictions to address existing diversion, affected transportation impacts related to tolling and congestion, operations and maintenance and new infrastructure projects for all modes beyond any NEPA required mitigations.

The City of Lake Oswego continues to support these fundamental requests to address tolling in the Portland metropolitan area in a strategic and collaborative manner. All parties need to be engaged together to develop a solution that works for the metro area as a whole – not just one project at a time, developed without consideration of larger ramifications and area-wide impacts.

For all of the reasons detailed in this letter, we respectfully ask the ODOT/FHWA consider the requests of the City of Lake Oswego and multiple other agencies in pausing this project for a more cohesive and inclusive analysis that all parties can stand behind.

Sincerely,

Erica Rooney

Erica Rooney, PE
Public Works Director and City Engineer

cc: Lake Oswego Mayor and Councilors
Martha Bennett, City Manager
Will Farley, PE, Traffic Engineer

Attachments:

- LO Recommendation, January 5, 2023
- Joint Agency Letter, April 5, 2023

ENGINEERING DEPARTMENT

January 5, 2023

Ms. Mandy Putney
Director, Urban Mobility Office
Oregon Department of Transportation
355 Capitol Street NE, MS 11
Salem, OR 97301

RE: I-205 Tolling Project Traffic Impacts & Environmental Assessment

Dear Ms. Putney:

Thank you for the opportunity to partner with ODOT's Urban Mobility Office when determining what improvements are needed to offset the traffic impacts of the I-205 Tolling Project. Based on the expected diversion to be added through Lake Oswego on Stafford Road, McVey Avenue, and State Street (Oregon Highway 43), the City formally requests the following improvements to the public street system be included in the project's Environmental Assessment.

State Street

The ODOT project team has shared results showing a significant amount of diversion using Oregon 43 through West Linn and Stafford Road/McVey Avenue through the Stafford region of Clackamas County. A significant impact along State Street is expected north of where these two diversion routes converge at the State Street/McVey Avenue intersection. The following intersections are expected to have increased safety and operational impacts for both drivers and pedestrians frequenting the businesses along the State Street corridor:

- State Street at B Avenue
- State Street at A Avenue
- State Street at Foothills Road
- State Street at Northshore Road
- State Street at Wilbur Street/Middlecrest Road
- State Street at McVey Avenue

As mitigation for the additional diversion along the corridor, ODOT's project team has recommended providing pedestrian improvements at the State Street/McVey Avenue intersection including implementing Leading Pedestrian Interval and enhancing the signage. Additionally, the project team has recommended providing adaptive signal systems to help coordinate traffic between A Avenue and McVey Avenue so less delay is experienced by drivers

passing through the City. As City staff expressed earlier, these have been requested of ODOT for several years now, as the need already exists for these warranted improvements.

City Requests:
The City appreciates the project team recommending these currently-necessary improvements and requests that ODOT improve the safety for active transportation users along the corridor. Please consider improving all pedestrian crossings along the corridor to be compliant with current Americans with Disability Act Standards including reconstructing pedestrian ramps and updating the traffic signal indications and buttons. Also, ODOT should evaluate providing bicycle infrastructure to allow those who choose to ride a bike to safely share the road with the increased traffic needing the roadway.

Understanding that the coordination of the signal system will increase traffic delays for those wishing to access commercial areas along the corridor, the City requests that ODOT carefully consider the delays to the minor-street approaches when adjusting the timing of signals. ODOT should also consider improving the safety of the intersections along the corridor by adding reflective backplates to the indications and improving the vehicle detection.

Since additional diversion from the I-205 Tolling Project will likely impact all intersections north of McVey Avenue as traffic travels through the downtown core, the City requests that ODOT include the following additional improvements to the corridor:

- *State Street at B Avenue*: Significant redevelopment is anticipated to occur on the northwest corner of this intersection prior to 2027. Additional safety improvements should be included at this intersection, including the implementation of Leading Pedestrian Intervals for pedestrians and reflective backplates for the signal indications.

- *State Street at Terwilliger Boulevard*: The City has identified the need for speed feedback signs near this intersection in the City's Transportation System Plan (Project #110). Additionally, traffic signal warrants should be reviewed for this busy intersection, as the diversion would be expected to increase the traffic turning left onto Oregon Highway 43 at this location.

Stafford Road

The ODOT project team shared the expected impacts along the Stafford Road corridor north of Interstate 205 and recommended improvements to the Stafford Road/Rosemont Road/Atherton Drive roundabout including improved street lighting for vulnerable users, providing Rectangular Rapid Flashing Beacons (RRFBs), and installing raise crosswalks.

City Requests:
Since Stafford Road is a critical emergency access route, the City would not recommend installing raised crosswalks at the roundabout, as they would delay emergency response

vehicles. Also, since pedestrian infrastructure only exists on the northern leg of the roundabout, the City would not recommend installing an RRFB on the east leg until a sidewalk is provided south of the roundabout. The City would accept improved street lighting and crosswalk markings as well as the installation of an RRFB on the northern leg to improve safety for pedestrians crossing between Atherton Drive and Rosemont Road.

The additional diversion from the I-205 Tolling Project triggering the need for improvements at Stafford Road/Rosemont Road/Atherton Drive and at the State Street/McVey Avenue intersections is expected to also impact safety and operations at intersections within the City between the two points. The City would recommend the following additional improvements on the Stafford Road/McVey corridor to allow residents to safely and efficiently use the roadway with the additional traffic diverting to and from Interstate 205:

- *Stafford Road at Bergis Road*: A traffic signal has been identified in the City's Transportation System Plan (Project #141) and is projected to be warranted at the Stafford Road/Bergis Road intersection prior to 2027. The traffic signal would ensure access for residents on Bergis Road to use Stafford to travel to/from their destination and would improve pedestrian connectivity across Stafford Road. Project may need to be completed with realignment of Bergis Road (Project #223).

- *McVey Avenue at South Shore Boulevard*: Pedestrian crossing improvements should be provided at this major intersection that includes access to a commercial area in the neighborhood.

- *McVey Avenue at Cornell Street*: A traffic signal has been identified in the City's Transportation System Plan (Project #63). A signal in this location would ensure residents south of McVey Avenue could still use the corridor to travel to/from their destinations and would improve pedestrian safety at this popular crossing location.

- *McVey Avenue*: Pedestrian and bicycle connectivity is limited along McVey Avenue between South Shore Boulevard and State Street. With the additional diversion expected in this area, improvements would be needed to ensure pedestrians and bicyclists are able to safely use the roadway in this stretch.

Childs Road

During a recent meeting with ODOT and their project team, the City of Rivergrove expressed concern with additional diversion expected to use Childs Road when circumventing the tolling on Interstate 205. The City of Lake Oswego would like to echo this concern and recommend that ODOT make safety improvements to pedestrian crossings at major intersections along this diversion route. Improvements to signing and striping as well as possible enhancements to the common crossing areas would ensure pedestrians can remain safe when additional traffic unfamiliar with the area is introduced to the streets.

We appreciate being involved in this process, and ask that ODOT include our requests in the mitigation from the I-205 Tolling project, as the residents who will be severely impacted need improvements that allow them mobility through and within the City of Lake Oswego. For further details or coordination, please contact Will Farley, the City's Traffic Engineer, and myself.

Sincerely,

Erica Rooney

Erica Rooney, PE
Public Works Director/City Engineer

Cc: Joe Buck, Mayor
Martha Bennett, City Manager
Will Farley, Traffic Engineer

The 2023 State Legislature Must Take Action on the I-205 Toll Project
April 05, 2023

Dear Clackamas County State Legislators and Members of the Joint Committee on Transportation:

The local governments listed here respectfully request your immediate assistance to address our shared concerns about the proposed I-205 Toll Project.

The importance of I-205 as a dependable and safe route for freight, regional, and interstate movement cannot be overstated. This critical need is the reason that the communities who rely on I-205 have been united in their advocacy to fix the bottleneck between Stafford Road and the Abernethy Bridge.

Unfortunately, the Oregon Department of Transportation's (ODOT) current approach to toll I-205 ahead of the rest of the region and prior to building the third lane on I-205 will have devastating impacts on neighboring communities. ODOT's plan will shift traffic from the interstate onto roadways within communities, causing increased safety risks and more congestion on local roads that are already failing.

ODOT's public engagement efforts to date have ignored and dismissed many of the questions and concerns raised by our cities, the county, the region and our shared constituents. ODOT staff have made it clear that they are being directed by the legislature to toll I-205 and that they are pursuing this approach per your direction. **We implore you to take legislative action this session to lessen the detrimental effects of the proposed tolling in our communities and your districts.**

To help you and the entire Clackamas delegation center on the shared priorities of our jurisdictions, we collectively request legislative action on the following four items that will have an immediate impact on the direction of the proposed toll program:

1. Direct ODOT to pause the I-205 Toll Project until it can be aligned with the Regional Mobility Pricing Program (RMPP), and, direct ODOT to conduct an analysis showing the full impacts of regional tolling on the overall transportation system prior to implementing tolling on any one segment;

2. Schedule a public hearing in the Joint Committee on Transportation, being mindful of the Committee's May 5th bill deadline, to provide a venue for the public to share impacts and concerns about the I-205 Toll Project, RMPP, and how ODOT plans to achieve its vision;

3. Create the Regional Toll Advisory Committee (RTAC) in statute to directly advise the Oregon Transportation Commission. Retain RTAC in perpetuity to guide development and implementation of the regional toll program. Also, create a technical committee comprised of regional technical staff to advise RTAC;

4. Direct ODOT to develop a formula that allocates a portion of tolling revenues directly to impacted jurisdictions to address existing diversion, affected transportation impacts related to tolling and congestion, operations and maintenance and new infrastructure projects for all modes beyond any NEPA required mitigations.

We respectfully request your leadership to advance these solutions to ensure ODOT is meeting the needs of our shared constituents and is only allowed to advance a project if it is fair, equitable, and beneficial to all Oregonians.