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**Chloe Eudaly** Commissioner **Chris Warner** Director

August 26, 2020

Ms. Lucinda Broussard  
Toll Program Director  
Oregon Department of Transportation  
355 Capitol Street NE, MS 11  
Salem, OR 97301-3871

Dear Director Broussard,

As a Participating Agency on the I-205 Toll Project, this letter serves as the City of Portland's official feedback on the draft Purpose and Need Statement.

The I-205 Toll Project offers the region an opportunity to begin to use roadway pricing to advance the equity, climate, safety, and demand management goals that have been adopted in the Regional Transportation Plan. It is critical that the project moves us closer to a more equitable transportation system, reduces greenhouse gas emissions, decreases the number of serious and fatal crashes in the corridor, and improves travel times and reliability.

It is with these values in mind, that we offer the following feedback on the Purpose and Need Statement.

### **Purpose Statement**

As it is currently written, the draft purpose statement does not address important goals that have been identified by the region: equity, safety, and climate. The purpose of pricing should not just be about moving cars and raising revenue, but rather it should be about making things better for people. It should be used to improve access to opportunities, especially for those who have been historically harmed by transportation and other governmental investments. It should be done in a way that reduces serious and fatal injuries. It should focus on reducing the greenhouse gas emissions that are generated in the corridor. It should lead to better and more reliable travel times so that people can get where they need to go.



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Because this project is ultimately about people, it should also be broadened to recognize that the revenue generated should be used not just to fund congestion relief projects, but to increase access and mobility for people and good.

We recommend the following as a purpose statement:

Manage transportation system demand on I-205 between Stafford Road and Oregon Route 213 (OR 213) in a manner that is safe, reliable, equitable, cost-effective and maximizes efficient use of current and future roadway capacity, while avoiding, minimizing, or mitigating negative impacts. Generate revenue to improve access and mobility for people and goods in the region.

### **Need for the Proposed Action**

While construction funding for congestion relief projects is identified as a need, it is also clear that there are funding needs beyond future roadway expansions that are needed in this corridor in order to have successful outcomes from the I-205 Toll Project. Feedback from regional partners and community members has consistently pointed to the need for improved transit service in the area, as well as the need to increase opportunities for people to get around on foot and on bicycle. Revenues from this project should be used to improve mobility and access needs throughout the corridor.

It is also worth noting that the need statement does not mention the need to advance racial and social equity. Our existing transportation system is inequitable with much of its burdens falling on the shoulders of Black, Indigenous, and People Color (BIPOC) community members. BIPOC community members are more likely to be exposed to transportation-related pollutants, more likely to be killed or seriously injured when walking or biking, and more likely to have less access to opportunities than white community members. As people have taken to the streets the last few months to demand action, we as government entities have a responsibility to do all that we can to improve racial and social equity. If we don't get this right, we will only repeat the mistakes of the past. There is a clear need and it should be included in the need statement for this project.

### **Goals and Objectives**

Under the *Goal: Provide equitable benefits for all users*, it would be constructive to more clearly articulate which populations have been “historically underserved or underrepresented or negatively impacted by transportation projects.” Identifying these populations will make it easier to evaluate whether the goals, including project participation, have or haven't been met.

Under the *Goal: Support safe travel regardless of mode of transportation*, the goal should be more explicit that the project will be designed in a way that advances the region's efforts to reduce and eliminate fatal and serious crashes, not just on I-205, but on other roadways that are impacted by this project.

*Under the Goal: Improve air quality and reduce contributions to climate change effects*, reduction of vehicle air pollutants and GHG should include reference to achieving this through shifts to other modes and higher occupancy vehicles in addition to improvements in travel efficiency.

Thank you again for collaborating with us on the I-205 Toll Project.

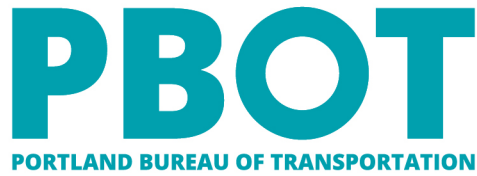
Sincerely,



Chloe Eudaly, Commissioner  
City of Portland



Chris Warner, Director  
Portland Bureau of Transportation



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**Chloe Eudaly** Commissioner **Chris Warner** Director

August 20, 2020

Ms. Lucinda Broussard  
Toll Program Director  
Oregon Department of Transportation  
355 Capitol Street NE, MS 11  
Salem, OR 97301-3871

Dear Director Broussard,

As a Participating Agency on the I-205 Toll Project, this letter serves as the City of Portland's official feedback on the Comparison of Screening Alternatives report.

The City of Portland appreciates the collaboration that has taken place on the I-205 Toll Project to date. Our staff have been engaged with the project team and regional partners through the Equity and Mobility Advisory Committee, Modeling Technical Committee, and Multimodal Working Group.

While the I-205 Toll Project is located outside of Portland's city limits, we know that this is an important project that will have impacts in our city and throughout our region. It is part of a larger effort to utilize tolling to advance the equity, climate, safety, and demand management goals that are in the 2018 Regional Transportation Plan.

It is with these outcomes in mind that we offer the following comments on the Comparison of Screening Alternatives report.

**Alternative 5 should be advanced for further consideration**

The stated purpose of the I-205 Toll Project is to *both* manage transportation system demand and to raise revenues for future projects. In reviewing the evaluation of the five alternatives, we agree that alternatives 3 & 4 should be advanced for further consideration. Both alternatives perform well at raising revenues relative to the other alternatives. However, the relative performance of these alternatives for managing transportation system demand and I-205 traffic is not as strong as Alternative 5.



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The report does not articulate why revenue generation has seemingly been prioritized over transportation system demand management at this point. Demand management is identified in both the Regional Transportation Plan and in state law [ORS 366.292 and HB 2017 Section 120(3)] as desired and necessary outcomes from roadway pricing.

*Alternative 5 should be advanced for further study. Additionally, Alternatives 3 & 4 should be further analyzed for how they can be implemented in a way that better supports system demand management.*

### **Include Tolling on I-5 in the Evaluation**

While we understand why the analysis of tolling on I-205 has been done separately from an analysis of future tolling on I-5, we want to emphasize the importance of taking a comprehensive, systemic approach to tolling in our region. Our interstate system is designed as an interconnected network, not a collection of individual pieces. As was recommended in the 2018 Value Pricing Feasibility Study, an effective tolling system that both manages transportation system demand and raises revenues should be evaluated as a system and not as a series of individual projects.

*We encourage future modeling and analysis to include tolling on the I-5 corridor so that we can all understand the potential regional benefits and burdens from the tolling alternatives.*

### **Use the Regional Transportation Plan's Mobility Corridors Framework**

The Regional Transportation Plan has identified a number of mobility corridors throughout the region. The regional mobility corridors framework is useful for understanding the multimodal ways in which people travel within a corridor, as well as the implications for land use. These are defined in the RTP as:

Mobility corridors represent subareas of the region and include all regional transportation facilities within the subarea as well as the land uses served by the regional transportation system. This includes freeways and highways and parallel networks of arterial streets, regional bicycle parkways, high capacity transit, and frequent bus routes. The function of this network of integrated transportation corridors is metropolitan mobility – moving people and goods between different parts of the region and, in some corridors, connecting the region with the rest of the state and beyond. This framework emphasizes the integration of land use and transportation in determining regional system needs, functions, desired outcomes, performance measures and investment strategies.

*When evaluating the I-205 tolling alternatives, the future multimodal impacts, and potential uses and locations of tolling revenues, we would ask that this be done using these existing, regionally adopted mobility corridors.*

**Apply an Equity Lens to Analysis**

The Comparison of Screening Alternatives uses a standard technical approach to narrowing down tolling alternatives. While this is an accepted practice in transportation planning, we also know that traditional approaches that largely focus on automobile movement have helped to create a transportation system today that is inequitable with Black, Indigenous, and People of Color (BIPOC) community members experiencing a disproportionate amount of the burdens. It is noticeable that the report does not once mention equity.

Through all stages of this project, including the narrowing of alternatives, we should be asking what are the impacts of the choices that are being made and who is being impacted. This analysis should include the members of our community who have traditionally been most harmed. It should be transparent so that policy decisions can be made to help create a more equitable transportation system. We appreciate that ODOT has established an Equitable Mobility Advisory Committee (EMAC) and strongly encourage you to incorporate their expertise and advice on how to robustly assess the benefits and burdens associated with the project and the tolling program more generally.

Thank you again for collaborating with us on the I-205 Toll Project.

Sincerely,



Chloe Eudaly, Commissioner  
City of Portland



Chris Warner, Director  
Portland Bureau of Transportation