

I-205 Toll Project

Environmental Assessment Public Engagement Activity and Comment Summary: February 21 – April 21, 2023

November 2023



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Prepared for:



Prepared by:



WSP USA
851 SW 6th Avenue, Suite 1600
Portland, OR 97204

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1 Public Engagement Summary

1.1 Report Purpose

This report summarizes notification and engagement activities as part of the engagement process for the 2023 I-205 Toll Project Environmental Assessment (2023 Environmental Assessment). The engagement process was used to gather comments on the I-205 Toll Project Environmental Assessment, which compared two alternatives: a Build Alternative and a No Build Alternative.

In February 2023, Oregon Department of Transportation (ODOT) and the Federal Highway Administration (FHWA) issued an Environmental Assessment for the I-205 Toll Project in accordance with the National Environmental Policy Act (NEPA). The Project proposed variable-rate tolls¹ on the Abernethy Bridge and Tualatin River Bridges to raise revenue for construction of planned improvements to I-205, including seismic upgrades and widening, and to manage congestion. The 2023 Environmental Assessment evaluated the effects of tolling and the toll-funded I-205 improvements on the human and natural environments and requested public input.

Since the issuance of the 2023 Environmental Assessment and comment period, several key factors have changed and had an impact on the costs and revenue sources for the Project. As a result, ODOT now proposes to focus on completing the Abernethy Bridge reconstruction and to reduce the scope of the I-205 Toll Project to tolling only at the Abernethy Bridge. ODOT and FHWA are now conducting a Supplemental Environmental Assessment to evaluate the environmental effects of this revised I-205 Toll Project. A public comment period will be provided with the publication of the Supplemental Environmental Assessment, currently planned for summer 2024.

Table 1-1. I-205 Toll Project Environmental Assessment Engagement at a Glance

| Activity | Total Engagement <i>(approximate)</i> |
|---|--|
| Public Outreach | |
| Public webinar viewers | 129 |
| Web page visits* | 11,899 |
| People engaged at tabling events | 100 |
| Project video views (all languages) | 2,685 |
| Virtual public hearing attendees | 150 |
| In-person comment opportunity attendees | 20 |
| Businesses engaged through canvassing | 169 |
| Participants at agency and public briefings | 360+ |
| Participants at equitable engagement discussion groups | 95 |
| Partner Agency Outreach | |
| Participating Agencies invited to participate and comment | 25 |
| Tribes invited to participate and comment | 7 |
| Partner agency webinar participation | 19 |

¹ Variable-rate tolls are fees charged to use a road or bridge that vary based on time of day and can be used as a strategy to shift demand to less congested times of day.

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| Activity | Total Engagement (approximate) |
|--|-----------------------------------|
| Advertising and Notification | |
| ODOT social media post impressions | 115,114 |
| Print and online advertising circulation | 526,665 |
| Recipients of Project email updates | 15,600 |
| Project-related media stories | 25+ |
| Total Comment Submittals Received | 2,852 |

1.1.1 Project history

In 2017, the Oregon Legislature passed Oregon House Bill 2017, known as “Keep Oregon Moving.” Oregon House Bill 2017 committed hundreds of millions of dollars to fund bottleneck relief highway projects, seismic improvements, freight rail enhancements, transit improvements, and upgrades to biking and walking facilities. The legislation also directed the Oregon Transportation Commission to pursue and implement value pricing² on I-5 and I-205 in the Portland metropolitan area to help manage traffic congestion. Oregon House Bill 3055, which the Oregon Legislature passed in 2021, further supported implementation of the Oregon Toll Program and related toll projects to manage congestion and raise revenue.

As directed by Oregon House Bill 2017 and the Oregon Transportation Commission, ODOT prepared the Portland Metro Area Value Pricing Feasibility Analysis (Value Pricing Feasibility Analysis) (ODOT 2018a), which determined that tolls could be used to help improve travel on I-5 and I-205 during peak times and raise revenue for congestion-relief projects. The Oregon Transportation Commission then directed ODOT to meet the Oregon Legislature’s directive and proceed with the NEPA process for tolling on I-5 and I-205 while addressing three priority issues identified during the public involvement process for the Value Pricing Feasibility Analysis:

Consistent with this direction, ODOT is developing a statewide tolling program, the Oregon Toll Program, to manage congestion and raise revenue, starting with two toll projects: the I-205 Toll Project and the Regional Mobility Pricing Project. The I-205 Toll Project is the first of ODOT’s toll projects to advance into the NEPA process and is seeking funding approval under the federal tolling authorization program codified in 23 U.S. Code Section 129 (Section 129).³ As part of the Oregon Toll Program, ODOT will deliver a recommendation to the Oregon Transportation Commission that addresses program-level strategies to promote equity and mobility.

In addition to tolling, Oregon House Bill 2017 identified improvements on I-205 as a priority project, known as the I-205: Stafford Road to OR 213 Improvements Project (I-205 Improvements Project). The purpose of the improvements was reducing congestion; improving mobility, travel time reliability, and safety; and

² Value pricing, sometimes known as congestion pricing or variable rate tolling, is a strategy that charges higher fees to use roads or bridges during “rush hour” in an effort to shift trips to less congested times of day.

³ The Section 129 General Tolling Program allows public agencies to impose new tolls on federal-aid highways for initial construction of a new highway, bridge or tunnel; initial construction of new lanes added to existing highways as long as the number of toll-free lanes is not reduced; and on the reconstruction or replacement of bridges, tunnels, and highways (FHWA n.d.-a).

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providing seismic resiliency for I-205 to function effectively as a statewide north-south lifeline route after a major earthquake by widening I-205 and seismically upgrading or replacing 13 bridges.⁴

In 2018, ODOT and FHWA determined that, with respect to FHWA regulations implementing NEPA, the I-205 Improvements Project qualified as a categorical exclusion (CE) (23 CFR 771.117[d][13]). In December 2018, FHWA signed a CE Closeout Document (2018 CE) for the I-205 Improvements Project, which demonstrated that it would not involve significant environmental impacts. In 2021, Oregon House Bill 3055 provided financing options that allowed the first phase of the I-205 Improvements Project to be constructed without toll revenue.⁵ This first phase, referred to as the I-205: Phase 1A Project (Phase 1A), includes reconstruction of the Abernethy Bridge with added auxiliary lanes and improvements to the adjacent interchanges at OR 43 and OR 99E. ODOT determined that toll revenue would be needed to complete the remaining construction phases of the I-205 Improvements Project as described in the 2018 CE (i.e., those not included in Phase 1A). The environmental effects of the toll-funded improvements were analyzed in the I-205 Toll Project Environmental Assessment.

1.2 Comment Period Overview

1.2.1 Purpose of engagement

ODOT and FHWA conducted an extensive communications and engagement program for the Environmental Assessment as a part of the environmental review process to meet the requirements of NEPA, ODOT guidelines, and community and agency interests. The goal of this engagement was to gather public and community partner input on the community and environmental effects reported in the Environmental Assessment.

During the 60-day comment period from February 21 to April 21, 2023, ODOT and FHWA invited input on the [I-205 Toll Project Environmental Assessment](#) and associated [appendices](#).

1.2.2 Methods to provide Environmental Assessment comments

The Project Team offered several ways to comment to account for different communications preferences, language needs, and those with limited access to the internet or technology:

- **I-205 EA Online Comment Form.** An online comment form was provided specific to the I-205 Toll EA comment period. The form asked commenters to indicate broad theme(s) associated with their comment and contained an open-ended comment box for commenters to share their thoughts on the Environmental Assessment. The comment form was only active during the EA comment period. Commenters could access the form via a link on the Oregon Tolling and I-205 Environmental Assessment landing pages. The online comment form was available in five languages: English, Spanish, Russian, Vietnamese, and Simplified Chinese.

⁴ More details about design alternatives considered for each component of the improvements can be found in the Proof of Concept Report (HDR 2017) and the Cost-to-Complete Report for the Combined Interstate 205 Abernethy Bridge and Widening Projects (HDR 2018a).

⁵ If tolling is approved upon completion of environmental review of the I-205 Toll Project, toll revenues could be used to pay back loans for Phase 1A.

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- **Accessible Online Comment Form.** An English-language accessible I-205 EA Online Comment Form was provided to ensure compatibility with screen readers and accessibility for commenters with functional access needs. Commenters could access the form via a link on the I-205 Environmental Assessment landing page.
- **Oregon Tolling Online Comment Form.** The Oregon Tolling website provides an online form for general public comments. Comments are welcome at any time. The form is linked on the homepage and website sidebar. Comments provided through the Oregon Tolling website comment form were considered Environmental Assessment comments during the comment period.
- **I-205 EA Email Inbox.** Commenters who preferred to send an email or provide attachments could email ODOT directly. A specific inbox – I205TollEA@odot.oregon.gov – was created for the I-205 Toll Project Environmental Assessment and was only available during the comment period. This email address was linked on the project website and shared in notification materials.
- **Oregon Toll Program Email.** The Oregon Tolling website provides an email address for general public comments: oregontolling@odot.oregon.gov. Emails are welcome at any time. The email address is linked on the homepage and website sidebar. Comments provided through the Oregon Tolling email address were considered Environmental Assessment comments during the comment period.
- **Mail.** ODOT also invited written comments via mail: Mandy Putney, ODOT Urban Mobility Office, 18277 SW Boones Ferry Road, Tualatin, Oregon 97224
- **Paper Comment Form.** A paper comment form was provided at in-person events for individuals who preferred to provide written comments. Paper comment forms could be returned to staff at in-person events or submitted via mail. The paper form was made available in English, (simplified) Chinese, Russian, Spanish, and Vietnamese.
- **Virtual Public Hearing.** ODOT hosted a public hearing to collect comments on the I-205 Toll Project Environmental Assessment on April 4, 2023, from 3 p.m. to 6 p.m. The meeting was held virtually on Zoom. Mandy Putney, ODOT Toll Program Director, and Thomas Parker, FHWA, were present to listen to comments. Participants were invited to provide verbal comment in any language. Names and comments were transcribed by a court reporter. Comments were limited to three minutes to ensure that all participants had an opportunity to speak.

Approximately 150 people attended the virtual public hearing and 61 provided comment.

- **In-Person Comment Opportunity.** In addition to the online comment forms and written comment, an in-person opportunity to comment was held simultaneously with the virtual public hearing on April 4, 2023, from 3 p.m. to 6 p.m. at the Pioneer Community Center, 615 5th St. Oregon City, Oregon 97045. Commenters were invited to give verbal comment to a court reporter in any language. Comments were limited to three minutes to ensure that all participants had an opportunity to speak. All comments recorded during the virtual public hearing were submitted as comments to the Environmental Assessment.

Approximately 20 people attended the in-person comment opportunity and 15 provided comment.

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- **Voicemail.** As an alternative to online or written options, commenters could provide verbal comment by voicemail at: (503)837-3536. Audio instructions to use the voicemail were provided in multiple languages: Cantonese, Mandarin, Russian, Ukrainian, Spanish, and Vietnamese.

1.3 Information Tools and Tactics

The Project Team developed materials, conducted outreach, and held public opportunities to share information, answer questions, and invite comments during the public comment period.

1.3.1 Informational materials

The Project Team shared information using the resources and channels described below during the public comment period.

Outreach Toolkits: The Project Team developed an outreach toolkit as a resource for agency and community partners to share information about the project and the public comment opportunity. This toolkit included body email text, a cover letter with links to the project website and resources, and PDFs of fact sheets, comment forms, and flyers in multiple languages. Leading up to and during the public comment period, emails with these toolkits were sent to agency partners and community-based organizations.

Project fact sheets: A [fact sheet](#) was developed as a reader-friendly resource and companion to the official Environmental Assessment. The fact sheet included a summary of the I-205 Toll Project and the Environmental Assessment, high-level findings from critical topics studied in the Environmental Assessment, and information on how to make a public comment. Fact sheets were posted online, printed for in-person events, and made available in English, (simplified) Chinese, Russian, Spanish, and Vietnamese.

Comment forms: Comment forms included background information on the I-205 Toll Project and “How to Comment” tips to facilitate the commenting process. Print comment forms also included informational graphics. Comment forms were posted online, printed for in-person events, and made available in English, (simplified) Chinese, Russian, Spanish, and Vietnamese.

Flyers and postcards: The Project Team developed flyers and postcards for digital and in-person distribution. Flyers and postcards contained information about the project, the public comment period, a webinar, and a virtual hearing. They also included a QR code that could be scanned to access the project website and further information. Both were available in five languages: English, Spanish, Russian, Vietnamese, and Simplified Chinese.

Public libraries. Printed copies of the Environmental Assessment were available for review at the Oregon City Public Library, the West Linn Public Library, the Tualatin Public Library, and the Canby Public Library.

Oregon Tolling website: During the 60-day public comment period, the Oregon Tolling website included graphic banners linking to the Environmental Assessment subpage, which included an interactive project map, links to all the Environmental Assessment materials, reports and videos, and descriptions of the public comment period and how to participate. The Oregon Tolling web calendar included dates and relevant links for in-person events, webinars, and a virtual public hearing. Advertising, email, and social media notifications also linked to the Environmental Assessment subpage.

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Interactive map: Using GIS, the Project Team developed an [interactive web map](#) tool that illustrated three primary categories of information related to the I-205 Toll Project:

- Traffic effects studied in the I-205 Toll Project Environmental Assessment, including traffic effects for adjacent roadway segments and the 50 intersections analyzed.
- Improvements to the I-205 corridor that are studied in the I-205 Toll Project Environmental Assessment.
- Proposed Mitigation included in the I-205 Toll Project Environmental Assessment to address negative impacts from the project.

Table 1-2. Website views during the I-205 Toll Project Environmental Assessment comment period

| Page | Page views |
|---|-----------------------|
| Oregon Toll Program website | 2,260 unique visitors |
| I-205 Toll Project website | 5,568 unique visitors |
| I-205 Toll Project Environmental Assessment website | 3,095 unique visitors |
| I-205 Toll Project Environmental Assessment Interactive Map | 976 unique visitors |

Informational videos: The Project Team developed six [animated videos](#) with information from the fact sheets. A playlist was created for them on the ODOT Oregon Toll Program YouTube channel. Videos were also linked to the Environmental Assessment subpage. Subtitles for each video were made available in English, (simplified) Chinese, Russian, Spanish, and Vietnamese.

In addition to the six animated videos, the Project Team prepared an in-depth video reviewing the details of the I-205 Toll Project Environmental Assessment Transportation Technical Report, as well as a tutorial video for the interactive map.

Table 1-3. I-205 Toll Project Environmental Assessment Informational Videos

| Video title | Views to date |
|--|---------------|
| I-205 Toll Project Environmental Assessment Video Series: Overview | 1,176 |
| I-205 Toll Project Environmental Assessment Video Series: How to Comment | 502 |
| I-205 Toll Project Environmental Assessment Video Series: Air Quality, Climate, and Noise | 160 |
| I-205 Toll Project Environmental Assessment Video Series: Economics | 171 |
| I-205 Toll Project Environmental Assessment Video Series: Environmental Justice and Equity | 223 |
| I-205 Toll Project Environmental Assessment Video Series: Transportation | 216 |
| I-205 Toll Project Environmental Assessment: Transportation Technical Report | 80 |
| I-205 Toll Project Environmental Assessment Interactive Map Tutorial | 157 |
| Total | 2,685 |

1.3.2 Tabling Events

The Project Team held seven tabling events, listed in Table 1-4, where members of the public were informed of the I-205 Toll Project Environmental Assessment and invited to submit comments during the public comment period. Tabling took place at various locations throughout the project area to reach a range of communities in the project area. Staff provided the informational materials referenced in Section 1.3.1 at each event, along with reference hard copies of the full Environmental Assessment for visitors to review. Each tabling event ran for roughly two hours, and between three and five staff were present at each.

Table 1-4. I-205 Environmental Assessment Tabling Events

| Tabling Location | Jurisdiction | Date | Number of people reached |
|---|-------------------|----------------|--------------------------|
| Fred Meyer | Oregon City | March 14, 2023 | 20 |
| Grocery Outlet | Oregon City | March 31, 2023 | 15 |
| Clackamas County Development Services Building - STIP | Clackamas County | April 3, 2023 | 8 |
| Tualatin Public Library | Tualatin | April 5, 2023 | 15 |
| Beaverton City Library - STIP | Washington County | April 8, 2023 | 5 |
| West Linn Adult Community Center | West Linn | April 12, 2023 | 25 |
| Gladstone Senior Center | Gladstone | April 13, 2023 | 15 |
| Total | | | About 100 |

1.3.3 Webinars

The Project Team hosted [two virtual webinars](#): March 14, 2023, 6-7:30 p.m. and March 16, 2023, 12-1:30 p.m. The webinars were scheduled so that attendees could attend either during the day or during the evening and the same content was shared at each webinar. Recordings were posted online.

Webinars were each one hour long, with 30 minutes dedicated to presenting information about the I-205 Toll Project and the Environmental Assessment, and 30 minutes dedicated to a moderated question and answer period. Live interpretation in Cantonese and Spanish was available at the March 14 webinar, and in Mandarin, Russian, and Vietnamese at the March 16 webinar. ASL interpretation was provided for both events.

There were approximately 20 attendees to the March 14 webinar; nine questions were received and answered. The YouTube recording has been viewed 46 times.

There were approximately 25 attendees to the March 16 webinar; 22 questions were received and answered. The YouTube recording has been viewed 38 times.

1.3.4 Business canvassing

The Project Team canvassed business districts in four communities in or near the project area: Canby, West Linn, Oregon City, and Tualatin. Approximately 170 businesses were reached between the dates of April 13 and April 17, 2023. Staff brought print flyers and postcards to distribute to each business they visited and would leave flyers at the doors of businesses that were not open.

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Table 1-5. Business Canvassing

| Canvassing Area | Date | Businesses Reached |
|-----------------|----------------|--------------------|
| Canby | April 13, 2023 | 51 |
| West Linn | April 14, 2023 | 38 |
| Oregon City | April 14, 2023 | 34 |
| Tualatin | April 17, 2023 | 46 |
| Total | | 169 |

1.3.5 Oregon Toll Committees

Public advisory committees and regional partner groups provide guidance and direction on the Oregon Toll Program, including the I-205 Toll Project. During the Environmental Assessment comment period, these groups were informed about project materials and opportunities to comment. These groups are:

- Equity and Mobility Advisory Committee (EMAC):** EMAC prioritizes equity and mobility in designing the I-205 Toll Project and the Regional Mobility Pricing Project. This committee is a group of individuals with professional or lived experience in equity and mobility coming together to advise the Oregon Transportation Commission and ODOT on how congestion pricing on I-205 and I-5, in combination with other traffic demand management strategies, can include benefits for populations that have historically and currently been underrepresented or underserved by transportation projects.

The Project Team held a briefing with EMAC during the public comment period, providing an overview of key findings in the I-205 Toll Project Environmental Assessment and how the committee’s guidance to ODOT has been applied. The team also notified EMAC members through email of comment period resources to share with their communities. The Project Team sent a shared Google document for the EMAC members and conducted one-on-one meetings with members to collect their input to be shared as a comment on the Environmental Assessment.

During the April 5, 2023, EMAC Meeting, the pre-final comment was reviewed, and additional clarifying questions were raised and answered by ODOT representatives. EMAC members were provided a final opportunity to edit the comments between April 14 and April 19. After receiving no additional input, the EMAC comments were finalized and submitted prior to the close of the public comment period.

- Regional Toll Advisory Committee (RTAC):** RTAC advises the ODOT Director to develop congestion pricing projects in the Portland metropolitan area. Committee meetings provided a forum to provide feedback to ODOT leadership in advance of toll-related decisions by the Oregon Transportation Commission or ODOT. The Committee is composed of approximately 25 members representing a variety of interests and perspectives and is appointed by the ODOT Director.

The Project Team shared an overview of the public engagement plan for the public comment period with RTAC in January 2023 and an overview of the Environmental Assessment transportation and diversion findings and public engagement activities in February 2023. The team also provided RTAC members with information and informational resources through email two times over the duration of the public comment period. At the end of the public comment

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period, the Project Team shared initial outcomes of the comment period with RTAC at meetings in April and May.

- Statewide Toll Rulemaking Advisory Committee (STRAC):** STRAC is composed of 18 individuals from across the state who help ODOT develop Oregon Administrative Rules (OARs) that will determine how customers will interact with and use tolling systems and how toll rates will be set and adjusted.

The Project Team notified STRAC of the comment period during public meetings in February and March of 2023. The team also notified STRAC members through email three times over the duration of the public comment period.

1.3.6 Agency and Public Briefings

The Project Team conducted briefings to provide additional opportunities for agencies and the public to hear information and ask questions before submitting official comments. Briefings were provided by request and are listed in Table 1-6. The briefings gave an overview of the I-205 Toll Project Environmental Assessment results.

Questions and comments taken at briefings were not recorded as official comments; participants were encouraged to submit comments through the online form, a paper comment form, email, voicemail, or the online public hearing.

Table 1-6. Agency and Public Briefings

| Audience | Date | # of Participants (not including Project staff) |
|--|-------------------|---|
| Clackamas County Coordinating Committee Diversion Subcommittee | February 15, 2023 | 21 |
| Happy Valley Business Alliance | February 22, 2023 | 34 |
| Achieve Coalition | March 1 | 30 |
| Clackamas County Coordinating Committee | March 2, 2023 | 18 |
| Lake Oswego City Council | March 7, 2023 | 26 |
| Clackamas County Board of Commissioners | March 8, 2023 | 13 |
| Clackamas County Coordinating Committee Diversion Subcommittee | March 15, 2023 | 19 |
| West Linn City Council | April 3, 2023 | 10 |
| Clackamas County Pedestrian and Bike Advisory Committee | April 4, 2023 | 20 |
| Washington County Coordinating Committee – Transportation Advisory Committee | April 6, 2023 | 26 |
| Stafford-Tualatin Valley Community Planning Organization | April 11, 2023 | 24 |
| Westside Economic Alliance | April 12, 2023 | 33 |
| Charbonneau Country Club | April 14, 2023 | 100+ |
| Total | | 360+ |

1.4 Equitable Engagement

The Oregon Toll Program is committed to minimizing burdens and maximizing benefits to communities historically and currently excluded or underserved by the transportation system. The Project Team implemented the efforts described in this section during the comment period to inform and involve historically and currently excluded and underserved communities.

1.4.1 Translation and interpretation

The Project Team worked with Community Engagement Liaisons (CELs) to ensure key materials were available to people with limited English proficiency. A fact sheet, flyer, postcard, and comment form were translated into Simplified Chinese, Russian, Spanish, and Vietnamese and were offered as printed copies and made available on the project website. Digital advertisements and the closed captions for informational videos were translated as well. All materials were shared with the CELs for distribution to their respective communities. CELs also provided audio recordings in Cantonese, Mandarin, Russian, Ukrainian, Spanish, and Vietnamese for the project voicemail dedicated to receiving verbal public comments.

The Environmental Assessment document was made available in English, Spanish, Chinese, Russian and Vietnamese. In response to a community member request, the appendices to the Environmental Assessment were made available in Vietnamese.

Public webinars provided simultaneous interpretation in Cantonese and Russian on March 14, 2023, and in Mandarin, Spanish, and Vietnamese on March 16, 2023. Using the Zoom interpretation feature, participants who preferred hearing the information in one of those five languages could join a separate room where translators interpreted the presentation. Both public webinars were also interpreted in American Sign Language. Participants could share questions in-language, which could then be translated and submitted to the presenters during the Q&A portion of the webinar. Recordings of the webinars were available on the project website after the events concluded.

1.4.2 Partnership with Community Engagement Liaisons

The Project Team worked closely with the CELs to share information with diverse and underserved communities, recruit members of the public to discussion groups, and translate or interpret information from English into Vietnamese, Chinese, Russian, or Spanish. CELs used toolkits in multiple languages to share project and comment period information with their communities.

Between February 21 and April 22, 2023, the CELs recruited for and then hosted seven discussion groups. Discussion groups were focused on the following audiences: Latin American, Slavic, Chinese, Vietnamese, people with disabilities, Native Americans, and Black, Indigenous, or People of Color (BIPOC) communities.

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Table 1-7. Community Engagement Liaison Discussion Groups

| Discussion Group | Date | # of Participants |
|---|----------------|-------------------|
| Vietnamese (Vietnamese language) | April 5, 2023 | 16 |
| Slavic (Russian/Ukrainian) (Russian language) | April 6, 2023 | 15 |
| People with Disabilities | April 8, 2023 | 8 |
| Chinese | April 10, 2023 | 15 |
| Latinx (Spanish language) | April 13, 2023 | 9 |
| BIPOC | April 14, 2023 | 16 |
| Native American | April 22, 2023 | 3 |
| Total | | 82 |

1.4.3 Community Based Organization engagement

The Project Team reached out to about 300 community-based organizations in the Portland metropolitan area to share information and the toolkit of materials about the release of the I-205 Toll Project Environmental Assessment comment period.

The Project Team also coordinated a discussion group designed for representatives of community-based organizations. To recruit for this event, the Project Team identified 46 organizations that work with historically and currently excluded and underserved communities, including culturally-specific organizations, advocacy organizations, non-profits, and service-based organizations. The briefing was attended by members from 13 community-based organizations.

1.4.4 Advertising

The Project Team advertised the 60-day public comment period as well as the March 14 and March 16, 2023, webinars and the virtual public hearing in Spanish-language and Vietnamese-language media, including *El Latino de Hoy*, *The Asian Reporter*, and *VietNNN*. An online ad was also published in *The Skanner*, a newspaper dedicated to covering African American and underserved communities in the Pacific Northwest.

1.4.5 Accessibility

The Project Team used several strategies to ensure materials and activities were accessible to people with visual or auditory impairments. All documents about the I-205 Toll Project Environmental Assessment posted online are compliant with the requirements of Section 508 of the Rehabilitation Act of 1973. This means materials are optimized for screen reader software to allow visually impaired users to review written information through speech. Closed captioning was available for informational videos posted on YouTube and through the Zoom platform for the webinars. American Sign Language interpretation was provided for the webinars.

Materials were available digitally and in print for distribution at in-person events and for CELs and Project Staff to distribute during the public comment period. Copies of the Environmental Assessment and complementary materials were also distributed at public libraries in the project area to ensure members of the public with limited internet access could view the document in its totality.

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The Environmental Assessment document was made available in English, Spanish, Chinese, Russian and Vietnamese. In response to a community member request, the appendices to the Environmental Assessment were made available in Vietnamese as well.

1.5 Notifications

The Project Team notified community members about the Environmental Assessment comment period through several different channels to encourage people to visit the website and learn more about the Project, webinars, and ways to comment. This included paid advertising through regional and multicultural publications and through ODOT information channels, including the Oregon Tolling Program website, email newsletters, and social media. ODOT also encouraged project committees, regional agency staff, CELs, and CBOs to share information about the informational webinars and comment opportunities with their networks.

1.5.1 Email notifications

The Project Team sent a total of seven broadcast emails through ODOT’s GovDelivery system.

Table 1-8. Broadcast emails

| Newsletter topic | Date | Number of recipients |
|---|-------------------|----------------------|
| Urban Mobility Strategy newsletter: Coming Soon: Public Comment Period for the I-205 Toll Project | February 10, 2023 | 15,097 |
| News release: Interstate 205 Toll Report Open Today to Public Comment through April 7 | February 21, 2023 | 5,912 |
| Project Update: Toll Report for Interstate 205 Open to Public Comment through April 7 | February 23, 2023 | 8,980 |
| Urban Mobility Strategy newsletter: I-205 Toll Report Comment Period Extended Two Weeks | March 9, 2023 | 15,226 |
| News release: ODOT Seeks Public Comments for I-205 Toll Project Environmental Assessment - Open until 4 p.m. Friday, April 21 | April 7, 2023 | 6,102 |
| Project Update: Reminder: Share your feedback on the I-205 Toll Project report! | April 7, 2023 | 9,255 |
| Urban Mobility Strategy newsletter: Reminder: Share Your Input on I-205 by this Friday, April 21 | April 17, 2023 | 15,631 |

In addition, the Project Team sent email notifications to project committee members, regional agency staff, and CBOs.

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Table 1-9. Partner notification emails

| Newsletter topic | Date | Distribution |
|---|-------------------|--|
| Environmental Assessment preview alert, with request to share with networks | February 10, 2023 | Elected officials Participating agencies Local jurisdiction staff EMAC members RTAC members Tribes <i>Approximately 290 recipients</i> |
| Alert of document publication and available engagement opportunities, with request to share with networks | February 21, 2023 | Elected officials Participating agencies Local jurisdiction staff EMAC members RTAC members STRAC members Tribes Community Based Organizations <i>Approximately 590 recipients</i> |
| Comment extension alert, extending comment period from April 7 to April 21 Email included a toolkit of materials, including fact sheet, flyer and postcard | March 1, 2023 | Elected officials Participating agencies Local jurisdiction staff EMAC members RTAC members STRAC members Tribes Community Based Organizations <i>Approximately 590 recipients</i> |
| Reminder email of end of comment period | April 10, 2023 | Elected officials Participating agencies Local jurisdiction staff EMAC members RTAC members STRAC members Tribes Community Based Organizations <i>Approximately 590 recipients</i> |

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1.5.2 Social media

During the comment period, the Project Team coordinated with ODOT’s social media team to publish three organic media posts. Posts were shared on ODOT’s Facebook, Twitter, Instagram and LinkedIn platforms.

Table 1-10. Social media posts

| Date | Social media topic | Total reach |
|-------------------|--|---|
| February 21, 2023 | Project announcement | 115,144 impressions |
| February 27, 2023 | Link to project videos | 1,165 engagements |
| March 10, 2023 | Reminder of March 14 and March 17 webinars | 313 link clicks |
| April 6, 2023 | Reminder of end of comment period | 82 comments 48 shares 214 reactions |

1.5.3 Partner social media

Jurisdictional partners shared information about the I-205 Toll Project Environmental Assessment comment period through their social media channels. Table 1-11 summarizes reach of these notices.

Table 1-11. Partner social media posts

| Date | Jurisdiction | Platform and link |
|-------------------|------------------|--------------------------|
| February 21, 2023 | Oregon City | Facebook |
| February 22, 2023 | West Linn | Twitter |
| February 22, 2023 | Clackamas County | Twitter |
| February 22, 2023 | Clackamas County | Facebook |
| March 10, 2023 | Tualatin | Twitter |
| March 13, 2023 | West Linn | Facebook |
| March 14, 2023 | Oregon City | Facebook |
| March 16, 2023 | Oregon City | Facebook |
| March 21, 2023 | Stafford Hamlet | Twitter |
| March 30, 2023 | Oregon City | Facebook |
| April 3, 2023 | Oregon City | Facebook |
| April 3, 2023 | Clackamas County | Twitter |
| April 4, 2023 | Gladstone | Twitter |
| April 4, 2023 | Gladstone | Facebook |
| April 4, 2023 | Clackamas County | Twitter |
| April 4, 2023 | Clackamas County | Facebook |
| April 6, 2023 | West Linn | Facebook |
| April 10, 2023 | Oregon City | Facebook |
| April 10, 2023 | West Linn | Twitter |
| April 10, 2023 | West Linn | Facebook |

1.5.4 Paid advertising

The Project Team placed print and digital advertisements in media outlets. Advertisements included information about the public comment period, a webinar, and a virtual public hearing. Some advertisements were also re-formatted to post on Facebook or Instagram and shared with CELs to distribute online. Digital ads linked to the project website, and print ads included a QR code that readers could scan to access the website.

A list of publications is shared below, along with circulation details for each publication.

Table 1-12. Paid advertising outlets

| Outlet | Print/Digital/Both | Circulation |
|--|--------------------|--|
| Pamplin Media newspapers (Clackamas/Oregon City News, Lake Oswego Review, West Linn Tidings, The Times (Beaverton/Tigard/ Tualatin), Canby Herald) | Both | 142,250 (Portland) 50,700 (Beaverton, Tigard, Tualatin) 37,000 (Lake Oswego) 25,954 (West Linn) 38,430 (Clackamas/Oregon City) 33,331 (Canby/Molalla) |
| El Latino de Hoy | Print | 90,000 |
| The Asian Reporter | Print | 20,000 Print 2,000 Digital |
| Portland Observer | Both | 40,000 |
| The Oregonian | Both | 7,000 Print 40,000 Digital |
| VietNNN | Both | N/A |

In addition, a Notice of Availability for the Environmental Assessment was published in Pamplin Media newspapers on February 21 and 22, 2023, and in The Oregonian on February 22, 2023.

1.5.5 Media coordination and earned media

On February 21, 2023, ODOT sent a news release promoting the publication of the Environmental Assessment, comment period and engagement opportunities to the full Oregon Toll Program email list. In addition, the project invited 60 news organizations to a media briefing on February 21, 2023, to share information and answer questions about the Project and comment period. Five media outlets attended.

There were more than 25 media stories about the I-205 Toll Project and the Environmental Assessment during the comment period.

Table 1-13. Earned media and blog stories

| Date | Publication | Headline |
|-------------------|--|---|
| February 21, 2023 | KATU | ODOT to release assessment of new I-205 tolling project, asks for public comment |
| February 21, 2023 | KPIC | ODOT taking public comment on report over I-205 toll project |
| February 21, 2023 | Portland Tribune | Tolls in Oregon move closer to reality with ODOT's release of environmental assessment report |
| February 22, 2023 | City Observatory | I-205 tolls will cost you \$600 per year |
| February 23, 2023 | Cascade Policy Institute/ Oregon Catalyst | ODOT says households will pay \$575 a year in its first round of tolls |

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| Date | Publication | Headline |
|-------------------|-------------------------|--|
| February 23, 2023 | Clackamas County | ODOT seeking public input on tolling Clackamas County |
| February 25, 2023 | The Urbanist | How to Finance a Highway Spending Spree: Records Reveal Oregon's Plans for Toll Hikes - The Urbanist |
| February 28, 2023 | Portland Tribune | OPINION: Time to pump the brakes on ODOT tolling plan Guest Opinion |
| March 2, 2023 | KGW | Bill would block ODOT from tolling I-5 and I-205 |
| March 3, 2023 | KXL | ODOT's Tolling Plan Facing Opposition |
| March 6, 2023 | Wilsonville Spokesman | Opinion: Initiative petition is the only way to stop I-205 tolling |
| March 7, 2023 | Canby Current | New Bill Would Put Brakes on ODOT's I-5, I-205 Tolling Plans |
| March 9, 2023 | Clark County Today | I-205 toll report comment period extended two weeks |
| March 13, 2023 | Lake Oswego Review | Opinion: Is ODOT about to swerve out of its lane with its I-205 Toll Project? |
| March 15, 2023 | Portland Tribune | OPINION: Tolls will make Oregonians worse off Guest Opinion |
| March 23, 2023 | Lake Oswego Review | Let LO residents vote on tolling |
| March 31, 2023 | Tualatin Life | Mayor's Corner: I-205 and Abernathy Bridge Tolling |
| April 3, 2023 | KOIN | OR tolling: Oregon City mayor blasts ODOT amid strong opposition to I-205 toll (|
| April 4, 2023 | KATU | Strong opinions at I-205 tolling project public hearing |
| April 4, 2023 | KOIN | Oregonians are split on ODOT's I-205 tolling project in public hearing |
| April 4, 2023 | KATU | Clackamas County encourages citizens to comment on ODOT's plan to toll I-205 |
| April 4, 2023 | Oregon City News | ODOT gets an earful from Clackamas County residents against tolling |
| April 9, 2023 | KATU | YVYV: Mayors of Oregon City and West Linn react to ODOT's proposal to put tolls on I-205 |
| April 9, 2023 | KATU | YVYV: ODOT responds to community concerns about tolling on I-205 |
| April 12, 2023 | KOIN | Clackamas County, OR commissioners push back on Interstate 205 tolling |
| April 13, 2023 | Portland Tribune | OPINION: Modern tolling is a new approach to reduce traffic in the Portland metro area Guest Opinion |
| April 13, 2023 | KGW | Here's why ODOT wants tolls on I-5 and I-205 |
| April 13, 2023 | Forest Grove News Times | OPINION: Modern tolling is a new approach to reduce traffic in the Portland metro area Guest Opinion |
| April 17, 2023 | Wilsonville Spokesman | ODOT forum on tolling grows contentious at Charbonneau in Wilsonville |
| April 20, 2023 | Bike Portland | Freeway fight turns to half-billion dollar expansion of I-205 in Clackamas County |

1.6 Tribal and Participating and Cooperating Agency Engagement

1.6.1 Tribes

The below tribes are consulting tribes with the I-205 Toll Project and are also considered to be Participating Agencies.

- Confederated Tribes of the Grand Ronde Community of Oregon
- Confederated Tribes of the Siletz Indians
- Confederated Tribes of the Umatilla Indian Reservation
- Confederated Tribes of Warm Springs Reservation of Oregon
- Confederated Tribes and Bands of the Yakama Nation
- Cowlitz Indian Tribe
- Nez Perce Tribe

ODOT notified tribes of the Environmental Assessment comment period through a series of emails. This included an email in advance of the comment period (February 10, 2023); a formal announcement at the launch of the comment period with information about the web resources that included a comment form, interactive map, project factsheet, and webinars (February 21, 2023); a formal announcement of the comment period extension (March 2, 2023); a reminder about the deadline for comments (April 10, 2023); and a thank you for engagement (May 5, 2023). During the Environmental Assessment comment period, ODOT and FHWA invited Consulting Tribes to attend a webinar on March 9, 2023, at 11 a.m. None of the Tribes requested additional meetings during the comment period.

1.6.2 Participating and Cooperating Agencies

ODOT notified the Participating and Cooperating Agencies about the Environmental Assessment comment period through a series of emails, including an email in advance of the comment period (February 10, 2023); a formal announcement at the launch of the comment period with information about the web resources that included a comment form, interactive map, project factsheet, and webinars (February 21, 2023); a formal announcement of the comment period extension (March 2, 2023); a reminder about the deadline for comments (April 10, 2023); and a thank you for engagement (May 5, 2023).

During the Environmental Assessment comment period, ODOT and FHWA invited Participating Agencies to attend a webinar on March 9, 2023, at 11 a.m. The purpose of the Participating Agency webinar was to share an update on the Project and the environmental analysis and address questions. The presentation to Participating and Cooperating Agencies was similar to the presentation for the public webinars. A total of 19 representatives from at least 10 agencies attended the webinar. Section 3 provides a summary of comments received from participating agencies during the comment period.

1.7 Comment period responses

1.7.1 Total comments

During the 60-day comment period, ODOT and FHWA received more than 2,800 submissions, as shown in Table 1-14. About half of the commenters submitted their feedback through the online Environmental Assessment comment form through SurveyMonkey.

Table 1-14. Number of Submissions by Submission Method

| Submission Method | Number of Submissions | Percentage of Submissions |
|---|-----------------------|---------------------------|
| <i>I-205 EA submission avenues</i> | | |
| Accessible form | 169 | 6% |
| Discussion group | 12 | 0% |
| I-205 EA email | 571 | 20% |
| In-person comment opportunity | 15 | 1% |
| Letter | 21 | 1% |
| Paper form | 5 | 0% |
| Public hearing | 60 | 2% |
| Online comment form | 1,321 | 46% |
| <i>General toll program submission avenues</i> | | |
| Toll program email | 188 | 7% |
| Voicemail | 39 | 1% |
| Web comment form | 451 | 16% |
| Total Submissions | 2,852 | |

**Letters were mostly submitted to the I-205 EA email, with a few submitted to the general toll program email.*

Participating and Cooperating Agencies provided 16 total submissions. Those agencies included:

- City of Gladstone
- City of Happy Valley
- City of Lake Oswego
- City of Oregon City
- City of Tualatin
- City of Vancouver, WA
- City of West Linn
- City of Wilsonville
- Clackamas County Board of Commissioners
- Clark County, WA
- Metro Council
- Metro Staff
- Southwest Washington Regional Transportation Council
- TriMet
- Washington County Staff
- WSDOT

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Submissions provided in languages other than English included:

- One Spanish-language comment submitted through the I-205 Environmental Assessment email address
- One Vietnamese comment submitted through SurveyMonkey
- Three comments transcribed from the Russian Discussion Group
- Eight comments transcribed from the Latinx Discussion Group

1.7.2 Geographic distribution of commenters

In both the Environmental Assessment comment form and the general toll program comment form, commenters had the option to submit their ZIP codes to help identify the geographic distribution of submissions. ZIP codes included in emails were also included in the dataset. A total of 2,032 of the 4,459 submissions, or 46%, included ZIP code information. The ZIP codes shared by commenters are grouped by county in Table 1-15. A heat map showing the relative concentration of commenters by ZIP codes is shown in Figure 1-1, in which the darker colors indicate ZIP codes with higher concentrations of commenters. Similar to previous engagement efforts, Clackamas County, and particularly the communities directly around the I-205 Toll Project, represented a higher proportion of commenters compared to other areas in the Portland metropolitan area.

Table 1-15. Geographic Distribution of EA Commenters

| County | Number of Commenters | Percentage of Commenters | Percentage of Portland Metro Area Population |
|------------------------|----------------------|--------------------------|--|
| Clackamas | 1176 | 58% | 58% |
| Clark | 277 | 14% | 14% |
| Multnomah | 221 | 11% | 11% |
| Washington | 185 | 9% | 9% |
| Marion | 48 | 2% | All other = 8% |
| All Other | 125 | 6% | |
| Total Responses | 2,032 | 100% | 100% |

Note: Numbers may not add up to 100% due to rounding. ZIP codes do not align spatially with County boundaries. Numbers are a generalization.

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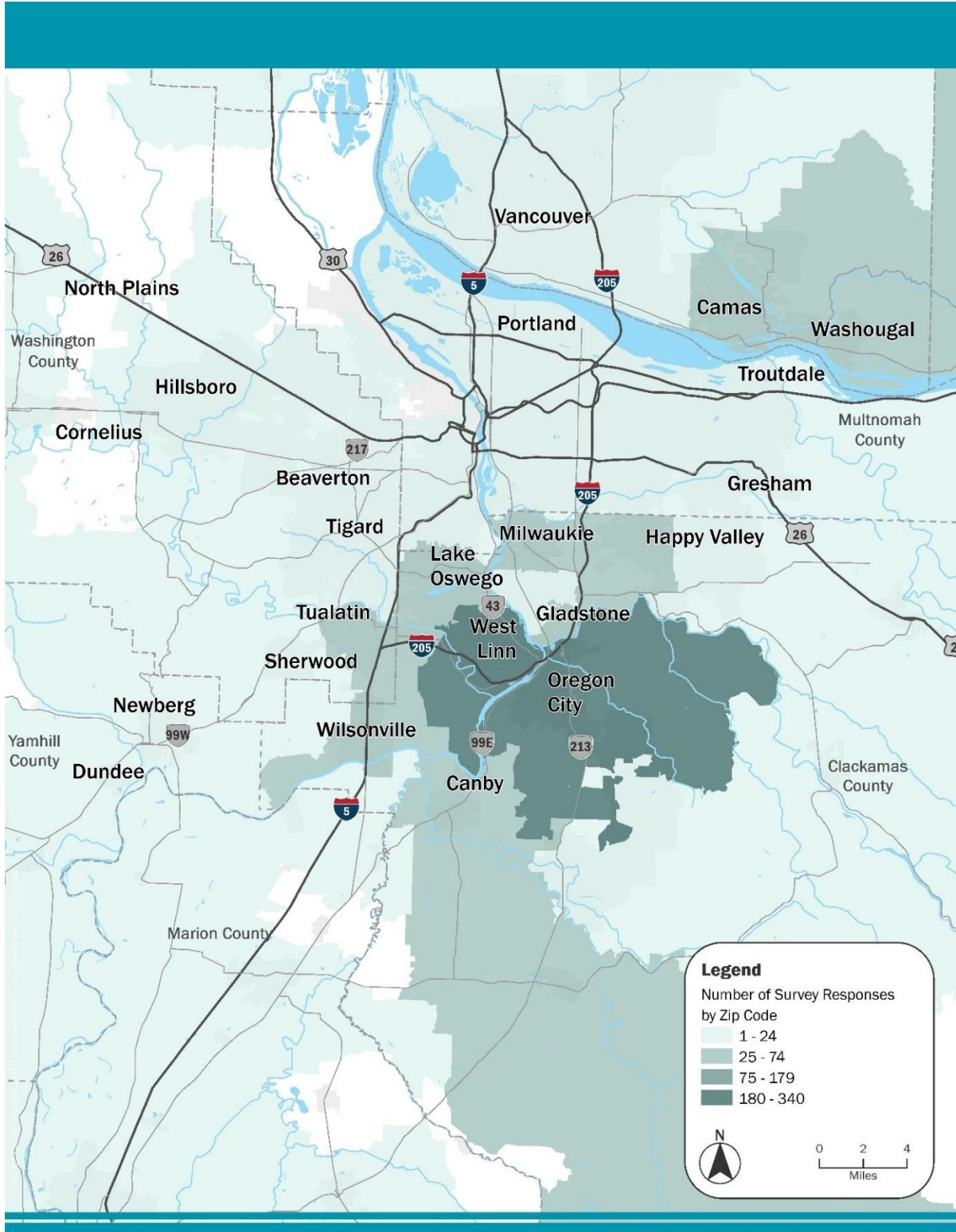


Figure 1-1. Geographic Distribution of EA Commenters by ZIP Code
Note: Darker colors indicate ZIP codes with higher concentrations of commenters.

1.7.3 Topic interest among commenters

The Environmental Assessment comment form asked respondents to select options from a list of topics that best represented the topic of their written comment. This question was optional, and respondents could select as many options as they liked.

Table 1-16. Number and Percentage of Self-Selected Topics

| Topic Options | Number of Submissions | Percentage of Submissions |
|---|-----------------------|---------------------------|
| Effects to local communities – including household finances, the regional economy, environmental justice and the combined effects of the improvements and tolling | 885 | 67% |
| Effects to the transportation system – including rerouting/diversion to local streets, congestion and traffic flow on I-5 and I-205, traffic safety, active transportation, biking, walking, transit and freight | 822 | 62% |
| Project Purpose, Need, Goals and Objectives | 325 | 25% |
| Effects to the local natural environment – including air quality, climate change, noise, geology and soils, hazardous materials, vegetation and wildlife and wetlands and water resources | 193 | 15% |
| Proposed mitigation – or solutions developed to reduce adverse impacts identified in the environmental review process | 167 | 13% |
| Another topic | 164 | 12% |
| Effects to the local built environment – including land use, visual quality and historic and archeological resources | 145 | 11% |
| None of the above | 40 | 3% |
| Total Responses | 1317 | - |

2 Comment Summary

This section provides a summary of the approximately 2,800 comments received between February 21 and April 21, 2023 (inclusive), via the Environmental Assessment comment form, Environmental Assessment email, general comment form, general email, mailed comments, voicemail, public hearing, in-person comment opportunity, tabling events, and Environmental Assessment discussion groups (as listed in Table 2-1). This summary includes comments sent from both Participating Agencies and other commenters. A more detailed summary of Participating Agency comments can be found in Section 3.

Table 2-1. Number of Submissions by Submission Method

| Submission Method | Number of Submissions | Percentage of Submissions |
|---|-----------------------|---------------------------|
| <i>I-205 EA submission avenues</i> | | |
| Accessible form | 169 | 6% |
| Discussion group | 12 | 0% |
| I-205 EA email | 571 | 20% |
| In-person comment opportunity | 15 | 1% |
| Letter | 21 | 1% |
| Paper form | 5 | 0% |
| Public hearing | 60 | 2% |
| Online comment form | 1,321 | 46% |
| <i>General toll program submission avenues</i> | | |
| Toll program email | 188 | 7% |
| Voicemail | 39 | 1% |
| Web comment form | 451 | 16% |
| Total Submissions | 2,852 | |

**Letters were mostly submitted to the I-205 EA email, with a few submitted to the general toll program email.*

Project Team members reviewed all comments submitted and categorized them by topic. Each comment submittal could be included under multiple topics. Table 2-2 identifies the frequency that each topic was categorized. A summary of key themes by each topic follows, in order from most to least frequent.

Table 2-2. Count of EA Comments by Topic

| Topic | Number of Comments ⁶ |
|-------------------------------------|---------------------------------|
| Diversion/rerouting | 1,010 |
| Revenue and Taxes | 960 |
| Household finances | 900 |
| Trust and Accountability | 880 |
| Fairness | 790 |
| Congestion observations and impacts | 790 |

⁶ Each comment could be tagged with multiple topics. Numbers are rounded to the nearest ten.

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| Topic | Number of Comments ⁶ |
|--|---------------------------------|
| Public Engagement/Process | 740 |
| Alternatives | 600 |
| Purpose and Need, Goals and Objectives | 580 |
| Multimodal Transportation | 490 |
| Toll Implementation | 470 |
| Equity | 400 |
| Safety | 350 |
| Air Quality, Climate Change, Greenhouse Gas Emissions and Energy | 350 |
| Business and Freight | 300 |
| Social Resources and Communities | 270 |
| Mitigation and Monitoring | 190 |
| Other Regional Projects and Transportation Plans | 170 |
| Other Examples of Tolling | 140 |
| Other Environmental Effects | 130 |

For the purpose of indicating the frequency of key themes and messages, the Project Team used the terms “many,” “several,” “some” and “few.”

- “Many” is used to indicate that a theme was expressed in more than 50% of the comments within a topic area.
- “Several” indicates approximately 30% to 50%.
- “Some” indicates approximately 10% to 30%.
- “A few” means it was mentioned more than once in up to approximately 10% of comments.

2.1 Diversion/Rerouting

Approximately 1,010 submissions addressed traffic rerouting and diversion, which was defined as traffic and congestion being pushed or rerouted to alternative routes and neighborhood streets as drivers try to avoid congestion or tolls. Comments included concerns about potential impacts to local communities and streets near I-205, observations about current and future congestion and road conditions due to tolls and comments how the individual will choose to avoid tolls in the future. Beyond traffic effects, these concerns often touched on other influences on quality of life perceived as related to traffic rerouting and diversion, such as safety, air quality, noise, and local economic vitality.

The following is a summary of the major themes from the comments received pertaining to rerouting and diversion.

EXAMPLES OF COMMENTS ABOUT DIVERSION/REROUTING

“I live in Tigard and work in Oregon City. If tolls are imposed on I-205 I will likely avoid them by using back roads. This will just take one issue for traffic and make a new one.”

“As a resident of West Linn, I just think this is going to negatively impact our town a lot more than people are estimating, just with the diversion traffic alone, and the impact to people that don’t have much of an option to get onto the highway from our point in town.”

2.1.1 Traffic effects from rerouting

- Many commenters said that drivers will divert to alternative routes and local roads to avoid tolls, particularly to communities near I-205 in Clackamas County.
- Some commenters mentioned concerns about specific routes to which drivers will divert, including:
 - Arch Bridge
 - Blankenship Road
 - Borland Road
 - Bryant Road
 - Child Roads
 - Cornwall Street
 - Ek Road
 - I-5
 - I-84
 - Johnson Road
 - Hidden Springs Road
 - Main Street
 - McLoughlin Boulevard
 - Nyberg Road
 - Oakfield Road
 - OR 43
 - OR 99
 - OR 213
 - Pete's Mountain Road
 - Rosemont Road
 - Salamo Road
 - Schaeffer Road
 - Sellwood Bridge
 - Stafford Road
 - Summit Street
 - Sunset Avenue
 - Washington Street
 - Willamette Falls Drive
 - Webster Road
 - 10th Avenue
 - 65th Avenue
 - 82nd Avenue
 - 122nd Avenue
- Several commenters wrote that congestion will increase on alternative routes and local streets due to rerouting.
- Some commenters stated concerns that local roads that will receive diverted traffic are not built to accommodate such high volumes, and that those roads are already under stress from existing rerouted vehicles. A few expressed concerns about freight trucks traveling on local roads specifically.

2.1.2 Safety effects from rerouting

- Some commenters said that increased congestion from diversion will make alternative routes and local roads more dangerous. A few mentioned specific road names, including Childs Road, I-5, Johnson Road, Oakfield Road, OR 43, OR 99, South End Road, Stafford Road and Willamette Falls Drive.
- Some commenters said that tolling will push congestion onto routes used heavily by cyclists and pedestrians and create unsafe conditions for them. A few mentioned specific road names, including Borland Road, Ek Road, OR 43, OR 99, Willamette Falls Drive and 10th Avenue.

2.1.3 Other effects on quality of life from rerouting

- A few commenters said that increased congestion from diversion and rerouting will lead to increased emissions, pollution and noise levels in nearby neighborhoods.

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- A few commenters said that the livability of nearby neighborhoods will be negatively affected due to increased traffic from rerouting and additional time needed to access schools, shops, community resources and medical facilities.
- A few commenters said that local businesses will be negatively affected because customers will take fewer shopping trips due to local road congestion and employee recruitment will be difficult due to increased commuting costs.
- A few commenters expressed concern that rerouting and diversion through neighborhood streets will lead to decreased property values.

2.1.4 Other considerations related to rerouting

- A few commenters said that ODOT should set toll rates low enough that drivers do not divert to alternative routes and local roads.
- A few commenters said that they or someone they know would divert to alternative routes and local roads to avoid tolls, either because they are opposed to paying tolls in principle or for financial reasons.
- A few commenters were concerned that low-income drivers will be forced to divert to alternative routes and local streets due to the increased costs of commuting.

2.2 Revenue and Taxes

Approximately 960 submissions addressed revenue and taxes. The major themes for these submissions included comments about existing taxes (such as the income tax and gas tax), how current tax or fee revenue is being spent, suggested alternative sources of transportation revenue and use of future toll revenue. These comments are often also categorized under Purpose and Need, and Goals and Objectives for commonalities in questioning why toll revenue is needed to fund improvements, and under Trust and Accountability because they expressed dissatisfaction in how ODOT is spending current revenue.

The following is a summary of the major themes from the comments received pertaining to revenue and taxes.

2.2.1 Current taxes and use of existing revenue

- Many commenters expressed concern that they are already paying high taxes and see a toll as another tax.
- A few suggested that setting up the toll system would cost more than what toll revenue can cover, so they would prefer to spend current revenue on fixing existing infrastructure and improving access to public transit and active transportation options, instead of implementing tolling.

EXAMPLES OF COMMENTS ABOUT CURRENT TAXES AND USE OF EXISTING REVENUE

“Oregon’s money needs to be managed better.”

“We already pay many taxes that should cover any needed repairs or improvements.”

2.2.2 Suggested alternate revenue sources

- Some commenters said that other existing methods should be used to fund transportation projects, such as raising or enforcing existing taxes and fees (gas tax, vehicle registration, parking and speeding tickets), or reallocating revenue from other sources, such as taxes on lottery winnings, income tax and bonds.
- A few commenters said that funding for transportation improvements in Oregon should come from federal funding, such as the 2021 federal infrastructure bill (Infrastructure Investment and Jobs Act).
- A few recommended reducing current spending on other public services, such as homelessness services and active transportation projects, or diverting funds from other local transportation agencies and projects.
- Some commenters recommended a range of new funding sources, including tolling the interstate bridges between Washington and Oregon; implementing new taxes on vehicle mileage, electric vehicles, corporations or higher-income individuals; tolling all highways equally; tolling only other highways and implementing only one express lane instead of tolling all lanes on I-205.
- A few asked for alternate methods to fund transportation projects but gave no specific suggestions.

EXAMPLES OF COMMENTS ABOUT SUGGESTED ALTERNATE REVENUE SOURCES

“Please find another way to raise money. Vehicle registration, fuel tax, income tax, anything but tolling!”

“Where does the billions of dollars already allocated for infrastructure projects from the Biden Administration fit in for Oregon?”

“I can understand the need to improve our roads but there has got to be another way to do it.”

2.2.3 Use of future toll revenue

- Some commenters were unclear on how and for what the tolls would be used, expressing concerns about potential misuse, rising costs and lack of enforcement of future tolls.
- A few commenters called for a sunset clause once improvements on I-205 are complete and did not understand why that is not already a part of the plan.
- A few commenters said toll revenue should only be used for highway and roadway improvements in I-205-adjacent communities impacted by the tolls and diversion.
- A few commenters wanted toll revenue to be used for improving public and active transportation, fixing existing infrastructure and other services such as greater electric vehicle adoption and mitigating damage to the natural environment. Most of these commenters approved of tolling but not the I-205 highway improvements, including an additional lane.
- A few commenters said that toll revenue should partially reimburse those living in the most impacted communities, or that residents of those communities should receive reduced toll rates or exemptions.
- A few mentioned concerns over loss of revenue from out-of-state visitors not wanting to pay tolls and thus not visiting, in addition to people moving out of state due to tolls.
- Even fewer said that toll revenue should be used to create alternative driving routes and that a special tolling committee should be put in place to guide the use of toll revenue.

EXAMPLES OF COMMENTS ABOUT USE OF FUTURE TOLL REVENUE

“Tolling is useful in encouraging residents to change their travel behavior. Instead of adding lanes and focusing on roadway improvements, funds should be invested in alternative transportation such as public transit, cycling, and walking.”

“I am very worried about how fees will be levied and where that money will go.”

“I propose that ODOT be forced to use a portion of all tolls collected to directly reimburse drivers/property owners from local communities affected by these changes.”

2.3 Household Finances

Approximately 900 submissions addressed household finances, which related to financial impacts from tolls to individuals, families and households, including comments about personal impacts of inflation and the COVID-19 pandemic.

The following is a summary of the major themes from the comments received pertaining to household finances.

- Many commenters expressed concern about the impacts of tolls on household budgets. This concern often related to the commenter's personal household budget, but was frequently expressed in terms of the impacts to low-income households, middle-income households and household budgets in the context of broader economic challenges, such as current inflationary trends and lasting economic impacts from the COVID-19 pandemic.
- Many commenters expressed concern about the impacts of tolls on the household finances of equity framework communities, such as people of color, people with disabilities and low-income households.
- Many commenters expressed concern that they and many other travelers would not qualify for or benefit from the low-income toll program but would still feel financial strain from the tolls.
- Many commenters expressed concern that people who commute for work on I-205 do not have the flexibility to change their driving behaviors in response to tolling and would feel the financial impact from commuting daily.
- Many commenters expressed concern that the cost of goods and services would increase as businesses pass the cost of tolls to consumers.
- Several commenters expressed interest in creating a toll exemption, discount or cap for residents who live in communities adjacent to I-205.
- Several commenters expressed concern for the impacts to senior citizens and those with disabilities, especially in relation to traveling to seek care or receiving in-home care services.
- Several commenters expressed frustration that implementing tolls will have a negative impact on the value of homes located near and/or heavily reliant on I-205.

EXAMPLES OF COMMENTS ABOUT HOUSEHOLD FINANCES

"People are already struggling to make ends meet with the current inflation and ever-widening income gap economic environment. I find the flippant references to people choosing to commute at off-peak times offensive as many working people do not have the flexibility to commute at off-peak times."

"It's not just the expense of trip tolls, but the hidden, additional cost burden that will fall on lower income, middle-class & family-wage workers paying higher prices for basic goods & services, because those prices were increased by businesses whose own costs of deliveries, vehicle use, commuting & freight have gone up due to tolls."

2.4 Trust and Accountability

Approximately 880 submissions addressed trust and accountability. Comments in this category spoke to trust in ODOT or government in general, whether tolling will work to manage congestion and raise revenue, whether tolling federal highways is legal, beliefs that public input is not taken seriously, and privacy protection for data collected by the toll system. Comments about trust and accountability were often also included under the topics of Purpose and Need, Goals and Objectives and Revenue and Taxes.

The following is a summary of the major themes from the comments received pertaining to trust and accountability:

- Several commenters shared their disagreement with tolling as a legitimate funding source.
- Some comments shared a belief that ODOT and the government should have sufficient funding available because it is collecting revenue from the gas tax that is already intended to make roadway improvements.
- Some commenters expressed a lack of trust in how ODOT manages its budget and suggested that tolling is a way to make the people pay for ODOT's mismanagement.
- Some commenters expressed a belief that the Project is predetermined and that ODOT is not considering or interested in hearing input from the public and local governments.
- Some commenters said the Project is unnecessary because road improvements are already paid for by the gas tax, and that the public already pays one of the highest gas taxes in the country.
- Some commenters expressed concern about a lack of accountability for how toll revenue will be used because ODOT has not been transparent about its plans for using the toll revenue.
- A few commenters asked how ODOT is allowed to toll federal highways or stated that it is unconstitutional to do so because it violates the principle of freedom of travel.
- A few commenters said that ODOT has not been successful on past projects due to budgeting issues and insufficient effort (such as the Columbia River Crossing Project), and it's likely that the I-205 Toll Project would also fail.

EXAMPLES OF COMMENTS ABOUT TRUST AND ACCOUNTABILITY

"This is simply a money grab. If it were truly to be used only to pay for the repairs to the bridges then the revenue would be designated only for those uses and there would be a sunset clause indicating when the tolling would cease after the repairs were paid off."

"If you think you do not have enough money to cover the needed repairs or improvements then I would suggest that you look at your expenditures and use the money you have more wisely because you have plenty of money."

2.5 Fairness

Approximately 790 submissions addressed perceived fairness. These included comments related to disproportionate impacts on groups or communities that are not classified as historically and currently excluded or underserved.⁷ Examples include fairness concerning the existence of viable alternative routes, uneven geographic impacts, the ethics of user-pay systems, paying for existing roadways, feasibility of changing travel behavior, and pricing only certain parts of the highway system.

The following is a summary of the major themes from the comments received pertaining to fairness.

2.5.1 Geographic fairness

- Several commenters said that the toll would have a disproportionate financial impact on Clackamas County residents because they would pay more for a highway of statewide importance; commenters said they felt that Clackamas County residents were being targeted and penalized just because of where they live.
- Some commenters expressed concern that the proposed toll was unfair because there are presently no viable alternative routes or reliable transit services to geographically isolated communities, such as West Linn.
- Some commenters said that their community would be disproportionately impacted by diversion, causing increased congestion and longer travel times for specific local commutes, especially in the underdeveloped rural communities of Clackamas County. Commenters frequently mentioned OR 43, OR 99, OR 213, Borland Road, Willamette Falls Drive, the Arch Bridge, downtown Oregon City and the Willamette neighborhood of West Linn as areas that would have higher levels of congestion.
- A few commenters said that Southwest Washington residents should not have to pay a toll because they already pay taxes in Oregon and Washington. In contrast, a few commenters said it would be fairer to toll the interstate bridges because Washington residents should pay their share to fund the region's transportation system.

EXAMPLES OF COMMENTS ABOUT FAIRNESS

“The tolls are being assessed and placed primarily on the people of Oregon City and West Linn, but the 205 corridor benefits all of the Portland area. It's unfair to have a couple communities bear the brunt of these when everyone benefits from road improvements.”

“While lower class individuals may see some level of relief on the cost of tolls, a large amount of the burden will be placed on the middle class. Hard working Oregonians and people of the metro area who really cannot afford to be paying tens of dollars every day just to drive on roads that they've already paid for.”

⁷ Fairness is distinct from equity. Equity refers to whether certain underserved groups will experience disproportionate outcomes and impacts as a result of congestion pricing. Comments that use the word “equity” but are not about underserved communities are categorized as Fairness, not as Equity. For comments related to historically and currently excluded and underserved communities, see the section on Equity.

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- A few commenters said that tolling the proposed section of I-205 first would unfairly target Clackamas County and suggested that other regional tolls (including under the Regional Mobility Pricing Project and Interstate Bridge Replacement Program) be implemented first or simultaneously, so all drivers would start paying at the same time.
- A few commenters said that tolling the proposed section of I-205 would hinder local businesses' ability to attract customers and remain competitive in the hiring market.

2.5.2 Income and usage fairness

- Several commenters said that tolls would have a negative financial impact on middle- and working-class earners who don't have the opportunity to work remotely or flex their commute times but would not be eligible for the low-income toll program. A few commenters said either that middle-income drivers should also receive a discount or that there should not be a discount just for low-income drivers.
- A few commenters said that the proposed variable-rate structure would target people with fixed employment, childcare or school schedules.

2.5.3 Other fairness concerns

- Some commenters said that because they already pay taxes to fund roads, those roads belong to the taxpayers and taxpayers should not have to pay again to travel on them. Such comments often used the phrase "double taxation" or "triple taxation" to express this sentiment of unfairness.
- A few commenters said that electric vehicles should not receive a discount or exemption from tolls, because they already do not pay gas taxes and should pay their fair share to fund the road system.
- A few commenters said that the proposed toll was fair because people benefiting from the improvements should pay the cost. In contrast, a few commenters said the proposed toll was biased because only car-owners would see a benefit from the project improvements.

2.6 Congestion Observations and Impacts

Approximately 790 submissions addressed congestion observations and impacts, including existing and future conditions. Overall, these comments addressed how congestion affects individual behavior, communities, the economy and/or the environment. They often reflected commenters' beliefs about what causes congestion and changes in traffic patterns, including tolling.

2.6.1 Existing congestion and impacts

- Some commenters said that alternative routes and local roads are already congested during peak travel times or severe weather events. Some commenters mentioned specific routes that already experience congestion, including Arch Bridge, Boones Ferry Road, Borland Road, Childs Road, Ek Road, Elligsen Road, I-5, Johnson road, Main Street, McLoughlin Boulevard, OR 43, OR 99, OR 213, OR 217, Rosemont Road, Schaeffer Road, Stafford Road, Willamette Falls Drive, 10th Avenue and 65th Avenue.
- A few commenters said there is not enough congestion to warrant large infrastructure projects like lane expansion or tolling.

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- A few commenters said that out-of-state commuters cause congestion, so toll gantries should be placed to toll those drivers instead, such as at the Washington-Oregon border.
- A few commenters suggested congestion has decreased since the COVID-19 pandemic because more people are working from home or have changed their travel patterns, so tolling is no longer necessary.

2.6.2 Future congestion and impacts

- Many commenters said that congestion will increase on alternative routes and local roads because of the I-205 Toll Project. Several commenters said that increased congestion would be due to diversion and rerouting while others gave no reasoning. Some commenters said that ODOT should further study congestion impacts and mitigation options on alternative routes and local roads.
- Several commenters mentioned specific routes where they believe congestion will increase due to tolling, including:

- | | | |
|-----------------------|------------------------|--------------------------|
| ○ Arch Bridge | ○ McLoughlin Boulevard | ○ South End Road |
| ○ Blankenship Road | ○ McVey Avenue | ○ Stafford Road |
| ○ Boones Ferry Road | ○ Nyberg Street | ○ Summit Street |
| ○ Borland Road | ○ Oakfield Road | ○ Tacoma Street |
| ○ Center Avenue | ○ OR 43 | ○ Telford Road |
| ○ Childs Road | ○ OR 99 | ○ US 26 |
| ○ Cornwall Street | ○ OR 213 | ○ West A Street |
| ○ Ek Road | ○ Pete's Mountain Road | ○ Washington Street |
| ○ Elligsen Road | ○ Pimlico Drive | ○ Webster Road |
| ○ Hidden Springs Road | ○ River Road | ○ Willamette Falls Drive |
| ○ I-5 | ○ Rosemont Road | ○ 8th Avenue |
| ○ I-84 | ○ Ross Island Bridge | ○ 10th Avenue |
| ○ Johnson Road | ○ Salamo Road | ○ 65th Avenue |
| ○ Main Street | ○ Schaeffer Road | ○ 82nd Avenue |
| ○ Markham Bridge | ○ Sellwood Bridge | ○ 122nd Avenue |

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- Some commenters said that tolls will not reduce congestion because traffic will just be rerouted to other roads, or that people will still have to use I-205 because there are no alternative routes.
- Some commenters said that widening I-205 will not reduce congestion because adding capacity would just lead to induced demand.
- A few commenters said that tolls will reduce congestion because they have seen them succeed in other places.
- A few commenters said that a toll system will slow traffic on I-205. These comments often included assumptions that tolls will be collected via toll booths, or that even with an electronic tolling system, vehicles would still need to slow down to be registered by the sensors.
- A few commenters said they support widening I-205 to reduce congestion because ODOT has not adequately increased the capacity of the region's interstate system to match its population growth.

EXAMPLES OF COMMENTS ABOUT CONGESTION OBSERVATIONS AND IMPACTS

"I'm not sure if you have seen it yourself, but the surface roads off of the OR 43 exit, 10th street exit and Stafford Road exit already are terribly backed up at rush hour or with any weather."

"Nobody likes traffic. Nobody likes congestion on their local streets. Believe me, I have it. But tolling is the one way that might get our freeways functional again in this area and pay for the infrastructure that they need."

2.7 Public Engagement/Process

Approximately 750 submissions addressed the Project's development process, decision-making process and public engagement strategies.

The following is a summary of the major themes from the comments received pertaining to Public Engagement/Process.

2.7.1 Public input in the decision-making process

- Many commenters said that the Project should not move forward without a public vote, implying or explicitly stating that the Project does not have widespread support.
- Many commenters requested that a full Environmental Impact Statement be conducted to accurately capture all major negative impacts of the Project, especially concerning rerouting.
- Several commenters expressed concern that ODOT is not listening to public input and that the opportunity to comment is disingenuous because the Project is continuing to move forward despite public concerns.

EXAMPLES OF COMMENTS ABOUT PUBLIC ENGAGEMENT/PROCESS

"I once asked you to send me evidence tolls will help people but instead you added me to your mailing list and sent me canned responses that did not address my question."

"Performing an EIS should be a bare minimum requirement and more engagement with the cities and people in the impacted communities is imperative."

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- Some commenters indicated that they would like to see further research and analysis done to find other ways to meet Project goals.
- A few commenters spoke on the legal considerations regarding tolling and identified possibilities for a legal challenge.

2.7.2 Avenues of public engagement and communications

- Several community members, government agencies, Chambers of Commerce and Boards of Commissioners suggested that the 45-day (pre-extension) or 60-day (post-extension) public comment period was insufficient and requested a further extension.
- Some commenters indicated the Environmental Assessment documents were dense and technically complex, and the supporting public documents did not clearly explain the analysis, Project costs, toll rates or toll implementation mechanisms.
- Some commenters were concerned about a perceived lack of opportunities for public engagement, requesting additional public hearings that are publicized more widely and further in advance, as well as scheduled during times when people who work standard business hours can participate.
- A few commenters indicated that the public hearing was inadequate and not well planned, and that people were given short notice or were not made aware of the public hearing at all. They also suggested that more people would have participated if they knew about the event.
- A few commenters indicated that ODOT should provide more clarity and transparency in response to key questions, including expected toll rates, uses of revenue and potential negative impacts.

2.8 Alternatives

Approximately 600 submissions addressed Project Alternatives, defined as components of the No Build and Build Alternatives. Commenters often referenced revenue sources, climate change, public transportation, active transportation and congestion when discussing this topic. This category had three subtopics: toll gantry location, number of lanes to toll, and physical improvements on I-205. Comments under each subtopic are summarized below.

Several comments stated that presenting the two Alternatives (Build and No Build) as the only possibilities was dishonest and unhelpful in understanding the effects of various Project components and their configurations.

Many of these comments also said that the Environmental Assessment should have analyzed more Alternatives, or that going forward, the Project Team should prepare an Environmental Impact Statement that presents other Alternatives and their effects.

EXAMPLES OF COMMENTS ABOUT ALTERNATIVES

"Put the gantry on 205 before the Stafford exit if going North bound. This will stop anyone wanting to divert because they have paid the toll already."

"The seismic upgrade is necessary, and the extra lane is necessary, but there must be a better way to fund it."

"Adding lanes will increase total vehicle miles traveled and increase emissions."

2.8.1 Toll gantry location

Comments about toll gantry location included those that suggested moving toll gantries to elsewhere within or immediately adjacent to the project area, as well as those that suggested moving gantries to other parts of the highway system, including other parts of I-205 or other highways.

- Some commenters said they desired changes to the toll gantry locations because the current gantry locations would cause large amounts of rerouting to local streets in adjacent communities, particularly West Linn and Oregon City. These commenters often stated that they felt targeted by the current gantry locations.
- Some commenters suggested moving the gantries farther away from West Linn and Oregon City, so these cities do not receive even more rerouted traffic than they already do today. These suggestions included moving the gantry on northbound I-205 to before the Stafford Road exit.
- Some commenters suggested placing toll gantries elsewhere, such as on I-5 and I-205 at the Washington-Oregon border to toll inter-state travel, in Portland where they perceive income levels to be higher, or on other highways, including I-84 and OR 217.

2.8.2 Number of lanes to toll

- A few commenters expressed that they were not completely against tolling, but wanted the option of choosing a toll-free lane, either for themselves or for drivers in general.
- A few commenters suggested implementing a carpool lane or express lane instead of tolling all lanes, so that those who choose to pay can do so, without forcing everyone else to pay the toll.
- A few commenters said that some people would rather sit in traffic than pay a toll.
- A few commenters said that since there are no alternative routes to I-205 near the project area, not all lanes should be tolled.
- A few commenters said if tolling is to be implemented, it should only be on newly built lanes; existing lanes should not be tolled.

2.8.3 Physical improvements on I-205

Many commenters mentioned any physical components of the Build Alternative were about the added lanes. Other than comments that were against tolling or the project entirely, relatively few comments referenced the other improvements.

- Some commenters discussed physical improvements to I-205, particularly the addition of the missing third lane. Nearly equal numbers of comments supported and opposed the third lane. Many of those who supported adding the third lane said they saw it as necessary capacity to address the bottleneck and reduce congestion, while many of those who opposed it said they rejected highway expansion in favor of investments in other transportation modes, such as public transit and active transportation.
- Some commenters mentioned seismic upgrades; out of these, most expressed support for the upgrades. However, a few questioned whether seismic improvements are necessary and suggested investing in more urgent needs, such as repairing damaged roads.

2.9 Purpose and Need, Goals and Objectives

Approximately 580 submissions addressed the Purpose and Need, Goals and Objectives topic. Comments categorized under this topic include both feedback on the Purpose and Need Statement specifically and more general comments that address the Project’s core components, including tolling, adding the missing third lane on I-205 between the Tualatin and Abernethy Bridges and retrofitting the bridges in this corridor to be seismically resilient. Comments included in this category also addressed the effectiveness of tolls in achieving the Project’s objectives, including reducing congestion, generating revenue for the roadway and bridge improvements, encouraging alternative forms of travel and reducing emissions.

The following is a summary of the major themes from the comments received pertaining to Purpose and Need, Goals and Objectives.

2.9.1 Concern about effectiveness of tolling in meeting Project purpose and need

- Many commenters said they were concerned that tolls would not be an effective method for reducing congestion. The most common reason given was that tolling would move congestion from highways onto side streets.
- Some commenters were concerned that tolls would not be an effective way to motivate people to choose alternative modes or times of travel, either because of the lack of alternative transit, pedestrian or bike options, or because most people are unable to change their time of travel.
- Several commenters expressed that any perceived benefits of the Project were misleading or were outweighed or eliminated by the negative impacts of the Project. The most common theme within these sentiments was that the financial impacts of the tolls on families and businesses would outweigh any local or regional benefits.
- A few commenters expressed concern about the effectiveness of tolling in generating revenue, stating their belief that there are more efficient ways of doing so, such as by raising the gas tax.
- Some comments expressed concern that tolling would not be successful in reducing vehicle emissions, because the traffic would just be redirected elsewhere or that vehicles would take longer routes to avoid tolls.

EXAMPLES OF COMMENTS ABOUT PURPOSE AND NEED, GOALS AND OBJECTIVES

“How many of us do you think DESIRE to be on the freeway between 7-9am? Don’t you think, that if we had a different time option we would likely use it? You will not obtain the effect you desire by tolling this freeway.”

“While I agree that the highway system needs modernizing, it is inappropriate and improper to use tolls to support the upgrades. Such tolls will make the communities less livable, will increase congestion, increase greenhouse gas emissions and air pollution, lead to more noise pollution, and generally degrade the quality of life for everyone in the region.”

“I’m supportive of electronic tolling on I205 and I5. Although it seems counterintuitive, I hope tolling will eventually help to reduce traffic congestion on Stafford Road and Oregon 43. Additionally, as gas tax revenues decrease, we will need another source of revenue to pay for highway and bridge upgrades which are sorely needed.”

2.9.2 Support for Project goals

- Some commenters expressed support for tolling. Among these, about half expressed total support, while half expressed some reservations about the negative impacts of tolling, including potential diversion, burden of tolls for those experiencing low incomes and the lack of a sunset clause associated with tolls.
- A few commenters expressed support for the Project's goals and planned I-205 improvements but had reservations about tolls as a part of the Project.
- A few commenters said that the Environmental Assessment should clearly state that one of the Project's goals is to reduce vehicle miles traveled and greenhouse gas emissions, and that the Project should be designed to reflect those goals.

2.9.3 Skepticism about stated goals

- A few commenters expressed skepticism about the stated purpose and need for the Project, suggesting that the true purpose is to take money from the public to compensate for poor financial management, to fill government coffers or to enact social engineering.
- A few commenters expressed that the Project goal of raising revenue was either not necessary or not a valid justification for the Project because highway projects are already funded via other means.
- A few commenters expressed that the Project goal of reducing congestion is not necessary, either because congestion has decreased since the COVID-19 pandemic started or because congestion is preferable to paying a toll.
- A few commenters questioned the need for the third lane on I-205, noting that tolling might sufficiently reduce traffic to levels that a third lane would not be necessary.
- A few commenters questioned whether the goal of retrofitting bridges to be seismically resilient was necessary and suggested investing in more urgent needs, such as repairing damaged roads.

2.9.4 Need and scope for tolling

- A few commenters said that there should only be tolls on Columbia River crossings between Oregon and Washington. However, a few commenters said there should be no tolls on those interstate bridges.
- A few commenters said that all toll projects in the region should begin at the same time, including the Regional Mobility Pricing Project and the Interstate Bridge Replacement Program.
- A few commenters said that I-5 should be tolled instead of I-205.

2.10 Multimodal Transportation

Approximately 490 submissions addressed multimodal transportation, which includes comments relating to public transit and active transportation.

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The following is a summary of the major themes from the comments received pertaining to Multimodal Transportation.

- Many commenters indicated public transit in the I-205 subregion and surrounding communities is not a viable alternative for them because it is unsafe, infrequent, unreliable and/or inaccessible.
- Many commenters indicated ODOT should invest more in public transit.
- Many commenters said that ODOT should invest more in pedestrian and cycling infrastructure, while a few said ODOT should stop spending money on pedestrian and cycling infrastructure. A few that supported investment wished to see improvements near I-205 and on parallel routes.
- A few commenters said that walking and cycling are not alternative transportation options due to the lack of infrastructure or one's physical ability.
- A few commenters said that the Arch Bridge should be closed to vehicular traffic, while a few said it should not be closed to vehicular traffic.

2.11 Toll Implementation

Approximately 470 submissions addressed toll implementation. These submissions included comments about the toll rate structure, credits and exemptions, toll collection mechanisms, payment enforcement and toll system infrastructure.

Overall, commenters expressed interest in understanding how much tolls would cost them, as well as how long tolls would be collected. Commenters shared ideas for how to minimize the financial impacts of tolling on residents and specific demographic groups. Several commenters expressed concern that the administrative processes for tolling implementation would be costly and therefore ineffective at generating revenue. Frequent questions were about the administrative cost of the toll program, peak-time toll rates, whether tolls will discontinue at some point and eligible populations for toll discounts.

The following is a summary of the major themes from the comments received pertaining to Toll Implementation.

2.11.1 Timing and duration

- Several commenters said that toll collection should stop once the I-205 improvements have been paid for.
- Some commenters expressed concern that, once implemented, the toll rates would continually increase. Some commenters also expressed concern that the I-205 Toll Project would lead to additional toll projects across the state.
- Some commenters said that toll collection should only begin after the construction of improvements and mitigation projects on local roads were complete to address diversion impacts before they occur.

EXAMPLES OF COMMENTS ABOUT TIMING AND DURATION

"All projects should have costs associated configured ahead of time and the tolls should cease once the money has been raised for the project. We all know this will be never ending and DOT will keep finding reasons to toll us even when these projects are paid for."

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- Some commenters suggested that the I-205 Toll Project and the Regional Mobility Pricing Project should be implemented simultaneously to reduce rerouting to local roads and its associated negative effects.
- A few commenters said that tolls should be implemented before assessing the need to expand I-205.

2.11.2 Toll rates

- Several commenters suggested that Clackamas County residents should receive toll discounts because they believe tolls will cause them a disproportionate financial burden.
- Several commenters said that they could not sufficiently review and provide feedback on the Environmental Assessment because the toll rates were not yet determined. Commenters expressed concern that ODOT was not transparent with the rate assumptions used in the analysis and suggested that more information is needed on the actual cost of the tolls to an average or median household.
- Some commenters said that the assumed toll rate of up to \$2.20 per trip was too high and would have a substantial financial impact. A portion of these comments also included the commenter’s own estimates of monthly or annual costs for a household based on the highest toll rate and an approximated number of trips needed.
- Some commenters expressed concern that the variable rate and peak-time toll would cause higher financial burdens on people who cannot change their time of travel.
- Some commenters suggested that specific demographics receive toll discounts, including senior citizens, veterans and people working in healthcare, education or non-profits. A few commenters suggested that rideshare or delivery drivers should also receive a toll discount.
- A few commenters said that toll rates should be based on vehicle type and weight. A few commenters suggested that low- or zero-emission vehicles should receive discounts, but a few also suggested the opposite because those vehicles already pay little to no gas taxes.
- A few commenters suggested that there should be a cap on the variable rates or to only charge users once per day.

EXAMPLES OF COMMENTS ABOUT TOLL RATES

“Allow WL [West Linn] citizens who sign up for a transmitter to only be allowed to be charged \$10 or XXX number of dollars due to the proximity of the toll. This will provide some relief to WL citizens.”

“Telling me the toll is between \$0.55 and \$2.20 is a huge range when added on a daily, monthly, yearly basis. More transparency on the actual cost of the toll is needed for the public to be better informed on the decisions.”

2.11.3 Toll technology

- Some commenters expressed concerns that toll collection would involve toll booths, which would require cars to stop to pay a toll and therefore increase congestion on I-205.
- A few commenters expressed concern about the security of using electronic tolling and the collection of license plate numbers, photos of drivers and other information. A few commenters asked who would have access to the information collected.
- A few commenters said that tolls should be collected via transponders or electronic systems.
- A few commenters expressed concern that the toll technology would be energy intensive and therefore counterproductive to greenhouse gas reduction goals.

EXAMPLES OF COMMENTS ABOUT TOLL TECHNOLOGY

“Even in this proposed camera capture system currently being floated, traffic would need to slow for the radio collection from transmitters as well as the photo collection of license plates and drivers faces as it does in every other state that uses these systems (MA, NH, NY, etc.).”

“I am opposed to electronically “capturing” the toll. I do not want my information available for tracking.”

2.11.4 Enforcement

- A few commenters expressed concern that electronic tolls could be easily evaded by people covering their license plates or those without plates.
- A few commenters questioned the efficacy of enforcing toll collection for out-of-state drivers and other people without transponders.
- A few commenters asked that toll payment enforcement not exacerbate racial and/or income inequities by punishing those who are least able to pay on time.

EXAMPLES OF COMMENTS ABOUT ENFORCEMENT

“People are already covering their license plates (if present) with shaded covers on I-5. Evasive behavior will increase.”

2.12 Equity

Approximately 400 submissions addressed equity. Comments under this topic expressed feelings about how the implementation of the I-205 Toll Project would have inequitable impacts, especially for people experiencing low incomes, Black, Indigenous, and People of Color (BIPOC) populations, people with disabilities, senior citizens, people with limited English proficiency and other historically and/or currently underserved communities.⁸ Comments about equity often also fell under Household Finances and Toll Implementation: Toll Rates, in connection to the financial burden on these communities and calls for a discount for them.

The following is a summary of the major themes from the comments received pertaining to Equity.

- Many commenters shared the belief that the Project would disproportionately burden low-income persons because they are least able to afford an additional cost or change their travel times due to inflexibility in work schedules.
- Some commenters expressed that the Project would negatively impact senior citizens because they have fixed incomes, travel frequently across communities for medical appointments and/or have trouble using other modes of transportation.
- A few commenters expressed that the Project would affect BIPOC communities because of the correlation between race/ethnicity and income level, and because some BIPOC communities were directly or indirectly pushed to the edges of the Portland metropolitan area where there are fewer transportation options other than driving a personal vehicle.
- A few commenters expressed their thoughts on how the Project would affect people with disabilities who often need to travel to other communities for medical appointments and have difficulty using other transportation modes.

EXAMPLES OF COMMENTS ABOUT EQUITY

“I’m a low income single mom, this would be a MAJOR financial hardship for me. I depend on I-205 for important activities for my children, I would not have an option to choose an alternate route.”

“My husband and I are seniors who live on a restricted budget and having to pay a toll to just do errands, shopping, doctor appointments, etc. would be a horrible hardship on us and so many others in our town.”

“Oregon is already an expensive place to live and tolls will create a disproportionate financial burden to those of low-income and minority neighborhoods.”

“This will make it even harder for folks who rely on in-home caregivers to find caregivers as the costs will continue to be passed on to the caregiver and then the disabled person.”

⁸ Equity is distinct from fairness. Comments that use the word “equity” but is not about historically and/or currently underserved communities are coded as Fairness, not as Equity. Examples include concerns for the middle class and geographic communities that commenters see as being unfairly burdened by the Project.

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- A few commenters mentioned effects on the “working class,” often implying that they consider the working class low-income without explicitly stating so.

2.12.1 Low-income toll program

A few submissions specifically commented on the development of a low-income toll program.

Commenters appeared to be unaware or unbelieving the program would make a meaningful difference for the populations of concern.

Main comment themes about the low-income toll program included the following:

- A few commenters said the process of applying for and accessing discounts through the low-income toll program would be an additional burden for low-income populations. It would help to link toll discounts to existing benefit programs, like the Supplemental Nutrition Assistance Program (SNAP).
- A few commenters stated there is not enough clarity about the low-income toll program, such as eligibility requirements and enrollment procedures.

2.13 Safety

About 350 submissions addressed transportation safety.

These included comments on safety for any mode of transportation, including driving, taking public transit, walking, biking and rolling. The most common concern was decreased safety on local roads due to increased congestion caused by traffic rerouting, both for travelers in general and for pedestrians and cyclists specifically.

The following is a summary of the major themes from the comments received pertaining to Safety.

- Several commenters said that increased traffic will create unsafe conditions for pedestrians and cyclists, especially because the communities adjacent to I-205 often lack sidewalks and protected bike infrastructure.
- Some commenters said that ODOT should invest more to make streets safer, based on a perception that rerouting and diversion from I-205 will likely increase congestion and crashes on local streets and because of a belief that alternative modes of transportation like cycling and public transit have been historically underfunded. A few mentioned specific areas that need investment, including Lake Oswego, West Linn, and Stafford Hamlet. A few also mentioned specific schools for focused investments, including Stafford Primary School, Trillium Creek Primary School, Bolton Primary School, Rosemont Ridge Middle School and Willamette Primary School.

EXAMPLES OF COMMENTS ABOUT SAFETY

“I am a student at West Linn High School. Hundreds of my classmates walk across Highway 43 every day during lunch hour. ... It’s unsafe as it is, and I am very worried about the safety issues from increasing re-routing and diversion off the freeway when these drivers try to save a few bucks on tolls by exiting the freeway to drive past my school and my neighborhood.”

“Tolling will increase the local diversion beyond rush hour to 24/7 as motorists avoid tolls. It is not safe or responsible to increase traffic through neighborhoods and on narrow, winding rural roads, and not offer any viable alternatives.”

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- A few commenters said that public transit is not safe enough to be an alternative transportation option.
- A few commenters said that widening I-205 will improve safety because traffic will flow better, while slightly more commenters said that widening I-205 will not improve safety because the increased capacity will induce demand and congestion will not decrease over time.
- A few commenters mentioned a new junior high school under construction, close to Ostman Road and Willamette Falls Drive. They expressed concern that potential increased traffic in that area due to tolling would put school children at risk when the school opens.

2.14 Air Quality, Climate Change, Greenhouse Gas Emissions and Energy

Approximately 350 submissions addressed air quality, climate change, greenhouse gas emissions and energy. These submissions included comments about increased emissions in the region and comments related to local, regional, state and national climate goals.

Overall, commenters voiced different opinions on the effectiveness of tolling as a means to reduce greenhouse gas emissions.

The following is a summary of the major themes from the comments received pertaining to Air Quality, Climate Change, Greenhouse Gas Emissions and Energy:

- Several commenters expressed concern that traffic rerouting due to tolling would increase traffic volumes, increase vehicle idling and decrease travel speed on neighborhood streets, thereby increasing localized air pollution.
- Several commenters said car-centric projects do not contribute to combating climate change. A few commenters said ODOT must act in accordance with Oregon’s goals of carbon emissions reduction and actions to combat climate change, which means not adding more highway capacity and investing more in transportation modes other than driving personal vehicles.
- Some comments addressed the possibility of travelers driving longer distances to avoid tolls, thereby increasing overall air pollution by increasing vehicle miles traveled, fuel usage and idling time at intersections.
- A few comments mentioned the use of electric vehicles (EVs) favorably for their reduced polluting emissions as compared to conventional-fuel vehicles.

EXAMPLES OF COMMENTS ABOUT PUBLIC ENGAGEMENT/PROCESS

“Localized increases in air pollutant emissions can occur where traffic volumes increase or where vehicles spend more time idling at signalized intersections.”

“Continuing to push car-centric changes to roadways in Oregon does nothing to combat climate change.”

“Increase traffic will bring higher levels of pollution to many residential neighborhoods.”

2.15 Business and Freight

Approximately 300 submissions addressed effects to business and/or freight movement. Overall, comments expressed concern about the impacts of tolls on small and local businesses in the communities directly adjacent to I-205.

The following is a summary of the major themes from the comments received pertaining to Business and Freight.

- Many commenters expressed concern that increased transportation costs from tolling to business operations would have negative impacts on small and local businesses.
- Many commenters expressed concern businesses would have to raise their prices to account for the additional expense of tolls.
- Several commenters expressed concern that tolls would discourage people from seeking employment in or visiting communities adjacent to I-205 to shop, dine or visit local tourist and recreational destinations. The most commonly mentioned communities were West Linn, Oregon City, and the Willamette area in West Linn in particular.
- Some commenters expressed frustration that tolling would result in less reliable freight movement.

EXAMPLES OF COMMENTS ABOUT BUSINESS AND FREIGHT

“This will also reduce traveling between states for activities like shopping, dining, and recreation. ... This might reduce some congestion, but impact on businesses will be huge.”

“Tolls will put inflationary pressure on household & business incomes, & lead to greater inequality & less economic activity, as there will be fewer dollars to spend in the metro economy.”

2.16 Social Resources and Communities

Approximately 270 submissions addressed social resources and communities. These comments expressed feelings about how implementation of the I-205 Toll Project would affect quality of life, in general, and specific physical access to social services, public services, religious organizations, schools, parks and recreational facilities and medical facilities in the area.

Overall, many commenters were concerned that increased local congestion from rerouting would discourage or hinder them from traveling to destinations for basic necessities and social needs.

The following is a summary of the major themes from the comments received pertaining to Social Resources and Communities:

- Several commenters shared the belief that tolling on I-205 would worsen quality of life in the surrounding neighborhoods by increasing traffic volumes and travel speeds on local streets.

EXAMPLES OF COMMENTS ABOUT SOCIAL RESOURCES AND COMMUNITIES

“We live in this community and I-205 is a road we have to use to access medical centers. My elderly parents live with me in West Linn and they have several medical appointments at Kaiser Sunnyside and Kaiser Tualatin.”

“It will now cost our family money to visit other family across the river, to go to church on Sundays, and see friends. People’s communities and social circles are not confined to the cities in which they live.”

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- Some commented that tolling on I-205 would hinder their ability to get to medical appointments in other communities by taking away the most accessible route and increasing travel time.
- Some said tolling on I-205 would make it difficult to access basic necessities such as grocery stores and pharmacies, services such as appointments with government agencies, and destinations such as churches, schools, libraries and the homes of friends and family, many of which require traveling to other communities. The most commonly mentioned communities were West Linn, Oregon City, and the Willamette area in West Linn in particular.

2.17 Mitigation and Monitoring

Approximately 190 submissions addressed mitigation and/or monitoring. Mitigation is defined as any measure to reduce potential negative effects from the Project, and monitoring refers to continued evaluation of the efficacy of the toll system and its effects after implementation.

Many comments about mitigation discussed congestion and safety mitigation for negative rerouting effects to alternative routes and local streets. These comments touched on the mitigation proposals in the Environmental Assessment, requests for specific additional mitigation projects, skepticism that Project impacts could be mitigated and the need for more details on mitigation implementation and timeline. Overall, many commenters expressed that currently planned transportation mitigation is not sufficient. Beyond transportation, a few comments addressed mitigation for increased noise and air pollution on local streets.

Partner agencies provided comments about monitoring, specifically related to the need for ODOT to work with partners on developing a satisfactory monitoring program.

These included comments about the need for continuous monitoring to identify Project effects, further definition of the monitoring program and details of how future mitigation measures would be determined and implemented. Overall, commenters expressed that more information about the monitoring program was needed.

The following sections summarize the major themes from the comments received pertaining to Mitigation and Monitoring:

2.17.1 Transportation mitigation measures

- Several commenters said the proposed transportation mitigation does not go far enough to address the negative impacts from rerouted traffic due to tolling, including the potential for increased congestion and safety risks on local roads.
- Several commenters said they need more details on the planned mitigation, some of which are noted as “to be defined” in the Environmental Assessment without information on when and how

EXAMPLES OF COMMENTS ABOUT MITIGATION

“While I have seen mention of mitigation that will be offered to the residents in the area, the mitigation seems to be vague and unbalanced seeing as the amount inconvenience in the immediate area around our home will be impacted.”

“Significantly more mitigation is needed at the Borland/Stafford intersection. ... Additional pedestrian and bicycle safety mitigation is needed as a direct result of the Build alternative and the increase of traffic on non-Interstate roads because of toll avoidance. Mitigation measures should be conceived as a direct result of the proposed project and independent of the RTP project list.”

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they will be determined. A few commenters specifically called for clarification on the process for identifying and implementing mitigation.

- Some commenters said that congestion and safety impacts on local streets cannot be mitigated because there is no feasible solution to accommodate the extent of projected traffic increases without widening the impacted roads, which is not possible because of geographic or right-of-way acquisition constraints.

2.17.2 Specific mitigation requests

- A few commenters asked what mitigation was proposed for Oregon City's Main Street, Willamette Falls Drive or the Arch Bridge.
- A few commenters requested mitigation measures such as traffic lights, rectangular rapid flashing beacons, and roundabouts for locations on Stafford Road, OR 99E and OR 43 to mitigate the impacts of increased diversion traffic and address perceived unsafe conditions for people who walk and ride bicycles.
- A few commenters requested that all toll revenue be used to mitigate impacts in West Linn and Oregon City.

2.17.3 Timing of mitigation measures

- A few commenters stated that transportation mitigation measures to address increased congestion and safety risks on local roads should be in place or under construction prior to the commencement of tolling.

2.17.4 Monitoring

Overall, commenters expressed that more information about the monitoring program was needed.

- Several commenters said that it is unclear how monitoring would lead to implementation of future mitigation measures, who would be responsible for their implementation and how ODOT and local jurisdictions would reach consensus on the implementation of and amendments to the monitoring program.
- Some comments expressed a belief that the need for a monitoring program was evidence that an Environmental Impact Statement should be required for the Project.
- A few commenters said that the monitoring plan lacks details on its scope, the length of the monitoring period, the transportation network that will be monitored, how it will be administered and funded, and what standards will apply.
- A few commenters said that the ongoing monitoring program must be supported by a commitment to mitigate the impacts of the toll program.
- A few commenters said that there needs to be further definition of the long-term monitoring process for operational standards, congestion management and safety.

EXAMPLES OF COMMENTS ABOUT MONITORING

“We strongly support an ongoing monitoring program that is supported by a commitment to mitigate unforeseen impacts due to factors such as changes in toll rates, growth assumptions, road and transit network assumptions and funding for assumed improvement projects.”

“We were unable to find any details on the scope of this [monitoring] program, the length of the monitoring period, the transportation network that will be monitored, how it will be administered and funded, and what standards will apply. It is also unclear what measures could be implemented as a result of monitoring, how mitigation might change in response to monitoring, and how ODOT and the local jurisdictions would reach consensus on the implementation and amendments to the monitoring program.”

2.18 Other Regional Projects and Transportation Plans

About 170 comments addressed other regional projects and transportation plans, including comments about other toll projects in the region, cumulative effects of multiple toll projects in the region and other regional infrastructure projects and transportation plans.

The following is a summary of the major themes from the comments received pertaining to Other Regional Projects and Transportation Plans:

- Some commenters said that ODOT should complete an Environmental Impact Statement to study the cumulative effects of the I-205 Toll Project with other regional projects, including the Regional Mobility Pricing Project and the Interstate Bridge Replacement Program.

EXAMPLES OF COMMENTS ABOUT OTHER REGIONAL PROJECTS AND TRANSPORTATION PLANS

“I’m asking that ODOT not use West Linn and Oregon City as the guinea pigs in their tolling experiment and instead complete the Regional Mobility Pricing (Toll) Project BEFORE tolling one part or the metro. That way a full view of regional tolling impacts can be properly assessed.”

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- A few commenters said that ODOT has focused too much on tolling, which has hurt other regional infrastructure projects by diverting the agency’s attention and funds away from them.
- A few commenters said that if tolls are implemented in the region, then all revenue should fund other construction projects, such as building a new I-5 bridge. A few others mentioned desired changes to other regional projects and transportation plans such as improvements to 82nd Avenue, light rail in the Interstate Bridge Replacement Program, and the closing of the Arch Bridge to vehicular traffic.

2.19 Other Examples of Tolling

About 140 comments addressed other examples of tolling, including tolling in other states and countries in general, as well as tolling in specific locations. Overall, many commenters referenced tolling elsewhere to express that tolls would negatively affect Oregon, that the Project should have a sunset clause and that there should be an alternative route that is not tolled.

The following list summarizes the major themes from the comments received pertaining to Other Examples of Tolling:

- Based on experience, some commenters said that tolling can reduce traffic congestion or is a good way to pay for highway infrastructure, but more said that tolling does not reduce traffic congestion and is inefficient for generating revenue.
- Some commenters referenced tolling in other places in the United States, wanting to avoid experiences in California, New York, New Jersey, Washington or other states that have tolled roads. Other places mentioned negatively include Washington D.C., Ohio (Columbus), Illinois, Virginia, Connecticut, Colorado (Denver), Texas, and Florida (Orlando).
- Some commenters said that there needs to be a lane or alternative highway route that is not tolled, and that tolling only works in places like California or New York because they have efficient public transportation and/or alternative routes.
- A few commenters mentioned positive components of toll projects elsewhere that ODOT should incorporate, such as using the EZ-Pass system, holding informative forums and town halls about tolling like those they have experienced in the Seattle area, implementing a system like the one in Guatemala, or a belief of a discount for local residents like Boston.

EXAMPLES OF COMMENTS ABOUT OTHER EXAMPLES OF TOLLING

“Road pricing was a big part of managing traffic in Singapore, and it worked. It worked on many levels. If worked to decrease demand. And it worked to incentivize people to take other modes of transportation.”

“I object to a funding system that will consume at least 40% of revenue just to operate. Having lived in northern VA as tolling increased, I know that administrative costs can total nearly 100% of revenue, with most or all going to private contractors.”

“When I lived in CA where there were occasional tolls, they were usually in effect during rush hours and typically only one lane of the freeway was the tolled lane (where there were fewer cars). If you build an additional lane in both directions, and toll just that one, you may find there are fewer objections.”

2.20 Other Environmental Effects

Approximately 130 submissions addressed the other community and environmental resources studied in the Environmental Assessment, including noise, visual quality, land use, historic resources, soil, water, vegetation, and wildlife.

The following is a summary of the major themes from the comments received pertaining to Other Environmental Effects.

2.20.1 Noise

- Some commenters expressed concern that diversion would increase traffic noise in local communities. Commenters noted particular concern about noise levels along OR 99E, OR 43, Mountain Road, Borland Road, Childs Road, Stafford Road, Pimlico Road and Johnson Road. A few commenters mentioned concerns about noise levels in the Willamette neighborhood of West Linn.
- A few commenters said the added third lane on I-205 would increase traffic in the long term and therefore increase noise levels on the highway.
- A few commenters said that a sound wall should be constructed on I-205 to mitigate existing and future traffic noise. A few commenters disagreed, saying that a sound wall was unnecessary spending because people who live near the highway already knew the implications on noise levels when they chose to buy homes there.
- A few commenters said that increased noise from diverting traffic would decrease their home values.

EXAMPLES OF COMMENTS ABOUT OTHER ENVIRONMENTAL EFFECTS

“Tolled highways, however, create undue and unjust burdens on local communities surrounding the highway, from increased noise, pollution, loss of property value, increase in local traffic congestion and wear and tear on locally funded and maintained roadways.”

“This widening is a subsidization of further suburban sprawl in the Portland region. Every new home built on the suburban fringe rather than as infill closer to urban centers will translate into more more GHG emissions from increased VMT, as well as the destruction of yet more farm and forest land.”

“The historical bridge in Oregon City is beautiful, but will crumble with the added traffic, as it is barely a drivable bridge now.”

2.20.2 Visual quality and land use

- A few commenters said the natural beauty and open spaces are a defining quality of the Pacific Northwest and expressed concern that increased traffic on local roads would reduce the visual quality of the area.
- A few commenters stated that traffic congestion is caused by population growth, along with urban and suburban sprawl, and suggested that the added third lane would further contribute to sprawl.
- A few commenters suggested that more analysis should be done to understand impacts to land uses in the project area, especially park and school properties.

2.20.3 Historic resources

- A few commenters said that diverting traffic will strain historic resources, particularly the historic Arch Bridge in Oregon City, the Oregon City Municipal Elevator, and a watering trough on Sunset Street.
- A few commenters expressed concern about the impacts of diversion on the historic Willamette neighborhood in West Linn, saying that increased traffic would deteriorate street conditions and destroy its character.

2.20.4 Natural environment: Soil, water, vegetation, wildlife

- Some commenters mentioned general environmental concerns about the land and water in the Project area.
- Some commenters expressed safety concerns about wildlife crossings and collisions due to increased traffic on side streets through traffic rerouting.
- A few commenters said they were concerned that increased congestion on surface streets and idle traffic would increase gas and oil pollution to storm drains and surrounding waterways.

EXAMPLES OF COMMENTS ABOUT NATURAL ENVIRONMENT

“Because of its rural location, it is common for large wildlife to be hit while crossing to access the river. Increased traffic will likely increase accidents due to deer crossing the road.”

“The environmental piece is certainly going to be a challenge since surface streets will be impacted and more heavy traffic will sit idle, spilling more oil and automotive fluids onto the street and into our storm drains. This will go right to our rivers and streams.”

3 Agency Comment Summary

3.1 Tribal and Participating Agency Input

As noted in Section 1.6, ODOT and FHWA engaged tribes and participating agencies in several ways prior to and during the Environmental Assessment comment period and encouraged them to submit comments. No tribes submitted comments. Sixteen participating agencies submitted comments, as listed in Table 3-1.

Table 3-1. Participating Agencies that Submitted Environmental Assessment Comments

| Participating Agency Type | Agency |
|---------------------------|--|
| State | Washington State Department of Transportation |
| Regional | Metro Council |
| | Metro staff |
| | Southwest Washington Regional Transportation Council |
| County | Clackamas County Board of Commissioners |
| | Clark County, WA |
| | Washington County |
| City | City of Gladstone |
| | City of Happy Valley |
| | City of Lake Oswego |
| | City of Oregon City |
| | City of Tualatin |
| | City of Vancouver, WA |
| | City of West Linn |
| | City of Wilsonville |
| Transit Agency | TriMet |

3.2 Key Themes from Participating Agency Comments

Many of the participating agency comment themes were similar to the overarching public comment themes, as described in Section 1.7. Some local agencies, including the cities of Gladstone, Lake Oswego, Oregon City, and Wilsonville, expressed agreement with, referenced, and/or attached a copy of the comments submitted by the Clackamas County Board of Commissioners. The Clackamas County Board of Commissioners also expressed concurrence with comments submitted by other participating agencies, including but not limited to the cities of West Linn, Oregon City, Lake Oswego, and Tualatin. The following subsections summarize major themes of the agency comments.

3.2.1 General Environmental Review Approach

- **Level of NEPA review:** Several agencies said ODOT and FHWA should prepare an Environmental Impact Statement for the Project, citing concerns that the Project would have

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significant environmental impacts that could not be mitigated and that additional analysis of Project effects is needed.

EXAMPLES OF COMMENTS ABOUT LEVEL OF NEPA REVIEW

“As a participating agency, we firmly believe that the EA does not currently support a Finding of No Significant Impact (FONSI). Instead, we urge the Federal Highway Administration to direct ODOT to proceed with an Environmental Impact Statement (EIS) for this project, combined with the RMPP, to address the deficiencies and issues identified above.”

- **Format and presentation of Environmental Assessment:** A few agencies said the Environmental Assessment was too dense, lengthy, and difficult to understand, and asked questions or requested clarifications on specific content and terminology in the documentation.
- **Consideration of other projects:** Several agencies said the Regional Mobility Pricing Project should be included in the analysis for the Environmental Assessment. Some agencies also requested inclusion or exclusion of other regional projects in the cumulative effects analysis. Examples include the several 2018 Regional Transportation Plan (RTP) projects such as the OR 43 Multimodal Improvements - Holly St. to Mary S. Young State Park (10127), Willamette Falls Drive Multimodal Improvements - Hwy. 43 to 10th St. (10128), I-205/10th Street Improvements (11242), and Willamette Falls Legacy Project Internal Roadways (12089). Some agencies suggested cumulative impacts could be captured by a larger study area and a more thorough monitoring program.

EXAMPLES OF COMMENTS ABOUT PURPOSE AND NEED, GOALS AND OBJECTIVES

“While increased safety and decreased congestion are included in the purpose and need, the Project fails to meet this need as the Project will, in fact, decrease safety and increase congestion on local roadways. Further, we found several examples in the EA of unmitigated safety impacts for vehicles, cyclists, and pedestrians.”

- **Purpose and need, goals and objectives:** A few agencies said the purpose statement is too narrow, not well defined, and/or restricts the range of reasonable alternatives to be evaluated under NEPA. A few agencies said the Project does not meet all of its stated needs (e.g., improved safety) and that the Environmental Assessment does not adequately explain how the Project meets its goals and objectives.
- **Alternatives analyzed:** Some agencies said that the Environmental Assessment should evaluate or conduct sensitivity testing for other alternatives. Suggested alternatives include a Project with only a third I-205 lane, either as a tolled/managed lane or without tolling; and Projects with various adjustments to the tolling assumptions, such as tolling only I-205 ramps instead of bridges, reducing overall assumed toll rates, and accounting for potential discounts or exemptions that would be implemented under the low-income toll program.
- **Area of Potential Impact and methodology:** A few agencies said the Area of Potential Impact for the Environmental Assessment is insufficient and requested expanded study areas that include additional roadways and localized areas that may experience changes in traffic patterns, particularly for transportation, noise, air quality, land use, and historic and cultural resources. Several agencies questioned the modeling methods and assumptions for the Environmental

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Assessment, with a few agencies providing detailed comments prepared by consultants for the transportation and economic analyses.

- **Public engagement process:** Several agencies said the Environmental Assessment development process did not provide adequate opportunities for input from agencies and the public and did not adequately incorporate the comments received prior to publication. Several agencies also said the 60-day public comment period for the Environmental Assessment was not sufficient and should have been extended further. Some expressed concern that translated materials were not available at the start of the comment period and said public hearings and in-person information sessions during the comment period were not well publicized. Some said more informational sessions about the Environmental Assessment should have been held outside of typical business hours.

EXAMPLES OF COMMENTS ABOUT AREA OF POTENTIAL IMPACT AND METHODOLOGY

“The EA fails to adequately analyze the impacts to the local community that will bear the burden of increased diversion. While the definition of the study area includes the local roadways and communities that would experience diversion, in many cases there is no meaningful analysis of localized impacts.”

“We are concerned about the I-205 EA analysis not including the broader Regional Mobility Pricing Project (RMPP). Looking at tolling in an isolated corridor when the region is looking at a broad tolling plan limits the reliability of the conclusions and leads to questions.”

3.2.2 Tolling-Specific Issues

- **Costs of tolling infrastructure:** A few agencies said money spent constructing the tolling infrastructure and developing the toll program would be better directed to funding I-205 improvements.
- **Revenue Allocation/Use:** Several agencies expressed a desire for more information on how any net toll revenues from the Project would be used and/or made requests for specific transit, roadway, and active transportation projects that should be funded by toll revenue.
- **Toll rates and rules:** A few agencies commented on toll rates and rules, including a suggestion that tolling should be eliminated during nighttime hours.

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- **Toll policy and implementation:** A few agencies said any Oregon state toll policies related to enforcement and programs, including toll account set-up, low-income programs, and customer service centers, should be applied in the same way to Washington residents.
- **Fairness of tolls:** Several agencies indicated that tolling I-205 would place an unfair burden on local communities, including those in surrounding counties in both Oregon and Washington, and would require them to pay more for roadway maintenance than drivers in other areas of the state.

EXAMPLES OF COMMENTS ABOUT DIVERSION AND REROUTING

“The EA analysis showed significant amounts of traffic currently on I-205 would instead use local roads to get around the tolls, resulting in significant impacts to our city and the communities around us.”

“Most critically, the EA downplays the impacts that the Toll Project will have through diversion of traffic from I-205 onto the streets of Oregon City and its neighbors.”

3.2.3 Environmental Topic Areas:

- **Diversion/rerouting:** Most agencies expressed concerns about changes in future traffic patterns projected to result from the Project, including increased volumes of drivers diverting to local roads throughout their jurisdictions and related effects on transportation operations and safety. Some agencies questioned the validity of the transportation effects analysis and requested further analysis on traffic operations and safety at additional intersections and/or roadway segments that were not previously analyzed in the Environmental Assessment. Some agencies requested more detailed modeling of localized transportation impacts, particularly in Lake Oswego, Oregon City and West Linn. Most agencies requested more specific or comprehensive commitments from ODOT to manage diversion impacts.

- **Mitigation and Monitoring:** Several agencies said that mitigation measures described in the Environmental Assessment are insufficient, not well defined, not enforceable, and/or unlikely to be constructed. Several agencies requested more specificity on mitigation commitments and more details about proposed monitoring programs. Some agencies said their input on mitigation measures during development of the Environmental Assessment was not adequately incorporated. Several agencies proposed additional intersections and/or roadway segments that would warrant mitigation because of the Project effects, and some agencies suggested more specific thresholds that should be used to determine whether mitigation is required. Some agencies also requested that mitigation measures be implemented prior to the start of tolling. Some agencies requested a more detailed analysis of the direct and indirect environmental effects of proposed mitigation measures for the Project. Several agencies said the Environmental Assessment does not describe how impacts would be reduced to a level that would warrant a Finding of No Significant Impact.

EXAMPLES OF COMMENTS ABOUT MITIGATION AND MONITORING

“The draft EA presents mitigation options that are vague, have not been fully developed, are not fully analyzed, and are listed without a source of funding. These mitigation plans are neither commitments nor are they analyzed to an extent where their impacts can be understood. Until the mitigation plans are fully defined and analyzed, the issuance of a FONSI is inappropriate, and the need for an EIS essentially a requirement.”

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- **Multimodal transportation:** Several agencies questioned the validity of the transportation effects analyses presented in the Environmental Assessment. Some indicated that the Environmental Assessment does not accurately analyze levels of bicycle and pedestrian stress and safety effects and not propose adequate mitigation for associated impacts. A few agencies requested additional analysis of bicycle and pedestrian stress in localized areas, such as downtown Oregon City, downtown Lake Oswego, and near Stafford and Borland Road. A few agencies said the existing transit service in their jurisdictions is inadequate and expressed concern that the Environmental Assessment does not propose expanded transit service as mitigation for Project impacts. Some agencies requested additional transit-related mitigation measures, such as additional transit signal priority features and lane extensions.

EXAMPLES OF COMMENTS ABOUT MULTIMODAL TRANSPORTATION

“Although not characterized as a transportation safety impact in the I-205 Tolling EA, the increased traffic along city streets will have additional negative impacts on the safety of all transportation users.”

“Transit in the area is ‘limited’ at best. There is no funding plan projected to adequately address this.”

- **Air Quality, Climate Change, and Greenhouse Gas Emissions:** Several agencies requested more detailed modeling of future emissions, particularly along local roadways and near neighborhoods and schools.

- **Business and Economic Effects:** Several agencies said they were concerned that the Project would negatively impact their local economies and businesses and requested more detailed analysis of business impacts. Some agencies indicated they did not find the economic effects analysis for the Environmental Assessment to be credible.

- **Social Resources and Communities, Environmental Justice, and Equity:** Several agencies expressed concern that the Project would adversely impact low-income populations and other vulnerable populations, such as seniors on fixed incomes. Some agencies said that the Environmental Assessment did not adequately evaluate impacts to environmental justice communities and did not include adequate strategies for mitigating the effects of tolling on those populations.

EXAMPLES OF COMMENTS ABOUT SOCIAL RESOURCES AND COMMUNITIES, ENVIRONMENTAL JUSTICE AND EQUITY

“Despite the prevalence of EJ communities and individuals near the proposed toll project, the draft EA does not adequately analyze the disproportionate impacts the Build alternative will have on this populace. In particular, the draft EA fails to analyze EJ impacts at the correct geographic scale. Also, the lack of specificity surrounding the proposed tolling tiers prevents us from fully understanding the financial implication tolls may have on EJ communities in the API.”

- **Noise:** Several agencies requested more detailed modeling of future noise impacts on public health, particularly along local roadways and near neighborhoods and schools. One agency requested more flexibility in noise wall mitigation measures.

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- **Historic and Archaeological Resources and Section 4(f):** In addition to requesting a broader study area for the analysis of historic and archaeological resources and Section 4(f), a few agencies requested further analysis of the effects of the Project on the Oregon City Arch Bridge, a historic resource.
- **Land Use:** A few agencies said the Environmental Assessment does not adequately analyze compliance with state and local land use policies. These agencies requested ODOT conduct additional consistency review for the following items: Oregon Highway Plan (OHP) Policy 1F and 1G Action 1G1; Oregon City Transportation System Plan; West Linn Comprehensive Plan Goal 12 and Transportation System Plan Goal 4; and Stafford Hamlet Community Vision.