



September 6, 2022

To: Oregon Transportation Commission

Re: Comments regarding Oregon Highway Plan Goal 6: Tolling and Congestion Pricing Policy

Dear Oregon Transportation Commissioners,

Thank you for the extended opportunity to comment on the proposed amendment to Oregon Highway Plan policy Goal 6: Tolling and Congestion Pricing (dated June 13, 2022).

We recognize the need and support the dual purpose of tolling and congestion pricing to support demand management and raise revenue to create a fully functional multimodal transportation system. Washington County, the other counties in the Portland metro region and travelers statewide will be affected by the implementation of tolling and congestion pricing. We ask you to revise the proposed amendment to address the following concerns:

**Broaden the definition of a Corridor to reflect the wide range of mitigation needs, which should be addressed on a project-by-project basis.**

Diversion will affect roads that may be located relatively far away from the priced facilities. Therefore, the proposed policy that defines a corridor as one mile from the priced facility as being eligible for mitigation is too narrow. Defining a corridor through the NEPA process, proposed as an option in your policy, provides a more flexible approach that would allow for mitigation of the wide range of diversion impacts that could occur given the different transportation network characteristics along the facilities planned for pricing.

**Mitigate for health and safety impacts of diversion from trips of all length; not just trips over three miles as proposed.**

Mitigation is needed for health and safety due to diversion of trips of all lengths, though the mitigation strategies may vary by trip length.

**Strengthen commitment to multimodal investments in use of revenue.**

Pricing and tolling are effective tools to manage demand. Attractive and effective multimodal travel options are an essential part of a successful demand management strategy and should be eligible uses of revenue. Transit and access to transit improvements provide travel options for community and regional trips that might otherwise have been accommodated by driving on the priced facilities.

**Board of County Commissioners**

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**Add policies to reflect a commitment for meaningful engagement with local and regional communities throughout the tolling and pricing process.**

This engagement is essential during the initial consideration of a pricing project, the development of a pricing program and the ongoing monitoring and adjustment process over time.

**Commit to document and widely share costs and benefits in the project definition and use of net revenue and rate-setting analysis.**

The public needs to understand costs and benefits including economic impacts of tolls on businesses, access and mobility as well as potential benefits from travel time improvements and multimodal investments.

We support your commitment to center equity in designing tolling and pricing frameworks and your commitment to structure rates so as not to impose unfair burdens on people experiencing low income and to advance equity. As you move forward with the rate-setting process, we will look for more details on how low-income impacts are addressed for people living at both 200% and 400% of federal poverty levels.

Washington County, the region and the state depend on a fully functional and integrated local and state transportation system. We encourage you to continue engaging local communities as you refine these policies to reflect this interrelationship.

Implementing the tolling and congestion pricing program in Oregon is a challenging endeavor. Our Washington County Board members are ready to work with you to create a successful Toll Program and look forward to continued dialogue

Sincerely,



Kathryn Harrington

Chair, Board of County Commissioners

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