

My friend, Cam Gilmour, worked approximately 26 years for ODOT and had key leadership positions, went to Clackamas County to head Transportation, and when Lynn Peterson became the Director of Transportation in the State of Washington she brought Cam Gilmour to WSDOT as her Assistant Director of Transportation for the State. Cam is retired and lives out of state, but he has allowed me to ask him to review my comments and opinions. I don't want to add anything to his comments he provided me.

Paul Edgar

On 1/9/2023 8:08 AM, Cam Gilmour wrote:

Paul, as you know, the Frequently Asked Questions ODOT has prepared regarding the tolling projects is very general and essentially has the tone that ODOT will mitigate traffic diversion impacts and look at ways to reduce the impact of tolls on low income persons. The traffic studies done to date if I recall correctly, conclude that trip times on I-205 will be reduced by 14 minutes over the 7 miles between the Tualatin River Bridge and just north of the Abernethy Bridge 20 years in the future-- compared to the no-build alternative.

I doubt this will be the case, as these forecasts always miss the mark and traffic speeds slow and congestion resumes much sooner. Of course I am talking about congestion on the freeway, not the diverted to local roads traffic. These roads will be gridlocked the day the tolls are in effect, in my opinion. Traffic studies would need verify that these opinions are true.

There are no improvements I am aware of that can offset the effects of growing population and employment numbers in the greater Portland area. Of course, adding lanes to I-5 and I-205 will increase traffic capacity and allow temporary (probably less than 5 years) improved traffic speeds, even with increased traffic volumes on I-205. Future increases in population densities allowed by land use plans will produce more trips than can be accommodated by the projects in the current 20-year transportation plans.

Traffic diverted to roads and streets not designed to handle this traffic is unavoidable with I-205 tolling. There is already diversion to the local roads when there are accidents on 205 and when there are periods of congestion in the absence of crashes. You have already addressed what I would say is the significantly adverse impact this traffic diversion will have on schools, neighborhoods and commercial areas in Tualatin, West Linn, Oregon City, Lake Oswego and Canby. These areas will be degraded by these diverted trips and will

experience increased traffic accidents and be less safe for not only cars and trucks, but pedestrians and bicyclists as well.

It will be important that traffic studies address this as well as the social justice element of the forthcoming Environmental Assessment. These impacts appear to warrant the preparation of a draft and final environmental impact statement (EIS). An EIS process will allow much more debate and time to find another funding source—one that does not have the significantly adverse social and economic impacts. Again, traffic studies should address the net traffic diversion impact that tolls will have on local communities. These numbers should make the point that a non-tolled capacity improvement is needed on I-205. There should be a comparison of travel time savings on the freeway to the adverse impacts of traffic diversion on local roads and streets. Frankly, the traffic diversion that happens today should have led long ago to the traffic impact mitigation measures briefly touched upon in the Question and Answer information.

In my opinion, if ODOT is to increase the capacity of I-5 and I-205 in the areas under study, they should not use a funding quirk in FHWA's tolling regulations to do this. One wonders what transportation projects/funding the Oregon congressional delegation lobbied for and got in the recently adopted federal omnibus spending bill. The JPACT table should address this and debate whether funds now assigned to other projects or federal earmarked funds can be transferred to the I-5 and I-205 projects. These type of transfers happened 30 years ago to get the extension of light rail to Hillsboro. Eventually the street and highway improvements these funds were diverted from, were built.

Finally, in my opinion, the set-up for congestion pricing via bridge tolls now being studied, is not appropriate in the I-5 and I-205 corridors. The impacts of traffic diversion to roads and streets not designed to handle this traffic, degrade livability of neighborhoods taking the brunt of diverted traffic, and the financial impact to those paying the tolls appear to exceed the benefit of the estimated 14 minutes travel time savings on I-205. My assumption is tolling will divert significantly more traffic than the alternative of building the improvements without using toll revenue to fund the projects.

ODOT and the region should find another source of funds. I do hope the scoping already completed reinforces my opinion on the I-205 tolling project.

Cam