



City of Tualatin

www.tualatinoregon.gov

January 6, 2023

Oregon Department of Transportation
355 Capitol Street NE, MS11
Salem, OR 97301

Sent via email to: Oregon Department of Transportation Toll Program at
oregontolling@odot.oregon.gov

RE: Comments on Scope of Analysis of the Regional Mobility Pricing Project Under the National Environmental Policy Act (NEPA)

The City of Tualatin greatly appreciates the opportunity to provide feedback on the Regional Mobility Pricing Project (RMPP) as a participating agency. Tualatin lies directly within the corridor under consideration for congestion pricing. We have serious concerns regarding the impact congestion pricing will have on Tualatin's residents and businesses when freeway traffic diverts onto local roads, and the disproportionate effect these tolls will have on our residents and our businesses and their employees. Without appropriate mitigation measures, discounts, exemptions, and access to public transit options, livability and economic vitality in Tualatin will be severely impacted by congestion and drivers, cyclists, and pedestrians will be less safe using our local transportation system.

Tualatin is bisected by I-5 and part of Tualatin is bounded by I-205.

Congestion pricing will likely increase diversion of traffic onto local roadways beyond what the city is already experiencing. The following major and minor arterials are already seeing significant impacts from diversion and would see significant increases in traffic volumes and crashes if congestion pricing goes into effect:

- Boones Ferry Road
- 65th Ave
- Nyberg St
- Borland Rd
- McEwen Rd (connecting I-5/Lower Boones Ferry to Childs Rd and Stafford Rd)
- 124th Ave
- Tualatin Sherwood Rd

Like many jurisdictions in the Metro Region, Tualatin receives frequent input from the public regarding congestion and safety concerns on local roads. Protecting the safety and viability of our roads is a major priority for the city. Metro's 2018 Regional Transportation Safety Strategy indicates that arterials are the most dangerous roadways in the regional system. Sixty-six percent of serious crashes in the region occur on arterial roadways, and drivers diverting from freeways into local roads have seven times the crash rate of drivers staying on the freeways.¹ Toll-caused diversion of drivers from I-5 and I-205 will cause substantial increases in fatal and serious-injury crashes in our community and around the region.

Local roads are already seeing significant congestion and crash rates due to drivers diverting around significant congestion on the existing freeways due to inadequacy of the existing freeways to meet traffic

¹ Oregon Metro. Regional Transportation Safety Strategy (2018), p. 51.

https://www.oregonmetro.gov/sites/default/files/2019/01/29/2018-Regional-Transportation-Safety-Strategy_FINAL.pdf

demand. This diversion must not be treated as an existing condition to burden and threaten our people forever- it must be mitigated along with mitigating the additional diversion that would be caused by tolls.

While we appreciate ODOT's commitment to mitigate issues identified in the NEPA process, we must emphasize the importance of avoiding diversion mitigation measures that are incompatible with the City's vision for its transportation system and community livability. For example, modeling is likely to indicate thousands of vehicles per day using Boones Ferry Road to divert around tolls on I-5, which could lead to a proposed 'mitigation measure' to widen Boones Ferry to five-lanes. This mitigation measure would not only be incompatible with the City's Transportation System Plan, but the higher speeds, volumes, difficult crossings, noise, and crash rates associated with a five-lane Boones Ferry Road goes against the City's community vision.

Our part of the region is sorely lacking in north-south and east-west routes, so many drivers in our community must rely on I-5 and I-205 multiple times a day to get to their jobs, schools, childcare, medical, shopping, and other essential services. Many of our companies have no other option than using I-205 and I-5 to ship goods or access other company buildings or jobsites (such as contractors and landscapers). Many of our residents are part of lower-income and historically underserved populations, and our conversations with them indicate they will be disproportionately impacted by tolls on their daily routes and/or diverted traffic on the streets they need to cross to get to jobs, grocery stores, parks, and transit stops. To ensure that the RMPP is truly equitable, ODOT must mitigate for the impact that congestion pricing will have on all of these folks, and consider implementing appropriate exemptions or discounts for local users (including local business users) of I-5 and I-205. We also encourage ODOT to study the potential impact that gantry placement will have on drivers who lack viable alternate routes.

We are also very concerned about how the toll revenue would be used. Fair uses of the revenue would be to maintain the freeway, bridges, signs, lights, etc. and improvements to the freeway that directly benefit the people paying the tolls. Improvements to diversion routes could be fair to the extent of diversion onto that specific route to directly address the diversion. It would be objectionable to use tolls to punish people for driving or to divert the revenue to other projects that do not really improve the freeway or directly address diversion around it.

Finally, access to reliable and efficient public transit could play a crucial role in reducing congestion to get around the region for some people, if efficient and reliable transit were actually available. However, for many of our residents and businesses, transit is just not a viable option due to needs to visit multiple offices or jobsites, family situations, goods movement, and transit not going where they need to go. We encourage ODOT to work closely with local jurisdictions, and TriMet to expand public transit options. For example, extending and increasing frequency on Line 76, connecting Tualatin to Oregon City, would help. However, while it would help, it would not address the majority of issues caused by tolling.

In summary, we have grave concerns about the effects of tolling on our community and its effects on the lives and safety of our residents and businesses (and their employees). These include additional congestion on our streets and in our neighborhoods, financial burdens on our residents and businesses – especially low-income and people of color – and the increased threat of crashes caused by existing and projected diversion around the freeways.

Sincerely,



Frank Bubenik
Mayor, City of Tualatin

Cc: Director Strickler, Oregon Department of Transportation
Director Finn, Urban Mobility Office, ODOT
Oregon Transportation Commission