



# City of Tualatin

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August 28, 2020

Lucinda Broussard, Toll Program Director  
Oregon Department of Transportation  
355 Capitol Street NE, MS11  
Salem, Oregon 97301

RE: I-205 NEPA Alternatives Comment Period – City of Tualatin comments

Dear Director Broussard:

On behalf of the Tualatin City Council, I respectfully submit the following comments into the public record as a part of the National Environmental Protection Act (NEPA) comment period on the I-205 tolling alternatives:

1. Please clarify that revenues gained from I-205 tolling will be for investment in the I-205 corridor.
2. The NEPA analysis should fully account for the quality of life impacts from tolling and diversion, especially on businesses, neighborhoods, and schools that serve our equity populations. We are very concerned about the impacts to transportation reliability and access, public health, the environment, and economic impact to family and business budgets. With increased automobile traffic due to diversion on local roads, we are concerned about safety conflicts and air quality, as vehicles will spend more time in congestion emitting carbon.
3. The analysis should go beyond simple mitigation to propose and identify a funding plan for equity-informed improvements for increased transportation options and programs to serve lower income and historically marginalized communities, as is identified as a best practice in TransForm's "*Pricing Roads, Advancing Equity*" report and toolkit. The I-205 corridor has limited parallel transportation routes and many of those are severely lacking of basic safety infrastructure for pedestrians and cyclists.

Of specific importance is Borland Road, which has no transit service and is lacking safety infrastructure for pedestrians and cyclists, yet is home to a free clinic, food bank, day home serving people experiencing homelessness, and a warming/cooling center.

4. Before removing any I-205 alternatives for consideration, we would like to see the following actions, as they will better examine the reality of when I-205 tolling would be in place:
  - a. Run the model with I-5 tolling assumed

- b. Run the model with a 2040 horizon, which would be similar to other major projects in the area, such as the Southwest Corridor
  - c. Greater analysis needs to be completed on the impact to equity and health, specifically with emissions and worker commuting data
5. Clarify how the list of goals and objectives will be addressed and incorporated into the project. Traditionally, NEPA documents are guided by the purpose and need statement and federally required areas of analysis and disclosure. The proposed list of goals and objectives represents categories which are traditionally not studied through a NEPA process. Since these items address many of the equity-based concerns, they should be more than data point considerations in the process to get to a locally preferred alternative. How will solutions, such as new programs or transportation improvements, that derive from equity-based discussions be planned and funded?
  6. In addition to alternatives 3 and 4, we recommend furthering analysis of alternative 5 into NEPA. Also, we recommend adding an alternative where the tolled area extends from a location west of Stafford Road to a location north of the OR 212 interchange into the NEPA analysis.
  7. With our understanding of the purpose and need statement's importance in NEPA decision-making, and dedication to equity on this project, we believe that it is imperative that equity be referenced in the project's purpose and needs statement.
  8. We understand that this section of I-205 was selected from the 2018 Value Pricing Feasibility Study, but we would recommend that tolling be considered at a regional-scale to address the major chokepoints of the Boones Bridge and Columbia River Crossing. The current situation of spot tolling has unequal impacts on the region, as only certain communities will bear the greatest burden.

We look forward to discussing your consideration and incorporation of our comments, questions, and requests into this project. We look forward to your response as a part of the NEPA process.

Sincerely,

Frank Bubenik, Mayor