

March 18, 2022 Letter to Oregon Department of Transportation Toll Program from Vancouver City Council

The Vancouver City Council recognizes the significant impacts of freeway/highway congestion on the bi-state region, and the need to manage the transportation system to maximize existing infrastructure and move more people in ways that address our climate and equity goals as the region grows. Our Council embraces the need for policymakers and agencies to work together to fund and implement improvements to the bi-state regional transportation system, including bottleneck removal and operational and multi-modal enhancements. Given the significant costs of any mitigation strategy, the Vancouver City Council is compelled to advocate on behalf of our residents for fair and equitable solutions. The current I-205 Toll Project and the Regional Mobility Pricing Project currently under consideration will have direct and substantial impacts on commuters from around the Portland-Vancouver Metropolitan region. In particular, the ~60,000 or more daily commuters from Southwest Washington who use the I-5 and I-205 corridors to enter Oregon and that have no other alternate routes will be inequitably impacted. For the Vancouver City Council to accept a program that prices users to manage congestion and fund facility improvements, it must provide equitable distribution of benefits and reflect the following principles:

Regional Analysis of the Bi-State Transportation System

Coordination with metropolitan area transportation and transit related agencies, including those in Southwest Washington, must be thoughtful and ongoing throughout the planning and design processes for any long-term change to the regional, bi-state system.

- The current tolling proposals for I-5 and I-205 will have impacts on the entire regional transportation system. The impact analysis for any tolling proposal must evaluate these system-wide impacts and should not be limited to the areas directly adjacent to tolls. This should include local street systems and highways.
- A full analysis of the regional bi-state transportation system is required to understand potential future impacts of a priced regional system. In Oregon, this analysis must include I-84, I-405, OR-26 and OR-217, as well as all regionally significant bottlenecks, including the Interstate 5 Bridge. In Washington, this analysis should include SR-14 and SR-500.
This analysis must be conducted prior to implementation of a priced system, should be the basis for determining what roadways are included in it, and definition of timeframes for when they would be priced.
- The analysis of tolling impacts must include impacts to Washington residents of all income ranges.

Regional Mitigation

The mitigation strategy for any congestion pricing project must consider the entire regional system, be equally applicable in both Oregon and Washington, and include all impacted local street systems and highways. All impacts, both direct and indirect, must be addressed by mitigation strategies that are proportional to the impact.

- Low-income residents of SW Washington must be able to access, without additional burden, discounts or subsidies that are established as part of any tolling program.
- Mitigation strategies that focus on increased transit must apply throughout the bi-state region.

As the only transit provider that currently operates in both Oregon and Washington, C-TRAN will be a key partner in providing enhanced service and expanded transportation options.

- In relation to transit, constitutional restrictions in Oregon currently limit the use of tolling revenues to capital improvements and cannot fund expanded transit service and operational costs.
- Prior to implementation of any congestion pricing concept, ODOT must commit to identifying and proposing remedies to the state legislature to address the regulatory barriers to using tolling revenues to fund transit operations, and geographic limitations on where funding can be directed.

Regional Project Implementation

Tolling revenues should be used to address operational, safety, and congestion management issues throughout the bi-state region, including regionally significant bottleneck projects within the defined ODOT Toll Program area, transit enhancements and other multi-modal improvements. We support improvements that benefit the people who pay the toll.

- In order to ensure that benefits are distributed equitably, improvements should be tied to the corridor where the revenue is generated.
- Increased transit options must be provided regardless of state of origin.
- Replacement of the Interstate 5 Bridge must be included in all traffic analysis related to congestion relief projects and associated safety and operational improvements.
- Tolling revenues should be used to support capacity, operational and multimodal improvements identified in and consistent with adopted regional plans.

Regional Engagement

- In order to ensure that residents and policymakers throughout the region have the opportunity for meaningful participation, the Toll Program/congestion pricing process must allow sufficient time for analysis and integration of feedback.
- The current I-5 and I-205 Toll Program proposals represents a significant change to our regional transportation system. Inevitable implementation glitches in a highly congested corridor could have crippling effects on the entire system. Implementation should include a high level of transparency, have comprehensive risk management strategies, and be phased to contain disruptions to small areas, with the most congested areas being transitioned last.
- The Oregon Transportation Commission must continue to engage with policymakers and constituencies in Southwest Washington.

Past bi-state planning and coordination has resulted in significant and equitably beneficial regional infrastructure improvements. The Vancouver City Council hopes our concerns are acknowledged and addressed and the implementation of the full Oregon Toll Program is collaborative and equitable. This will allow future efforts to address regional transportation challenges, like the Interstate 5 Bridge Replacement Program, to proceed in a positive, productive and expeditious manner.

The Vancouver City Council supports the ODOT Commitments drafted in February 2022 and the Equity and Mobility Advisory Committee's Foundational Statements approved in November, 2021. The Council will continue to monitor and participate in the process and will use all levers at our disposal to ensure that Southwest Washington residents are not disproportionately negatively impacted and receive equitable benefit from changes that impact them.

If, at conclusion of the most near-term milestone of the Toll Program, the Preliminary Engineering phase of the I-205 Project or any subsequent phase of that Project or the Regional Mobility Pricing Project, the Commitments and Foundational Statements and the other key elements of our policy framework have not been adequately addressed, Council understands there is opportunity to revisit these prior to Construction phase and will continue to work to ensure that that changes favor and support residents of Vancouver and Clark County.