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Joint Special Subcommittee on Transportation Planning  
Hon. Sen. Wagner  
Hon. Rep. Walters  
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Re: Oregon City, West Linn, and Gladstone Area Tolling Project

My comments are limited to two specific items; 1.) The current strategy of the Oregon Transportation Commission and ODOT to delay the third lane addition to I205 from Stafford Rd. to Abernathy Bridge and to postpone seismic improvements to the bridges, overpasses and viaducts in this road is inherently flawed because it defeats the purpose of seismic upgrades to the Abernathy Bridge and 2.) Road tolls other than those on interstate bridges disproportionately burden local residents with financial cost and with the impact of diversion on local roads and streets.

**ODOT strategy to postpone improvements to I205 from Stafford Rd. to Abernathy Bridge**

The Oregon Transportation Commission recently approved the ODOT recommendation to postpone the third lane of I205 and the seismic improvements to the multitude of bridges, overpasses, and viaducts therein due to lack of funding and postponement of tolling. Strategically this will be a massive blunder which could result in failure of ODOT's stated goal of providing a seismically sound emergency route in the event of a significant Cascadia subduction event. ODOT touts the Abernathy Bridge project as providing the only bridge in the Portland Metropolitan Area that will meet seismic standards. Obviously, if the route to the Abernathy Bridge is unavailable because the bridges in the nearest two miles have failed, the seismic upgrades to Abernathy will be of little use.

This decision has the distinct appearance of being punitive to the local residents as pay back for their opposition to the tolling proposal. Additionally, our legislators claim there is a lack of funding available to pay for these needed improvements. I cannot accept a lack of funding as a reason when the Oregon Legislature was able to appropriate \$525 million to Multnomah County and Hood River County for bridge projects on roadways that are not owned by the State of Oregon. Helping counties is fine if the State has funded needed improvements on roadways actually owned by the state, but when the Legislature decides it is fine to defer critical seismic improvements on their own roads to pay for county roads, I do not accept that there is a lack of available funds.

In addition, ODOT has made disparaging comparisons to criticisms about the ongoing improvements to Highway 217, noting that the I205 improvements would be much more expensive. Yes, that is true, but the cost of the project is due to the geography of this area and not the fault of the local residents and certainly not a reason to adopt a failing strategy for managing a seismic event.

The Oregon Transportation Commission and ODOT must reverse their current strategy of postponing the I205 third lane and bridge improvements to prepare for an emergency route if/when a significant earthquake strikes our area.

**Road tolls other than those on interstate bridges disproportionately burden local residents.**

Highway tolls are described as placing the cost of improvements on those who use the same. Where this nice sounding phrase fails is when the tolled roadway has historically served both as a through route and as a local connector street. In the case of West Linn, Oregon City, Gladstone and other local communities, we have relied for years on the Abernathy Bridge to cross the Willamette River for shopping, medical services, recreation, government services and many other reasons. Implementing tolling on the bridge and on I205 itself, in an unlimited amount would place a disproportionate financial burden on local residents. I would prefer no tolls at all, but if tolling is implemented there should be either a “no toll” lane for those who do not need to enjoy the speedier tolled lanes or there should be a maximum toll assessed on either a daily or weekly or monthly basis.

In addition to the disproportional financial burden of tolls, there is the diversion that will undoubtedly result from tolling implementation. With the adopted started of OTC/ODOT to postpone the third lane and bridge improvements from Stafford to Abernathy combined with tolling at the bridge, there will be even more diversion onto local roads. Clearly, ODOT has not taken this diversion seriously, instead adopting a “wait and see” attitude. Without doubt, when diversion problems to become known, ODOT will claim lack of funding to address it or simply deny responsibility and place blame elsewhere.

Tolling must not be implemented until the issues of disproportionate financial burden and diversion are addressed with concrete plans.

Respectfully Submitted  
Richard Larson