

DATE: May 19, 2022
TO: JPACT
FROM: Douglas R. Allen
SUBJECT: Resolution 22-5265 MTIP Amendment

Chair Craddick and JPACT Members:

It is becoming increasingly clear, as a result of today's proposed MTIP amendment, and the recently approved MTIP amendment for I-205 Tolling Preliminary Engineering, that the current I-205 project is no longer the same project envisioned when it was included in the RTP, and when it received a Federal Documented Categorical Exclusion in December of 2018.

At that time, it was a single project, with multiple components including work on the Abernethy Bridge, and widening seven miles of I-205. According to the DCE, tolling of I-205 was not reasonably foreseeable.

Now, the project has been broken into multiple phases, with no designated funding for the later phases, and the initial phase dependent on toll revenue.

Today's MTIP amendment should require ODOT to formally separate the phases into two projects, and initiate an appropriate process of environmental analysis to consider alternatives for the delayed widening phase that are consistent with the anticipated tolling.

Options to consider for this later phase or project should include No-Build, and Managed Lane options, with Bus Rapid Transit service. A managed lane has special requirements, such as high occupancy, or a higher toll, implemented in a variable manner throughout the day to ensure that priority vehicles, such as public transit, can operate in free-flowing traffic in a fast and reliable manner.

Without such a requirement, you should vote no on this amendment, because it appears to violate regional climate goals and Governor Brown's directives on greenhouse gas emissions, by promoting increased VMT, and fails to provide needed facilities for the equitable provision of improved transit service.

Sincerely,
Doug Allen