

Date	Name	Comment:
12/4/2023	Cameron Wilson	Please put speed cameras along the length of OR-569 (Randy Pape Beltline) through Eugene and consider lowering the speed limit to 50 or 45. The speeding situation on OR-569 is dangerous and unbearable. Everyday the vast majority of drivers go 15-20mph over on this narrow 4 lane highway with short on ramps and frequent bottlenecks. Every mile per hour over the speed limit reduces the decision time needed to react to merging traffic. These speeding drivers threaten the lives of everyone. Speed cameras would level the playing field and consistently enforce the law that is flagrantly violated every day.
12/6/2023	Shannen Knight	PDF Letter pg. 2
12/6/2023	Equity and Mobility Advisory Committee (EMAC)	PDF Letter pg. 5

Thank you for taking the time to read to my testimony. I had the pleasure of serving as a STRAC member for the past several months. Overall my experience on STRAC was positive, but as the Past Chair and current Vice Chair of my local CCI (Committee for Citizen Involvement), I'm kind of a stickler for public process. At the first STRAC meeting we set up some bylaws which stated we would be trying to come to a consensus on our recommendations. These bylaws were posted publicly, and thus I feel it is fair to assume that the general public assumed this was our role. However, in the subsequent meetings, we never really were polled as to where the group stood on various topics, nor did we try to come to a consensus on topics. Thus, I believe there is a disconnect in what the public assumed role of STRAC and what work actually done by the committee.

I do believe ODOT staff did a good job of incorporating most of the STRAC feedback, however, our scope of work was limited to rules that were already written by ODOT staff. We did not help "shape" the rules themselves, nor did we decide by any consensus about things like exemptions or discounts. Since this was not our charge as a member of STRAC. I wanted to make this clear as you hear the presentation from ODOT staff as they reference the STRAC.

As a STRAC member, I appreciated that I was able to personally talk to ODOT staff about the concerns of local businesses and residents. However, these concerns were not addressed in the rules. Thus, I felt it necessary to send this testimony to you. I am a minority and women owned small business just blocks away from I-205. I also live within a 0.25 mile of the freeway as well. While I am not completely opposed to tolling in general, I think the current tolling plan is inequitable or unfair to the local community. I understand the need for funding with electric vehicles not contributing via the gas tax anymore. I also have personally lived where managed toll lanes have worked in other parts of the country. However, the current plan to toll only one "bridge" does not take into account the hardship this places on the people and businesses in the immediate area. I have "bridge" in quotes because it is not really a bridge. It is an overpass. I feel it a little disingenuous to use the Federal law for tolling a "bridge" to justify tolling all lanes. It is technically a "bridge" but when you think of a bridge, you think of the St. John's or other iconic architecturally designed crossing. This is just part of the freeway, and in order to toll all lanes, you have to call it a "bridge". Also, West Linn residents also have to pay millions to replace the water line that had many years of useful life to improve this "bridge". This "bad PR" is what is making tolling a hard sell to the local community. I do think ODOT could have done a better job of framing tolling from a PR standpoint. There may have not been as much push back from the local community if there was a better attempt to toll in more places than just this one spot by calling it a "bridge".

I also know you need to start tolling somewhere, but rolling out just one toll "bridge" which impacts only one community is just not fair. For instance, my business used to be in Lake Oswego. If I was still in Lake Oswego, customers would not have to pay a toll to patronize my business. However, since I'm now in West Linn, customers are going to have to pay a toll or be re-routed off the freeway just to come to my business. How is this fair? Do you think a customer will come to visit my business knowing they have to pay a toll to get here? Or will they go to one of my competitors where they don't have to pay a toll to patronize? This is an unfair competitive advantage my competitors have just because it was decided only to toll one place in the whole metro area. Likewise if I lived just a few miles away in Tigard and commuted to Portland I wouldn't have to pay a toll to go to work every day. But just because I live in West Linn, I now have to pay a toll just to go to work. Again, it is unfair to start tolling in just one location. Tolling should be rolled out to the whole metro area to be equitable.

I'm also concerned with how local businesses will be able to compete for employees. I was the former President of Historic Willamette Main Street so I know the hardships our local business have. Most of our local businesses are restaurants with lower wage workers. Most of them also have a hard time keeping staff with the current employment environment. Also, the cost of living is such in West Linn that these employees usually don't live locally, and thus would likely have to pay a toll, or find alternative roads which could add to their commute time just to go work. Again, why would someone choose to work at a place where they have to pay a toll (or leave early) to go to work, versus another restaurant where they don't have to pay a toll? This is a competitive disadvantage for local businesses when a worker can work anywhere else in the metro area and not have to pay a toll. Again, if tolling was going in at the same time for all the metro region, this would not be a problem.

The other option is to toll all but one lane. I know that ODOT looked at having a “managed lane” which is one lane tolled. But I don’t believe to option to toll all but one lane was looked at. Having at least one “free” lane alleviates all the equity issues. Customers can use the free lane to come to my business. Commuters have the option to use the free lane to go to work. Employees of local restaurants can come to work and not have to pay a toll. Those with lower incomes have the option to stay sacrifice a longer commute time in exchange for saving money on the toll. It is the simplest solution I believe to make tolling equitable for the local communities and businesses.

The Environmental Assessment (EA) stated that traffic on Willamette Falls Dr. (where my business is located, and my home is adjacent to) may have traffic increase 100%. Diversion is already a problem at rush hour. Having traffic increase 100% would make it impossible to for customers to come in and out of my business, and for me to run errands like going to the grocery store (which requires a car because the closest one is a few miles away and up a steep hill, with no local transit options). I believe this too could be alleviated by tolling all but one lane.

While I appreciate ODOT is no longer considering 24 hour tolling, I-205 is only an issue during rush hour. The rest of the time it is a wide open freeway (again, I look out onto it all day from my office window). I understand the argument that tolling all lanes has worked in other parts of the country, However, ODOT admits that the next closest option to cross the river in those tolled areas is a few miles away. We have a unique scenario in that you can divert less than a 1/8 mile and still cross the river without toll (on what I think of as a “real” bridge, the Oregon City Bridge). Weekends especially, I believe very few people will opt to pay a toll. Instead, they will divert to our local roads and bridges instead. Again, this is an unnecessary burden on the local communities. In one of the ODOT presentations, ODOT stated that only 10% of people will pay a toll no matter what. 40% will not pay a toll at all and will divert. That last 40% will make a “game time” decision on whether to pay a toll or not. If there is no traffic on local roads which is most of the time outside of rush hour, how much revenue is actually going to be generated when people have an easy way to divert and not pay the toll? Having one lane no toll would at least keep these people on the freeway and off our local roads. It will also create some congestion which may motivate that 40% of the people to actually use the toll road at the last minute as they run into traffic in the “free” lane.

If the plan continues to be all lanes tolled and only the one toll gantry for now, then I believe some kind of employee discount for tolling would be the best way to keep businesses competitive for staff. Similarly, West Linn and Oregon City residents who live within a certain distance of the toll road should also get some kind of discount or waiver as they will be dealing with the diversion in their neighborhoods. Again, this only needs to be until more toll roads go into the Metro area. This is the only way tolling will be equitable for businesses and residents. I emailed the ODOT team several other tollways in the country that offer discounts or waivers to the local residents. This was something the ODOT team took under advisement, but never made it to the STRAC for discussion. Most notably is the Bay City Bridge where tolling is being waived for local residents until 2028. <https://www.baycityarea.com/bay-city-bridges/tolls#:~:text=Bay%20City%20residents%3A%20Free%20through,1%2C%202028>. I think something like this would go a long way to helping locals get used to toll roads, and feel like they are “getting something” for having to be the “guinea pigs” for tolling in the Metro region. I also gave the ODOT team some examples of things like “unlimited crossings” that is also mentioned in this article for Bay City. This would allow people to budget for tolling for each month as the amount of tolling would not change month to month. I proposed \$40 to \$50 a month for an “unlimited pass”. This would keep people on the freeway as well, helping to reduce diversion.

I do know this is not in your scope as tolling has been mandated by the legislature. But I will add that tolling has been going on for centuries. In the modern world, it seems a bit strange to be implementing a system that requires building expensive infrastructure just to collect the toll, and has high administrative costs so very little of every dollar collected will be actually generating “revenue”. Charging per mile, or higher registration fees, for instance, seems like a simpler, less infrastructure heavy way to accomplish similar fundraising. But I understand tolling is what we are dealing with right now. I believe the best way to make it fair is to either toll all but one lane, don’t charge tolls until they are set up for the entire metro

area, or give discounts to businesses and residents affected by the one toll bridge. I hope these ideas are helpful and something the OTC would consider as STRAC did not discuss any discounts for residents or businesses. Thank you taking the time to read my comments.

Shannen Knight  
A Sight for Sport Eyes

# Equity and Mobility Advisory Committee (EMAC): Input on Oregon Transportation Commission (OTC) Low-Income Toll Program Decisions

<b>Subject</b>	Low-Income Toll Program Memorandum for the Oregon Transportation Commission
<b>Date</b>	December 6, 2023
<b>EMAC Members</b>	Olivia Kahn, John Gardner, Duana Johnson, Tangerine Behere, James Paulson, Philip Wu, Amanda Garcia-Snell, Leah Fisher, Jan Campbell, Paul Burgess, LaQuinta Daniels, and Rachel Winslow

## Purpose

The purpose of this memorandum is for the Equity and Mobility Advisory Committee (EMAC) to provide further guidance in developing the Low-Income Toll Program to the Oregon Transportation Commission (OTC) and ODOT when the OTC meets on December 12. EMAC acknowledges where they support the current OTC direction and where more work is needed to better align with EMAC’s Foundational Statements, and the OTC-supported EMAC Recommended Actions ODOT is implementing.

An important next step is to come to a shared understanding among EMAC, ODOT, and the OTC of who will be responsible for implementing key actions and when the additional work requested by EMAC will take place.

## Background

Since its inception, EMAC was charged to provide guidance on addressing affordability concerns of tolling on vulnerable populations. Through a series of committee meetings in 2023, EMAC deliberated on various considerations related to ODOT’s Low Income Toll Program (LITP), including where and to whom the program should apply, what type of benefit(s) should be prioritized, and depth of affordability benefit to people experiencing low incomes.

In October, November, and December 2023, ODOT staff presented their LITP recommendations to EMAC members through a series of small group and full EMAC meetings.

*Low-Income Toll Program Memorandum*

After significant dialogue, EMAC members arrived at a general consensus of support for staff's recommendations, with additional suggested direction for staff and OTC moving forward.

To be clear, the Low-Income Toll Program decisions being made now would first be applied through the I-205 Toll Project and shape the development of the Oregon Toll Program's back-office system. As new projects are planned to come online, such as the Regional Mobility Pricing Project, I-205 impacts to low-income customers should be evaluated to inform longer term plans and interventions. We understand that policy decisions for the Interstate Bridge Replacement will be made as part of a future, bi-state process.

**EMAC's input on the OTC decisions for their December 12, 2023, meeting is provided in the following chart:**

Low-Income Toll Program Components	OTC Direction	EMAC Comments
1. <b>Geographic Extent</b>	Residents of Oregon and Washington	General consensus for support.
2. <b>Benefit Type</b>	Percentage discount on each transaction	General consensus for support.  This should not preclude the option to offer free trips or credits as a special offer to help address affordability needs and encourage people to enroll. In the spirit of meeting the intent of the OTC/EMAC guiding principle of toll-free travel, EMAC recommends that ODOT consider a hybrid approach of offering a certain number of toll credits to LITP participants in addition to the percentage discount.

*Low-Income Toll Program Memorandum*

<p><b>3. Benefit Level – 0-200% FPL</b></p>	<p>Commit to a 50% discount</p>	<p>General consensus for support, with more work needed to support the Foundational Statements and EMAC’s Action #4 identified in EMAC’s recommendations. Work needed includes thoroughly exploring opportunities to fund the work needed to align with the Foundational Statements and address the following activities:</p> <ul style="list-style-type: none"> <li>○ Thoroughly explore potential partnerships with other agencies and organizations to increase enrollment and access to the LITP both in Oregon and Washington.</li> <li>○ Ensure enrollment in the LITP automatically qualifies participants for other programs that will subsidize toll expenses—using new and available existing funds—for people experiencing low incomes.</li> <li>○ Provide resources for 501(C)3 organizations that provide services to people experiencing low incomes such as the Native American Rehabilitation Association of the Northwest (NARA).</li> <li>○ Develop communication materials tailored to specific historically and currently excluded and underserved communities and their needs (e.g., travel to Oregon Health &amp; Science University, Veterans Administration, Oregon Employment Department, or other social service centers)</li> <li>○ Monitor the effectiveness, benefits, and impacts of the I-205 Toll Project LITP to inform the approach for the Regional Mobility Pricing Project LITP.</li> </ul> <p><b>Toll-free Travel Opportunities</b></p> <p>To align with the intent of the OTC and EMAC’s prior support for toll-free travel continue to explore and define “toll-free travel” options for people experiencing low incomes. For example:</p> <ul style="list-style-type: none"> <li>○ Develop partnerships that are aligned in supporting people experiencing low incomes (agencies, institutions, community organizations, employers), to reduce enrollment barriers and supplement LITP benefits with those of other programs.</li> <li>○ Leverage the infrastructure of existing affordability programs with agencies such as the Veterans Administration and Oregon Employment Department,</li> </ul>
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*Low-Income Toll Program Memorandum*

Low-Income Toll Program Components		
	OTC Direction	EMAC Comments
		<p>and explore opportunities with existing programs such as the <a href="#">Innovative Mobility Program</a>.</p> <p><b>Enrollment Engagement</b>                      Consider adjustments to affordability strategies over-time in response to enrollment in the program. For example, offer a number of free trips for a designated period with a discount to follow. Adjust the number of trips or the discount to reach target enrollment goals.</p> <p>Extend LITP educational activities and campaigns to Oregon and SW Washington with an emphasis on educating equity framework communities in both states, including historically and currently excluded and underserved people traveling to and from SW Washington and Oregon.</p>
<p><b>4. Benefit Level - 200%-400% FPL</b></p>	<p>Analyze 10 and 25% discounts in the Level 3 Traffic and Revenue analysis for both 300% and 400% of FPL, with decision in 2025 after analysis is completed.</p>	<p>General consensus for support, with more clarity needed on the intention of this benefit and opportunity to support workforce, avoid abrupt changes in discount eligibility, and continue to explore creative solutions. Gain clarity about the following:</p> <ul style="list-style-type: none"> <li>○ Who would benefit?</li> <li>○ How will the program reach those who need the benefit?</li> <li>○ What does delivery of the program look like for those within 200% - 400% FPL?</li> </ul>