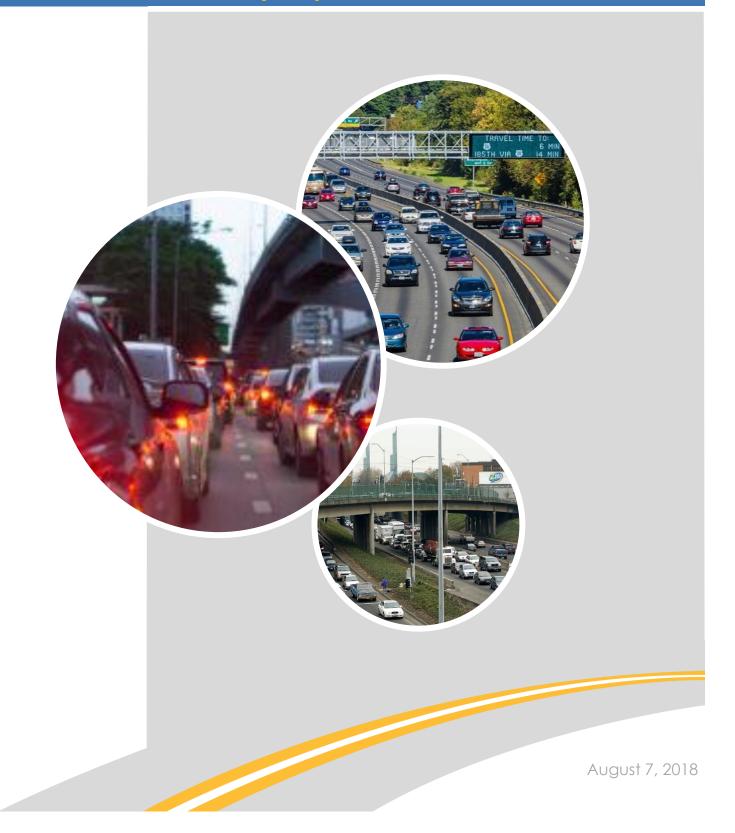


Portland Metro Area Value Pricing Feasibility Analysis Summer 2018 Community Engagement Summary Report



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Summer 2018 Community Engagement Summary Report

Prepared for



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1 INTRODUCTION

1.1 Project overview and report purpose

This report summarizes public feedback received as part of the Portland Area Value Pricing Feasibility Analysis between June 19, 2018 and July 20, 2018.

Oregon House Bill 2017—"Keep Oregon Moving"—directed the Oregon Transportation Commission (OTC) to develop a proposal for implementing value pricing on I-5 and I-205 in the Portland metro area. Congestion pricing, also called value pricing, uses tolls to manage congestion, resulting in faster, more reliable and predictable trips.

At the OTC's direction, the Oregon Department of Transportation (ODOT) formed a Policy Advisory Committee (PAC) to analyze the feasibility of implementing congestion pricing on I-5 and I-205. The PAC was composed of 25 representatives from local, state, regional and federal agencies; the business community; transportation and environmental advocacy organizations; and environmental justice organizations. The PAC met six times between November 2017 and June 2018 to learn about congestion pricing, review the results of technical analysis, and prepare a recommendation to the OTC regarding: where pricing could be implemented; what types of pricing should be considered; and strategies for mitigating potential undesired impacts.

Throughout the feasibility analysis, ODOT engaged the public to hear comments, concerns and questions from the community. Engagement activities included in-person open houses, online open houses, online surveys and community briefings. Additionally, members of the public had the opportunity to provide comment via email, an online comment form, mail, a voicemail line or in person at any PAC meeting. Interim results of this engagement were summarized in four previous reports:

- Winter 2017-2018 Community Engagement Summary Report
- <u>Title VI/Environmental Justice Engagement Summary Report</u>
- Spring 2018 Community Engagement Summary Report
- May 1 June 18 Community Engagement Summary Report

On July 5, 2018, ODOT submitted the PAC's recommendation to the OTC¹. The PAC recommendation includes the following components:

- Mitigation strategies: Recommendations to consider strategies during project development and mitigation planning for improving public transportation and other transportation options as essential strategies for equity and mobility; providing special provisions for environmental justice populations, including lowincome communities; and minimizing potential negative impacts from diversion.
- Recommended initial pricing pilot program: A recommendation to advance pricing projects on both I-5 and I-205 as a pilot project for further study (known as Concept B and modified Concept E)². Concept B would price all lanes on I-5 between NE Alberta/Going Street and SW Multhomah Boulevard; exact termini

https://www.oregon.gov/ODOT/Value%20Pricing%20PAC/20180705_VP-PAC-Rec-to-OTC.pdf.

² A full explanation of the five studied concepts is available in Technical Memo 4: Round 2 Concept Evaluation (https://www.oregon.gov/ODOT/Value%20Pricing%20PAC/TechnicalMemo4_Evaluation.pdf). Oregon Department of Transportation
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¹ The complete PAC recommendation can be accessed at

1 Introduction

of the pricing application would be developed as part of future analysis. Modified Concept E would implement a toll on or near the Abernethy Bridge on I-205, with exact termini of the pricing application to be determined as part of future analysis.

- Recommended longer term pricing program: A recommendation to advance study of a broader implementation of congestion pricing on all of I-5 and I-205 in the analysis corridor, in the context of all Portland area highways, if the pilot is successful.
- Minority recommended initial pricing program: A recommendation from several PAC members to advance further study of Concept C (tolling all lanes on I-5 and I-205 from the state line to the I-5/I-205 interchange) as the initial recommended pricing option in the Portland metro area.
- PAC input on other topics include additional recommendations to:
 - Conduct further system-wide feasibility analysis with regional partners of potential pricing applications on the regional highway system.
 - Develop a plan for future roadway and public transportation capacity increases in a congestion pricing environment.
 - Use revenues from highway tolling to provide benefits within the region where revenues are collected for congestion relief.

The PAC was not required to reach a consensus; areas of agreement were noted, and minority opinions were encouraged. PAC members were invited to provide letters to the OTC as an appendix to the PAC recommendation report.

Comments summarized in this report were submitted in response to the PAC recommendation³ and the feasibility analysis in general. If further review of congestion pricing is conducted under the National Environmental Policy Act (NEPA), the information in this document, and the public and agency input received, may be adopted or incorporated by reference into a future environmental review process to meet those requirements.

Public input opportunities and notification 1.2

Between June 19 and July 20, 2018, the public was invited to provide comment to the OTC through the following channels:

- Online comment form on ODOT's value pricing website
- Online comment form on the OTC's website •
- Fmail⁴ •
- AskODOT help line •
- Project voicemail line •
- At the final PAC meeting on June 25, 2018
- At a special OTC meeting on July 12, 2018

³ The draft PAC recommendation was published online June 18, 2018, and distributed to the PAC members. This report includes all comments received following the publication date and by the published deadline.

⁴ Emails submitted to the PAC email address—valuepricingpac@odot.state.or.us--were auto-forwarded to the project's general inbox and have been included in this report. August 7, 2018



ODOT notified the public of these comment opportunities through emails, news releases, social media, the project website, and at community group briefings.

1.3 Comment participation: by the numbers

1.3.1 Public comment received between June 19 and July 20, 2018

In total, ODOT received 799 public comments between June 19 and July 20, 2018 (Table 1). Most of these comments were submitted via online comment forms or email. Eleven people provided verbal comments at the final PAC meeting and 54 people provided verbal comments at the OTC special meeting on July 12, 2018.

Table 1: Comments received between June 19 and July 20, 2018 by source

Comment source	Number received between June 19 and July 20
Online comment form	657
Email	57
Voicemail	3
Mailed or written comments	17
PAC meeting #6 verbal comment (June 25)	11
OTC special meeting verbal comment (July 12)	54
TOTAL	799

1.3.2 Public engagement throughout the entire feasibility analysis

The public comment received during this period builds on a broad body of feedback submitted since the feasibility analysis began in November 2017. Table 2 summarizes total reach of outreach efforts during the feasibility analysis, and Table 3 summarizes the number of comments received throughout the entirety of the project.

Table 2: Reach of outreach activities between November 2017 and July 20, 2018

Outreach activities	Total reach
Online open house visitors	13,260
In-person open house attendees	446 at eight events
Title VI/Environmental Justice discussion group attendees	114 at six meetings
DHM research focus group attendees	37 (including 17 Title VI/Environmental Justice)
Community group presentations	52
Video views	24,735

2 Key Findings



Comment source	Number of comments
Emails/online comment forms	1,962
Voicemails	59
Written letters and comments	28
Verbal comments (PAC and OTC meetings)	97
Completed questionnaires	2,586 (including 286 from self-identified Title VI/Environmental Justice participants)

Table 3: Comments received throughout the feasibility analysis by July 20, 2018

1.4 Comment analysis methodology and data integrity

For analysis purposes, the project team read comments and categorized them by topic. The project team applied a "code," or descriptive tag, to comments according to the topics mentioned in the communication (see Table 5 for complete list). Most comments discussed multiple different topics, and in these cases, the project team applied all relevant codes. Individual themes and nuances for each topic are summarized in Section 3. Team members applied each topic code only once per comment. In other words, if a comment discussed transit several different times, the project team applied the transit code once.

The content analysis methodology was consistent with past comment periods to allow the project team to track trends and compare public input over the duration of the project. The individual topics reflected during this five-week comment period were consistent with previous comment periods. The frequency of topics mentioned, however, differed over time, with topics such as revenue and diversion increasing during this comment period (see Table 4).

The objective of this public comment period was to provide residents from throughout the region the opportunity to give feedback to the OTC on congestion pricing and the PAC recommendation. Demographic and geographic information was not collected during this comment period. Additionally, commenters were able to submit comments through multiple channels. Each individual comment was coded to ensure all ideas were reflected in the summary. Some individuals made multiple comments in which they discussed the same topic. The numbers presented from the coding analysis, therefore, should be viewed as approximate "orders of magnitude" and not a vote or poll, as double counting may have occurred.

2 KEY FINDINGS

2.1 Findings from summer public comment period

• There is no consensus on how to address the impacts of regional growth, including traffic congestion, on existing transportation infrastructure. Debate continues about whether adding new vehicle and public transportation capacity would alleviate congestion, or whether other measures such as congestion pricing are a more effective solution.

- **Public opinion on the effectiveness of pricing is mixed.** While many commenters are optimistic about pricing's potential to address congestion, others express doubts about its efficacy and concerns about implementation.
- How tolling revenue will be spent is a key topic of interest. Many commenters have opinions about government spending to date, where and how tolling revenue should be spent, and the fairness of the transportation funding system.
- Traffic diversion onto local roads is a key concern and mitigation priority, particularly for residents in West Linn and North Portland.
- Echoing past comment periods, many commenters discussed the fairness of pricing, including whether it is fair to price existing roadways and how to make pricing implementation as fair as possible for as many people as possible.
- Many commenters discussed the capacity of the transportation system, including highways and public transportation. Most of these comments mentioned the strain population growth places on the system's capacity. Several commenters expressed a need for expanded roadway capacity to accommodate this growth, while others stated congestion pricing may help free up capacity on existing roads. Many talked about increasing transit as a way to add capacity within the system, while others suggested transit is not the solution to our congestion problem.

2.2 Feasibility analysis public comment trends

The topics of greatest interest to commenters have changed throughout the feasibility analysis. Table 4 shows the top four topics of interest over the last four major comment summaries. Over time, the topics of revenue, diversion, and transit have increased in importance among commenters. Throughout the project, commenters have been particularly interested in the "fairness" of congestion pricing, which is defined differently by different people. Most frequently, commenters discussed fairness in terms of whether they felt viable alternatives exist to highway travel, whether they have the ability to change their schedule, whether different geographies would be impacted disproportionately, and whether a user-pay system is more or less fair compared with other transportation funding systems,

Winter 2017-2018 Summary		Title VI/EJ Summary		Spring 2018 Summary		Late Spring 2018 Summary		Summer 2018 Summary	
Congestion observations/ impacts	30%	Congestion observations/ impacts	28%	Fairness	18%	Fairness	34%	Revenue and/or taxes	38%
Revenue and/or taxes	16%	Highway capacity/ expansion	18%	Highway capacity/ expansion	10%	Revenue and taxes	27%	Fairness	33%
Fairness	13%	Fairness	10%	Trust	9%	Transit	27%	Diversion	26%
Transit	12%	Equity	9%	Equity	8%	Highway capacity/ expansion	26%	Transit	25%

Table 4: Top four topics across comment periods

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3.1 Topics of greatest interest

Table 5 shows the results of the project team's content analysis for comments received between June 19 and July 20, 2018.

Table 5: Content analysis of comments received between June 19 and July 20, 2018

Торіс	Number	Percent
Revenue and taxes	304	38%
Fairness	261	33%
Diversion	210	26%
Transit	201	25%
Trust	154	19%
Expanding existing roadways	125	16%
Equity	119	15%
Adding additional roadways	108	14%
Congestion observations	93	12%
Mitigation strategies	83	10%
Pricing concepts reviewed by the PAC	71	9%
Congestion impacts	66	8%
Project scope and public engagement	63	8%
Personal financial impacts	59	7%
General economic impacts	36	5%
Environmental impacts	34	4%
PAC recommendation	33	4%
Lane conversion	21	3%
Technology	20	3%
Other concurrent projects	13	2%

3.2 PAC recommendation feedback

Approximately 19 percent of comments mentioned the PAC recommendation, mitigation strategies, or pricing concepts (A-E) analyzed by the technical team, reviewed by the public, and discussed by the PAC. However, many commenters that did not specifically reference the recommendation or concepts may have intended their comments as feedback for the OTC's consideration when reviewing the PAC report. This section summarizes comments specifically made about the pricing concepts and mitigation strategies. Topical feedback on related issues for all



comments—those referencing the recommendation and those that did not—is summarized in section 3.3.

3.2.1 Mitigation strategies

Approximately 10 percent of commenters discussed ways to mitigate potential undesired impacts of congestion pricing, often referencing or building off the strategies called out in the PAC recommendation. The mitigation strategies code was applied to comments that specifically mentioned a strategy for addressing potential impacts. If the comment just discussed a potential impact, such as diversion, but did not reference a strategy for mitigating this effect, the project team did not apply the "mitigation strategies" code. Key themes include the following:

- Several said diversion should be penalized, or efforts should be taken prior to implementing tolling that prepare for potential diversion.
- Several discussed the importance of providing discounts, incentives, or other mitigation measures to support lower-income drivers.
- Some discussed the desire for mitigation actions to also apply to Southwest Washington commuters (e.g. applying the same lower-income discounts or incentives, making C-TRAN exempt, etc.).
- A few suggested certain residents should be exempt if they have no viable alternatives to using a priced road.
- A few commenters talked about the two-tiered implementation approach (starting with Concept B and modified E as a pilot program with a longer-term, broader implementation on both corridors) as a way to ensure mitigation strategies work before expanding the pricing program.
- A few discussed hospitals along the study corridor and the need to ensure access for frequent users and emergency services.
- A few discussed other categories of people who should receive discounts, such as military service members or government personnel.
- A few discussed the need for interagency collaboration to implement successful mitigation strategies.

3.2.2 Pricing concepts reviewed by the PAC

Around 9 percent of comments discussed specific pricing concepts, namely Concepts B, E and C. These comments touched on the following themes:

- Several linked Concept E to diversion concerns in the West Linn area. A few
 provided feedback on where the termini of Concept E or D should be to avoid
 diversion (e.g. place the toll between the I-5 and Stafford Road exits to avoid
 drivers diverting onto Willamette Falls Drive before the Abernethy Bridge). Several
 others felt Concept E—no matter where applied—would exacerbate existing
 diversion already occurring in the area.
- Several suggested the planned expansion of I-205 near the Abernethy Bridge should occur before tolling is put in place. Others more generally asked that diversion be addressed prior to implementing Concept E.

- Several expressed support for implementing Concepts B and E as a pilot program, while a few comments said beginning with a pilot is a political compromise.
- Several discussed concept C, with many of these commenters arguing concept C would have the greatest impact on congestion, the least impact on diversion and help keep toll rates low.
- A few discussed the termini of Concept B, arguing the toll should be placed before certain exits to reduce diversion (e.g. before the Swan Island/Alberta Street exit or before the Multhomah Boulevard exit).

3.3 Comment themes

The following sections summarize key themes and nuances within each topic area. Verbatim comments are presented in Appendices A through C.

3.3.1 Revenue and taxes

Approximately 38 percent of comments discussed how revenue from tolling would be used and/or the current system of transportation funding and taxes. Key themes include the following:

- Many commenters expressed their belief that roadways under consideration have already been paid for.
- Many commenters said they perceive the goal of this project to be revenue generation rather than congestion mitigation.
- Many commenters who stated they reside in Southwest Washington noted they already pay Oregon state income tax and felt it was unfair to be tolled. A few suggested income taxes should be reduced if Washingtonians pay the toll or that Washingtonians should be exempt from paying the toll. In the state of Oregon, income tax is not used to fund transportation infrastructure.
- Many comments discussed how revenue should be used:
 - Many of these comments suggested it is important to know how the revenue will be used, either asking for more information on this point or generally saying tolling should be tied to specific projects.
 - Several said revenue should go toward highway expansion or construction of additional roadways.
 - Several disagreed and said toll revenue explicitly should not support highway expansion as this will induce further demand.
 - Several suggested revenue should improve multi-modal transportation, funding transit and active transportation projects.
 - Several others suggested revenue should not be spent on anything but highway projects.
 - Several noted revenue should be spent on the roadway from which it is collected.
- Several said transportation projects should be funded with fairer alternatives to tolling, including existing income tax revenue, a sales tax, gas taxes, cannabis taxes, registration fees, or voter-approved short-term bonds.



- Some mentioned the new statewide transportation tax, expressing they felt this revenue should be used for highway projects rather than implementing a new toll system for revenue.
- A few said certain roadway users should pay more, such as truck drivers.
- A few discussed the amount of revenue this project could produce. Some were skeptical that much revenue would be left over after administration costs. Others suggested a revenue neutral model would be fine.

3.3.2 Fairness

Similar to previous comment periods, fairness was frequently mentioned, appearing in approximately a third of all comments (33 percent). Specific themes include the following:

- Many said tolling would be unfair because few other options exist for some travelers, particularly in areas not well served by transit. Specifically, several residents of Clackamas County noted I-205 is a primary travel route, with few transit alternatives and increasing congestion on local streets.
- Many tied fairness to the ability of drivers to change their behavior, saying this unfairly penalizes those who cannot change the hours at which they drive.
- Many related fairness to transportation funding, either saying existing roads shouldn't be tolled because they've already been paid for or other revenue methods are fairer. Several said tolls are only fair if implemented on new infrastructure to pay for that infrastructure.
- Several comments from Southwest Washington commuters said it was unfair for them to pay a toll when they already pay income tax to Oregon.
- Several expressed support for maintaining an unpriced lane as an option to increase fairness.
- Several commenters from Hayden Island discussed the impact freeway tolling could have on them as they must use I-5 to access their homes. These comments suggested tolling in this area would be unfair to residents without other options.
- Some discussed the concept of induced behavior change and argued the Portland metro area is an auto-dependent society because that is what consumers prefer.
- Some said it is unfair for revenue to be spent on non-roadway projects, with some specifically saying drivers shouldn't subsidize transit.
- Some said congestion pricing is unfair because it "shifts" the congestion problem elsewhere rather than addressing it. These comments suggested certain communities would bear an unfair burden from possible diversion (e.g. West Linn, North Portland).

3.3.3 Diversion

Around a quarter of comments (26 percent) referenced diversion of vehicle traffic onto local roads. This comment period saw a marked increase in interest and concern around diversion. Specific themes included the following:

- Many people expressed concern about diversion onto local streets in the following communities:
 - West Linn (on Borland Road, Willamette Falls Drive, OR-43, Oregon City Arch Bridge)
 - North Portland (in the Overlook neighborhood, on Interstate Avenue, Lombard Street and Greeley Avenue)
 - Barbur Boulevard
 - Lake Oswego
 - o Tualatin
 - o Tigard
 - o Milwaukie
- Several commented about existing congestion problems in the West Linn and Overlook areas, arguing tolling will make this worse.
- Some said diversion could slow down buses on side streets, impacting transit commuters.
- A few noted light rail development can decrease the capacity of alternative thoroughfares, e.g. on Interstate Avenue or on Barbur Boulevard if the Southwest Corridor project is implemented.
- A few noted diversion results in higher cost burdens for local cities to maintain their roads and enforce traffic safety.

3.3.4 Transit

Around a quarter of all comments (25 percent) discussed transit. Specific themes include the following:

- Many discussed whether transit is a viable alternative to highway use. Specifically, several commenters noted transit options are limited in Clackamas County. Others noted transit trips take significantly longer. Some said transit is not viable for people with mobility challenges.
- Several expressed support for expanding transit with congestion pricing revenues, while several others said this would be unfair.
- Several called for specific transit expansion, such as bus rapid transit, more rail options, and more transit between Vancouver and Portland.
- Some noted investments in transit have not improved congestion (e.g. in the Overlook neighborhood). A few others said pricing should not be implemented until certain transit projects are completed (e.g. Southwest Corridor).
- Some discussed crime rates on transit, stating this makes transit use undesirable.

3.3.5 Trust

One in five (19 percent) of comments discussed trust in government. Specific themes include the following:

• Several commenters said transportation planning has been inadequate, resulting in the current congestion challenges. Many of these commenters said more should have been done earlier to expand capacity and improve congestion.



- 3 Summer public comment themes
- Several expressed frustration and asked questions about where existing revenue has been spent.
- Several called for ODOT to fix existing roads and bottlenecks.
- Several suggested the true purpose behind value pricing is revenue generation, not congestion relief, which creates high levels of distrust.
- A few talked about perceived governmental corruption.
- A few expressed concern about the management of a tolling program of this size.

3.3.6 Equity

Around 15 percent of all comments discussed equity in terms of impacts to historically disenfranchised populations. Specific themes include the following:

- Many discussed the increasing cost of living and expressed concern for lowincome people already struggling to make ends meet.
- Several noted lower-income people are being priced out of closer in neighborhoods, forcing them to live farther from the metro center and further from transit options.
- Some said tolling in the Portland inner city could exacerbate gentrification by making it more difficult for lower-income people to access these areas.
- Some noted the share of lower-income individuals who use vehicles to drive to work is higher than in the rest of the metro area.
- A few noted diversion and other negative impacts could disproportionately affect lower-income and environmental justice communities who often live near higher traffic corridors (e.g. in North Portland).

3.3.7 Adding additional roadways and expanding existing roadways

Approximately 23 percent of all comments discussed either expanding existing roadways (16 percent) or adding additional roadways (13 percent; e.g. new bridges, highways, bypasses, etc.). Specific themes include the following:

- Many discussed population growth in the area and said there is a need for more capacity to accommodate this growth. Several noted growth is not projected to slow in the near future.
- Several said tolling should be connected to expanding capacity to provide true "value." Specifically, some said they would accept tolling if the revenue went to building a new bridge, a highway or adding lanes.
- Many commenters said ODOT should not add additional capacity because it will fill up due to induced demand.

3.3.8 Congestion impacts and observations

Around 16 percent of comments discussed either observations about existing congestion trends and distribution (12 percent) or personal impacts experienced due to congestion (8 percent). Specific themes include the following:

- Many said diversion and congestion are already bad in several areas, causing safety concerns and increasing driver frustration. Particular hotspots mentioned in comments include West Linn, the Overlook neighborhood in North Portland and US-26.
- Many linked congestion to population growth and lack of new highway capacity in recent years.
- Many suggested congestion pricing won't reduce congestion, either because people can't or won't change their behavior or because it will simply displace the problem onto other roads. Some said congestion pricing will make congestion worse.
- Several said rush hour lasts most of the day now. Among those, several said this is impacting businesses and neighborhoods.
- Several said congestion is exacerbated by poor road design (e.g. on-ramp geometry). Others attributed congestion to poor driver behavior.
- Some noted toll roads in other parts of the world are congested and said they don't believe tolls will reduce traffic here.
- A few said truck traffic is a key cause of congestion on our freeways.
- A few noted construction related to congestion pricing may increase congestion.

3.3.9 Project scope and public engagement

Around 8 percent discussed the scope of the project, outreach and engagement efforts, and the feasibility analysis process. Specific themes included the following:

- Many of these comments focused on the scope of the project, with most asking why other highways (e.g. US-26, OR-217, I-84 or I-405) were not included in the study. Several suggested they should be.
- Several said more study is needed before any decisions are made.
- Several said they do not believe public comment matters to the decision makers.
- Several said they feel the process has been misleading by referring to the concept as "value pricing" or citing Seattle as an example of successful implementation.
- Several commenters from Washington said it is unfair they cannot vote for the decision makers on this project.
- A few said smaller cities need to be more engaged because they will bear a significant burden of diversion and increased maintenance and enforcement costs.

3.3.10 General economic impacts and personal financial impacts

Around 10 percent of comments discussed personal financial impacts from tolling (7 percent) and/or general economic impacts (4 percent). Specific themes included the following:

• Several expressed concern they would not be able to afford the tolls. Some asked for more information on the price of the toll.



- Several said they would change their shopping habits if tolls were introduced.
- Several said people will have less disposable income to spend in the economy.
- Several said freight and shipping costs may increase.
- A few said they were concerned companies may relocate from the metro area.
- A few noted I-5/I-205 are major thoroughfares for the west coast region and expressed concern about how tolls on these freeways could impact goods movement through the area.

3.3.11 Other topics

Environmental impacts

Approximately 4 percent of comments discussed environmental impacts. These largely focused on the air pollution impact of heavy congestion, references to poor air quality around schools and the overall climate and environmental benefits of reducing car use.

Lane conversion

Around 3 percent discussed lane conversion, largely in the context of preferring to keep an unpriced lane available as an option.

Technology

Around 2 percent of comments discussed technology. These comments mentioned privacy concerns, asked questions about how the technology will work and if certain drivers could be exempt, and referenced technology systems used elsewhere (e.g. EZ Pass or Fast Pass).

Concurrent transportation topics

A few comments (2 percent) mentioned other concurrent transportation planning projects, including:

- Expanding I-5 at the Rose Quarter:
 - Some commenters said expanding the Rose Quarter should be a priority to alleviate congestion, while others said the project should wait until pricing is implemented to see if it is still needed.
- Abernethy Bridge expansion project:
 - Some said the bridge expansion should occur before pricing begins, and some expressed confusion around the status of this planned expansion.
- Southwest Corridor MAX project:
 - A few said it is important to consider how this could impact pricing and diversion on Barbur Boulevard.

4 CONCLUSIONS AND NEXT STEPS

The findings from this comment period will be provided to the OTC and the technical team. The OTC is expected to provide direction to ODOT at its August 2018 meeting for preparation of the FHWA proposal. ODOT will prepare a draft proposal for FHWA and present it to the OTC at its November meeting. The final proposal will be submitted to

4 Conclusions and next steps

FHWA by December 31, 2018. Any decision to move ahead with further analysis of pricing in the metro area will be accompanied by additional public engagement and more detailed analysis. If further review of congestion pricing is conducted under the National Environmental Policy Act (NEPA), the information in this document, and the public and agency input received, may be adopted or incorporated by reference into a future environmental review process to meet those requirements.