



**Date:** Wednesday, February 26, 2020

**To:** Co-Chair Senator Lee Beyer  
Co-Chair Representative Caddy McKeown  
Co-Vice Chair Senator Brian Boquist  
Co-Vice Chair Representative Ron Noble  
Senator Lynn Findley  
Senator Lew Frederick  
Senator Sara Gelser  
Representative Shelly Boshart Davis  
Representative Paul Evans  
Representative Rick Lewis  
Representative Susan McLain  
Representative Brad Witt

**CC:** Oregon Governor Kate Brown  
Oregon Transportation Commission  
Kris Strickler, Director, Oregon Department of Transportation  
Oregon House Speaker Tina Kotek  
Megan Channell, Oregon Department of Transportation

**From:** Aaron Brown, No More Freeways Coalition  
Chris Smith, No More Freeways Coalition  
Colin Herring, Sunrise PDX

**Subject: ODOT Cost to Complete Report on the Rose Quarter Freeway Expansion; request for full Environmental Impact Statement**

On Thursday, February 27, the Joint Committee on Transportation is scheduled to receive an update on the Rose Quarter Freeway Expansion's Cost to Complete Report. Members of the No More Freeways Coalition, would have liked to attend and provided public comment despite the short notice, but it appears that the Committee curiously is only accepting invited testimony. Therefore, we are writing this letter to make sure our opposition to this project, our objections to ODOT's continued abysmal transparency and accountability, and our requests for a full Environmental Impact Statement for this project are officially added to the legislature's public record. We are also submitting copies of letters we submitted during the public comment period last



spring, as well as media coverage in *Willamette Week* and *The Oregonian*, detailing the escalating costs on the Cost to Complete report.

**For legislators that aren't familiar, ODOT's proposed freeway expansion into the literal backyard of Portland Public Schools' Harriet Tubman Middle School has increased in cost by 66% over the past three years.** Research from Portland State University has suggested that the air pollution from the freeway is so bad that students at the Middle School should consider forgoing outdoor recess. The agency has claimed this \$800+ million boondoggle will somehow improve nearby air pollution, reduce traffic congestion, and reduce carbon emissions despite the fact that there isn't a single freeway expansion proposal anywhere in North America that has ever successfully achieved these outcomes. **We repeat: ODOT's claims that this project will have a positive impact on traffic congestion have \*never\* been realized for any freeway expansion anywhere in North America.** A \$1.6 billion freeway expansion in Los Angeles actually made traffic commutes slower by a full minute, due to the concept of induced demand.<sup>1</sup> Building more freeways merely incentivizes more driving.

Whenever ODOT has given the public an opportunity to weigh in on this freeway expansion proposal, the opposition has been overwhelming. **89% of the 2200+ comments received during the Public Comment period for the Rose Quarter Freeway Expansion Environmental Assessment last spring were in unequivocal opposition to this proposal.** Requests for the agency to conduct a full Environmental Impact Statement have been issued by numerous community leaders including Rep. Karin Power, Portland Mayor Ted Wheeler, Portland Transportation Commissioner Chloe Eudaly, Portland Public Schools, Oregon Walks, Oregon League of Conservation Voters, the Harriet Tubman Middle School PTSA, The Street Trust, Neighbors for Clean Air, the Eliot Neighborhood Association, Business for Better Portland, the Portland Planning and Sustainability Commission, and the Portland Audubon Society.<sup>2</sup> No More Freeways had to explicitly request numerous data sets be made publicly available during the public comment period to independently verify ODOT's claims about this project; when the data was eventually made available, our independent traffic engineers found numerous glaring discrepancies in ODOT's findings which cast significant doubt as to the veracity of their claims about the project's purported benefits.<sup>3</sup> The United

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<sup>1</sup> This was covered in length in a December 2016 article in *The New York Times*;

<https://www.nytimes.com/2016/12/20/us/los-angeles-drivers-on-the-405-ask-was-1-6-billion-worth-it.html>

<sup>2</sup> Copies of testimony submitted by these and other organizations and individuals is provided online on No More Freeways' website: <https://www.nomorefreewayspx.com/publiccomment>

<sup>3</sup> We are submitting the No More Freeways Technical Memo providing the detailed ways in which ODOT's traffic projections are brazenly inadequate for a project of this magnitude into the public record for the



States' Public Interest Research Group (US PIRG) recently included the Rose Quarter Freeway Expansion in their June 2019 "Highway Boondoggles" report, listing it as **one of the nine worst transportation infrastructure projects underway in the country**.<sup>4</sup>

Given that 40% of the Portland Metro region's carbon emissions now come from transportation, it is imperative that the hundreds of millions of dollars of public infrastructure that we build encourage low carbon transportation options including public transportation, biking and walking; this is simply outdated, twentieth-century infrastructure that ODOT's own traffic consultants admit will not solve the abysmal traffic congestion in the corridor.<sup>5</sup> Youth climate leaders including Sunrise Movement PDX have grown increasingly vocal in their opposition to this project, having created massive art displays shining "Climate Leaders Don't Widen Freeways" onto the side of ODOT's Region 1 building at a protest last December.

The massive cost overruns detailed in Thursday's Cost to Complete report were known to the OTC members in December, yet the agency nearly voted to move forward with the deeply flawed Environmental Assessment without the cost overruns being made available to the public. **This substantial increase in cost for this project, it should be noted, doesn't address the expensive but necessary recommended changes that Portland Public Schools and Albina Vision have requested to ensure that ODOT's proposals contributes to initiatives for a healthy, equitable and functional neighborhood, city and region.**

Next March, the OTC has the opportunity to demand accountability and transparency from ODOT, the agency they oversee, by requiring that the agency conduct a full Environmental Impact Statement on the Rose Quarter Freeway Expansion. With the costs continuing to escalate, the uncertainties about the proposal growing, and the growing opposition to this project on the grounds of air pollution, carbon emissions and traffic congestion, it seems apparent that ODOT needs to restart their planning for this project and provide more seats at the table for a wider variety of community partners. All of the traffic on this stretch of freeway could be removed through the implementation of congestion pricing, which could raise revenue for sorely needed maintenance of existing roads and construction of new, green infrastructure. **No More Freeways continues to demand that ODOT conduct a rigorous Environmental Impact Statement** that could clarify whether ODOT is telling the truth in

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legislature. It can also be accessed here:

[https://nomorefreewayspx.files.wordpress.com/2019/04/nmf\\_technical\\_memo-1.pdf](https://nomorefreewayspx.files.wordpress.com/2019/04/nmf_technical_memo-1.pdf)

<sup>4</sup> US PIRG's report can be found here: <https://uspirg.org/reports/usp/highway-boondoggles-5>

<sup>5</sup> This finding, from a study ODOT hired WSP to conduct in 2018, was covered by *the Portland Mercury* in 2018. The *Mercury's* coverage is available online here:

<https://www.portlandmercury.com/news/2018/03/07/19724128/a-new-report-shows-highway-widening-wont-solve-portlands-congestion-woes>



their claims that the Rose Quarter Freeway Expansion would somehow be the first in America that reduced traffic congestion, lowered carbon emissions or improved air pollution. Our independent analysis of ODOT's traffic projections revealed numerous, easily-challenged assumptions and discrepancies with significant implications to the project's public health and climate considerations. The public deserves nothing short of full accountability, transparency and honest assessment of these impacts for a proposed half billion dollar investment in fossil-fuel infrastructure on the dawn of our hastily arriving climate emergency.

As Oregonians asking for accountability from a state agency, as climate justice advocates begging for a livable future for the next generation, and as commuters looking for meaningful solutions to solving the miserable and worsening traffic congestion in the Portland region, we wish to express an eager willingness to meet with any and all legislators, regardless of party and geography, who are interested in learning more about our opposition to this proposal. We are happy to discuss why we believe that the Rose Quarter, along with the Abernethy Bridge and 217 widenings, are atrocious investments that should be reconsidered, with the revenue redirected towards public transit, commuter rail, and other sustainable transportation options. **We believe that, at a minimum, ODOT must conduct a full Environmental Impact Statement for the Rose Quarter Freeway Expansion** to further study the impacts this proposal will have on our children's lungs, our neighborhood's streets, and our community's future. We welcome legislators to join us in demanding this modicum of transparency and accountability.