

Date: 29 November 2023 by email and electronic submission

To: Joint Committee On Transportation Special Subcommittee On Transportation Planning

CC: Portland Transportation Commissioner Mingus Mapps
Oregon Transportation Commission
Megan Channell, Rose Quarter Freeway Expansion

From: Chris Smith, No More Freeways
Joe Cortright, No More Freeways

Subject: Proposed \$1.9 Billion Rose Quarter Expansion Project

“Some highway engineers have a mentality ... that would run an eight-lane freeway through the Taj Mahal. That is our problem.”

– Oregon Governor Tom McCall, 1970

We appreciate the focus of the subcommittee on the Oregon Department of Transportation’s (ODOT’s) Urban Mobility projects.

The No More Freeways campaign is based on the premise that in an era defined by the wildfires, floods, droughts and regular catastrophic events resulting from climate change, investing in freeway expansion is a diversion of resources that could be better applied to other transportation projects that improve safety and reliability while reducing air pollution and greenhouse gas emissions.

Our initiative was launched in 2017 specifically to oppose the inclusion of the proposed Rose Quarter Freeway Expansion in Portland’s Central City Plan. It made no sense to us that the biggest public expenditure proposed in the 20-year horizon of the Central City Plan would be a destructive freeway expansion, widening the gulf dividing Albina, disrupting Harriet Tubman Middle School and filling the neighborhood with air pollution.

Since then, we have successfully sued the Federal Highway Administration to force the withdrawal of a Finding of No Significant Impact. We also successfully sued to force ODOT to withdraw unfounded land use findings.

We have partnered with teenage climate leaders who staged a year-long protest outside the ODOT headquarters, drawing national attention about the discrepancy between Oregon’s climate goals and ODOT’s transportation plans. We’ve galvanized the community, with over 90% of the thousands of comments submitted by the public expressing opposition demanding ODOT consider alternatives to expansion. **And our supporters have provided us with a**



substantial legal war chest to challenge future decisions that do not serve the community's best interests.

Since the withdrawal of those findings the project has been redesigned to accommodate Albina Vision's request for a significant cap over the freeway and is now being designed a third time to satisfy the Trail Blazers organization over their concerns about traffic near the Moda Center.

During the course of these redesigns, the project cost estimate has ballooned from \$400M to almost \$2B, a spiraling cost overrun that cannot be blamed on inflation that has received national attention as an example of wasteful transportation spending.¹ And despite overwhelming consensus in public comment that the freeway shouldn't be widened, ODOT now proposes a freeway width of 160 feet or greater, twice today's 82 foot width.²

¹ "Oregon's proposal to widen Interstate 5 through the Rose Quarter is one of the nation's 9 worst highway boondoggles, according to a report from two nonprofit environmental think tanks released Tuesday."

- quoted from "Rose Quarter project is one of nation's biggest highway boondoggles, environmental watchdogs say" *The Oregonian*. June 19, 2019.
<https://www.oregonlive.com/commuting/2019/06/rose-quarter-project-is-one-of-nations-biggest-highway-boondoggles-environmental-group-says.html>

USPIRG's "Highway Boondoggles 5" which includes the Rose Quarter Expansion is available here:
<https://publicinterestnetwork.org/wp-content/uploads/2019/06/USP-Highway-Report-Jun19-web-rev1-1.pdf>

² No More Freeways is happy to provide the official schematics we received from our public records requests that detail this expansion to any elected official who requests them. We will also note that ODOT has repeatedly attempt to obstruct our attempts to obtain information about the project; last month No More Freeways sent a letter to ODOT Director Kris Strickler enumerating the multiple circumstances in which ODOT unfairly denied our requests about items including basic facts like the width of the freeway.
https://nomorefreewayspx.com/wp-content/uploads/2023/11/021123-NMF-Rose-Quarter-Governance-Concerns-ACFrOgBwoBmZ2N2GpYfxpONYQfdB4utjTpyPhfJmwRF4cfEQPAbFXedb7ZcnwwJbU7rJxuFY_KAHypU0BOsaule_OXRYMtMf9d54cUYiJ7FAoqlQgAisoiMmF1a52_bR2BderJCHlrbS9NAeT88i.pdf

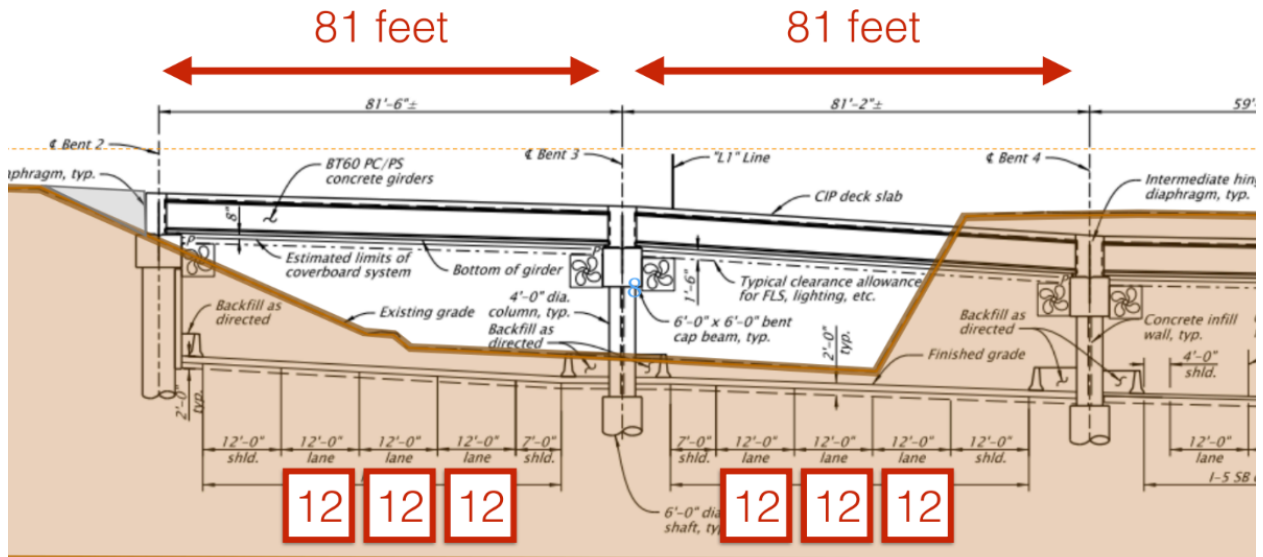


Diagram obtained via public records request, with red emphasis added by City Observatory

The continued redesigning of this project is a clear indication that the original Purpose and Need Statement did not really comprehend the community's true priority - reducing the impact of freeway traffic and noise on the surrounding neighborhoods and encouraging restorative justice and healing in the Albina neighborhood. Each redesign has essentially been about moving the impact of the traffic to some other place. The failure to understand the real community priorities leads us to the first of our three recommendations to you:

- 1) **Legislators should demand ODOT revisit the Purpose and Need statement and conduct a full Environmental Impact Statement (EIS) that studies alternatives to freeway expansion.** We fully support Albina Vision's call for capping the freeway. But could we accomplish that at a lower cost by capping the current lanes? Would building safety shoulders accomplish the main operation goals, as suggested by ARUP, the international traffic engineering firm hired as a consultant by ODOT?³ Is it time to look at

³ "Given the emphasis on safety and traffic congestion in the goals and objectives of the project, there is an opportunity to better reflect the congestion and safety benefits from an extended shoulder along the entirety of the project corridor, which may mitigate the need for an additional auxiliary lane where proposed."

- Quoted from p. 13 of ARUP's Independent Covers Assessment report. ODOT has chosen not to make this document publicly available on the Rose Quarter website, so we've linked to it on ours: https://nomorefreewayspx.com/wp-content/uploads/2023/11/20201211-Appendix-E-Technical-Design-Assessment_Accessible-1.pdf



boulevarding the freeway through our central city rather than expanding it? All this and more should get the full accountability of a robust EIS process.

Indeed, the ideal EIS scope would be ODOT's entire Urban Mobility Strategy, including both pricing and construction projects, looking at multiple alternatives to using tolling to expand freeways.

- 2) **Price before you build!** Even the cursory analysis in ODOT's Supplemental Environmental Assessment (SEA - attached) makes it clear that pricing has as much or more impact on reducing congestion than adding auxiliary lanes⁴. Both the original Environmental Assessment and SEA make the bizarre claim that "pricing is not reasonably foreseeable" despite the direction in HB 2017, HB 3055 and other discussions with the Legislature. An important element for an EIS would be a deep understanding of the impact of pricing so that we can design the project needed in a world with pricing, not the 1950s fantasy that ODOT continues to pursue.

An additional benefit is that we anticipate that a pricing level to manage congestion is likely to be lower than a toll required to fund expansion projects.

- 3) **Any low income benefit should be multimodal.** We appreciate the work of ODOT's Equitable Mobility Advisory Committee (EMAC) and agree with their recommendation that some form of benefit must be provided to low income families facing freeway pricing. However, we believe strongly that such a benefit should assist all those affected by the project, whether they drive or not, and should encourage non-automobile travel options. Therefore, in addition to toll credits or discounts, we must have transit or bike/ped options (e.g., help buying an eBike). While this has not been central to discussions of Abernethy Bridge tolling, it is much more important for portions of the freeway network in urban Portland. The legislature must also aggressively pursue resources to not just make transit affordable to all Oregonians but make it in fact attractive to all Oregonians, primarily by dramatically increasing TriMet service frequency.

Rethinking the Rose Quarter provides opportunity for legislators to meaningfully reinvest in Oregon's entire statewide transportation system

⁴ This has been clear since as early as 2018, as detailed in ODOT commissioned report issued for the Value Pricing Advisory Committee, covered in an article in *the Portland Mercury*. "A New Report Shows Highway Widening Won't Solve Portland's Congestion Woes, And as a Tolling Plan Rushes Forward, Some Officials Want to Know Why ODOT Won't Research a World Without New Construction Projects" *Portland Mercury*. March 7, 2018.

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



As legislators on this committee tasked with navigating Oregon's perilous deficit for transportation funding, we urge you to take leadership to rethink the Rose Quarter Freeway Expansion, if only for the opportunities and resources it provides you to tackle the litany of other problems of Oregon's transportation system. Investments in fixing orphan highways will address the skyrocketing rate of traffic fatalities. Prioritizing investment in maintenance in local and statewide roads, along with addressing ODOT's 700+ seismically vulnerable bridges, will also make our streets safer and improve commerce. Investments in transit will lower Oregon's transportation based carbon emissions and air pollution, and provide mobility options for the 1 in 4 Oregonians who can't or don't drive.

As we approach the anticipated transportation package of the 2025 legislative session, none of these crucial statewide priorities will be addressed if we continue to instead spend tens of millions planning and litigating the Rose Quarter Freeway Expansion, with costs that will only continue to rise. We need bipartisan leadership to demand statewide transportation investments that serve the needs of Oregonians across the state, and the resources to do that can only be unlocked by rethinking our multi-billion dollar investment in this proposed expansion.