

Date: Monday, April 1, 2019

To: Megan Channell
I-5 Rose Quarter Freeway Expansion Project
Oregon Department of Transportation

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Subject: Public Comment on I-5 Rose Quarter Freeway Project: Request for
Congestion Pricing Study and Implementation on I-5 Rose Quarter before
Proceeding with Freeway Expansion

Our organizations wish to thank the Oregon Department of Transportation (ODOT) for the opportunity to provide public comment on the Rose Quarter Freeway Expansion project. Our organizations worked diligently with state legislators and advocates to pass House Bill 2017, which allocated funding for this proposed project. HB 2017 was a transformative, bipartisan legislative victory for investment in transportation infrastructure across the state, directing over \$5.3 billion in funding. Our organizations are proud of our role in the passage of this bill - HB 2017 is directing hundreds of millions of dollars to fund a substantial increase in the provision of public transportation across the state, new revenue to build safe routes to school, incentives for electric vehicles, and bike/pedestrian infrastructure in cities across Oregon. These investments are crucial to Oregon's commitment to providing congestion relief to commuters stuck in traffic, decarbonizing our state's economy, fulfilling our statewide land use planning goals, and reducing air pollution. We find it gratifying to watch the numerous components of the Keep Oregon Moving legislation move forward, and our organizations share a sense of ownership and obligation in ensuring these projects and proposals are thoughtfully implemented through meaningful public engagement to ensure the intent of the transportation bill is realized in our community.

Value Pricing a Core Component of the HB 2017 Legislation

Among the key components of the HB 2017 bill that our organizations prioritized in our advocacy was the inclusion of policy language asking ODOT to move forward with the study and implementation of value pricing the Portland Metro Region. Value Pricing, (also known as Congestion Pricing or Decongestion Pricing), is a cost-effective, innovative, and demonstrably powerful policy mechanism that is now available at our disposal to manage traffic on our state's busy roads. Dr. Alex Bigazzi, a professor at the University of British Columbia, recently concluded after an exhaustive review of sixty different peer-reviewed studies on the subject that road pricing is the most effective strategy to reduce emissions (both air pollution and carbon pollution) and traffic.¹

With HB 2017, the Oregon Legislature directed ODOT to move forward with a study to determine the efficacy and value of establishing Value Pricing on stretches of I-5 and I-205 through the Portland Metropolitan Area. ODOT's Value Pricing Stakeholder Advisory Committee concluded in the Spring of 2018, and the agency received federal approval this past December to move forward with implementation of value pricing on stretches of I-205 and I-5, including the entire stretch of the Rose Quarter Freeway on which ODOT is proposing this \$500 million expansion. Studies commissioned by ODOT during the Value Pricing process affirmed what we already knew; congestion pricing is very effective at reducing carbon emissions, reducing traffic congestion, and reducing local air pollution, and it would have a substantial positive impact on traffic if implemented on any stretch of I-5 (all scenarios that included value pricing implemented on I-5 included this stretch of the Rose Quarter Freeway from I-84 to I-405).² Our organizations also recognize the potential regressive impacts of value

¹ "Can traffic management strategies improve urban air quality? A review of the evidence" AY Bigazzi, M Rouleau Journal of Transport & Health 7, 111-124

² "Baseline, significant congestion will exist in 2027 on the I-5 and I-205 study corridors, even with all the improvements...This congestion impacts not only speed, but also the number of vehicles that the facility can accommodate, with consequential impacts upon quality of life, economic vitality, and vehicle emissions in the region." This quote is from the Portland Metro Area Value Pricing Feasibility Analysis:

pricing if implemented poorly; we encourage ODOT to continue to reach out to frontline populations to ensure value pricing provides mobility and public health benefits for working class and marginalized communities across the Portland region.

Concern that Rose Quarter Freeway Expansion Traffic Modeling Does not Include Significant Impacts Value Pricing Implementation will have on Traffic

Given the bipartisan support for value pricing, the overwhelming academic literature suggesting its efficacy as a policy mechanism and ODOT's own research suggesting the applicability of this policy initiative to this specific stretch of freeway, we were surprised to learn that ODOT's traffic modeling for the Rose Quarter Freeway Expansion were conducted without any consideration as to how congestion pricing would impact these projections. ODOT appears to be moving forward with the next steps of value pricing implementation in foreseeable future. We therefore question the validity of the traffic projections that ODOT is using to justify the Rose Quarter Freeway Expansion, given that the EA document projects traffic volumes out to 2045 and does not consider the substantial impacts that value pricing is likely to have on this project. It's difficult to understand how ODOT can be certain about the accuracy of these traffic projections and this proposed expansion's impact on travel times over the next 25 years without factoring in a forthcoming policy initiative likely to dramatically impact travel patterns.

Our organizations would also ask ODOT why the Environmental Assessment project didn't study the impact that value pricing would have on traffic through this corridor if implemented first, without any freeway expansion or "auxiliary lanes."

Efficacy of Value Pricing to Reduce Transportation Related Carbon Emissions

Meanwhile, in the nearly two years since House Bill 2017 was signed, the international consensus has coalesced around a finding that our planet must lower greenhouse gas emissions to 45% of the 2010 levels in the next eleven years to limit warming to 1.5C. This urgent warning stems from the IPCC report released last October, and this call to action to expedite decarbonization initiatives are growing in strength locally, nationally, and internationally.

Our communities across the state of Oregon have experienced first hand a mere taste of what this new normal might mean - more wildfires, floods, heat waves, water shortages. To quote *The Oregonian*, “The effects of climate change are no longer predicted. They are here today, they are serious, and they are costing Oregonians money and affecting their lifestyles and health. The state is suffering through drought, reduced snowpack, increased wildfire and impacts to fisheries. Larger forest and grassland fires are now more frequent, a consequence of warmer, drier summers. The fire season begins earlier and ends later.” That article goes on to acknowledge that “The main culprit is transportation emissions, primarily from trucks and passenger vehicles. This sector is the largest source of emissions in Oregon, accounting for nearly 40 percent of the total....There are three main ways to lower those emissions: Boost the conversion rate to electric vehicles; substantially increase public transit; and modify urban design over time to support electric vehicles, bikes, walking and public transport.”³ Even with passage of pending Clean Energy Jobs legislation in Salem, Oregon simply won't hit carbon reduction targets without fundamentally reducing emissions from private automobiles.

Value Pricing Implementation Must Be Studied Before Freeway Expansion

Given ODOT's own findings that Value Pricing was likely to be more effective in both reducing traffic congestion and traffic-related carbon emissions, it seems self-evident that this policy should be implemented before freeway expansion is

³ “With emissions on the rise, Oregon falls well short of greenhouse gas reduction goals” *The Oregonian*, December 15 2018. https://www.oregonlive.com/politics/2018/12/with_emissions_on_the_rise_ore.html

undertaken. We believe that the current Environmental Assessment is inadequate in its lack of analysis of this cost-effective, climate-friendly, demonstrably proven policy alternative included in the bipartisan statewide transportation package. We ask that ODOT undertake a more rigorous Environmental Impact Statement to study the impact that implementation of value pricing could have on carbon emissions, air pollution and traffic congestion before moving forward with plans to expand the Rose Quarter Freeway. This position is wholly consistent with our years of advocacy and engagement with the state legislature to pass HB 2017 - implementation of value pricing should inform how ODOT moves forward with the Rose Quarter. There are simply too many significant impacts to the local community to not prioritize studying value pricing and understanding its impacts to traffic patterns before moving forward with a \$500 million freeway expansion.