



Date: Monday, April 1, 2019

To: Megan Channell, Project Manager, Oregon Department of Transportation

CC: Portland City Council
Metro Council
Multnomah County Commission
Chris Warner, Interim Director, Portland Bureau of Transportation
Joe Zehnder, Interim Director, Portland Bureau of Planning and Sustainability
Oregon Transportation Commission

From: No More Freeway Expansions Coalition

Subject: Official No More Freeways Statement in Opposition to the Rose Quarter Freeway Expansion for the Public Comment Period

The No More Freeway Expansions Coalition is writing to submit our organization's official public comment in opposition to the Oregon Department of Transportation (ODOT) Rose Quarter Freeway Expansion project. The freeway expansion project proposed in ODOT's Environmental Assessment (EA) document (and the agency's subsequent lackluster commitment to public engagement) are simply inadequate to address the numerous mobility, public health, and climate-related challenges that Oregonians are counting on government institutions to tackle through courageous leadership.

Given the numerous inadequacies with the EA, the No More Freeway Expansions Coalition joins the numerous educators, public health specialists, environmentalists, neighborhood leaders, transportation advocates, frontline communities, climate-hawks and elected officials demanding that ODOT conduct an Environmental Impact Statement that more appropriately studies the concerns raised by a plethora of community organizations before proceeding with this proposal. What follows is an overarching summary of the numerous failures of this project to address the Portland region's mobility needs, public health concerns or moral responsibility to shift investments away from fossil fuel infrastructure that greatly imperil current and future generations of Oregonians.



Freeway Expansion Has Never Solved Traffic Congestion (and ODOT's claims this project is any difference is based on questionable traffic modeling)

Among urban planners and traffic engineers, the concept of “induced demand,” that suggests that widening roads and freeways simply encourages more driving that inevitably fills the additional lanes with new traffic congestion, is accepted as a well-known and commonly understood phenomenon. The validity of this concept is backed by a nearly unanimous body of academic literature spanning decades of research on transportation planning and urban economics. In only the most recent prominent example, a \$1.6 billion freeway widening project to address what was described as a “bottleneck” on Los Angeles’ I-405 actually made traffic congestion worse when the project was completed.

Traffic congestion in our region is undeniably miserable, and poses a significant threat to the public health, economic vitality, and livability of our region. It is therefore imperative that we pursue transportation policies and investments that meaningfully tackle the problem. ODOT’s claims that this proposed freeway expansion would somehow improve traffic congestion - lined throughout their promotional materials of the EA document - implies that somehow the Rose Quarter Freeway Expansion would be the first expansion in recent history to improve congestion. Therefore, when the No More Freeway Expansions coalition was finally granted access to enough traffic modeling data to meaningfully conduct an independent assessment of ODOT’s findings (more on our frustrations with ODOT’s public process and community engagement later), we rigorously studied the projections to understand how ODOT came to the conclusion this project was uniquely capable of solving traffic gridlock.

Turns out, ODOT’s project staff arrived at this conclusion by putting their fingers on the scales and hoping no one would notice. There are numerous questionable assumptions baked into ODOT’s traffic modeling, but the two most significant are the inclusion of the Columbia River Crossing and the exclusion of congestion pricing.

- **Inclusion of Columbia River Crossing:** The inclusion of the Columbia River Crossing Project (CRC) in ODOT’s traffic projections artificially inflate the agency’s traffic projections, making the need for the Rose Quarter Expansion more viable than it would otherwise. This proposed 12 lane freeway bridge was pronounced dead by legislators in 2014 after continued disagreement between Washington and Oregon state legislators about cost and design, notably about the project’s inclusion of tolling and light rail. Despite recent murmurs from Washington legislators hoping to revive the project, it’s difficult to conceive of any realistic timeline in which a new effort to build a similarly-designed CRC would be



approved and constructed within the next decade at minimum. By including this failed, \$3 billion project in the assumptions used for ODOT's traffic modeling on this corridor over the next 25 years, ODOT directed a firehose of expected automobile traffic at the Rose Quarter, essentially modeling a "problem" in which an expansion of the Rose Quarter freeway would be necessary to "solve."

- **Exclusion of Congestion Pricing** - House Bill 2017, the transportation package passed by the Oregon Legislature back in 2017, included both funding for the Rose Quarter Freeway Expansion and explicit policy language directing ODOT to move forward with feasibility studies to implement value pricing (also known as congestion pricing or decongestion pricing) on major freeways in the Portland Metropolitan area. In the past year, ODOT studied Value Pricing and received approval to proceed with the policy from a Value Pricing Stakeholder Advisory Committee assembled to review the literature and from the federal government, which granted approval for ODOT to move to the next steps of implementation this past January. Elected officials across the region have signaled their strong support for implementation of value pricing. The academic literature (and the studies that ODOT commissioned for the Value Pricing Stakeholder Advisory Committee) overwhelmingly suggests that implementation of the policy has an enormous impact on traffic congestion.¹

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, it is baffling that 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

¹ We also wish to acknowledge that there are legitimate regressivity concerns with the potential implementation of congestion pricing, as with any policy proposal that raises revenue. The No More Freeways Coalition has written letters to the Oregon Transportation Commission, the Value Pricing Advisory Committee, and the City of Portland outlining how congestion pricing can be implemented fairly, and they are included in the public record. (In short, it involves including low-income exemptions for working class commuters and directing revenue raised from pricing into transit investments and not further freeway expansion). We believe that ODOT should work closely with frontline communities and anti-poverty advocates to ensure this policy is implemented in a manner that provides meaningful benefits to working class Oregonians and SW Washingtonians.



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.

Whether due to incompetence, negligence, or outright deliberate malfeasance, it is difficult to avoid skepticism that the traffic modeling (on which ODOT's entire case for this \$500 million project rests) was conducted by the agency accurately or in objective good faith. The claims based on these faulty projections deceive the public and obfuscate crucial details that challenge ODOT's assertion this freeway expansion is justified and would provide any benefit to motorists frustrated with traffic gridlock. Our independent team reviewing the data made available found it near impossible to replicate ODOT's findings and trace their work to come to their conclusions.

The above is our best attempts at describing in layman's terms the impact that assumptions baked into ODOT's traffic modeling. The No More Freeways Traffic Modeling Team produced a technical memo that provides more specific detail as to the numerous flaws in these projections that should disqualify these findings. This document has also been submitted for public comment, and is available on the No More Freeways website.²

40% of Oregon's Carbon Emissions are from the Transportation Sector. This Freeway Expansion is Climate Change Denial.

ODOT's demonstrably questionable traffic projections suggesting that this freeway expansion will improve traffic congestion have also been extrapolated by the agency to suggest that the freeway widening will also lower carbon emissions because of fewer cars idling while stuck in traffic. Unfortunately, this claim by the agency is similarly disingenuous. Squandering half a billion dollars widening a mile of freeway is an egregious form of reckless climate denialism.

Last month's reporting by The Oregonian suggests that even with passage of pending carbon legislation, Oregon won't hit carbon reduction targets without fundamentally reducing emissions from private automobiles. Transportation emissions already comprise 40% of Oregon's greenhouse gas emissions, and it's the only sector of Oregon's economy where emissions are increasing. Despite increasingly rigorous GHG emissions requirements for cars and light trucks, the transportation-related GHGs contribution to the State's GHG emissions rose from 35% in 2014 due to increased vehicle-miles travelled. The region's population is forecasted to increase by 390,000

² The Technical Memo is posted on our website here:
https://nomorefreewayspx.files.wordpress.com/2019/04/nmf_technical_memo.pdf



people by 2050, and it is imperative that we develop a transportation network that accommodates these new residents without any additional vehicle miles traveled and any increase in associated emissions. It's simply disingenuous to invest half a billion dollars in a freeway expansion project in the center of Oregon's densest city and claim that this project has any benefits to carbon reduction, especially given the project's abysmal contributions to walking, biking, and transit options in the neighborhood (see below). It is frustrating to watch ODOT champion freeway expansion when 40% of Oregon's carbon emissions come from transportation. Expansion of this freeway represents a complicit willingness to ignore Oregon's responsibility to future generations and the planet.

We've all felt the unease that permeates our communities when our neighborhoods are cloaked with the wildfire smoke that has draped itself through the Willamette Valley three of the past four summers. Last October's IPCC report warned that phasing out fossil fuels in eleven years was essential to avoiding the destruction of society as we know it. It's unconscionable to imagine that this freeway expansion is the best transportation investment we can make to honor the need to protect Oregon for current and future generations when the impacts of climate change are already here, and will almost certainly only get worse.

Oregon-based environmental stewards and advocates including Portland Audubon Society, Oregon Environmental Council, 350 PDX, Oregon League of Conservation Voters, Center for Sustainable Economy, OPAL - Environmental Justice Oregon, and the Urban Greenspaces Institute have all asked ODOT to conduct an Environmental Impact Statement and stated their concern about this project's impacts on greenhouse gas emissions.³

ODOT's claims to traffic safety, "surface level" improvements are disingenuous

Please do not be fooled by ODOT's claims that the Rose Quarter Freeway Expansion is an "Improvement Project" with "multimodal investments" and benefits for people biking, walking, or taking transit. Unanimous opposition to and concern about this project has been voiced by transportation advocates across the Portland region, including Oregon Walks, The Street Trust, Community Cycling Center, Oregon Families for Safe Streets, BikeLoudPDX, the City of Portland's Bicycle Advisory Committee and

³ Letters from these organizations submitted for public comment will be available on the No More Freeways website within the next week.



Pedestrian Advisory Committee, Portland Bus Lane Project, Safe Routes to School - Pacific Northwest Chapter, and AORTA.⁴

These organizations and citizen advisory committees have written long, detailed, thoughtful letters for ODOT's Rose Quarter Freeway Expansion public comment highlighting the surface street-level flaws within ODOT's proposal. The Bicycle Advisory Committee wrote that "the Build Alternative would fail to achieve the stated project goals and objectives, especially in critical areas related to bicycling, but also including the resulting conditions for walking and transit, local connectivity, safety, equity, and climate outcomes. This is in direct conflict with city and state planning goals." We will be posting many of these letters in full on the No More Freeways website in the next few days; a brief summary of the most frequently-cited concerns is listed below:

- ODOT claims that this project is a "safety improvement" for the freeway. However, there hasn't been a traffic fatality on this stretch of freeway in over a decade. Meanwhile, ODOT has numerous other arterials and orphan highways across the region that are very dangerous to people walking, biking, and driving. Just this past month, during the public comment period, a sixteen year old student at Madison High School was hit by a car while crossing 82nd Avenue. It's disingenuous to sell this freeway widening project as a traffic safety project when there are numerous other arterials that have much more demonstrable need for traffic safety investments. Doing so is directly antithetical to the City of Portland's Vision Zero initiative, passed in 2015, that uses a data-driven approach to eliminate traffic fatalities by 2025.
- TriMet's 4 and 44 bus lanes actually experience slower travel times through the corridor under the "Build" alternative. We simply cannot spend half a billion dollars on a transportation investment in the center of the biggest city in Oregon that actually makes public transit less efficient and viable an option, given the overwhelming relevance of excellent provision of public transit to air quality, anti-poverty, and decarbonization goals. Many groups requested ODOT to implement more transit-priority lanes through the corridor.
- The Rose Quarter plan calls for the removal of the Flint Avenue Bridge, a popular route for bike commuters, with one of the highest volumes of weekday morning bicycle traffic. Meanwhile, the proposed "replacement," a east-west connection on Hancock, is too steep to be ADA compliant (10%), and the proposed crossing has abysmal bike/pedestrian amenities. The proposed crossing on Clackamas is also largely panned as largely irrelevant to existing and expected future bike/ped

⁴ Letters from these organizations submitted for public comment will be available on the No More Freeways website within the next week.



patterns. Other groups cited national standards including the AASHTO bikeway design manual, the Oregon Bicycle and Pedestrian Plan, and Oregon Highway Design Manual noting the inadequacies of the bicycle and pedestrian plans.

- Significant concerns that ODOT’s EA doesn’t address how expected construction detours will significantly impact biking and walking throughout the numerous years of construction. The Street Trust writes in their letter that they are “alarmed by the likely impact on walking, biking and transit during the construction period and the lack of information in the EA about how this will be mitigated... Extraordinary efforts will need to be taken to mitigate the huge disruption that will be caused by the construction of the project in an area that sees 8,000 cyclists per day and is the primary portal between downtown and North and Northeast Portland. A five-year setback is not an acceptable outcome for our climate change and growth management goals nor is it acceptable to the individuals who will be impacted.”
- An overall level of disgust with the opportunity cost of this project, and what \$500 million could buy for other investments that would meaningfully provide safe places to walk, bike, and take transit across the city. \$250 million would build safe routes to school for every public school in the city of Portland. The May 2016 Fixing Our Streets Gas Tax was estimated to raise \$64 million for crucially needed investments in backlogged road maintenance and traffic safety improvements. \$500 million is roughly analogous to what TriMet receives from commuters over four years on farebox revenue, and is comparable to the cost of TriMet purchasing an entirely new, all-electric bus fleet.

As BikeLoudPDX wrote in their letter opposing this project, “Future study and proposals for this freeway expansion must significantly improve the proposed active transportation infrastructure plans, demonstrate a more rigorous active transportation design standards methodology, be able to show that delays during the estimated five year construction period not significantly impact active transportation and transit in the project area.”

Similarly, ODOT’s claims that they are working closely with local community partners are countered by letters submitted to public comment by the Albina Vision Trust, Eliot Neighborhood Association and Irvington Community Association. The No More Freeway Expansions Coalition stands in firm solidarity with the efforts of the Albina Vision to build a vibrant, dense, walkable neighborhood in the wake of the twentieth-century urban renewal that decimated Oregon’s largest black neighborhood. The Albina Vision point out that the “lids” over the freeway are not strong enough to



build multiple stories of housing and office space, as their organization intends for the neighborhood. The Albina Vision Trust has asked ODOT for an Environmental Impact Statement, and both the Irvington CA and Eliot NA have written strongly worded letters opposing this project on numerous grounds and also asking ODOT for an Environmental Impact Statement.⁵

Freeways make children sick. ODOT is widening I-5 into the backyard of Harriet Tubman Middle School. Yikes.

ODOT's proposed Rose Quarter Freeway Expansion involves widening Interstate 5 farther East into to Portland Public Schools' (PPS') Harriet Tubman Middle School campus. Harriet Tubman reopened to students in September 2018; both Portland Public Schools as an entity and parents, students, teachers, and staff from the Tubman community have come out in opposition to this project and asking ODOT for a full Environmental Impact Statement to more appropriately understand the impacts this project would have on their neighborhood school.

According to PPS' data, just under half of Harriet Tubman's students qualify for free and reduced price meals. Only 31.4% of Harriet Tubman students identify as white - this is the 2nd lowest percentage of a middle school campus out of the thirteen in the district. 40% of Harriet Tubman's students identify as black - the third highest of any PPS campus across all grade levels. Youth are particularly susceptible to lung diseases.

⁵ Letters from these organizations submitted for public comment will be available on the No More Freeways website within the next week.



	% Non-White	% Black	% Underserved	% on Free /Reduced Lunch
Harriet Tubman Students	68.6	40.5	73.5	48.9%
All PPS Middle Schools	44.3	9.5	47.5	33.3%
All PPS students	43.7	8.9	49	36.0%

- 2018-2019 PPS Demographics⁶

Air quality researchers at Portland State University released a report in April 2018 expressing their concerns about the high levels of air pollution at Harriet Tubman Middle School. The first recommendation of the report stated that “student outdoor activities be limited at Harriet Tubman Middle School, especially during high traffic periods.” The report found levels of acrolein, benzene, and naphtalene higher than Oregon’s Ambient Benchmark Concentrations. Nearly 18,000 diesel-powered trucks pass by Tubman on a daily basis - as of March 2019, Oregon has by far the weakest diesel regulations on the West Coast. The report was clear: “the primary risks to future occupants of Tubman MS related to ambient air quality are due to freeway emissions.”⁷

Willamette Week reported on this finding, and quoted PSU’s Dr. Linda George saying that “It’s very reasonable to expect concentrations would be higher and extend further into the property” if the freeway was widened into the backyard of the campus.

This report is bolstered by other findings. Late last year, the Environmental Protection Agency (EPA) published their most recent iteration of the National Air Toxics Assessment, which reflected conditions in 2014. EPA ranked census tract 23.03 (the tract at Tubman) as the seventh highest of risk for cancer of any in Oregon (census tracts 22.03 and 21 are similarly high). All three rank among the top ten in the state, and this is almost certainly an underestimate - the EPA doesn’t recognize diesel particulate as a carcinogen, so it’s not fully included in the estimate.

As Harriet Tubman parents write in a letter submitted to ODOT’s Rose Quarter Freeway Expansion public comment, “As parents of students who breathe the polluted

⁶ These data are taken from the Tubman parents community letter, which cites specific PPS demographic tables available online, and is submitted for ODOT’s public comment on the Rose Quarter Freeway Expansion. We will provide a link to the Tubman community letter on the No More Freeways website in the next week.

⁷ This report, and numerous others about the impacts that air pollution have on student health and academic performance, is included in the Rose Quarter Freeway Expansion Public Comment Record.



air, we are the ones forced to live with the repercussions of these decisions. It's our material and physical loss when we are forced to buy inhalers for our children when they are diagnosed with asthma, and it's our children who suffer these very real health consequences. It's our faculty and staff who are always wondering if a headache is just an occasional migraine or a symptom of something more nefarious, due to the particulates in the air from the nearby freeway. It's our right and responsibility to demands a fierce, rational approach to ensuring this Middle School is a safe and healthy learning environment." Their letter also notes the difficulty the school community is already facing at recruiting families to attend the school, and worry that the expansion will further deter families from sending their students to the facility when the campus needs sustained population growth for it to succeed.

The overwhelming academic literature on air pollution from transportation suggests that decongestion pricing, and not freeway expansion, is the best policy to improve local air pollutants and mitigate the impacts of freeways on their surrounding communities. According to *The Washington Post*, childhood asthma rates in Stockholm, Sweden were reduced by nearly fifty percent after the implementation of decongestion pricing. Dr. Alex Bigazzi's research, the body of which has been submitted to ODOT's public record for this project, highlights the numerous studies that suggest the best way to improve the air quality at Tubman Middle School is to institute congestion pricing instead of widening the freeway.

By not studying congestion pricing, ODOT is not considering the easiest, most cost-effective policy to address traffic congestion that the scientific consensus also recognizes is the most likely to improve air quality in the Tubman community. ODOT's projections of improved air quality in the area under the "build" scenario are also based on assumptions about improvements in technology and local air quality regulations - assumptions the agency is unable to promise will happen.

The full letter from the Portland Public School board detailing their concerns about this project explains how the district was unable, on ODOT's shortened time-frame, to study the other impacts this proposed expansion might have on the campus, including not only air quality but traffic impacts, soil stability, noise, and other factors. As the resolution passed unanimously by PPS Board Members states, "it is PPS's position that the depth, complexity and severity of potential significant short and long term negative impacts to PPS facilities, staff, students, families, and stakeholders warrants a full environmental impact statement (EIS). An EIS will provide a better understanding of the impacts of the proposal and development of potential mitigation options."⁸

⁸ This memo has been submitted to ODOT's Public Comment, and will be available on the No More Freeways website within the next week.



There are significant environmental justice implications with ODOT rushing through this freeway expansion into the backyard of Harriet Tubman in direct opposition to the local community's wishes. Further poisoning the air so that low income students of color are unable to enjoy outdoor recess is the diametric opposite to the Albina Vision Trust's aim to undertake a restorative initiative to rebuild a prosperous community, and is enormously detrimental to Portland Public Schools' efforts to provide a safe learning environment for every student.

ODOT's Community Engagement Plans Were, Frankly, Abysmal

The No More Freeways Coalition, along with dozens of organizations and small business owners, requested an extension of the public comment period November 30th. This request was denied by ODOT in mid January; we only got a public hearing out of the event due to pressure from Commissioner Chloe Eudaly's office, and ODOT didn't provide video recording of the event despite having done so for numerous other recent public hearings for Value Pricing and Oregon Transportation Commission hearings. When the Environmental Assessment document was released on February 15th, it was missing numerous technical documents central to ODOT's claims about the efficacy of this project to address congestion, air pollution or carbon emissions. We sent ODOT a letter asking for these data on February 23rd, and only received part of what we asked for on March 13th, the day after the public hearing. We then sent ODOT a letter asking ODOT to honor their original commitment to a 45 day public comment period, and we were once again denied.

Numerous letters from advocacy organizations, including that from Portland Public Schools, noted the abbreviated public comment time made it difficult to evaluate the project, especially given the enormous consequences this project represents to the community, region, and state. ODOT ignored all of these requests. Separately, community member Iain MacKenzie sent ODOT an email on February 15th asking for access to relevant engineering drawings for this project. ODOT responded that "they do not yet exist," a statement that was demonstrably untrue. It took over a month to obtain the drawings that could have easily been published when they were first requested. These schematics were enormously valuable in allowing community members to understand the specific impacts the proposed project would have on treasured community resources, including the expansion of the freeway over the Vera Katz



Eastbank Esplanade.⁹ Mr. MacKenzie submitted public testimony providing a detail and copy of email records of his correspondence with the agency.¹⁰

Given the agency's general recalcitrance to share information about the project, unwillingness to hold meaningful public forums about the project, denial of repeated requests for extension of the public comment period, and numerous deceptions included in the traffic analysis, the No More Freeways Coalition wishes to state our loud disapproval and concern with the way a public agency ostensibly serving constituents engaged with concerned community members. Especially here in Oregon, where we celebrate our regional livability we've earned through rigorous community engagement, public process and commitment to environmental stewardship, it's remarkably disheartening to watch the Oregon Department of Transportation brazenly push this project through public process with disingenuous data, Orwellian language, and disinterest in meaningful partnership with community partners. The ability for current and future generations to enjoy Tom McCall's Eden is dependant on community leaders, elected officials and government bodies collaboratively working together to decarbonize our economy, prioritize investments that safeguard frontline communities, and double down on public health initiatives.

The Oregon Department of Transportation's Environmental Assessment proposal of this Rose Quarter Freeway Expansion fundamentally fails our local neighborhood, our city, our region, our state, and our planet on every single one of these fronts, as the approximately 800 letters from angry community members attests. We urge this project be scrapped, that ODOT be forced to undertake an Environmental Impact Statement, and that our regional elected officials take notice: The Oregon Department of Transportation is an emperor wearing no clothes. If we have any meaningful commitment to alleviating gridlock and congestion, eradicating the senseless violence of traffic fatalities, improving air quality so school doesn't make kids sick, restoring a neighborhood scarred by the worst racist impulses of our forefathers, or tackling climate change for current and future generations, this project must be abandoned. The Rose Quarter Freeway Expansion mega-project has no place in our community.

⁹ The Portland Audubon Society's letter, in particular, explores the significant lack of information in the EA about the necessary construction mitigation plans, particularly for the plans to build in the Willamette River along the southern edge of the project. This letter has been submitted to the Public Comment record, and will be available on the No More Freeways website in the next week.

¹⁰ His letter is available here:

<https://nomorefreewayspx.files.wordpress.com/2019/03/i5-rose-quarter-letter-1-1.pdf>