

AORTA, Association of Oregon Rail and Transit Advocates
P.O. Box 2772
Portland, OR 97208-7185
Office: Portland Union Station, Suite 253
www.AORTArail.org
March 28, 2019

Oregon Department of Transportation
ATTN: Megan Channell
123 NW Flanders St.
Portland, OR 97209

SUBJECT: Comments on I-5 Rose Quarter Improvement Project EA

AORTA (Association of Oregon Rail and Transit Advocates) is an Oregon non-profit with statewide membership. We feel this project and Environmental Assessment are fatally flawed. We ask ODOT to cancel this project by requesting the Oregon Legislature to redirect funds to more cost-effective and environmentally sound projects.

In the alternative, ODOT must withdraw this EA; rethink the purpose and need; restart the scoping process; consider alternatives that provide greater benefits in light of current needs for greenhouse gas reductions and environmentally sustainable transportation modes; develop a Draft Environmental Impact Statement; select a Locally Preferred Alternative; follow with a Final Environmental Impact Statement and project construction and implementation.

In support of the above request, we offer the following criticisms of the Environmental Assessment and prior project development work:

- 1) A project of this scope and magnitude needs a full Environmental Impact Statement. The 2017 Oregon Legislature defined a "mega transportation project" as one that *"...includes transportation projects... that cost at least \$360 million to complete, that attract a high level of public attention or political interest because of substantial direct and indirect impacts on the community or environment or that require a high level of attention to manage the project successfully."* The Rose Quarter project meets this standard.
- 2) The EA offers conclusions in an opaque manner that reveals neither the assumptions behind them, nor the logic employed.
- 3) The EA fails to offer an adequate discussion of past and future projects on the Portland freeway system, and how these projects, in conjunction with the Rose Quarter project, cumulatively affect the environment.
- 4) The claim of no capacity expansion is erroneous. The project creates an additional through traffic lane on I-5 by shifting weaving movements off the two existing through lanes onto auxiliary lanes.
- 5) The project does not solve the "weave" problem, which is supposedly the reason for this project in the first place.
- 6) The EA minimizes the construction impacts. Construction will close off travel paths for both motorists and non-motorists, and the resulting congestion will subject the region to years of delays and detours. We can expect the Portland Streetcar to be closed for five years, and bus riders will be similarly impacted for five years of construction. Detours will slow bus service, causing longer trip times, while a "bus bridge" for the Portland Streetcar will add huge increases to trip times caused by bus detours caught in congestion and construction delays plus waiting times to board and deboard shuttle buses.

Delays to transit service will degrade the quality of transit service well beyond the vicinity of the project, particularly by causing unreliable arrival times and gaps in service. The very groups who are already making the choices needed to reduce congestion will be severely and extensively impacted by the construction of this auto-centric project. The EA totally fails to give an adequate picture of the scale of this disruption.

- 7) After the construction impacts are over, the net benefit for transit is essentially nil, yet the EA concludes otherwise.
- 8) The EA fails to consider transit alternatives. These would include priority bus service on the freeway as well as a parallel extension of the Yellow light rail line east of the Willamette River to the Tilikum Crossing, and extension of the Yellow Line north to Hayden Island for better connection with C-Tran service..
- 9) It fails to consider TSM/TDM alternatives, including value pricing.

Page 23 of the EA states, with regard to the consideration of TSM/TDM options during project development: "*As a result, value pricing (also called tolling) was not included within the TSM/TDM alternative because value pricing, as a tool for transportation demand management, was not among the existing strategies at use in the study area at that time.*" This is one of the most ridiculous circular arguments of all time: Because value pricing had not been implemented already, it would not be considered for future implementation!

The EA goes on to state: "*The potential termini for value pricing in the I-5 corridor is not determined and is not currently included on any adopted transportation fiscally constrained list. Therefore, value pricing is also not considered a reasonable and foreseeable action.*" This is a mendacious distortion, as HB 2017, passed in the 2017 Oregon Legislature, directs the Oregon Transportation Commission (OTC) to implement value pricing "*On Interstate 5, beginning at the Washington state line and ending where it intersects with Interstate 205.*" On January 8, 2019, FHWA sent a letter to ODOT stating: "*...the FHWA's approval of tolling projects under the VPPP has typically been a straight forward process, commonly taking as little as a few months.*"

- 10) Regarding greenhouse gas (GHG) emissions, the OTC adopted a Statewide Transportation Strategy for Greenhouse Gas Emissions (STS) on August 16, 2018. An appendix to the EA, the Climate Change Technical Report (CCTR) gives a totally inadequate explanation of how this projects relates to the STS. For example, where in this project are the "pricing and funding mechanisms" mentioned on page 20 of the CCTR?
- 11) GHG emissions are studied, according to the EA, only for the so-called Area of Potential Impact (API). If travel times are reduced and become more reliable as a result of this project, trips, and vehicle miles traveled (VMT), will necessarily increase because of the elasticity of demand. This does not seem to be reported in the EA. Much of this VMT increase will be outside the API. On page 23, the CCTR claims: "*A larger analysis area that included emissions from the entire Portland metropolitan area was evaluated but did not as effectively show the changes resulting from the Build Alternative.*" One must conclude that analysis of GHG emissions in the EA is defective and inadequate.

Respectfully submitted,

Jon Nuxoll, President
AORTA (Association of Oregon Rail and Transit Advocates)