

## **OEC Comments on Rose Quarter Environmental Assessment March 28, 2019**

Oregon Environmental Council (OEC) appreciates that traffic congestion has a serious impact on quality of life, productivity, public health, and the environment in the Portland metropolitan region. We question, however, whether the Rose Quarter project, as designed, will lead to the congestion reduction and environmental co-benefits described in the Environmental Assessment.

Real-world evidence demonstrates again and again that adding lane capacity will help improve traffic flow, *but only in the short-term*. Likewise, although active traffic management techniques (e.g., coordinated signal timing and ramp metering) are certainly worthwhile and can help reduce greenhouse gas (GHG) emissions by improving traffic flow, they also result in induced demand, albeit on a smaller scale. The only truly effective solution to traffic congestion (and the GHGs that result from stop-and-go traffic) is to use prices to balance the supply of and demand for travel (i.e., congestion pricing).

ODOT states that analyzing congestion pricing will be done separately, but there is no law prohibiting the agency from including a congestion pricing analysis in an environmental assessment of a road project. In fact, NEPA requires the analysis of reasonable alternatives and also requires the assessment of “reasonably foreseeable circumstances.” Given that the Oregon Legislature has required ODOT to pursue pricing for I-5 (and other freeways), leaving congestion pricing out of the analysis will lead to an incorrect interpretation of impacts.

OEC therefore urges ODOT to conduct a full Environmental Impact Statement for the Rose Quarter and to include congestion pricing both as part of the base case and as an alternative to widening the freeway.

OEC is also concerned about the limited vision for the neighborhood improvements. It’s high time to redress the harm inflicted when I-5 was built through the heart of Portland’s African American community back in the 1960s. We agree with the champions of the Albina Vision who are concerned that:

- The freeway caps are not big enough or strong enough to hold the needs of the Albina Vision project. The project must be designed to allow for parks, affordable housing and small businesses, essentially the ability to recreate true neighborhoods.
- The current bicycle lanes, pedestrian walkways and bridges for biking and walking are not congruent with promoting vibrant and vital areas for community to thrive. The current design is too complicated, hilly and with too many zigzags to invite people into the community spaces.
- The project does not address the long-term wealth creation needs of the communities most affected (communities of color and the most marginalized communities).

ODOT must work closely with Albina Vision to determine how the project can result in longer-term benefits.

To summarize, given the complexity of the issue and the many concerns that have been raised regarding the draft Environmental Assessment, OEC requests that ODOT (1) conduct a full Environmental Impact Statement, including analysis of congestion pricing, and (2) engage authentically with the champions of the Albina Vision.

Thank you for considering these requests.