



Date: September 29, 2021

To: Oregon Toll Program (ODOT)

CC: Oregon Governor Kate Brown
Portland Commissioner Jo Ann Hardesty
Multnomah County Commissioner Jessica Vega Pederson
Metro Council President Lynn Peterson
Oregon Legislature - Joint Committee on Transportation

From: Aaron Brown, No More Freeways
Chris Smith, No More Freeways
Joe Cortright, No More Freeways
Mary Peveto, Neighbors for Clean Air
Paxton Rothwell, Sunrise PDX

Subject: Comments on Regional Mobility Pricing Project draft Purpose and Need

No More Freeways PDX and our partner organizations appreciate the opportunity to comment on the Draft Purpose and Need Statement for the Regional Mobility Pricing Project. We are fans of pricing as a tool to improve the equity, sustainability and functioning of our regional transportation system.

Having said that, we have to express our extreme disappointment with ODOT's approach to pricing as expressed in this Purpose and Need Statement and in other projects.

The purpose of a pricing system needs to be the management of congestion and the reduction of Vehicle Miles Travelled (VMT) and the associated impacts of over-reliance on single-occupancy automobile trips - NOT the expansion of freeway facilities.

Here are our detailed concerns:

- No More Freeways' core philosophy is that just as the use of horses for urban transportation reached a point more than a century ago where it simply could not scale, leaving cities awash in a flood or horse manure, we now have reached the point where the single-occupancy vehicle, and freeways especially, cannot scale to meet the needs of urban transportation. Our society cannot tolerate the greenhouse gas emissions, air toxics and particulates, horrendous safety impacts and long-standing inequities arising



from considering the SOV as the core of our transportation system. In addition we are simply running out of space to store and move vehicles that consume so much space to hold in most cases a single occupant.

As such, ODOT's efforts to continue expanding the freeway system in the Portland metro area are anathema to our vision of an equitable and effective transportation system. In particular we object to the "build it, then price it" approach to the projects underway for RMPP, IBR and I-205 pricing.

In all cases pricing should be considered as an **alternative** to freeway expansion, rather than being applied after construction of new facilities.

- The document is devoid of any mention of induced demand. The regional approach of inducing demand via new capacity, then seeking to manage that demand via pricing is counterproductive and will waste resources that could be better spent addressing climate, equity and the critical safety needs of ODOT's orphan highways in the region.

How revenues are spent is a critical factor in whether any pricing system is equitable. Revenue from congestion pricing should be focused on giving disadvantaged communities alternatives to buying and maintaining an expensive vehicle to be able to access our transportation system. Solutions that expand transit, biking and walking options are critical to both the equity and sustainability of our transportation system. Dollars spent on expanding freeway capacity have negative returns to the community.

You cannot serve two masters. Attempting to set a toll rate that funds freeway expansion projects **and** provides funding to multi-modal alternatives will result in increasing the cost of the transportation system while significantly reducing the expansion of much needed alternative options.

- The document fundamentally mis-identifies the sources of emissions from our road network. The approach in the document suggests, as made clear by one subheading that "Our transportation system must reduce greenhouse gas emissions by managing congestion."

Let's be clear. While traffic congestion may result in concentrating emissions in some areas, the source of greenhouse gases and other emissions is **traffic**, not traffic congestion. A larger amount of free flowing traffic produces more emissions than a lesser amount of congested traffic¹. The misdirection in this document is a criminal deception on this point.

¹ Alexander Y. Bigazzi, Miguel A. Figliozzi (2012). Congestion and emissions mitigation: A comparison of capacity, demand, and vehicle based strategies, Transportation Research Part D: Transport and Environment, Volume 17, Issue 7, Pages 538-547. https://pdxscholar.library.pdx.edu/cgi/viewcontent.cgi?article=1130&context=open_access_etds



The core metric that drives so many of the negative system impacts is Vehicle Miles Traveled (VMT). VMT drives all flavors of emissions and is also critical for safety. Crashes, injuries and deaths are proportionate to VMT. While because of its limited access nature, freeway miles are generally safer, there are no freeway-only trips. Freeway trips start and end on the local street network, where traffic deaths are now at record levels.

VMT reduction is a footnote in this document. It must become a major theme.

Transportation contributes 40% of the greenhouse gas emissions in our region, and these emissions are increasing. We must reduce VMT to curb these emissions. Electrification of the fleet will not happen quickly enough to meet national and international climate goals, and does nothing to reduce the impacts of congestion and particulate pollution from tire and brake wear.

- This proposal is freeway-centric and does not look at the whole transportation system. Both Metro² and the City of Portland³ have congestion pricing studies in progress, and this project references neither. In particular, the Metro study analyzes four approaches to pricing analyzed against Regional Transportation Plan goals and suggests that the segment tolling approach that ODOT is pursuing may not be the optimal approach. ODOT is blinded by its desire to fund the expansion of freeways and needs to be a much better regional partner.

² Metro Regional Congestion Pricing Study, Final Report July 2021
<https://oregonmetro.legistar.com/View.ashx?M=F&ID=9783574&GUID=BAC80BE1-9549-4721-806D-F1194FA9B605>

³ City of Portland Pricing Options for Equitable Mobility (POEM)
<https://www.portland.gov/transportation/planning/pricing-options-equitable-mobility-poem>