



Date: 17 Feb 2022

Via email

To: Megan Channel, Rose Quarter Project Director
Brendan Finn, ODOT Urban Mobility Office

CC: Oregon Transportation Commission
Governor Kate Brown
Kris Strickler, Director of Oregon Department of Transportation (ODOT)
Joint Policy Advisory Committee on Transportation (JPACT)
Metro Council
Phillip Ditzler, FHWA Oregon Division
Stephanie Pollack, FHWA Deputy Administrator

From: Chris Smith, No More Freeways
Joe Cortright, No More Freeways
Aaron Brown, No More Freeways
Mary Peveto, Neighbors for Clean Air
Allan Rudwick, Eliot Neighborhood Association
Adah Crandall, Sunrise Movement PDX

Subject: Reevaluation of ODOT Rose Quarter Project

Since the selection of the Hybrid 3 option from the Independent Cover Analysis process, there have been several significant changes in circumstances:

- FHWA Deputy Administrator Stephanie Pollack's December 16, 2021 memo issuing guidance for IJA funding programs, emphasizing state of good repair over capacity expansion. This guidance is likely to be very influential in the competitive grant programs that ODOT may apply to.
- January 18, 2022 Rescission of Finding of No Significant Impact
- An evident gap on the order of \$500M in the project funding plan, as established at the January 2022 Oregon Transportation Commission meeting.¹

¹"Rose Quarter freeway project in Portland short hundreds of millions. ODOT says" *The Oregonian*. Jan 20, 2022.

<https://www.oregonlive.com/commuting/2022/01/rose-quarter-freeway-project-in-portland-short-hundreds-of-millions-odot-says.html>



Given the need for NEPA reevaluation of the project, we strongly suggest several subjects for the scope of this reevaluation that it will be important for the agencies to cover:

1. Undertake a full Environmental Impact Statement

It is no longer plausible to argue that the Rose Quarter Freeway widening project has “No Significant Environmental Impact.” This project, now much enlarged and much more expensive, makes major changes to the routing of the I-5 freeway on and off ramps, changes the local street grid, and forces the relocation of Harriet Tubman Middle School. These are exactly the kind of impacts that necessitate undertaking a full environmental impact statement, one which seriously assesses a range of alternatives, and provides the public with a hard look at the environmental consequences of each alternative. The “short form, quick and dirty” environmental analysis that was done in the prior round and the Finding of No Significant Impact does not suffice for a project of this scale and impact.

2. Inclusion of a pricing alternative

Given the progress that ODOT has made on the Regional Mobility Pricing Project, the statement in the prior Revised Environmental Assessment (REA) that “pricing is not foreseeable” clearly no longer holds true. Pricing is not only foreseeable, a study of it is in progress. Also, in December 2019, Governor Brown explicitly directed the Oregon Transportation Commission to include analysis of pricing as part of its environmental review.² To date, as far as we know, ODOT has not done this, and a re-opening of the environmental review process is a perfect opportunity to carry out the Governor’s instruction in a timely way. Pricing would better achieve the stated purpose and need of the project, at far lower financial, social and environmental cost, according to ODOT’s own consultants.³ Assessment of whether pricing, perhaps in conjunction with other tools, could help meet the safety and operational goals of the project is long past due and now the agencies have that opportunity to rectify that prior omission.

3. Consideration of a more modest construction project

ODOT has designed a roadway for the I-5 Rose Quarter Freeway widening that is as much as 160 feet wide (a fact which it attempted to gloss over throughout the entire

² “Oregon Gov. Kate Brown calls for delay on Rose Quarter freeway project decisions on eve of expected vote” *The Oregonian*. December 16, 2019.

<https://www.oregonlive.com/commuting/2019/12/gov-brown-calls-for-delay-on-rose-quarter-project-vote-a-sks-for-full-review-of-how-tolling-may-impact-traffic.html>

³ https://cityobservatory.org/congestion-pricing-better_wsp/



Environmental Analysis process). This width is sufficiently wide to accommodate 8 to 10 travel lanes, which is far more than the project documents it needs in this area. If the project's overall width were scaled down to accommodate just the number of lanes ODOT claims it intends to build, the structures could be much smaller and cheaper. International traffic engineering firm, Arup, in their review of the project as part of the Independent Cover Analysis suggested that the project could be much smaller:

“The most significant driver of project cost (initial construction cost as well as ongoing maintenance and life-cycle costs), right-of-way impacts, and development potential on and adjacent to the covers is the cross-section width,” the draft report states, laying out various technical approaches used in other states.”We believe these options can be considered to reduce the tunnel width so as to minimize construction cost and impact to the adjacent properties.”

The Arup report shows the Rose Quarter project could be much smaller, cheaper, and less environmentally destructive. Arup recommends interior shoulders of 3 to 8 feet (instead of 12); exterior shoulders of 10 feet (instead of 12), and lanes of 11 or 12 feet (instead of only 12).

Arup has also suggested that simply adding standard shoulders to the existing roadway could achieve much of the operational benefits of the project.⁴

4. Inclusion of a transit alternative

Regular daily commuters represent a large percentage of the trips through the Rose Quarter, especially during peak commuting travel hours. Improved transit service in this corridor would provide more opportunities for travelers to consider alternatives to driving, improving system performance and reducing pollution as our region's population grows. ODOT has never studied how improved transit service could obviate the need for this expensive highway expansion. Multiple TriMet bus and light rail lines run through or parallel to the study area; ODOT could explore the costs and benefits of partnering with TriMet and C-TRAN to triple transit frequency instead of widening the freeway.

5. Consideration of a lower design speed

⁴The full report from Arup is available here:

“[Rose Quarter Independent Cover Assessment Constructability and Cost Analysis Report](https://nomorefreewayspx.files.wordpress.com/2022/02/arup_draft_cost-and-constructability-report_06-02-21-1.pdf)” June 2, 2021. https://nomorefreewayspx.files.wordpress.com/2022/02/arup_draft_cost-and-constructability-report_06-02-21-1.pdf



Another recommendation made by Arup is that a 50mph design speed would be more appropriate for an urban core environment rather than the 70mph design speed indicated in the EA documents. A lower design speed would allow for narrower lanes and shoulders and a smaller overall project footprint, with less disruption to adjacent neighborhoods, and which would decrease construction costs. Also, a lower design speed would increase safety.

6. Consideration of removing the freeway entirely

Portland's transportation system, economy and neighborhoods have always benefited more from the cancellation or removal of urban freeways than from their construction and expansion. The Albina neighborhood was decimated by three different ODOT highway construction projects in the 1950s (Interstate Avenue, Highway 99W), 1960s (I-5) and 1970s (The Fremont Bridge off-ramps). Collectively these eliminated hundreds of homes and led to a 60 percent decline in neighborhood population.⁵ Removing freeways has been shown to lead to urban revitalization, improved livability, and lower levels of pollution. This is a once in a lifetime opportunity to fully evaluate the environmental consequences of this choice.

The IJA included \$1 billion for the "Reconnecting Communities" program, a new federal initiative designed to invest in healing neighborhoods destroyed by freeway expansion. ODOT could propose an approach truly rooted in restorative justice by giving the land on which I-5 sits back to community organizations reflecting the population who lived in the hundreds of homes torn down by ODOT. Given the decades of racist injustice, the miserably unhealthy air pollution, our significant housing shortage and the urgency with which Oregonians need to reduce their driving, turning the stretch of Rose Quarter Freeway Expansion into Community Land Trusts and housing could create actual wealth for the displaced Black community. Similar efforts are underway in Oakland, Rochester NY and Syracuse NY.

7. Analyze cumulative effect of all projects in the corridor

ODOT has proposed three major changes to I-5: the widening of the freeway at the Rose Quarter, the construction of the I-5 "Bridge Replacement" project (in reality, widening I-5 to as many as 12 lanes for a stretch of five miles), and implementing pricing. Its approach to environmental review has treated these projects piecemeal, as unrelated. In effect, all three are integral to one another: the bulk of the traffic traversing the Rose Quarter also transits all or part of the five mile stretch of I-5 included in the IBR

⁵"[How ODOT destroyed Albina: The untold story](https://cityobservatory.org/how-odot-destroyed-albina-the-untold-story/)" *City Observatory*. March 22, 2021: <https://cityobservatory.org/how-odot-destroyed-albina-the-untold-story/>



project; pricing I-5 would affect both projects. As No More Freeways pointed out in its comments on the Rose Quarter freeway widening EA, ODOT incorrectly assumes in its “No-Build” scenario, that the Columbia River Crossing was built in 2015 (which it was not). The only way to do a fair, and NEPA compliant analysis of these projects is to undertake an EIS that looks at all these alternatives together, and which comprehensively addresses their cumulative impact. Treating each project separately, and assuming for environmental analysis that the others are (or aren’t) undertaken, is a clear attempt to evade any kind of overall understanding of the collective impacts of these changes.

We believe that some combination of the above elements could meet the transportation needs of the region and the state with less adverse impacts and with considerable savings to the public purse.

We continue to believe that an Environmental Impact Statement is the best way to evaluate the full range of opportunities.