



**Date:** 3 March 2022

Via email

**To:** Washington State Legislature

**From:** Chris Smith, No More Freeways  
Aaron Brown, No More Freeways

**Subject: Timing of Funding for Interstate Bridge Replacement Program**

No More Freeways is an Oregon-based, grassroots transportation justice advocacy organization who has been closely watching ODOT's proposed Rose Quarter Freeway Expansion and the proposed Interstate Bridge Replacement. We believe that to build the Green New Deal we must retire the Gray Old Deal, and that investments in additional freeway capacity is directly antithetical to any meaningful commitment to invest in reduction of traffic congestion, improvement of street safety, or reduction of carbon emissions.

We are cognizant that the Washington Legislature is considering a major transportation package and the current proposal includes \$1B or more for the Interstate Bridge Replacement Program. The Oregon Legislature will not consider a similar request any earlier than the 2023 legislative session.

No More Freeways believes a funding commitment for this project is premature and should not be included in the current package for the following reasons:

- The project relies on the Federal Record of Decision from the prior project and plans to do a Supplemental EIS. That Record of Decision defines an 'envelope' for the project that includes the 10-12 lane proposal that was not funded. It would be more appropriate to **delay funding until the new design and its updated environmental impacts are understood** via the SEIS.
- The project has released a draft Climate Framework that utterly fails to mention induced demand. **The project should not be funded until the very real impacts of highway expansion on increased vehicle miles traveled (VMT) and greenhouse gas emissions are understood and analyzed.**
- The project has not prepared new traffic forecasts and continues to rely on projections from the last iteration of the project circa 2007 which with the benefit of hindsight clearly



overestimated travel demand in the corridor. **The project should not be funded until updated and more accurate traffic forecasts are available.**

- The project intends to use tolling to both fund the project and manage demand, but has not done an investment grade analysis to inform the community about potential toll rates. **Ideally tolling would be implemented prior to design and construction so that the facility can be sized appropriately, an alternative that the IBR team refuses to study.**

Overall, we are grateful to see the drastic improvement in policy represented in the Move Ahead Washington transportation package. Dramatically shifting transportation investments towards transit, road maintenance, and active transportation represents true, progressive and innovative leadership on climate and economic justice that we hope legislators on our side of the Columbia River will emulate in the years ahead. We are similarly in agreement that there is a need for dramatic, substantial improvements for transportation connectivity between the Portland Metro and Southwest Washington; our organization is eager to support any investment that aims to create tens of thousands of green collar jobs while also reducing traffic congestion and greenhouse gas emissions.

However, at this point there is simply no guarantee - and in fact significant reason to believe otherwise - that these will be the outcomes of any iteration of the Interstate Bridge Replacement as currently proposed. The Washington Legislature's progress on climate and transportation reform will be significantly hampered by any transportation package that gives a billion dollar blank check to WSDOT and ODOT for a proposed five mile, ten-lane freeway expansion that has not yet undergone the most basic of evaluations on the metrics (congestion, climate, air pollution) that matter most to our community.

By power of the pursestrings, the Washington Legislature has the unique and important opportunity to ensure that your Department of Transportation upholds the values that both Oregon and Washington share. We need to get this bridge right, and giving WSDOT a billion dollars before the agency can credibly prove they will do so will only subject the agency towards future litigation and delay while costing taxpayers millions of dollars in consulting that could otherwise be spent on affordable housing or transit. We strongly encourage you to pass the Move Ahead Washington transportation package and withhold funding from the Interstate Bridge Replacement Program until the legislature can be confident that WSDOT and ODOT are building a bridge that best aligns with these shared values.