



Date: September 13, 2022

To: Megan Channell, Rose Quarter Freeway Expansion Project Manager

CC: Oregon Transportation Commission
Keith Lynch, Oregon Division Administrator, FHWA
Jo Ann Hardesty, Portland City Commissioner
Jessica Vega Peterson, Multnomah County Commissioner
Lynn Peterson, Oregon Metro

From: Joe Cortright, No More Freeways
Chris Smith, No More Freeways
Aaron Brown, No More Freeways
Allan Rudwick, Eliot Neighborhood Association

Subject: **Request for more information, timeline regarding Environmental Assessment - and request for 90 day Public Comment Period for Proposed Rose Quarter Freeway Expansion**

No More Freeways and the Eliot Neighborhood Association are writing to formally request more clarity about ODOT's plans for the forthcoming federally-mandated public comment period for the Environmental Assessment for the proposed Rose Quarter Freeway Expansion project, and to ask questions about the upcoming opportunity for community engagement.

We are proactively reaching out to you now to ask for this full 90-day public comment period because the 45-day public comment period the agency provided in 2019 during the original Environmental Assessment (EA) was wholly inadequate. We wish to make explicit our desire that the full community, and not just ODOT's hand-picked boosters, are given a fair and equal opportunity to weigh in about their concerns.

While No More Freeways is supportive of the freeway caps included in the "Hybrid 3" design introduced in this upcoming EA, ODOT still should have conducted a thorough Environmental Impact Statement (EIS) that studied alternatives to freeway expansion. We believe ODOT should support efforts to restore the Albina neighborhood



and fund freeway caps in line with Albina Vision Trust's work, instead of insisting any caps must be coupled with the proposed expansion of I-5.

Representatives from No More Freeways (along with thirty community leaders and small business owners) asked for a full ninety day public comment period for the original EA in 2018. ODOT denied our request.¹ That was inappropriate, given the importance of the issues.

When ODOT did release their Environmental Assessment in 2019, the document was missing numerous crucial data sets and resources necessary for community groups to independently review the proposed expansion.² We pointed that out, but we did not receive these additional data sets until March 13, a full 26 days into the allocated 45 day Public Comment period.

At that point, No More Freeways asked ODOT for more time for our group and the public to review the dozens of pages of significant and relevant data that ODOT omitted to include in the February 2019 EA. ODOT refused to extend the public comment period.³

¹ Our November 28, 2018 letter to ODOT asking for a 90 day public comment period is at the link below:
https://gallery.mailchimp.com/33eee76771d2f4f3df7221428/files/7a9d2360-272d-4ddb-b311-c4b1081d784b/112818_60_Day_Extension_Request_Letter.pdf

²Our March 4, 2019 letter to ODOT articulating all the data that was missing from the 2019 Environmental Assessment is available at the link below:
<https://nomorefreewayspx.files.wordpress.com/2019/03/030419-nmf-request-for-additional-ea-data.pdf>

³To quote the NMF letter from March 18, 2019:

ODOT only made these data available on March 13 - they were posted on the Rose Quarter project website a full nine days after our community group formally requested the information, which by all accounts should have been included in the original EA document. The data provided (Synchro output worksheets, Alternative for the AM/PM peak periods, VISSIM model outputs and calibration report, Volume Forecasts for the I-5 mainline, Build Alternative for the AM and PM peak periods, and the full Traffic Operations Analysis Summary and full collection of Appendices) represents over 632 pages of technical, quantitative measurements about bike, transit and automobile traffic flow on the freeway itself and the surrounding neighborhood streets.

It is difficult to overstate the centrality of these up-until-recently-missing data sets to ODOT's claims about the purported impacts this project will have on the neighboring community. Without these data, it is simply impossible to independently assess ODOT's claims about how this freeway expansion will impact the local community. ODOT's assertion that the proposed Rose Quarter Freeway Expansion will somehow improve traffic congestion, ambient air pollution or carbon emissions is a bold one - it flies in the face of decades of empirical research about urban freeway expansion projects across the country. Our community leaders believe we deserve more than nineteen days (and only thirteen business days!) to look over the six hundred and thirty two pages of data that are the heart of whether this half-billion dollar freeway expansion proposal will impact our state's carbon emissions, regional traffic congestion or local rates of asthma and diabetes.

The letter is available here:
<https://nomorefreewayspx.files.wordpress.com/2019/03/031819-nmf-request-for-full-45-day-public-comment-period.pdf>



Substantive Omissions

The 2018 EA failed to provide information on a number of subjects. We have briefly listed them in this letter, to remind ODOT that these issues need to be addressed, not ignored, for ODOT's work to be legally and factually valid.

1. Traffic Modeling: The 2019 EA failed to include information about the traffic modeling used to justify the project. ODOT provided fragmentary and incomplete traffic modeling only after most of the comment period had elapsed. Concealing this traffic information makes it impossible to independently analyze claims made about the project's efficacy and environmental impact.

2. Project Finances: Since 2019, the cost of the project has ballooned to as much as \$1.45 billion. The project has not disclosed how this amount will be paid for, but has indicated that it expects contributions from local governments. Because this form of financing is likely to jeopardize the availability of resources for other transportation projects - and for other investments in the Albina neighborhood - it is essential that ODOT fully disclose all of its financing plans related to this project.

3. Tolling: OTC Chairman Bob Van Brocklin stated in March of this year that the Rose Quarter project could not be financed without tolling. The 2019 EA failed to examine tolls as a means for financing this project. According to ODOT's own consultants, tolling I-5 would eliminate the need to widen I-5 at the Rose Quarter. That fact was not disclosed in the 2019 EA. A new EA should fully disclose and analyze how tolling would be used to finance this project and how it would influence traffic levels.

4. Road Pricing. The 2019 EA refused to consider the possibility of using road pricing to reduce traffic congestion, asserting (incorrectly) that road pricing was "not reasonably foreseeable." ODOT, Metro and the City of Portland are moving forward, as directed and approved by the Oregon Legislature, to implement the Regional Mobility Pricing Program (RMPP). Pricing is not merely "reasonably foreseeable" it is an essential part of the region's future transportation plans. The EA should fully address how road pricing will affect traffic in the "No build" scenario, and should also evaluate road pricing policies as an alternative means of achieving the project's purpose and need.



5. Project Dimensions. The 2019 EA provided only fragmentary and inaccurate information about the physical dimensions of the proposed freeway widening. ODOT hid this information from the public during the entire EA review process, and NMF was able to document it only as a result of a FOIA document request. The data we uncovered showed ODOT planning to build a roadway wide enough to accommodate as many as 10 lanes of traffic, something which would have far greater environmental impacts than disclosed or analyzed in the EA. NMF did not learn about this until March 2021 despite repeated public records requests and public testimony requesting this information delivered both to ODOT's staff working on the Rose Quarter as well as to the Oregon Transportation Commission.

6. Transit Alternatives: The 2019 EA failed to consider reasonable transit alternatives to widening. Subsequently ODOT has mentioned "bus-on-shoulder" as a possible project component, yet TriMet, Portland's regional transit agency, appears uninvolved in developing alternatives. Certainly "bus-on-shoulder" is a sub-standard option. Rail, and/or express bus in dedicated right-of-way or express bus operating in a managed lane (using congestion pricing or HOV restrictions) certainly merit analysis.

7. GHG Emissions: The 2019 EA studied emissions within a limited project area rather than analyzing how regional emissions would change given the induced demand that will occur outside the project area.

8. Cumulative Impacts: Analysis of cumulative impacts of this project in combination with the other freeway expansions in this region, was missing.

Given this history, No More Freeways is proactively reaching out to ODOT to ask the following questions regarding an upcoming public comment period:

- When will the public comment period begin?
- Will ODOT commit to at least a ninety-day public comment period?
- Will there be a public hearing? If so, will ODOT commit to providing video taping of the event?
- Will ODOT commit to releasing all of the traffic modeling data used to produce traffic projections? If so, will ODOT commit to making the data promptly available in an electronic format?
- Will ODOT release detailed plans showing the actual dimensions of the proposed roadway and structures?



- Will ODOT provide a complete and detailed financial plan for the project showing the sources and uses of all funds, including potential toll revenues?
- Will ODOT's traffic modeling include the impact of the Regional Mobility Pricing Program?
- Will ODOT's traffic modeling rely on any assumptions, such as the existence of other yet to be constructed or approved projects (including but not limited to the Interstate Bridge)?

We look forward to your response in advance of the upcoming public comment period. Thank you for your time and consideration.