



December 23, 2022

**RE: Rose Quarter Improvement Project Supplemental Environmental Assessment Comment Period.**

Dear Project Manager, Interstate 5 Rose Quarter Project,

1000 Friends of Oregon is a land use and transportation advocacy organization deeply concerned about livability and climate change in large and small communities across the state, including the Portland Metro Region. As part of that, we closely follow large-scale infrastructure projects, which depending on the project, and in particular how it is designed and for whom, can be beneficial or harmful to livability. Therefore, we have concerns about the environmental, social, economic, and racial equity impacts of the proposed Rose Quarter Freeway Expansion (RQP).

We appreciate the goals of the proposed Interstate 5 Rose Quarter Freeway Expansion: to reduce congestion and improve safety. However, we remain concerned that this project, as currently designed, will not achieve those goals. Decades of research show that projects that expand road capacity will induce more vehicle miles traveled, which decreases safety and increases congestion. Furthermore, we have concerns that in the pursuit of these goals, ODOT, the OTC, and other stakeholders are not correctly accounting for the additional potential negative impacts of this project on Portland and surrounding regional communities.

This project raises substantial questions about the potential negative environmental and public health impacts across the region, as it will increase vehicle miles traveled, which is associated with increased air pollution, greenhouse gas emissions, and toxic runoff into local waterways. The local impacts of this project are particularly concerning because this freeway was originally built through the heart of a thriving African-American community, destroying a robust business district, breaking physical community connections, and exposing the neighborhood to an ongoing source of noise and air pollution that damages human health.

The proposed project could expose neighbors to more of these hazards, adding extra weight to the need for thoughtful and complete review. While this project has the potential to help improve community outcomes through the creation of integrated and buildable freeway covers, the creation of lane miles below them arguably amplifies these negative impacts. We fully support the vision and work Albina Vision Trust is bringing forward in this project, including buildable freeway lids, and we

remain worried the freeway expansion elements might change the positive impacts Albina Vision Trust's concept plan creates, and certainly jeopardize potential funding for lids within the project.

We call on ODOT and the OTC to conduct a full Environmental Impact Statement for the I5 Rose Quarter Freeway Expansion and to include congestion pricing alternatives to widening the freeway. Congestion pricing and investing generated revenue in transit, biking, and walking is the best way to increase free movement of people and goods. While ODOT states that analyzing congestion pricing will be done separately, nothing prohibits the agency from including a congestion pricing analysis in an environmental impact statement of a road project and, in fact, the law might require ODOT to do so. The National Environmental Policy Act (NEPA) requires an analysis of reasonable alternatives and the assessment of "reasonably foreseeable circumstances." Given that the Oregon Legislature has required ODOT to pursue pricing for I-5 (and other freeways), and that OTC Chair Bob Van Brocklin is on record stating that there's no viable pathway to fund this proposed expansion without using revenue from tolls, leaving congestion pricing out of the analysis would fail to assess a very reasonably foreseeable circumstance.

Furthermore, Governor Brown's executive order on climate change reinforced actually achieving already-adopted strict emissions targets for the state and directed all state agencies, commissions, and boards to take action to achieve the state climate goals. This includes i) prioritizing activities that reduce emissions and ii) integrating climate change, climate impacts, and emissions goals into investments and policymaking. A full EIS is a critical component in understanding how the RQP fits within this executive order, as an EIS requires everything required in an EA, but, among other things, also requires a "hard look" at the cumulative impacts of the proposal along with all existing and reasonably foreseeable future development within the project area. This more holistic approach taken by an EIS creates improved policy, provides for the good stewardship of taxpayer dollars, and will help correctly frame this project within the context of the climate crisis.

In conclusion, 1000 Friends of Oregon joins many other Portlanders and Oregonians in raising concerns about this project. The best way to address these concerns, *and possibly the only legal way*, is the completion of a full environmental impact statement that includes congestion pricing as a part of both the base case and as an alternative to widening the freeway. We also remain concerned about the financial impact of this project, and the need to right-size expansion to ensure that our state transportation finances align with the many other regional projects moving forward. We know the RQP will have dramatic land use impacts on the region, and we believe asking and answering all questions is a critical part of this.

Sincerely,

Brett Morgan  
1000 Friends of Oregon