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Project Manager
c/o I-5 Rose Quarter Improvement Project
888 SW 5th Ave.
Suite 600
Portland, OR 97204

SUBJECT: Supplemental EA public comment period

AORTA-Association of Oregon Rail and Transit Advocates, is an Oregon non-profit with statewide membership.

Throughout the development of this project, we have repeatedly submitted testimony and comments. In June of 2012, we submitted a letter to the N/NE Quadrant Stakeholder Advisory Committee, asking that the freeway not be widened, recommending instead that a north-south transit alternative be considered. That letter is attached.

Despite claims that a large number of alternatives were considered in the period leading up to finalization of the N/NE Quadrant Plan, transit and tolling-only alternatives were not considered, even though such alternatives have the greatest potential for reducing VMT, GHG emissions, and other pollutants, producing significant environmental benefits compared with the chosen build alternative

We submitted comments on the February 2019 EA for this project, once again pointing out that the EA failed to consider transit alternatives, which should include priority bus service on the freeway as well as a parallel extension of the Yellow light rail line east of the Willamette River to the Tilikum Crossing, and extension of the Yellow Line north to Hayden Island for better connection with C-Tran service. These alternatives to I-5 expansion have still not been considered in the Supplemental EA.

We noted that the February 2019 EA did not properly consider the cumulative impacts of construction projects on I-5 and connecting freeway segments, such as the East Marquam Interchange Ramps Project, which built additional lanes on I-5 between the Marquam Bridge and I-84. This and other defects in the February 2019 EA have still not been properly addressed in either the November 2020 Revised EA or the Supplemental EA.

We subsequently testified to the Oregon Transportation Commission in January 2020, when they were considering whether to direct ODOT to do an EIS or not. Again, we asked for a full EIS with proper scoping of alternatives, to include those with less impact on the environment.

It is clear now that pricing (tolling) is an integral part of the project. HB 3055 (2021) spreads the money originally earmarked for this project by HB 2017 (2017) to several projects, all of which are under-funded, but sets up a system of short-term borrowing along with toll-backed bonds to fund these projects. All of these projects, along with the associated tolling, need to be analyzed in a single EIS that includes proper scoping to consider transit and/or no-roadway-expansion alternatives.

Greenhouse gas emissions are a cumulative, ongoing impact of both the build and no-build options. A congestion-pricing alternative for the region has the potential over multiple years of vastly reducing the GHG emissions of the transportation sector. GHG reductions are required in Oregon to meet environmental goals

The regional congestion-pricing EIS needs to consider all of the freeways in the Portland region, and consider funding increased transit service. The opportunity cost of diverting toll revenue to unnecessary construction should be evaluated.

Consultants to ODOT's Value Pricing Policy Advisory Committee in 2018 indicated that if congestion pricing were implemented, the Rose Quarter project would not be needed, because pricing would provide the capacity equivalent of an additional travel lane.

The November 2020 Revised EA, which is being supplemented, responds, in Appendix I, to comments submitted for the original February 2019 EA:

<https://www.i5rosequarter.org/pdfs/fonsi/Appendix%20I%20Final%20CSR.pdf>

Section "3.1.2 Project Alternatives" starting on page 9 (page 15/600 of the pdf), responds to comments about the inadequate analysis of alternatives. The response essentially blames the original 2012 process for coming up with the then-current plan (which has subsequently been modified). That process, and the steps that led up to it, were not a NEPA process. ODOT had a plan, and the City of Portland attempted to improve that plan. ODOT threatened the area around the project with development restrictions if the City didn't go along. No proper scoping of alternatives occurred at that time.

Now, ODOT is saying that because they did an EA, and found no significant difference in the long run between the project and no-build, they don't have to consider any other alternatives. They are using the EA process to avoid doing an EIS and are avoiding taking the hard look at alternatives required by NEPA. But the single new alternative covered by the Revised EA is still insufficient.

Sincerely,
Douglas R. Allen
AORTA Vice President, Portland Region