



**Date:** 24 July 2023

**To:** Administrator Shailen Bhatt  
Federal Highway Administration  
1200 New Jersey Ave SE  
Washington, DC 20590

**CC:** Keith Lynch, FHWA Division Administrator  
Oregon Transportation Commission  
Portland Transportation Commissioner Mingus Mapps  
Megan Channell, Rose Quarter Freeway Expansion Project Director  
Kelly Scannell Brooks, Office of Governor Tina Kotek

**From:** Chris Smith, No More Freeways  
Joe Cortright, No More Freeways  
Aaron Brown, No More Freeways  
Mary Peveto, Neighbors for Clean Air  
Nakisha Nathan, Neighbors for Clean Air

**Re:** **Supplemental Comment on SEA - ODOT Admits Lack of Funding for Rose Quarter Freeway Expansion**

This letter includes significant new information revealed since the closure of the public comment period for the Supplemental Environmental Assessment (SEA) for the proposed Rose Quarter Freeway Expansion. No More Freeways requests this document be included as a relevant addition to the existing public comment for the SEA.

We write to expand on our previous supplemental comments. In our letter of 15 May 2023 (attached) we noted that ODOT either lacked funding to proceed with construction of the Rose Quarter expansion or intended to use proceeds from the Regional Mobility Pricing Project, contradicting the statement that “pricing is not reasonably foreseeable” in both the original Environmental Assessment (EA) and subsequent Supplement EA (SEA).

We are grateful to Governor Tina Kotek who insisted on a financial plan for Rose Quarter and the larger Urban Mobility Strategy, something the Oregon Transportation Commission (OTC) had failed to do for the prior three years. That plan, as presented to the OTC on June 28th, makes it clear that ODOT has no construction funding available for Rose Quarter, the I-205 expansion or the expansion of the Boone Bridge.



Given the clear lack of funding, FHWA rules do not allow issuance of a Finding of No Significant Impact (FONSI), as detailed in our prior letters sent March 20 and May 15, 2023<sup>1</sup>. Given that Governor Kotek has imposed a moratorium on the implementation of tolling until 2026 and there is no prospect of other State funding prior to the 2025 Legislative Session, Oregon has an ideal opportunity to reassess this project and the entire Urban Mobility Strategy (UMS).

**No More Freeways and our partners continue to maintain that the most appropriate course of action is a full Environmental Impact Statement with a scope of the entire UMS,** allowing clear examination of the overall strategy of freeway expansion as a whole, rather than segment-by-segment EAs that ignore the cumulative effects by assuming that the other projects will be constructed.

In the case of the Rose Quarter component, given the rapidly escalating costs, an EIS should consider a broad range of alternatives, including:

- Capping the freeway without expansion
- A pricing-only alternative
- Build-out of adequate shoulders as an alternative to lane expansion, as suggested by the traffic consultants to the Independent Cover Analysis
- Freeway decommissioning in this area

Or various combinations of the above strategies.

Please use the disclosure of ODOT's financial shortfall as an opportunity to seek more environmentally sustainable and fiscally responsible outcomes for Portland's transportation network.

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<sup>1</sup> No More Freeways has previously requested that these letters also be included in the SEA; our March 20 letter detailing the lack of reasonably available funding is here:  
<https://nomorefreewayspx.com/wp-content/uploads/2023/03/032023-rq-failure-to-demonstrate-reasonably-available-funding-.pdf>

Our May 15 letter highlighting how ODOT refuses to answer clearly whether tolling is “reasonably foreseeable” or not for managing congestion on this corridor is available here:  
<https://nomorefreewayspx.com/wp-content/uploads/2023/05/051523-ODOT-Reasonable-Availability-of-RQ-Funding.pdf>