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To: Metro RTP Public Comment transportation@oregonmetro.gov

Copy: Metro Council by email
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Subject: No More Freeways' Comments on 2023 RTP Public Review Draft

“Some highway engineers have a mentality ... that would run an eight-lane freeway through the Taj Mahal. That is our problem.”

– Oregon Governor Tom McCall, 1970

No More Freeways appreciates the enormous effort, technical skill and public outreach that has gone into developing the 2023 Regional Transportation Plan Public (RTP) Review draft. We also appreciate the effort to develop new directions in pricing policy and mobility policy.

Metro is Planning to Fail to meet our necessary climate and safety improvements.

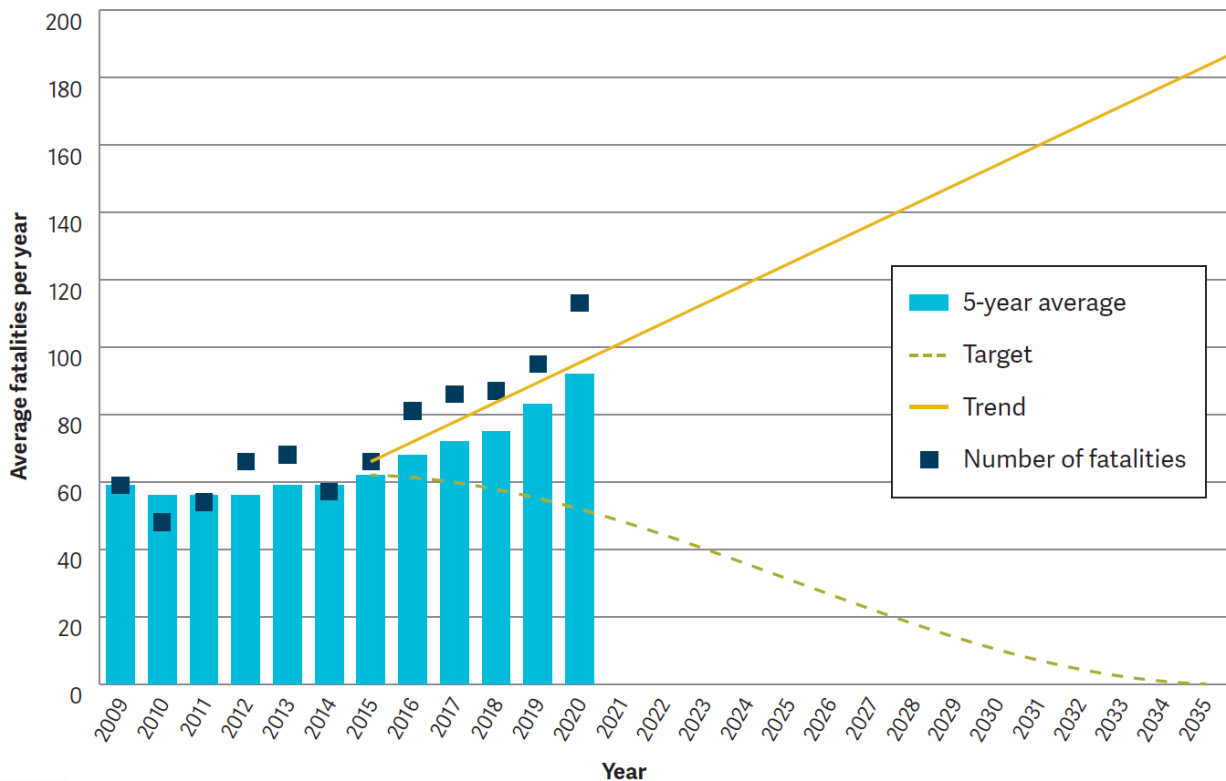
Nonetheless our review concludes that the old paradigm of prioritizing private automobiles, generally supported as much or more by State of Oregon policies than Metro policies, continues to drive our transportation system in the wrong direction. We appreciate the fact that the RTP honestly concludes that we fail to achieve regional goals in three critical areas: Safety, Climate and Mode Split. The failure on Climate is much worse than the plan indicates because it relies on a fictional model of vehicle fleet characteristics provided by the state, which is clearly belied by real world data.

In our comments we will specifically address these three failure areas and will comment on the new pricing and mobility policies as well as the issue of vehicle size, which we believe is a critical area for new policy, even though Metro currently lacks legislative authority in this area.



Safety Failure

We cannot describe this issue more starkly than Figure 4.10 does:



Chapter 4 documents how this is a critical equity issue on a number of dimensions, including race and housing status. We don't disagree that the causes are complex, but would call out specifically the alarming trends in vehicle size and weight, which we believe is an issue Metro must pursue (see policy discussion below).

But we must call out the conflicting pattern of investments. ODOT's Rose Quarter freeway expansion (\$1.9B) is billed as a "safety and operations" project, but there have been no fatalities there for over a decade. A region in which billions of dollars were applied to our high crash corridors instead of to adding freeway lanes would be a much safer region. While we appreciate the investments in jurisdictional transfer like outer Powell and 82nd Avenue the pace of efforts to address these corridors must be radically accelerated. It's our region's most vulnerable residents who suffer from this gravely significant misallocation of funds, and the Metro Council and JPACT have an opportunity to rectify this injustice by directing more revenue into safety projects by removing multibillion dollar freeway expansions from our plans.



We also acknowledge that there are “cultural” issues around the safety issue. We were very disappointed to recently hear a Portland Police Bureau leader admit publicly that the Bureau messaged to the community that they would not enforce traffic laws as a ploy to seek larger budgets.¹ We hope Metro leaders will use their bully pulpit to address cultural factors that are making our public realm less safe.

Finally on this topic, we’d like to call out a ray of hope, Multnomah County’s direction to view traffic safety as a public health issue.²

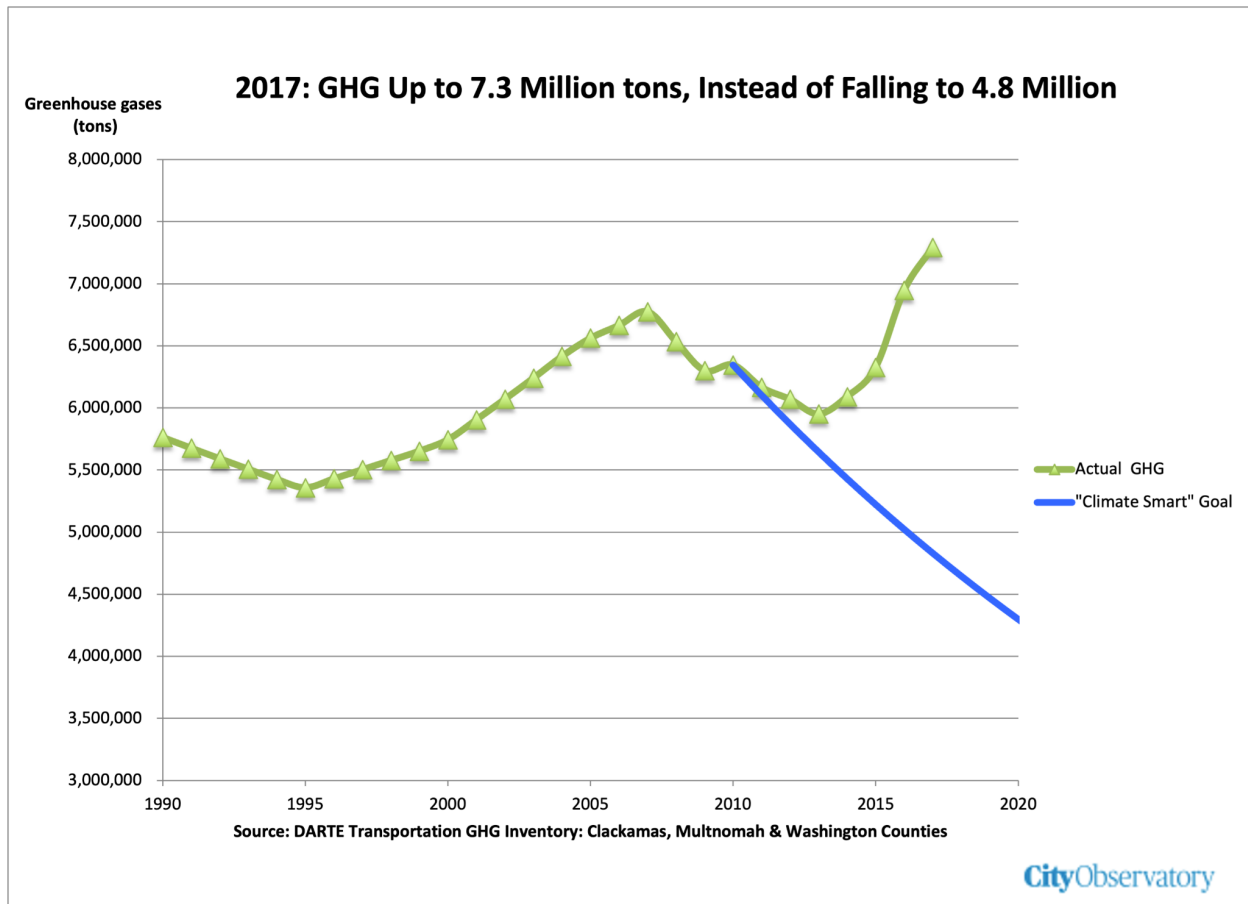
Climate Failure

The RTP and the Climate Smart Strategy that forms the basis for the RTP climate policy take ownership of a relatively narrow slice of transportation contributions to Greenhouse Gas (GHG) emissions: the amount of vehicle travel per person (VMT per capita). Even with this limited responsibility, the plan still predicts that we will fail to meet these goals (Table 3 of Appendix J) with the combination of this RTP and other adopted plans.

But by only looking at VMT per capita, the plan ignores the fact that the underlying vehicle fleet (the state’s responsibility under Climate Smart) is completely unreflective of the reality of vehicle size, fuel consumption and age. Our colleagues at City Observatory have charted this based on DARTE GHG inventories:

¹ Portland Police Bureau officer admits traffic enforcement messaging was politically motivated
<https://bikeportland.org/2023/08/08/portland-police-bureau-officer-admits-no-traffic-enforcement-messaging-was-politically-motivated-377939>

² Public Health Data Report: Traffic Crash Deaths in Multnomah County
https://multco-web7-psh-files-usw2.s3-us-west-2.amazonaws.com/s3fs-public/Revised_Final_MultCo%20traffic%20deaths%202020_2021.pdf



When it adopted its Climate Smart Strategy in 2014, (and again in the 2018 RTP, and yet again in the draft 2023 RTP), Metro promised to update its modeling to reflect actual progress in reducing vehicle GHG emissions, and to adjust its policies accordingly. The GHG analysis contained in the RTP shows just the opposite: The RTP ignores the increase in Portland area transportation greenhouse gasses over the past five to ten years, and also relies on assumptions about vehicle age and fleet composition that are exactly opposite of recent trends: today's vehicle fleet (and tomorrow's) is vastly older, larger and dirtier than assumed in the RTP modeling.

Nothing in the RTP prioritizes the spending of the region's scarce and limited resources on those investments that will produce the greatest reductions in greenhouse gasses. The RTP lacks any project-based GHG emission criteria. In essence, Metro says the GHG policy only applies to the overall *plan*, not the individual *projects*. As long as Metro can (based on obviously erroneous ODOT modeling) claim that the plan is on track to meet comply with the



LCDC rule, (which by the way doesn't do enough to get to the state's 75% GHG reduction by 2050 goal), then the RTP is "good" from a climate perspective.

What the RTP does do, in contrast, is prioritize projects that improve vehicle speeds (i.e. the standard that no throughway should have speeds of less than 35 MPH for four hours per day). The RTP says that if these projects do increase GHG, that there will be mitigation. But as we know, ODOT regularly claims that its freeway widening projects don't increase VMT or GHG (in spite of science to the contrary), so no mitigation is actually required. This policy of allowing projects that increase VMT and GHGs, and then spending even more to mitigate these emissions increases adds insult to injury, because we'll spend our limited resources on projects that increase GHG emissions, and then spend even more money on "mitigating" those increased emissions, instead of reducing the current level of GHGs.

Mode Split Failure

Chapter 7 makes it clear that the region's ambitious mode split goals will not be met with the pattern of investment in this RTP. Only a major shift in investment strategy can achieve our mode split goals. Of course mode split is only a means to the goal of a safer and more sustainable transportation system. While we strongly support additional investment in transit we note that building out the region's active transportation network would be the single most cost-effective investment we could make.

Pricing Policy

There is much to like in the policies outlined in Section 3.2.5 and in the research conducted by Metro in recent years that helped formulate this policy. A few notes on the policy:

- We are curious that table 3-3 omits mention of parking pricing since it lives at the intersection of policies that effectively drive our regional priorities and which can be implemented by the local governments within the region.
- The callout box on p. 3-46 notes the potential constitutional limitations on how revenues from roadway pricing might be used but fails to note a strategy that could be used to offset this: swapping pricing revenues with Federal dollars - now often spent on uses allowed to the Highway Trust Fund - but allowed to be used much more flexibly. Such a swap could greatly advance transit and active transportation efforts.



Our major criticism of the pricing policy is that it is not being applied rigorously to project selection. The inclusion of ODOT's I-205 and RMPP tolling projects would appear to fly in the face of major components of policy 3.2.5:

- “Revenues collected through pricing programs should be reinvested in a manner that helps meet state, regional and local goals related to reductions in greenhouse gas emissions and congestion while improving mobility and safety.”
- “Revenue should not be reinvested solely for single occupancy vehicles but should be invested to improve the entire multimodal transportation system.”

RMPP and I-205 both appear to be motivated in large part to fund further freeway expansions. Starting tolling in other corridors like I-84 or Highway 26 with strong transit alternatives would be more equitable and more likely to shift travel to modes that align with regional goals.

We would also note the strong diversion concerns being expressed in relation to the I-205 tolling project and point out that a VMT fee would be a stronger program that would alleviate many diversion concerns.

Mobility Policy

We are ecstatic to see the end of LOS, but question whether we have selected the right set of replacement measures. System completion is a useful measure for our transit and active transportation systems, but throughway vehicle throughput is likely to reinforce existing unproductive investment patterns. We are disappointed to see that there is no “people throughput” measure and especially that there is not a focus on accessibility to jobs, education and other sources of opportunity rather than simply on mobility. Accessibility measures would better reflect the combination of Metro’s planning responsibility for both land use and transportation.

The Missing Policy - Vehicle Size and Weight

One common element links the failures in both safety and climate - the arms race for larger and larger vehicles driven by fear-based marketing. This arms race benefits the profits of the automobile industry but is devastating to our communities and the health of our planet.

Electrification actually makes this issue worse as batteries increase the weight of these large vehicles. The full life cycle carbon footprint of a heavy electric vehicle can actually be greater than that of an internal combustion sedan.



We understand that this is a national failure, but that does not mean we cannot begin to address it locally. A variable VMT fee or registration fee based on vehicle height and weight would be an important signal and economic inducement to consumers to consider more reasonable vehicles.

We understand that Metro and local jurisdictions currently lack legislative authority to implement this, but Metro should add this to its legislative agenda for both 2024 and critically for the major transportation package anticipated for the 2025 session.

Creatively structuring such fees as a privilege tax for operating an oversized vehicle in an urban environment could be a potential path around Highway Trust Fund limitations on revenue use. Even failing that, these revenues could contribute to addressing the issues on our high crash corridors.

Conclusion

If the elected officials who comprise the Metro Council and the Joint Policy Advisory Committee on Transportation are serious about reducing carbon emissions and traffic fatalities, we have to make a plan. The RTP as currently proposed is a plan to fail to deliver to Oregonians the safer, healthier, more equitable, and climate-smart transportation that our region deserves. The policy recommendations provided above, coupled with the direction expressed by our advocacy peers at Verde, 1000 Friends of Oregon and the Street Trust, are necessary paradigmatic changes for any local government interested in not just talking about climate action but actually delivering on it. With heat waves continuing to pose significant health threats to our community and ever growing fires, floods, droughts and storms becoming ubiquitous around the planet, it is beyond time for our regional government to demonstrate bold leadership and make a new plan that does not sentence current and future generations to planetary havoc.

This review of the Regional Transportation Plan also provides an opportunity to remind the local elected officials of the opportunities that await to raise revenue for transportation projects in the 2025 legislative session. By all accounts, legislators are gearing up to propose a substantial investment in new infrastructure - with your leadership and lobbying, we can collectively push legislators to demand prioritization of investment in traffic safety and climate that will allow the best parts of the RTP to not just stay lines on a map but in fact be implemented, executed and built. No More Freeways and our robust membership are eager to support any local elected officials eager to collaborate on efforts to ensure the state invests in the transportation system we deserve.

Climate leaders don't widen freeways. Climate leaders don't keep plans to widen them, either. We hope the Metro Council will demonstrate in action the climate and traffic safety



leadership that they use in rhetoric by adopting these aggressive and necessary changes to the Regional Transportation Plan.