



**Date:** 5 March 2025

**To:** MTIP Comment Record  
TPAC  
JPACT  
Metro Council

**From:** Chris Smith, No More Freeways  
Joe Cortright, No More Freeways

**Subject:** **Objection to Rose Quarter Phase 1 MTIP Amendment**

## **Background**

No More Freeways (NMF) was organized in 2017 to oppose the proposal to double the width of I-5 at Rose Quarter. Our core philosophy is that in an age of obvious impacts of climate change, multibillion dollar investments in freeway capacity are harmful to our community and the planet, divert funding that should be applied to preserving our existing transportation system as well as expansion of more sustainable transportation projects including transit, biking and walking.

NMF is currently pursuing litigation at both the State and Federal level to block the freeway components of the Rose Quarter freeway expansion.

We urge TPAC, JPACT and Metro Council to reject the proposed MTIP amendment bundle for Rose Quarter for the following reasons:

## **Renewing Our Fundamental Objections to the Project**

The Rose Quarter freeway expansion is phenomenally expensive with a price tag of over \$1B per lane mile created. It will impose further impacts in the form of both air toxins and greenhouse gases. Any operational benefits will quickly be erased due to induced demand. ODOT's design for this project, which has been concealed throughout the environmental review process, is to build a roadway that is between 160 feet and 240 feet wide, easily enough to hold ten-lanes of traffic, just by re-striping. The project's Environmental Assessment doesn't analyze or disclose the reasonably foreseeable effects of this traffic on safety and air pollution.



## **Imbalanced Phasing**

NMF acknowledges that components have been added to this project either as “sweeteners” or by hard-won advocacy of organizations like Albina Vision Trust (AVT). These include:

- Significant developable cover areas over the freeway
- A new crossing over I-5 at Hancock, opening up an east-west connection to the Prophet site that AVT proposes to develop
- A bike/ped crossing connecting Clackamas Street on the east to the Moda Center area on the west
- Relocation of the southbound exit ramp to divert a significant volume of traffic away from the northern portion of the cover area proximate to the Prophet site.
- An assortment of multi-modal improvements to local streets.

The proposed Phase 1 does not advance all of these goals equally. It would construct something on the order of 75% of the freeway widening (including the full southbound expansion). It delivers perhaps 10% of the highway covers and little or nothing of the remaining promised improvements. Phase 1 is an unvarnished highway project.

## **Improper Application of Highway Cover Funds**

Phase 1 will consume all of the remaining funds from the \$450M Reconnecting Communities grant, yet produce only a small fraction of the intended highway cover.

It's important to understand that a major cost driver of the Rose Quarter project is demolishing and then rebuilding (with wider clearances for a widened freeway) the structures that support Flint, Vancouver, Broadway and Weidler. This replacement is fundamentally a freeway expense. The incremental expense of covers is to construct caps that are suspended between these structures. Yet a large portion of the Reconnecting Communities dollars will be spent replacing the Broadway and Weidler structures, claiming it's part of the cost of the covers.

This is an inappropriate and unjust use of funds intended to reconnect the Albina community. In addition, expending these funds on expanding the freeway appears to explicitly violate the conditions of the FHWA grant award letter which provides: “Importantly, projects receiving RCN grant funding cannot be used for additional through travel lanes for single-occupant passenger vehicles or highway expansion.”



## **The Uncertainty of the Federal Funding**

The Reconnecting Communities funding is largely (\$420M) not yet obligated and would appear to be squarely in the crosshairs of the criteria for rescission communicated by the Trump administration. Even the Biden Administration flatly turned down the request for an additional \$750 million of funds for this project. It is simply imprudent to commit locally controlled dollars until the financial situation is clear and the new administration has expressed their support and formally obligated federal funds for this project.

## **The Inevitable Cost Overruns**

There is no reason to believe that ODOT can deliver Phase 1 for the \$850M price tag, any more so than they delivered the Abernethy Bridge for the \$300M, \$500M, \$600M estimates they provided (the project is now north of \$800M). When the project does go over budget, the OTC will look to shift funds from other Region 1 projects to make up the difference, just as they have already cancelled or deferred more than \$100M of Region 1 projects to put together the current funding package. What priority projects are prepared to abandon to see Rose Quarter completed?

And this says nothing of the remaining portions of the Rose Quarter project. You should insist on a “cost to complete” report for the balance of the project before moving forward with Phase 1.

## **The Absence of Pricing**

When the Rose Quarter project was added to Portland's TSP, there was an requirement, memorialized in the TSP, that congestion pricing would be put in place for this segment of I-5 before the expanded lanes opened. In addition, the recently adopted Regional Transportation Plan assumes congestion pricing to manage demand. With the cancellation of RMPP there is no apparent prospect to uphold this promise. As a result there will be no tools to limit the induced demand generated by the expansion and there will be a significant shortfall in ODOT revenue which was assumed to come from pricing by the RTP.

It is clear to us that ODOT is desperate to “get shovels in the ground” so they can put the region and state on the hook for whatever it costs to complete this ill-conceived project. We urge you to reject the MTIP amendment bundle.