



Date: November 11, 2024

To: Interstate Bridge Replacement Project

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

Subject: **Comments on IBR SDEIS**

“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 is a member of the Just Crossing Alliance and fully supports the comment letter (attached) submitted by the Alliance.

In addition, No More Freeways feels strongly that the Purpose and Need statement that resulted in the Modified Locally Preferred Alternative and the Supplemental Draft Environmental Impact Statement is out of date and no longer reflects the priorities of today's world. This has been documented in a number of comments submitted by City Observatory and in the Marshall report submitted by the Alliance.

We would particularly call out the inconsistency between IBR's traffic projects and the VMT reduction goals of the Regional Transportation Plan as documented in the City Observatory analysis documented in the attached article from 4 November, 2024 (attached).

We also find the dismissal of an immersed tube tunnel alternative by the project to be shallow and superficial. A tunnel would allow for greatly reduced community impacts in both downtown Vancouver and on Hayden Island. Instead of spending \$100K for a report dismissing a tunnel, we would have preferred spending \$1M to hire engineers who could figure out how to make it work.

The region, and the world, deserve a reconceptualization of this project from the ground up.

We are likely to file additional comments with more detail.



To: Interstate Bridge Replacement Program
From: Just Crossing Alliance
Date: 6 November 2024
Re: Alliance Overview Comment on Draft Supplemental EIS

The Just Crossing Alliance (JCA) comprises 36 environmental, transportation, land use and environmental justice organizations who are seeking the most equitable and sustainable possible outcomes from the IBR project.

While we appreciate the need for seismic resilience in this important interstate connection and are enthusiastic about the opportunity for transit and active transportation connections, we find that this project is not, as advertised, a bridge replacement but rather a five mile freeway widening.

Many JCA member organizations and allies have submitted detailed comments about various aspects of this project. This letter is intended as an overview summary to tie all of these together in five main themes:

- The need for more credible traffic modeling
- Maximizing the potential of active transportation and transit
- A need for stronger pricing policy and tolling equity
- Health impacts
- Right Sizing the project

The need for more credible traffic modeling

In our view the traffic modeling for this project fails on two major points: the no-build traffic is grossly overestimated and the Modified Locally Preferred Alternative (MLPA) traffic is likely

underestimated.

The DSEIS essentially asserts the same demand for person trips in both alternatives and simply reassigns them to different modal and lane configurations.

JCA has commissioned and submitted an independent analysis of IBR traffic modeling by Norman Marshall, president of Smart Mobility, a nationally recognized consultant in the field. The Marshall report makes it clear that the current roadway simply cannot convey the number of auto trips projected in the no-build and also fails to identify bottlenecks south of the project area that will continue to restrict mobility in the corridor.

The existing bridge is already at full capacity during peak periods, traffic cannot grow significantly in the no-build. The CRC made this same forecasting error in the no-build and the historical evidence now makes this clear.

In the MLPA case, the modeling fails to clearly account for how availability of additional capacity impacts travel demand - the phenomenon known as induced demand (some may call it latent demand - either label results in more auto trips). The induced demand effect is well understood by everyone except state DOTs and their consultants. We have submitted numerous articles and papers documenting this.

The DSEIS itself does not mention induced demand, and the Transportation Technical report only analyzes "induced development" based on land use plan changes - and concludes that land use plans already anticipate completion of the project.

We appreciate that both the availability of transit and tolling will suppress auto travel demand to some degree. We hoped for a nuanced discussion of how induced demand due to more lanes (including collector-distributor lanes) would interact with pricing, but since induced demand is ignored we place little faith in the DSEIS analysis. We particularly reject the assertion that a second auxiliary lane would reduce greenhouse gas (GHG) emissions by reducing congestion. There is ample evidence that long term growth in traffic is proportional to increases in lane miles. We are also concerned that the two Transportation Commissions are approaching the project of setting toll rates in a manner centered much more around revenue raising than about demand management.

The DSEIS bottom line is relatively little difference in auto Vehicle Miles Traveled (VMT) between the no-build and MLPA alternates. We believe that because of the reasons outlined above, VMT will be substantially greater in the MLPA case.

Since almost all of the analysis of environmental effects (GHG, other emissions, health and safety impacts) flows from VMT levels, we simply don't accept the DSEIS as an accurate assessment. The only path to an accurate assessment of these effects is a new Supplemental EIS with credible modeling.

Maximizing the potential of transit and active transportation

We are happy to see active transportation and high-capacity transit connections established across the Columbia River but believe the connections fall far short of what could or should be achieved. We are submitting a separate vision document with detailed recommendations, but in summary:

- The Light Rail configuration is sufficient for opening day of the bridge, but should be designed to accommodate the volume and frequency of service that will be required when the bottleneck at the Steel Bridge is eventually addressed with a transit tunnel under the Willamette River and downtown Portland, something we hope will occur before the 2045 horizon year of the DSEIS. Specifically, stations in the IBR project area should be dimensioned to support four-car trains.
- Beyond the horizon year we anticipate the need for higher capacity modes of transit (e.g., multi-lane BRT or heavy rail) to accommodate passenger movement demand. We should be considering now as we design the physical structure of the bridge how these might be put in place later in the service life of the structure.
- The multi-use path must be positioned adjacent to the transit way to allow seamless transfers between modes and to make the transit elevators available to path users. In this configuration transit would also serve to buffer path users from the noise, debris and other impacts of the auto lanes. The path should also be shaded to protect users in the much hotter summer months the DSEIS anticipates.
- Active transportation connections must be extended deeper into the community on both sides of the river, at least as far as Evergreen in downtown Vancouver and connecting to the popular Vancouver/Williams corridor in Portland.

Need for stronger pricing policy and tolling equity

An additional conclusion of the independent Marshall report was that even before constructing an IBR project current travel times could be reduced by a combination of better ramp metering and a corridor-wide pricing plan to manage demand including some form of the Regional Mobility Pricing Project previously proposed for the Oregon section of I-5. Such a policy would bolster transit demand, manage other bottlenecks in the corridor and decrease the need for additional auto lane capacity, helping right-size the project.

JCA has followed the work of ODOT's Equity and Mobility Advisory Committee with great interest. We are disappointed that this committee was disbanded but are strongly in support of its recommendation for a 50% toll discount for low-income households. We are alarmed that the tolling scenarios selected for Level 3 analysis do not assume that such a discount is in place at the inception of pre-completion tolling. Applying this discount from day one is essential to the equity of this project!

Health and Equity impacts

We have been told to anticipate that disappointingly the Health Analysis for the project will not be published until the final week of the comment period. From what we have read in the executive summary it seems clear that most of the results are based on what we view as faulty VMT analysis as discussed above, meaning they are not reliable or useful.

Nonetheless it is apparent that the increase in traffic in either alternative will have negative health consequences for all populations.

Transit benefits will flow disproportionately to white, non-Hispanic residents and the burdens of noise and tolls will be disproportionately borne by low-income and equity priority communities. We must do better.

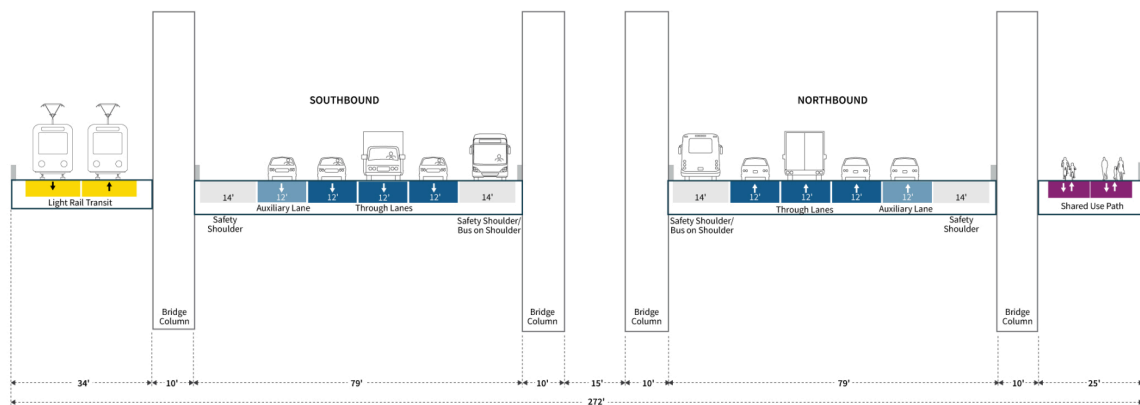
Right-sizing the project

We believe the SDEIS analysis does not provide justification for a second auxiliary lane.

We also continue to believe that this project would be much more appropriate if it were simply a bridge replacement with transit and active transportation connections, rather than a five mile freeway expansion.

makes it clear that forms of high capacity transit represent the most efficient use of space. We acknowledge that when the bridge opens, none of the lanes or modes will function to their highest capacity due to bottlenecks or lack of connectivity elsewhere in the corridor. We are looking past opening day, and even beyond the 2045 DSEIS horizon year to a century or more of operation of this bridge.

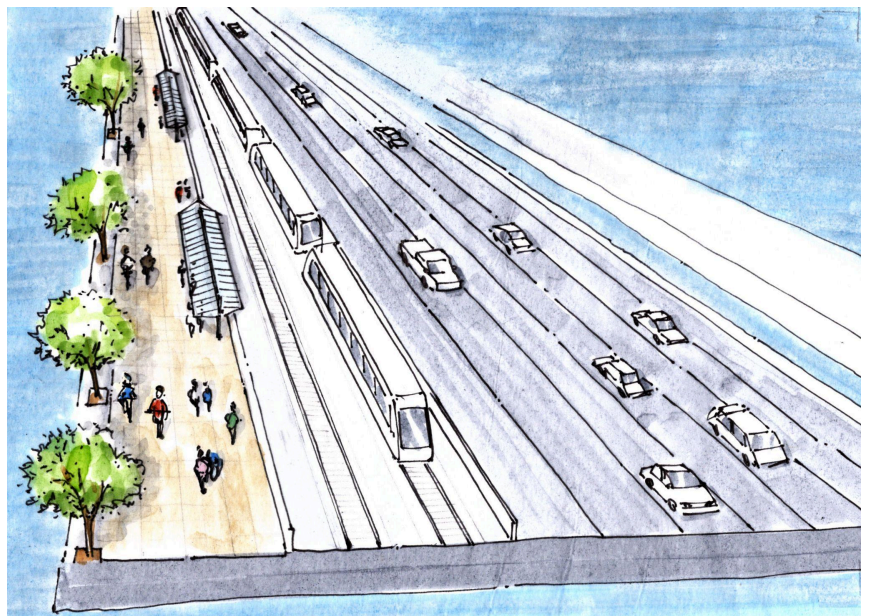
Currently the Modified Locally Preferred Alternative (MLPA), as documented in the diagram below from the DSEIS, allocates 158 feet to motor vehicle capacity, the lowest throughput opportunity, and only 59 feet to transit and active transportation. We don't consider bus-on-shoulder to be an allocation of space, only a borrowing of space from mixed traffic operations.



Ensuring that there are options to reallocate this space to higher throughput uses of transit and active transportation in the future is vital to a responsibly designed project for a climate-resilient future.

Prepare Now for Near Term Light Rail Improvements

The Draft SEIS makes clear that in the immediate future the full potential of Light Rail between Vancouver and Portland cannot be achieved because of the capacity limitations of the Steel Bridge. The Regional Transportation Plan anticipates a future transit tunnel under the Willamette River and downtown Portland. When that happens, **four-car trains will greatly increase transit capacity.** IBR should anticipate that happening within a few decades



and design the four transit stations in the project area to accommodate four-car trains without having to be redesigned and reconstructed.

Consider Now How Transit Capacity Could be Dramatically Increased in the Long Term

When the capacity of Light Rail in the I-5 corridor is maxed out we will need to consider supplementing or replacing it with additional modes like heavy rail or multi-lane BRT. IBR's design should include conceptual approaches for how we would make this fit on the structure we're about to build. Would we have a way to increase the width of the transit way? Or would we convert auto lanes to exclusive bus lanes? Or...? We should be thinking about that now, not in 20 years.

Active Transportation and Transit Should be Partnered, not Separated

The project configuration proposed in the Draft SEIS places active transportation on one edge of the project and transit on the opposite edge of an adjoining structure (or in the two level configuration, underneath separate structures).

We share a view with the Active Transportation Working Group that for numerous reasons, these two modes should be adjacent to each other. Some of these reasons include:

- Users should be able to transition from active transportation to transit or vice versa at any of the transit stations within no more than a few steps (and no grade changes).

- Active transportation users should have elevator access at elevated egress points. Making use of the transit station elevators removes the need for multiple sets of elevators.

- Transit operators and passengers will serve as “eyes on the path” countering a sensation of isolation and increasing the user security and comfort of the multi-use path.

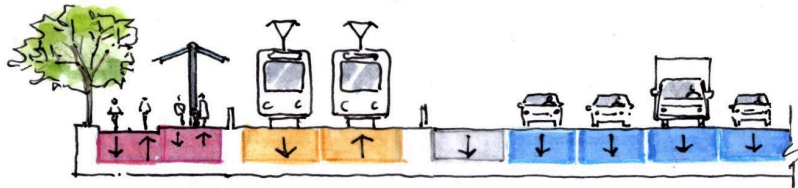


- The multi-use path can serve as emergency egress for the transit way.
- Inclusive design principles should be employed to make sure that the transit and active transportation components are as accessible as possible.

Furthermore, if a single-level configuration is selected, the multi-use path should be on the outside of one of the structures, next to the transit way which will serve as a buffer from noise, vibration and debris from the motor vehicle lanes.

Protect and Connect Active Transportation

The Climate section of the DSEIS makes it clear that ambient temperatures around the bridge will frequently exceed 100°F in summer months. Factoring in heat island effects, this will make the active transportation path unusable **unless the multi-use path is shaded**. Shading with plantings could additionally act as “the lungs of the bridge” helping with air quality.



On the Washington side, the multi-use path stops at the waterfront. This does not match the need and leaves us with a challenging spiral path ascending/descending more than 100 feet. It also puts travelers from northern parts of Vancouver in the challenging position of traveling downhill through the city, then having to gain that elevation back on the ramp system. The Active Transportation Working Group has identified this as “the Vancouver dip.” Instead, the multi-use path should continue north, at least to the “community connector” at Evergreen and most appropriately to the northern extent of the project area.

On the Oregon side, while the connection to the Kenton neighborhood appears reasonably robust, the connections to the MLK corridor area will leave active transportation users in no-man’s land. Securing a complete, safe and comfortable connection to the popular Vancouver/Williams corridor is a priority. The Active Transportation Working Group has also identified a lack of connections to the 40-mile loop and we look forward to additional detailed connectivity suggestions in their comments.

Review of Interstate Bridge Replacement Project
Draft Supplemental Environmental Impact Statement (“DSEIS”)

Prepared by Norman Marshall, President Smart Mobility, Inc.

October 2024



Executive Summary

I have reviewed the Interstate Bridge Replacement Project Draft Supplemental Environmental Impact Statement (“DSEIS”). I make the following findings:

- 1) Analysis of existing traffic data clearly shows that the Interstate Bridge is not the I-5 bottleneck. Rather, I-5 has two separate bottlenecks, at N. Lombard for a.m. (southbound) traffic and at N. Victory Boulevard for p.m. (northbound) traffic.
 - a. In the morning peak period, southbound bridge congestion is caused by traffic spillback from significantly more congested I-5 segments to the south centered on N. Lombard.
 - b. In the afternoon peak period, extreme I-5 northbound congestion south of N. Marine Drive, centered at Victory Boulevard causes the bridge to operate in an intermediate queue discharge condition as traffic flow begins to return to normal flow conditions that are achieved just north of the bridge.
- 2) Widening the bridge would do nothing to improve I-5 congestion and could make it worse, because expanded bridge capacity will funnel even more traffic into the actual, unresolved bottlenecks.
- 3) The DSEIS relies on invalid traffic forecast metrics derived from a series of two classes of traffic models:
 - a. The regional model grossly exaggerates future traffic growth because it uses an outdated “static traffic assignment” methodology that ignores the metering effects of sequential bottlenecks.
 - b. The more detailed VISSIM microsimulation operations models used to create “heat maps” of congestion rely directly on exaggerated forecasts from the regional model and translate them into unrealistic travel speed and travel time estimates, i.e. “garbage in – garbage out.”
- 4) The DSEIS modeling is useless for understanding future traffic conditions because it overstates future traffic growth and fails to account for capacity limitations.
- 5) Transit investments could help address I-5 congestion, but the SDEIS models are not reliable in evaluating transit alternatives.
- 6) The I-5 corridor could carry much higher vehicle throughput at much higher speeds without widening if oversaturated flow could be prevented through more effective ramp metering and/or tolling. Existing I-5 ramp meters are poorly calibrated and do nothing to prevent the regular “hyper-congestion” that causes slow speeds and low traffic throughput on I-5.
- 7) The existing ramp metering system should be audited to determine why it is functioning so poorly, and operations should be improved. Better ramp timing could improve freeway traffic flow and reduce waiting lines at ramp signals, producing a win-win at low cost.
- 8) Implementing system-wide tolling on I-5 would actually would address the I-5 congestion that the IBR project falsely claims to address. ODOT’s Regional Mobility Pricing Project analysis (September 11, 2023) found that system-wide tolling would improve speeds, and increase throughput.

Smart Mobility, Inc.

Smart Mobility is a consulting firm based in Thetford Center, Vermont founded in 2001 that offers advanced transportation modeling and planning services. We have worked on significant modeling projects throughout the United States including being the prime contractor with a \$250,000 project with the California Air Resources Board to review advanced travel demand models and land use models.

Norman Marshall, President, specializes in analyzing the relationships between the built environment and travel behavior and doing planning that coordinates multi-modal transportation with land use and community needs. He has managed transportation projects in over 30 U.S. states including projects for the U.S. government, state transportation departments, Metropolitan Planning Organizations, cities, and public interest groups. Areas where Mr. Marshall's travel demand modeling expertise is nationally recognized include Dynamic Traffic Assignment ("DTA") accounting for induced travel, and modeling non-motorized trips.

Mr. Marshall has presented his innovative modeling work at many national conferences, including the Transportation Research Board's Planning Applications conferences in Portland (2019) and Raleigh (2017) and the Transportation Research Board's Tools of the Trade Conference for Transportation Planning in Small and Medium-Sized Communities in Kansas City (2018).

The DSEIS Traffic Analysis Misrepresents Present Traffic Conditions

When stuck in traffic, it is natural to think that the traffic throughput is very high. However, that is not the case. The *Highway Capacity Manual* (“HCM”) describes three different operations regimes. The highest speed and the highest throughput are achieved together in undersaturated flow conditions. In *oversaturated* (congested) conditions, both speed and traffic throughput are significantly lower. The third regime, *queue discharge flow*, is a transitional stage when traffic flow gradually returns from oversaturated to undersaturated flow conditions. The HCM descriptions of the three traffic flow regimes are:

- 1) Undersaturated Flow – Traffic flow during an analysis period (e.g. 15 min) is specified as undersaturated when the following conditions are satisfied: (1) the arrival flow rate is lower than the capacity of a point or segment, (b) no residual queue remains from a prior breakdown of the facility, and (c) traffic flow is unaffected by downstream conditions.

Uninterrupted-flow facilities operating in a state of undersaturated flow will typically have travel speeds within 10% to 20% of the facility’s free-flow speed, even at high flow rates, under base conditions (e.g., level grades, standard lane widths, good weather, no incidents). Furthermore, no queues would be expected to develop on the facility.

- 2) Oversaturated Flow – Traffic flow during an analysis period is characterized as *oversaturated* when any of the following conditions is satisfied: (a) the arrival flow rate exceeds the capacity of a point or segment, (b) a queue created from a prior breakdown of a facility has not yet dissipated, or (c) traffic flow is affected by downstream conditions.

On uninterrupted-flow facilities, oversaturated conditions result from a bottleneck on the facility. During periods of oversaturation, queues form and extend backward from the bottleneck point. Traffic speeds and flows drop significantly as a result of turbulence, and they can vary considerably, depending on the severity of the bottleneck. . . On freeways, vehicles move slowly through a queue, with periods of stopping and movement. Even after the demand at the back of the queue drops, some time is required for the queue to dissipate because vehicles discharge from the queue at a slower rate than they do under free-flow conditions. Oversaturated conditions persist within the queue until the queue dissipates completely after a period of time during which demand flows are less than the capacity of the bottleneck.

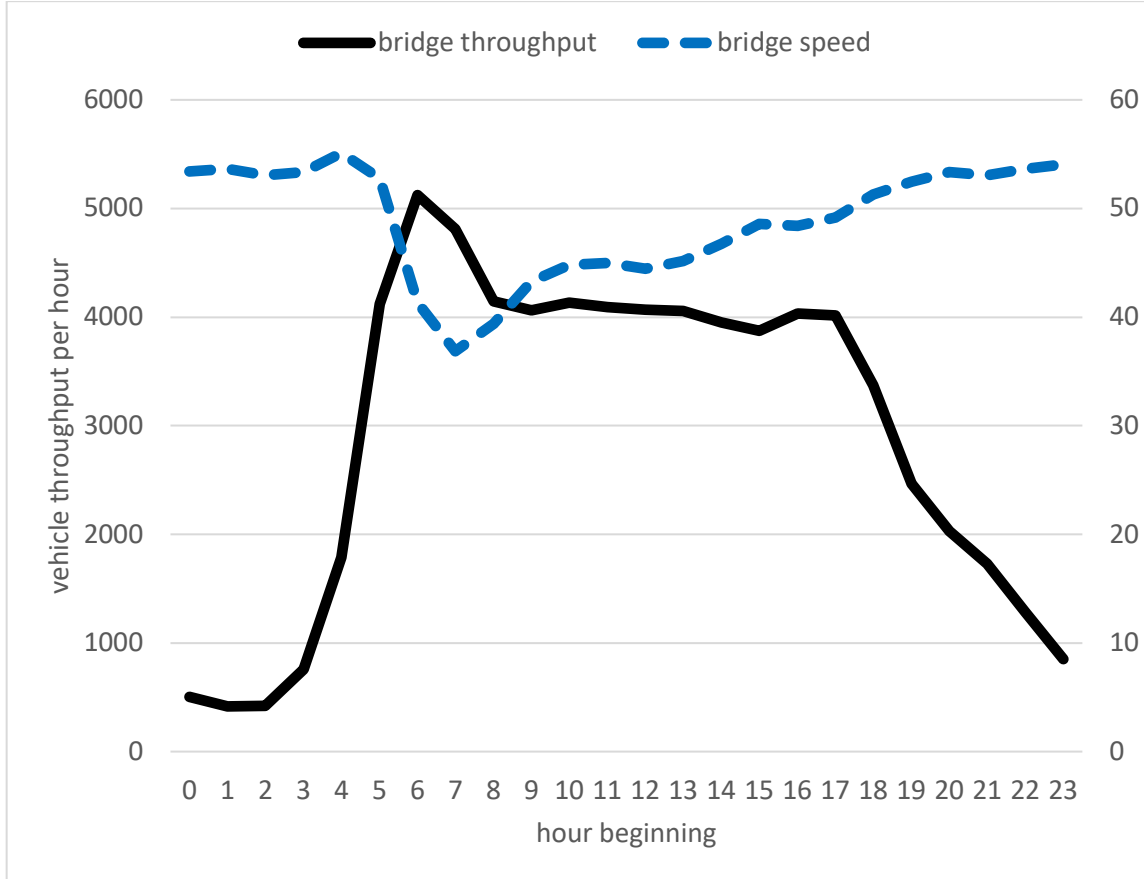
- 3) Queue Discharge Flow – Queue discharge flow represents traffic flow that has just passed through a bottleneck and, in the absence of another bottleneck downstream, is accelerating back to the facility’s free-flow speed. Queue discharge flow is characterized by relatively stable flow as long as the effects of another bottleneck downstream are not present.

On freeways, this flow type is typically characterized by speeds ranging from 35 mi/h up to the free-flow speed of the freeway segment. Lower speeds are typically observed just downstream of the bottleneck. Depending on horizontal and vertical alignments, queue discharge flow usually accelerates back to the facility’s free-flow speed within 0.5 to 1 mi. downstream of the

bottleneck. The queue discharge flow rate from the bottleneck is lower than the maximum flows observed before the breakdown.¹

Understanding I-5 traffic congestion requires understanding the three traffic flow regimes. Figure 1 shows average non-holiday weekday hourly vehicle throughput and speed for the southbound bridge based on data from all 2023 non-holiday weekdays.

Figure 1: 2023 Southbound Average Non-Holiday Weekday Hourly Bridge Vehicle Throughput and Speed²



The time periods for the different traffic flow regimes are:

- Undersaturated flow – 6 p.m. – 5 a.m. (hours beginning 0-4 and 18-23)
- Saturated flow – 5 a.m. – 5 p.m. (hours beginning 5-16)
- Queue discharge flow – 5 p.m. – 6 p.m. (hour beginning 17)

¹ Transportation Research Board. Highway Capacity Manual, 7th Edition, 2022, p. 2-14 – 2-15.

² Vehicle throughput from ODOT automatic traffic recorder; speed from Regional Integrated Transportation Information System (RITIS).

Note that these the traffic patterns in these periods match the descriptions in the HCM.

- Undersaturated flow – Throughput is higher at the end of the undersaturated flow period (hours 6 and 7) than at any other time of the day
- Saturated flow – as the HCM states: “Traffic speeds and flows drop significantly.”
- Queue discharge flow –. as HCM states: The queue discharge flow rate from the bottleneck is lower than the maximum flows observed before the breakdown.”

The key planning question is: what is the cause of the “breakdown” to oversaturated flow conditions?

The HCM identifies three possibilities:

- a) the arrival flow rate exceeds the capacity of a point or segment,
- b) a queue created from a prior breakdown of a facility has not yet dissipated, or
- c) traffic flow is affected by downstream conditions.

Capacity (a) is not the issue here. This question is addressed in more detail in a subsequent section. Prior breakdown (b) relates primarily to incidents including crashes, and these would have only a minor affect on the annual averages. Southbound morning congested (saturated flow) conditions result from downstream bottleneck conditions.

Figure 2 shows that I-5 southbound downstream of the bridge is much more congested than the bridge during the peak morning hours. The slowest a.m. Southbound speeds are reported from N. Victory Boulevard to N. Lombard, areas well south of the Interstate Bridge.

Figure 2: 2023 Non-Holiday Weekday Average Southbound Speed – 7-8 a.m. and 8-9 a.m. -
The Bottleneck is North of North Lombard Street



In Figure 2, the slowest speed/most congested segment is the 19 mph section shown in purple in the 8-9 a.m. hour which is north of North Lombard Street. Figure 3 adds the speeds for this bottleneck section to the data included in Figure 1.

Figure 3: 2023 Southbound Average Non-Holiday Weekday Hourly Bridge Vehicle Throughput and Speed at Bottleneck North of North Lombard St.³

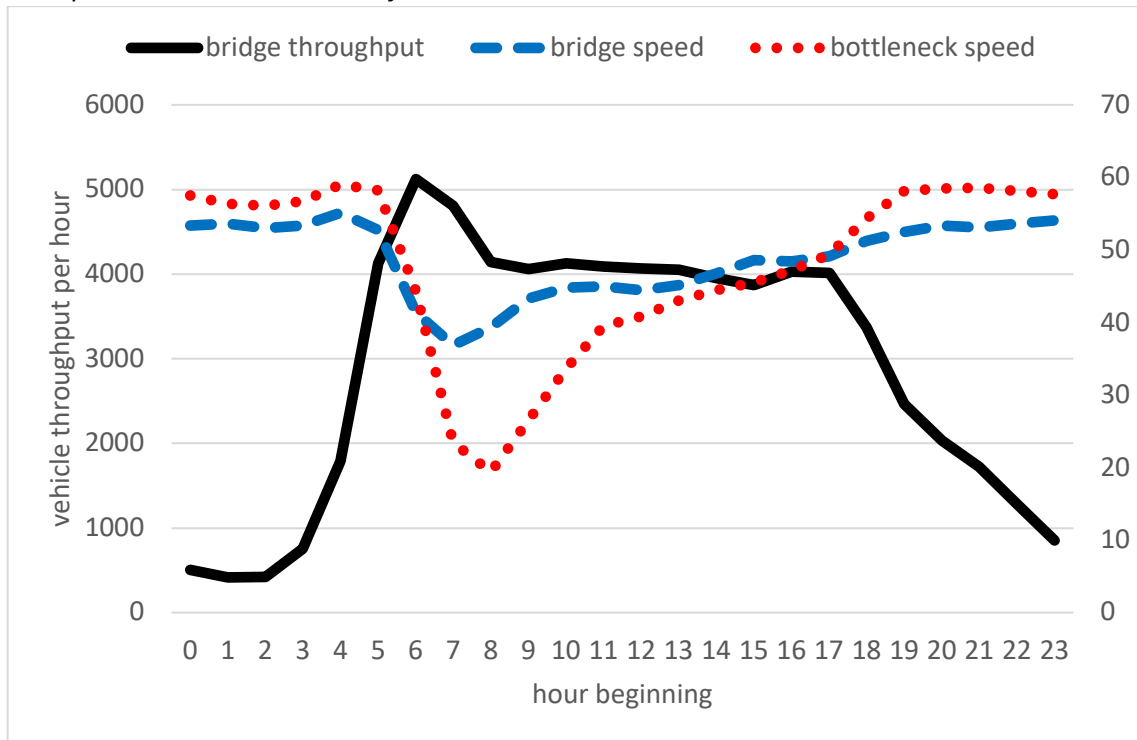


Figure 3 shows the same diurnal pattern of traffic flow regimes at the bottleneck location as on the bridge:

- Undersaturated flow – 6 p.m. – 5 a.m. (hours beginning 0-4 and 18-23)
- Saturated flow – 5 a.m. – 5 p.m. (hours beginning 5-16)
- Queue discharge flow – 5 p.m. – 6 p.m. (hour beginning 17)

However, the speed at the N. Lombard bottleneck is much lower than on the bridge. As is discussed below, this lower speed also indicates lower throughput than on the bridge. This lower throughput represents a temporary capacity constraint that limits upstream I-5 traffic throughput, including the southbound bridge. Reiterating the description in the HCM: “During periods of oversaturation, queues form and extend backward from the bottleneck point.” This is why the southbound bridge is congested in the morning, queues are extending backward from the N. Lombard bottleneck point.

Widening the bridge would not increase either speed or vehicle throughput in the study area because throughput is metered by the downstream bottleneck at N. Lombard.

³ The RITIS data that is the source for the speed data also includes throughput estimates. However, these throughput numbers are estimates based on a sample of vehicle, and are less reliable than the speed data. Therefore, I am only using throughput data from the ODOT and WSDOT automatic traffic recorders.

As shown in Figure 4, p.m. peak northbound congestion in the I-5 corridor is significantly worse than southbound congestion, but the extreme congestion is south of the bridge. The worst segment is near the N. Victory Boulevard exist, just south of N. Marine Drive.

Figure 4: 2023 Non-Holiday Weekday Average Northbound Speed – 3-4 p.m. and 4-5 p.m.

The Bottleneck is near the N. Victory Boulevard exist, just south of N. Marine Drive

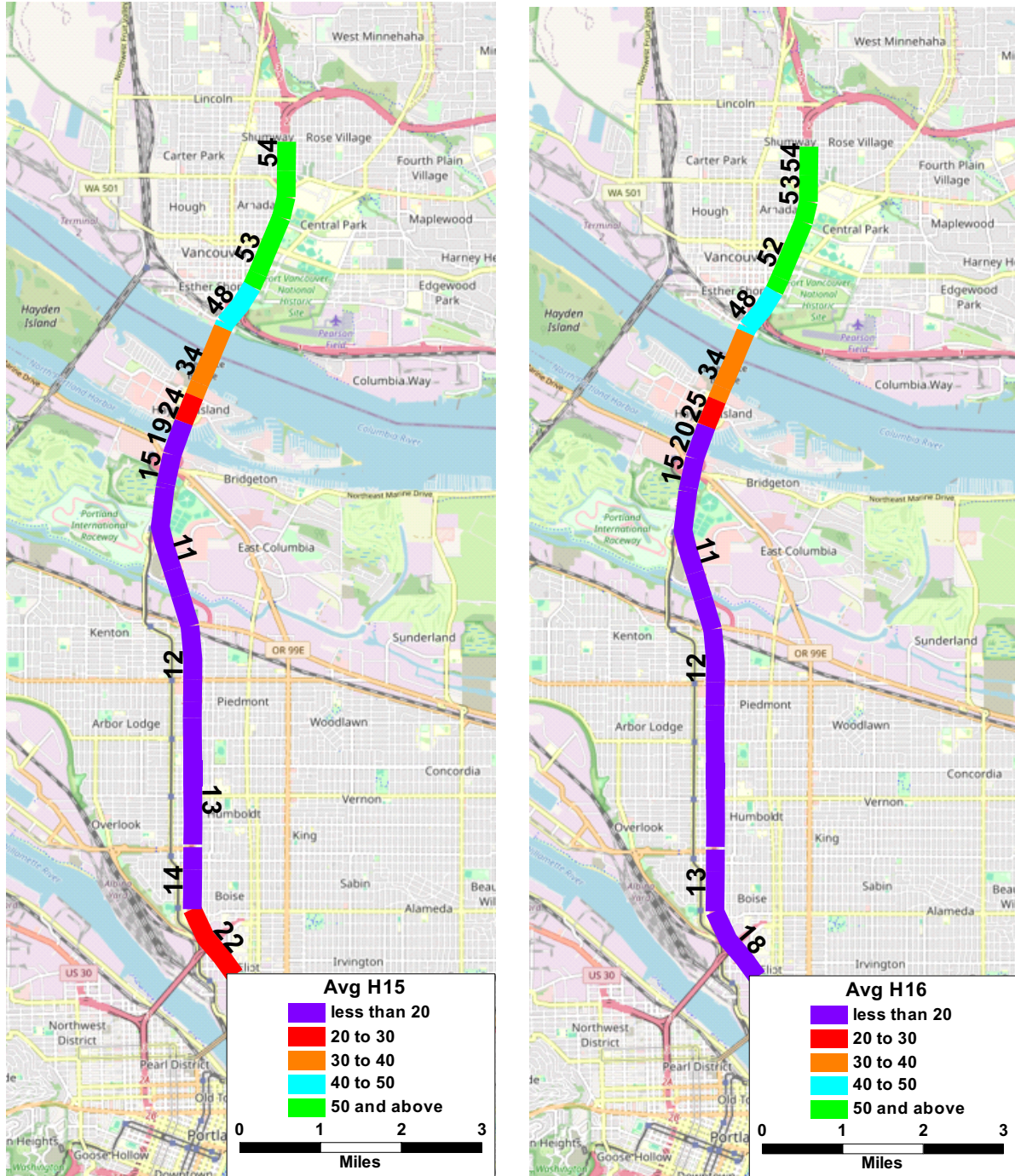
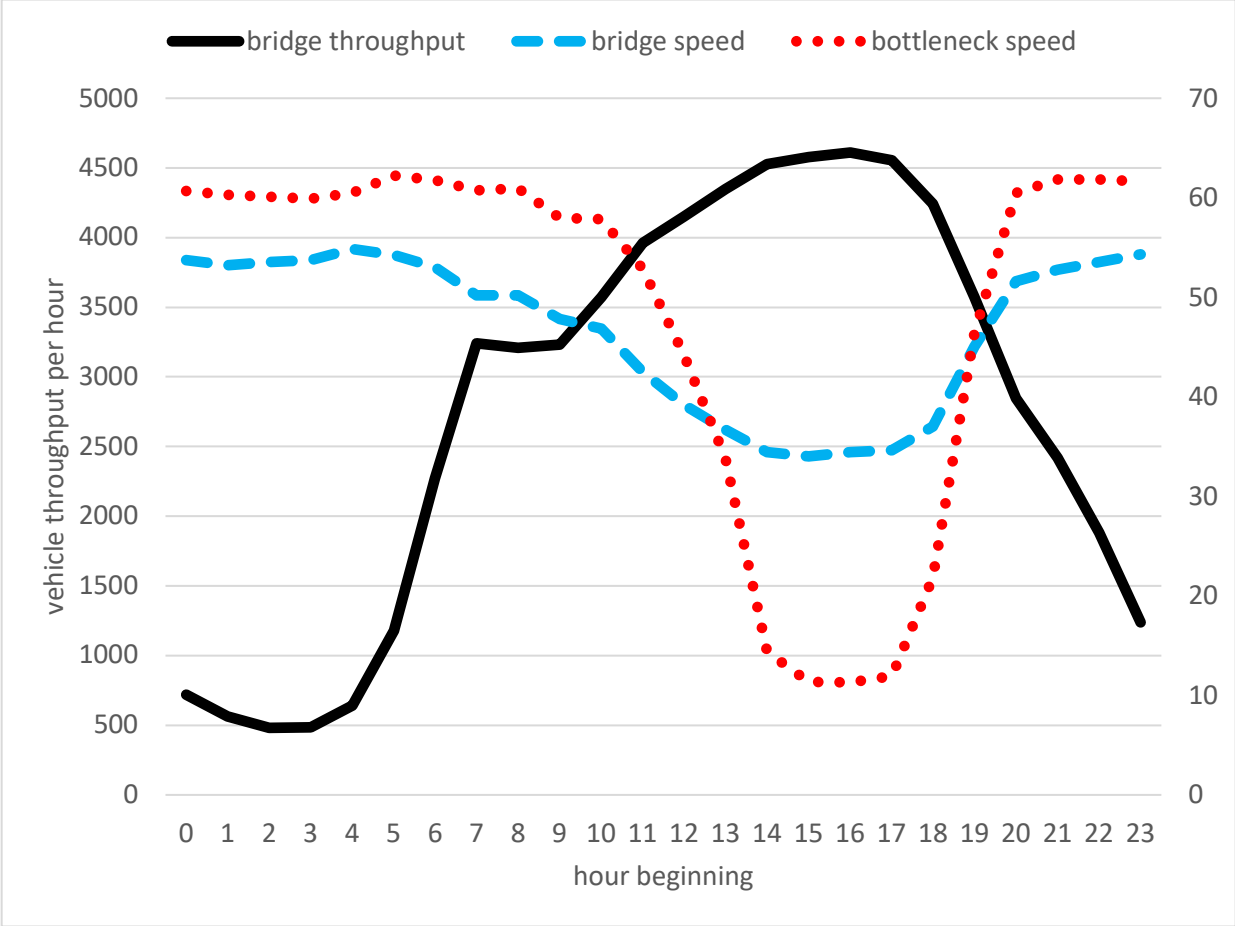


Figure 5 shows average non-holiday weekday hourly vehicle throughput and speed for the northbound bridge and the speed at the bottleneck at N. Victory Boulevard.

Figure 5: 2023 Southbound Average Non-Holiday Weekday Hourly Bridge Vehicle Throughput and Speed and Speed at N. Victory Boulevard Bottleneck



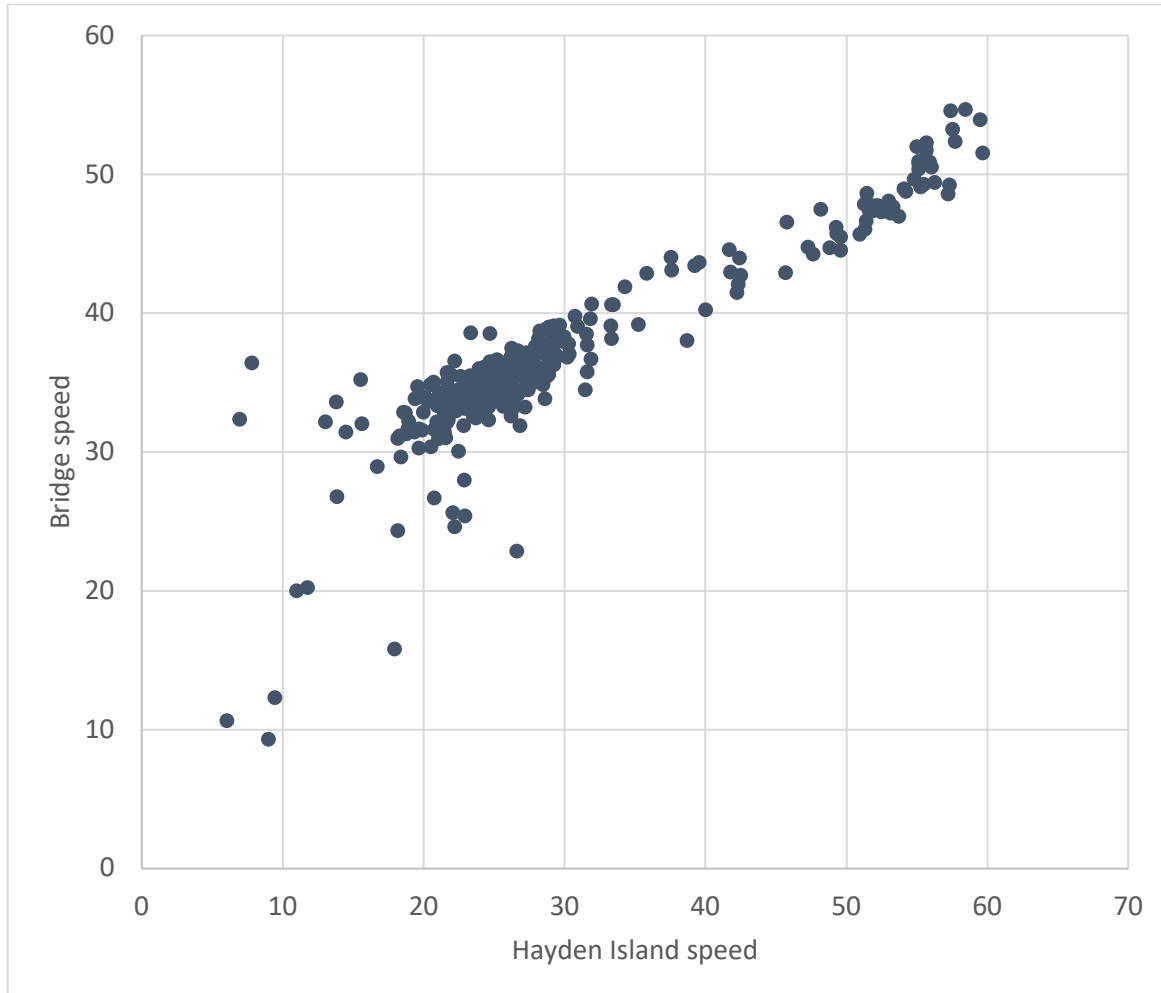
Focused first on the speeds at the N. Victory Boulevard bottleneck, the three traffic flow regimes are clearly visible:

- Undersaturated flow – 8 p.m. – 9 a.m. (hours beginning 0-8 and 20-23)
- Saturated flow – 9 a.m. – 6 p.m. (hours beginning 9-17)
- Queue discharge flow – 6 p.m. – 8 p.m. (hours beginning 18-19)

While the N. Victory Boulevard bottleneck experiences oversaturated flow, the Interstate Bridge does not appear to have significant oversaturated flow periods. Instead, there is a long period of queue discharge flow during which traffic flow recovers from speeds as low as 11 mph at the bottleneck to 34 mph over the approximately one mile distance between the N. Victory Boulevard bottleneck and the bridge, and then to 48 mph just north of the bridge in both the 4-5 p.m. and 5-6 p.m. hours.

The afternoon northbound queue discharge flow regime begins on Hayden Island. Figure 6 graphs data from Hayden Island and the bridge together for individual afternoon peak period hours. It shows the northbound speed on the bridge in the afternoon peak period is about 10 mph faster than the upstream road segment on Hayden Island.

Figure 6: 2023 Non-Holiday Weekday Northbound Bridge Speed vs. Hayden Island Speed – 3-4 p.m.

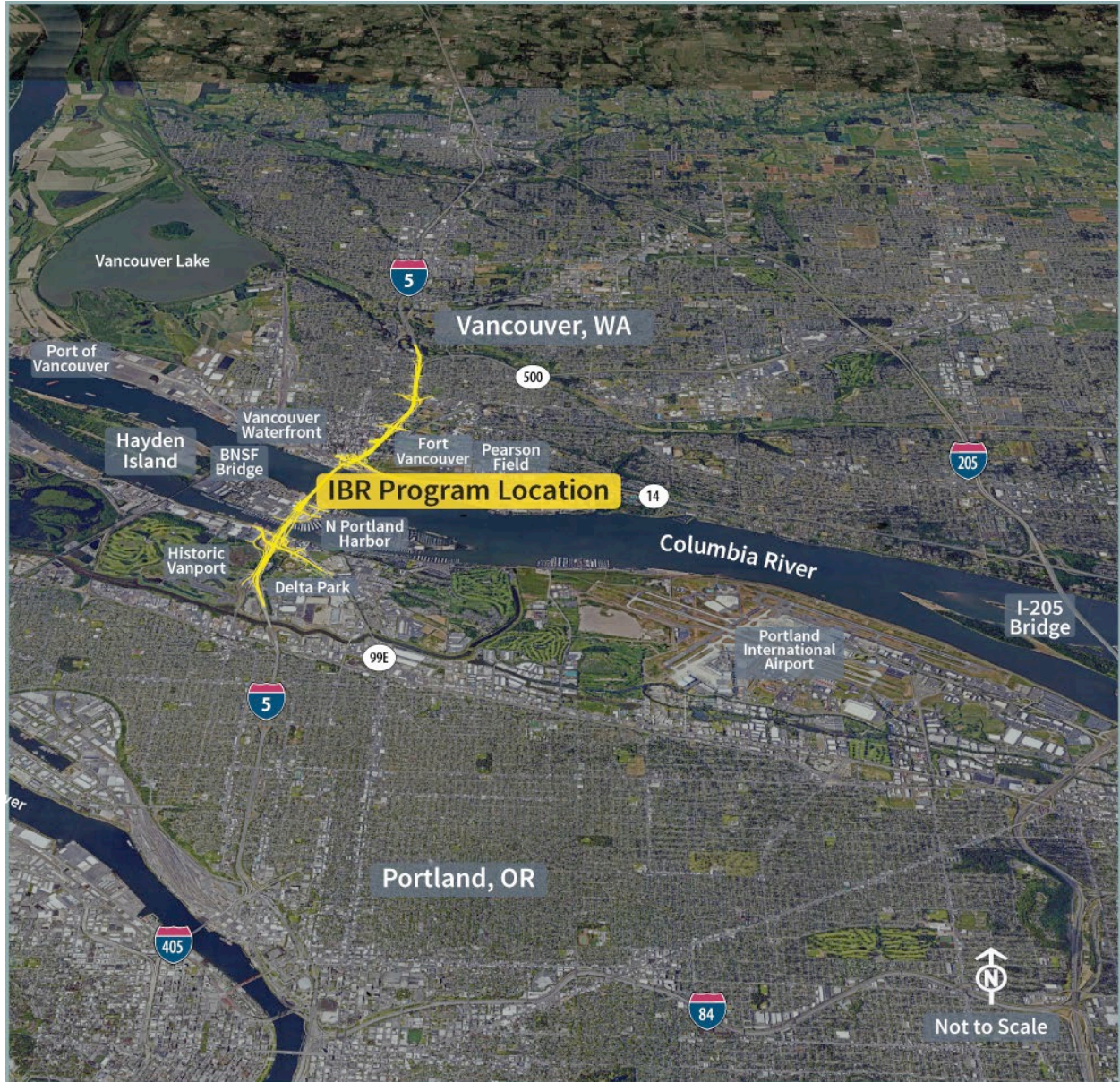


The largest cluster of data points in Figure 6 is for hours where the Hayden Island speed is between 20 mph and 30 mph, and the bridge speed is 10 mph higher, i.e., between 30 mph and 40 mph. The increase in speed on the bridge is even greater than 10 mph because vehicles are accelerating from the slower start on Hayden Island. As shown in Figure 4 above, the average speed on the first Washington segment is 14 mph faster than the average bridge speed. This suggests that the speed increase on the bridge from beginning to end is over 20 mph. The bridge is not the bottleneck; it is the road segment after a series of bottlenecks where better traffic flow resumes. This is consistent with the HCM description of queue discharge flow which states: “queue discharge flow usually accelerates back to the facility’s free-flow speed within 0.5 to 1 mi. downstream of the bottleneck.”

Widening the bridge could speed up this queue discharge process slightly by letting vehicles spread out over more lanes, but it would not increase vehicle throughput because vehicle throughput on the bridge is metered by the upstream bottleneck at N. Victory Boulevard.

The DSEIS takes a myopic view of the project as shown in DSEIS Figure 1-1 reproduced here as Figure 7. This myopic view apparently prevents a full understanding of traffic flow in the larger I-5 corridor.

Figure 7: DSEIS Figure 1-1 Program Vicinity (DSEIS p. 1-2)



Regarding p.m. northbound congestion in the study area, the DSEIS states:

In the northbound direction, the main bottleneck originates at the Interstate Bridge and lasts for 8.75 hours between 11:15 a.m. and 8 p.m. The congestion extends south from the Interstate Bridge and influences traffic flows south of the study area, back to I-405 and I-84. (DSEIS p. 3.1-7)

This is simply wrong. As demonstrated above, the bottleneck does not originate at the Interstate Bridge. It ends about a mile south of the bridge, just past the N. Victory Boulevard bottleneck. Queue discharge flow conditions are present on the bridge due to the extreme upstream congestion, but the queue discharge is mostly completed by the north end of the bridge.

The DSEIS fundamentally misrepresents existing northbound traffic conditions in the I-5 corridor and, in doing so, creates an erroneous “need” for the project.

The DSEIS also misrepresents a.m. southbound congestion when it states:

In the southbound direction, the Interstate Bridge experiences 3 hours of congestion between 6 and 9 a.m. . . The congestion is caused by approaching traffic that is above the bridge’s limited capacity, limited sight distance, substandard shoulders, short merge and diverge locations north and south of the bridge, heavy on-and off-ramp flows north of the river, and heavy truck volumes. (DSEIS p. 3.1-6)

Southbound travel in the study area is also affected by backups from regional bottlenecks such as the I-5/I-405 split in north Portland, which results in 6.5 hours of congestion between 6:30 a.m. and 1 p.m. that can extend north and combine with the Interstate Bridge bottleneck. Another southbound regional bottleneck is at the Rose Quarter, where congestion occurs for 12.5 hours from 7:15 a.m. to 2 7:45 p.m. where I-5 is reduced from three to two travel lanes. (DSEIS p. 3.1-6 – 3.1-7)

The DSEIS acknowledges that southbound congestion is worse south of the study area, with up to 12.5 hours of congestion vs. the 3 hours on congestion on the bridge, but fails to acknowledge that the congestion to the south is the cause of the congestion on the bridge.

The DSEIS fundamentally misrepresents existing southbound traffic conditions in the I-5 corridor and, in doing so, creates an erroneous “need” for the project. Southbound morning congestion on I-5 is not caused by a bottleneck at the Interstate Bridge, but rather by the bottleneck at N. Lombard, which is not addressed by the IBR project.

The DSEIS Traffic Modeling Cannot Represent Existing Traffic Conditions Accurately

The DSEIS Transportation Technical Report (“TTR”) describes a series of two classes of traffic models: Metro’s regional travel demand model (EMME), and operations models (VISSIM, Synchro, SimTraffic). (TTR, p. 441). The regional travel demand model estimates the origins, destinations and volume of vehicle traffic for the entire metropolitan area. The operations models take the estimates of vehicle volumes from the regional Metro model, and use these volumes as inputs to the operations models. The operation model claims (shown as heat maps of travel speeds) depend entirely on the accuracy of the regional travel demand model. The regional travel demand model cannot represent existing traffic conditions described in the section above accurately, and is even less capable of forecasting future traffic conditions accurately. The more detailed operations models can be used to model *existing* traffic conditions, but the operations models rely on erroneous regional model forecasts, and this makes all of the *future* operations modeling invalid.

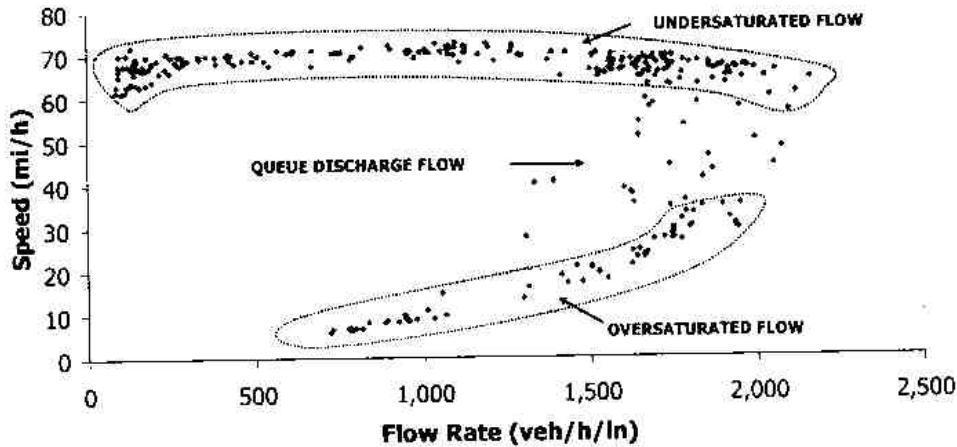
Metro’s regional travel demand model uses a static traffic assignment (“STA”) process. The STA algorithm was standardized in the 1960s and 1970s when computers had less processing power than today’s cellphones. (More accurate Dynamic Traffic Assignment (“DTA”) algorithms are discussed in a later section.) This outdated STA algorithm has two fatal flaws that prevent its outputs being useful for evaluating the DSEIS alternatives:

- 1) STA treats every roadway segment as independent; there is no queueing behind bottlenecks in the model. In the STA model, traffic that backs up on one section of roadway doesn’t affect speed or volumes on other segments of roadway, a plainly unrealistic assumption.
- 2) STA cannot model the three different traffic flow regimes discussed above. At best, it tries to represent some average condition of all three, and this fails to accurately represent any of the traffic flow regimes.

Treating every roadway segment as independent (#1) causes the regional model to exaggerate the benefits of widening individual segments because it assumes that traffic throughput can grow on road segments even where traffic growth is prevented by upstream and downstream bottlenecks.

For each individual roadway segment, STA assumes that higher vehicle throughput translates directly into lower speed (#2). As discussed above, this is wrong. In general, undersaturated flow conditions have high throughput and high speed, and oversaturated flow conditions have low throughput and low speed as shown in Figure 8 reproduced from the HCM.

Figure 8: HCM Exhibit 12-3 Three Types of Flow on a Basic Freeway Segment

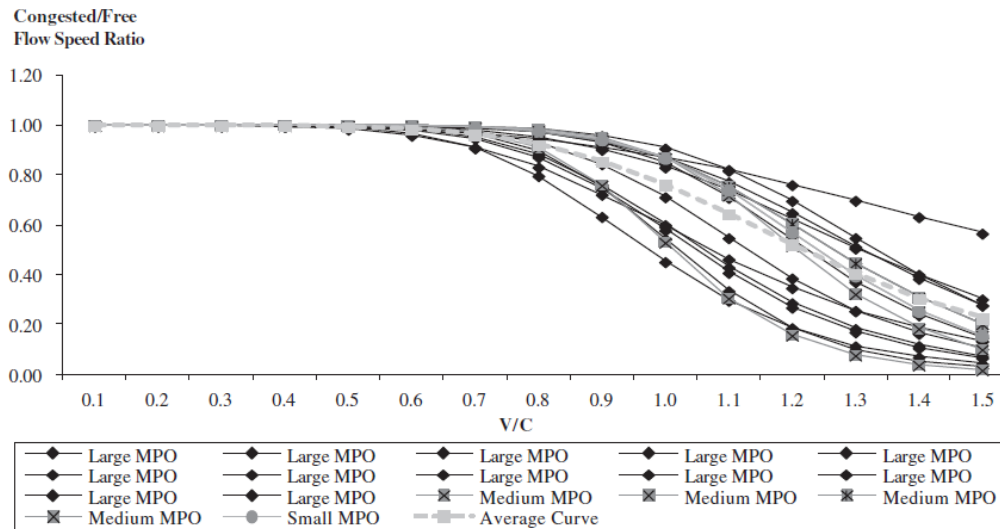


Source: California Department of Transportation, 2008.
 Note: I-405, Los Angeles, California.

Instead of modeling the three traffic flow regimes properly, STA models unrealistically assume that higher vehicle throughput always translates into lower speed. This relationship is expressed in the form of a volume delay function with a “capacity” (most often set to maximum possible throughput), and two or more parameters depending on the mathematical function that is embedded in the model.

The DSEIS does not document the STA parameters in the regional model volume delay functions. Figure 9 below shows representative volume-delay functions from a set of regional models reproduced from a modeling reference.

Figure 9: Freeway Congested/Free-Flow Speed Ratios Based on BPR Functions⁴



Source: MPO Documentation Database.

Figure 4.6. Freeway congested/free-flow speed ratios based on BPR functions.

⁴ Cambridge Systematics et. al. Travel Demand Forecasting Parameters and Techniques, National Demand Cooperative Highway Research Program (NCHRP) Report 716, 2012, p 76..

What is most striking about the functions graphed in Figure 9 is how varied they are. Some of the functions assume that traffic will continue to move swiftly when volumes reach 150% of capacity, i.e. one and a half times the theoretical maximum volume. Others predict a steeper decline in speed as a result of increased traffic volume. If there was a true simple relationship between volume and speed, the functions would be more similar. Different regions apply widely different functions because none of them work across all three traffic regimes, and some regions stress one regime or another in the function applied. The less steep functions do a fair job of representing undersaturated flow conditions, but fail badly in representing oversaturated flow conditions – predicting high speeds at impossibly high vehicle throughput. The steeper functions attempt to prevent impossibly-high throughput but underestimate speeds for most undersaturated traffic flow conditions (and exaggerate calculated “vehicle hours of delay”) while still being unable to represent the lower speeds associated with oversaturated flow conditions

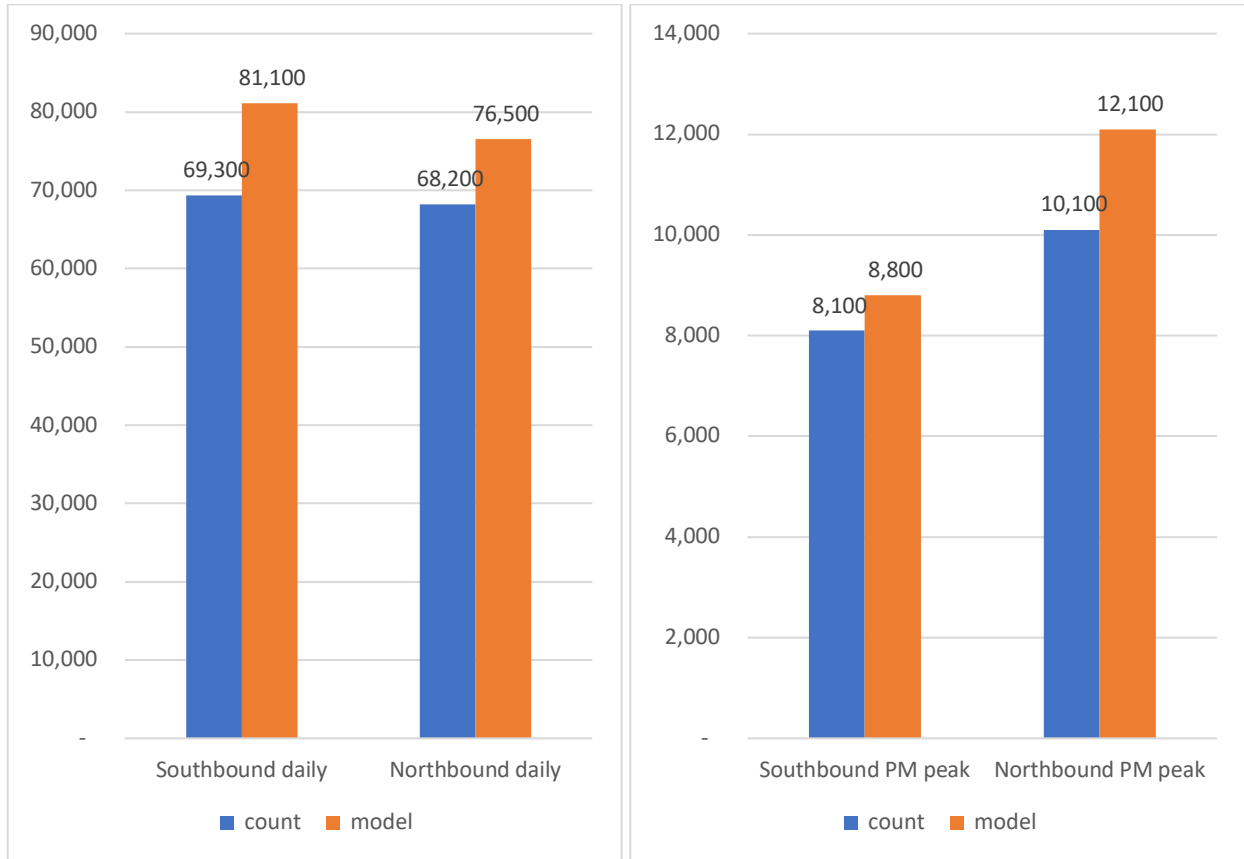
STA models generally routinely overestimate future traffic growth on congested urban freeways because they fail to constrain modeled vehicle throughput to realistic levels. In my peer-reviewed journal article: *Forecasting the impossible: The status quo of estimating traffic flows with static traffic assignment and the future of dynamic traffic assignment*⁵, I document these problems and demonstrate that replacing STA with Dynamic Traffic Assignment (“DTA”) addresses the STA problems described above, i.e.,

- 1) DTA models queueing behind bottlenecks in the model, and
- 2) DTA models all three traffic flow regimes.

In the DSEIS, the STA model overestimates bridge traffic volumes significantly, even in the model base year, 2015 as shown in Figure 10. The model used to predict future traffic cannot even accurately predict current traffic levels.

⁵ <https://www.sciencedirect.com/science/article/pii/S2210539517301232?via%3Dihub>

Figure 10: 2015 Regional Model Bridge Traffic Volume Errors (from TTR p. 616)



The errors reported in the DSEIS are:

- Daily southbound +17%
- Daily northbound +12%
- PM peak southbound 9%
- PM peak northbound 19%

The model performs worst in the afternoon peak period northbound, the most congested time/direction. This suggests that higher congestion results in poorer model fit. The model cannot properly account for congested conditions and therefore, is useless for evaluating DSEIS alternatives.

STA's problems with over-assigning traffic volumes in congested conditions and the DTA solution to are well known to ODOT and Metro. In 2019, I co-lead a DTA Development and Application Workshop with Peter Bosa of Metro at the Transportation Research Board's Planning Applications Conference held in Portland. A DTA model was used in ODOT's I-205 Toll Project Environmental Assessment. In that project, the *Modeling Methodology and Assumptions for Environmental Assessment* (February 2023) states:

In comparison to a static model, a DTA model will generate traffic and speed estimates that more closely align with observed traffic during congested times. Table 2 shows how the DTA model improves the match of modeled results with observed peak period volumes along I-205. The results show that the subarea DTA model estimates more closely align with observed volumes at these locations, and that the RTDM [Metro's

regional travel demand model] tends to over-assign volumes along I-205 during the peak periods.

As shown in Figure 11 which reproduces Table 2 from the I-205 report, Metro’s STA model over-predicted traffic on every segment analyzed in both the morning and afternoon peak periods and in both directions, with the errors being as great as 37%. Substituting the DTA model reduced the individual errors to no greater than 7% and provided a much more valid basis for analyzing the I-205 project than if the Metro STA regional model had been relied on.

Figure 11: Table 2 from I-205 Toll Project Modeling Methodology and Assumptions for EA

Table 2. RTDM and DTA Model Peak Period Base Year Volumes on I-205 Compared to Observed Volumes

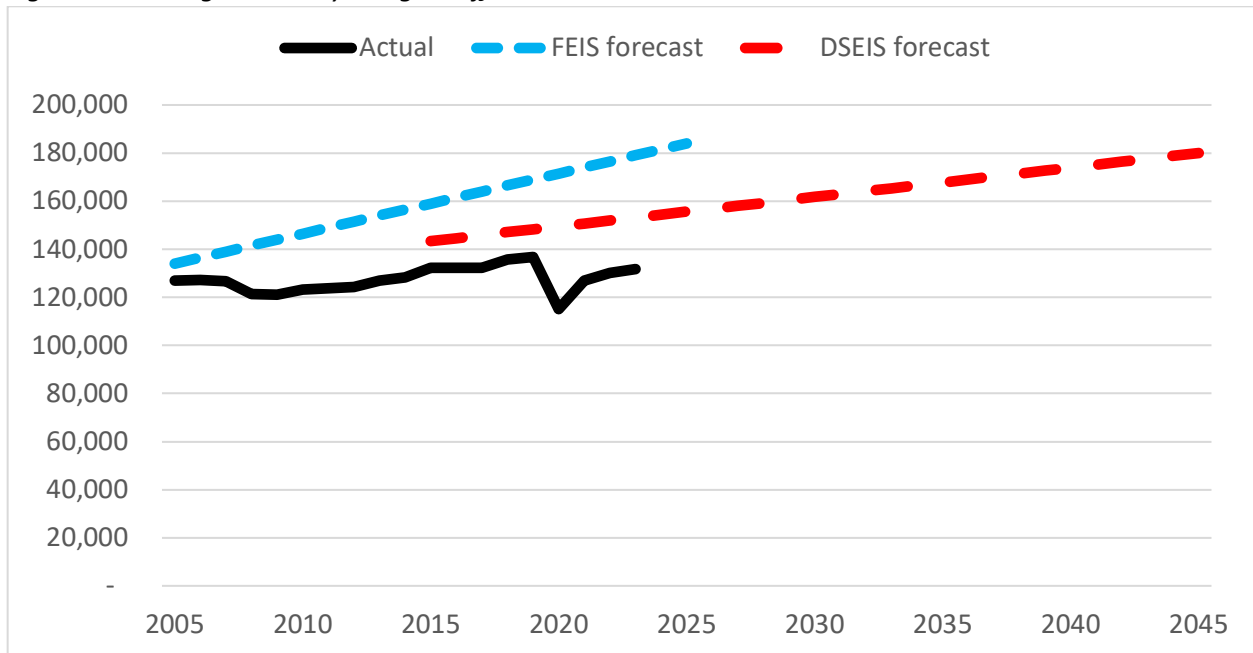
RTDM Results	Bi-Directional				Northbound				Southbound			
	2015 2-Hr Peak RTDM Volumes	2015 2-Hr Peak Counts	Difference RTDM - Counts	% Δ from Counts	2015 2-Hr Peak RTDM Volumes	2015 2-Hr Peak Counts	Difference RTDM - Counts	% Δ from Counts	2015 2-Hr Peak RTDM Volumes	2015 2-Hr Peak Counts	Difference RTDM - Counts	% Δ from Counts
AM Peak Period - 7-9 AM												
I-205 Mainline												
Between I-5 and Stafford Rd	13,327	11,931	1,396	12%	5,728	5,500	229	4%	7,599	6,431	1,167	18%
Abernethy Bridge	17,547	14,713	2,834	19%	8,607	7,455	1,152	15%	8,940	7,258	1,682	23%
Between OR 213 and SE 82nd Dr	22,441	18,744	3,697	20%	12,011	11,148	863	8%	10,430	7,596	2,834	37%
Group Summary:	53,315	45,388	7,927	17%	26,346	24,103	2,243	9%	26,969	21,285	5,683	27%
PM Peak Period - 4-6 PM												
I-205 Mainline												
Between I-5 and Stafford Rd	13,474	11,918	1,557	13%	7,193	5,984	1,209	20%	6,282	5,934	348	6%
Abernethy Bridge	18,310	14,976	3,334	22%	9,315	7,671	1,644	21%	8,995	7,305	1,690	23%
Between OR 213 and SE 82nd Dr	22,987	21,858	1,129	5%	10,836	10,468	368	4%	12,151	11,390	761	7%
Group Summary:	54,771	48,752	6,020	12%	27,344	24,123	3,221	13%	27,428	24,629	2,799	11%
DTA Model Results												
	Bi-Directional				Northbound				Southbound			
	2015 2-Hr Peak DTA Volumes	2015 2-Hr Peak Counts	Difference DTA - Counts	% Δ from Counts	2015 2-Hr Peak DTA Volumes	2015 2-Hr Peak Counts	Difference DTA - Counts	% Δ from Counts	2015 2-Hr Peak DTA Volumes	2015 2-Hr Peak Counts	Difference DTA - Counts	% Δ from Counts
AM Peak Period - 7-9 AM												
I-205 Mainline												
Between I-5 and Stafford Rd	12,931	12,248	683	6%	5,957	5,591	366	7%	6,974	6,657	317	5%
Abernethy Bridge	15,517	14,713	804	5%	8,009	7,455	554	7%	7,508	7,258	250	3%
Between OR 213 and SE 82nd Dr	19,148	18,744	404	2%	11,438	11,148	290	3%	7,710	7,596	114	2%
Group Summary:	47,596	45,705	1,891	4%	25,404	24,194	1,210	5%	22,192	21,511	681	3%
PM Peak Period - 4-6												
I-205 Mainline												
Between I-5 and Stafford Rd	11,321	11,792	-471	-4%	5,269	5,872	-603	-10%	6,052	5,920	132	2%
Abernethy Bridge	15,440	14,976	464	3%	8,167	7,671	496	6%	7,273	7,305	-32	0%
Between OR 213 and SE 82nd Dr	21,355	21,858	-503	-2%	10,510	10,468	42	0%	10,845	11,390	-545	-5%
Group Summary:	48,116	48,626	-510	-1%	23,946	24,011	-65	0%	24,170	24,615	-445	-2%

Even more importantly, the DTA model much more realistically constrains future traffic growth to capacity relative to the regional model. A DTA model should have replaced the STA model in the IBR DSEIS alternatives analyses.

Without true capacity constraint, the STA model relied on in the DSEIS forecasts ridiculously high traffic in the 2045 forecast year. The DSEIS claims that Average Weekday Daily Traffic (AWDT) on the I-5 and I-205 bridges will grow by 28% from 313,000 in 2015 to 400,000 in 2045 in the No Build alternative. (DSEIS, Table 3.11, p. 3.21 and many other instances). This is absurd and repeating it doesn’t make it any more plausible.

There has been no traffic growth on the I-5 bridge over the past 20 years, and traffic forecasts have been consistently wrong. Figure 12 shows the Columbia River Crossing FEIS (2011) and IBR DSEIS (2024) forecasts along with the actual average weekday daily traffic volume.

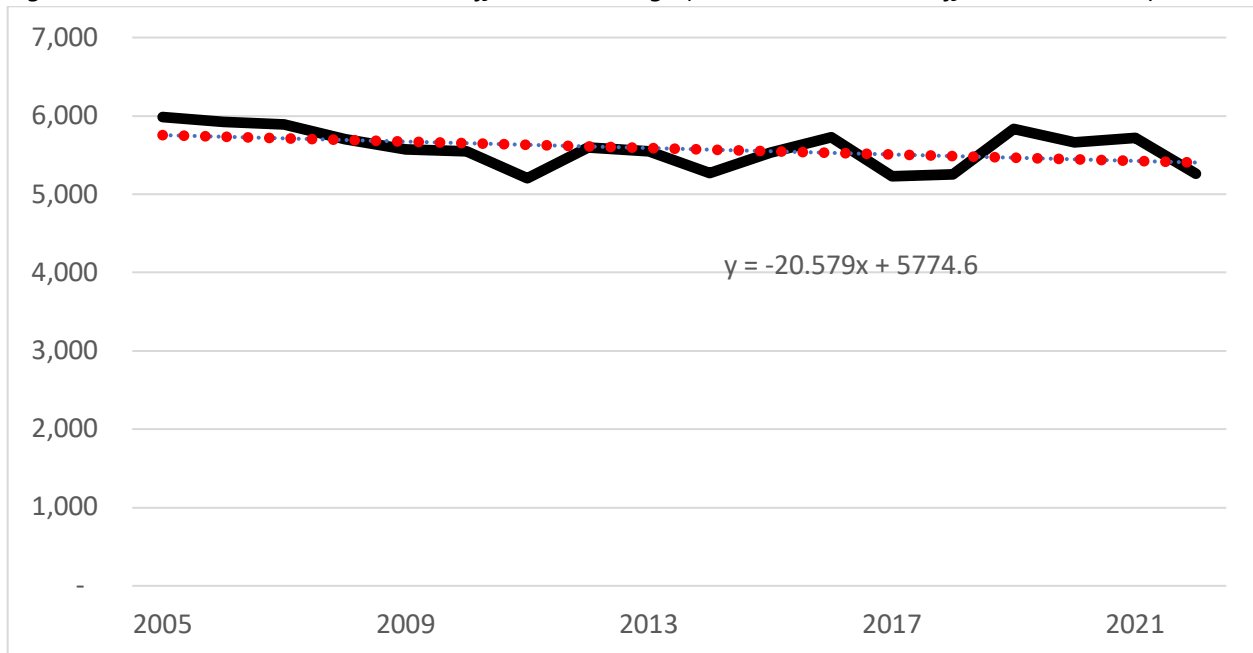
Figure 12: Average Weekday Bridge Traffic and FEIS and DSEIS Forecasts



Note that the FEIS forecast (finalized in 2011) also forecast 180,000 vehicles per day on the bridge in the horizon year – but that forecast said that the 180,000 vehicles total would be achieved by now – not 20 years from now. The STA model always will show this sort of traffic growth over the next 20 years – no matter what the base model year is. This is evidence that the STA model is wrong.

Daily traffic is illustrative of the flaws in the STA model but is not a critical metric for traffic analysis. What is important is peak period – peak direction traffic. Using the values given by ODOT for DHV-30 (the 30th highest hour of the year) and D% (directional split for DHV-30), there has been no growth in peak hour-peak direction traffic since 2005.

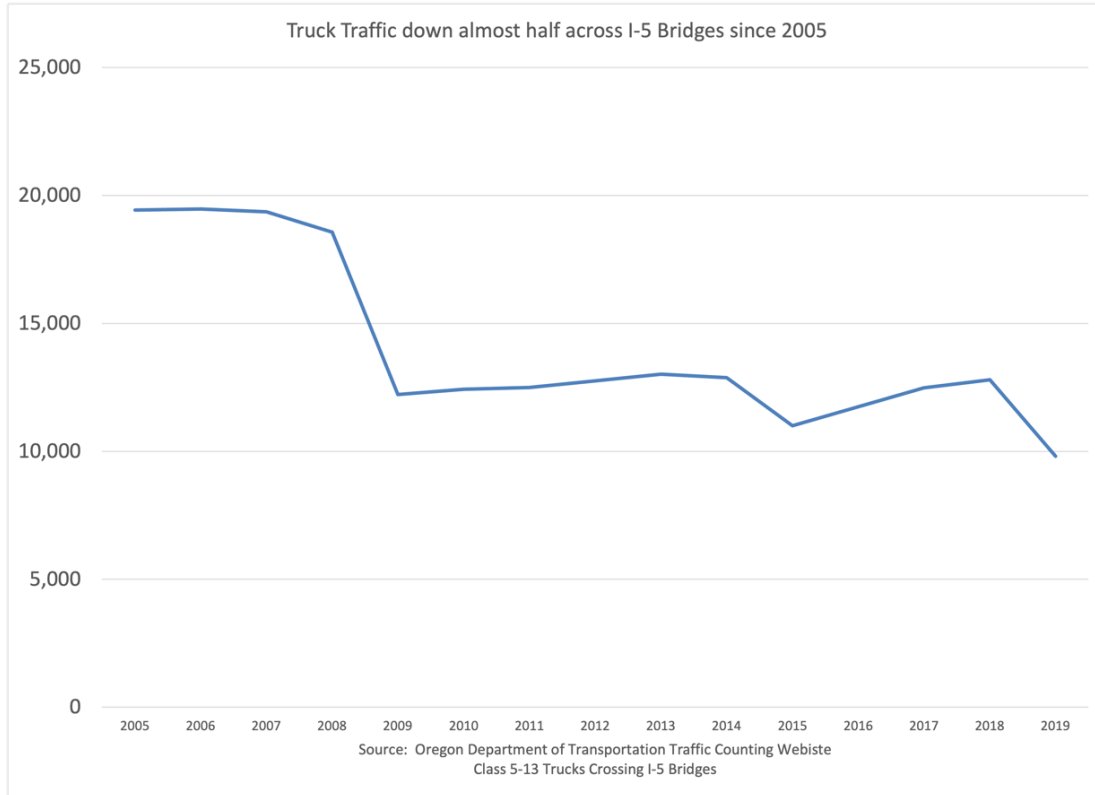
Figure 13: Peak Hour Peak Direction Traffic on the Bridge (ODOT Permanent Traffic Count Station)



As shown in Figure 13, the fitted (dotted) line is sloped downward, i.e. it shows a small decline since 2005. Peak hour peak direction traffic on the bridge has not grown because it cannot grow due to bottlenecks to the south in both the morning and afternoon peak periods. Without peak period traffic growth, traffic can only grow at all through additional peak spreading. The 28% daily traffic growth shown in the SDEIS table for the No Build alternative is preposterous. This problem demonstrates that all of the DSEIS traffic forecasts and analyses are invalid even without looking under the hood at the modeling details.

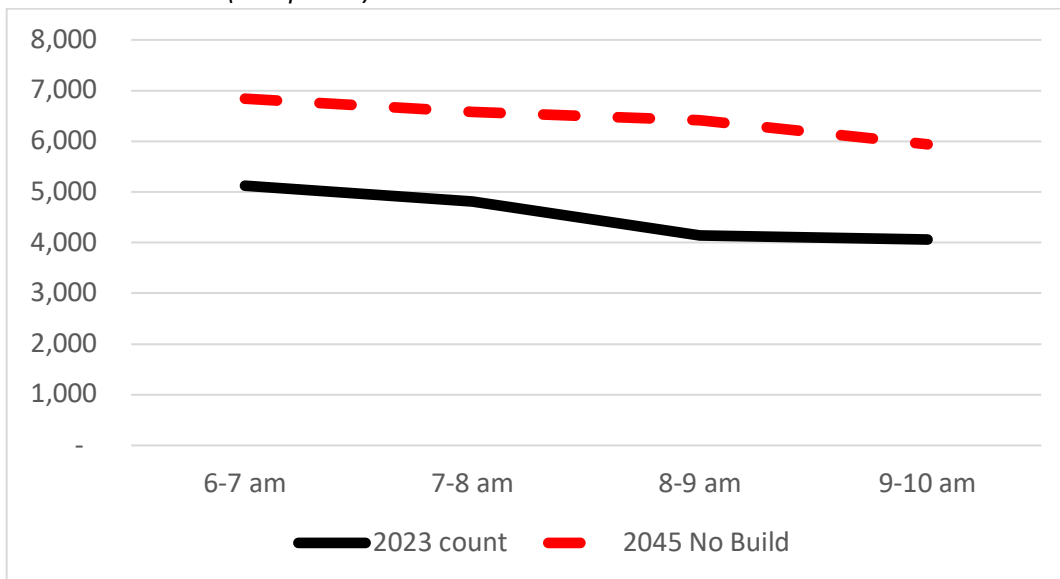
The truck traffic growth assumed in the DSEIS also is invalid. Although this growth is reported as a model output (DSEIS p. 3.1-31), the truck forecast is exogenous to the regional model, and the “outputs” simply restate the inputs, and have no separate meaning. Figure 14 shows that truck traffic has actually declined since 2005.

Figure 14: Daily Class 5-13 Truck Traffic on I-5 Bridges (ODOT Traffic Count data)



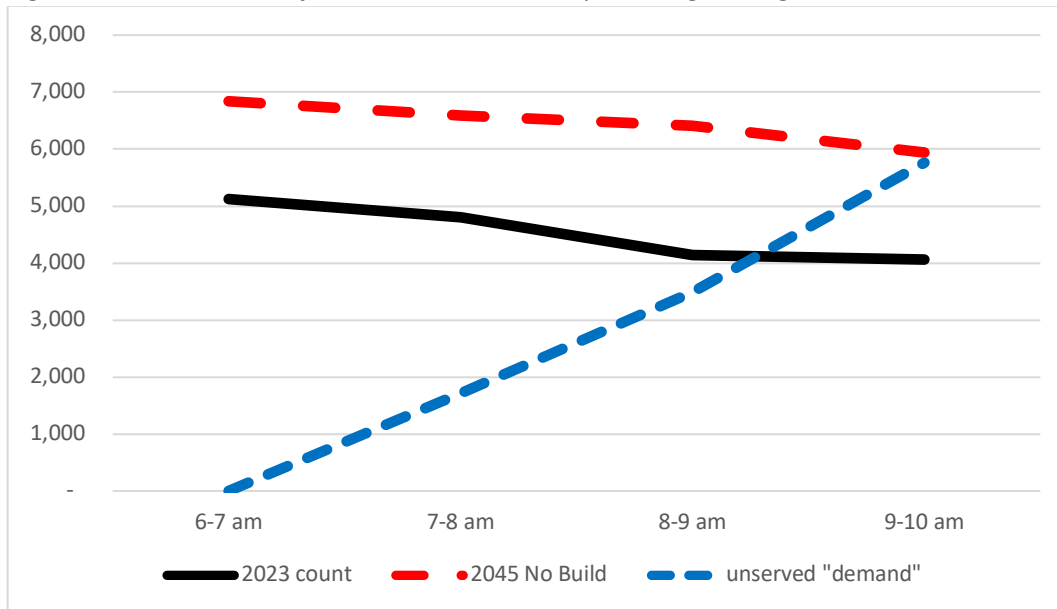
The attempts in the DSEIS to take this preposterous traffic growth through detailed operations modeling highlight the inherent absurdity. Figure 15 shows the hourly graphic growth assumed for the southbound bridge during the morning peak period in the 2045 No Build alternative compared to the 2023 traffic counts documented above.

Figure 15: Average 2013 Weekday Southbound Morning Peak Period Bridge Traffic Counts and DSEIS Assumed Demand (TRR p. 241)



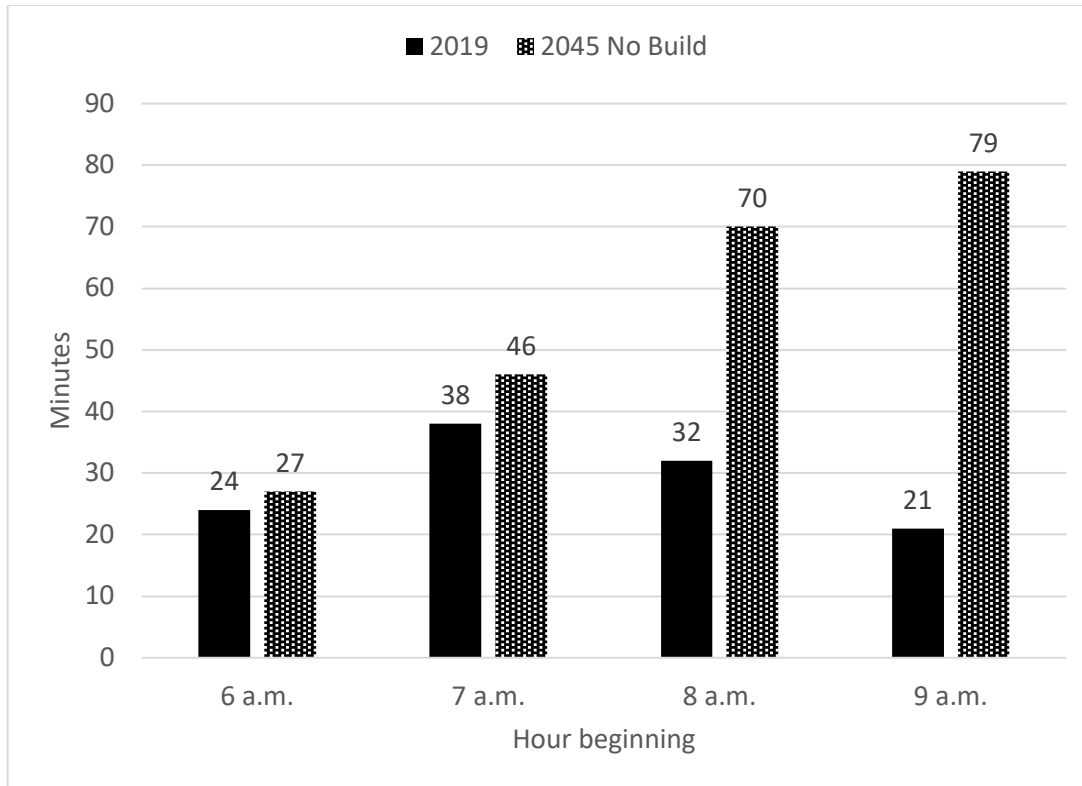
This cannot happen. As is documented above, in the morning peak period, once queues have formed to the south of the study area, southbound traffic is in the saturated flow regime, and is stuck at about 4,100 vehicles per lane per hour throughout much of the day. Unless something is done to eliminate the bottlenecks to the south, the assumed “demand” that exceeds throughput would accumulate over time as “unserved demand” as shown in Figure 16.

Figure 16: Unrealistic Traffic Demand in DSEIS Implies Lengthening Queues



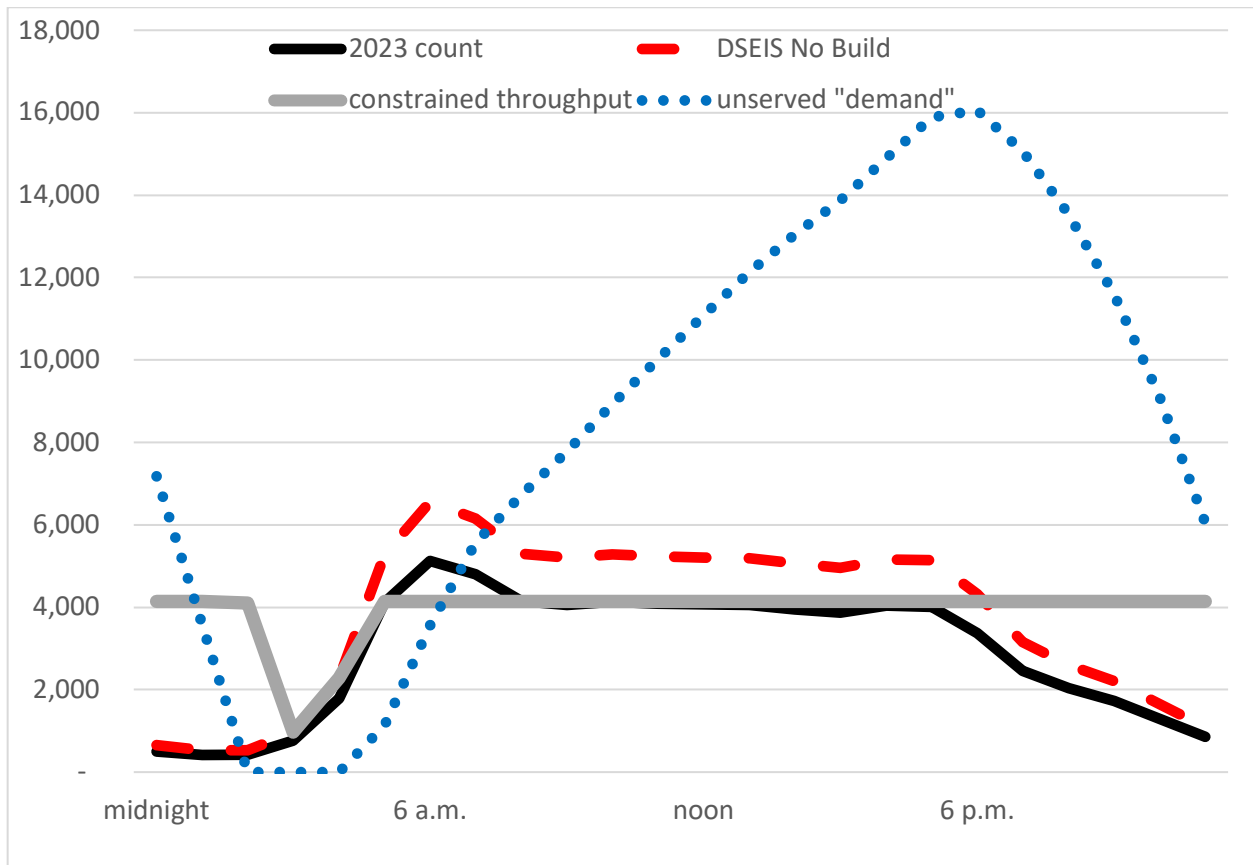
Unlike the regional STA model, the VISSIM operations model captures the three traffic flow regimes discussed above, and has been calibrated to match base year throughput. Therefore, it translates the lengthening queues shown in Figure 16 into lengthening corridor travel times (Figure 17) as queues spillback through the corridor.

Figure 17: VISSIM Model Translates Lengthening Queues into Lengthening Travel Times Southbound from I-205 to I-405 (TTR, p. 264)



The VISSIM morning peak period modeling metrics graphed in Figure 16 end at 10 a.m., but given the traffic growth assumed in the DSEIS, model queues would continue to lengthen after 10 a.m., peaking around 6 p.m. when the queue would represent about 4 hours of congested vehicle throughput. As shown in Figure 18, the queues that began to form in the beginning of the morning commute would not clear until the early morning hours the following day.

Figure 18: VISSIM Model Translates Lengthening Queues into Lengthening Travel Times Southbound from I-205 to I-405 (TTR, p. 264)



This is clearly ridiculous. Taking unrealistic STA outputs and inputting them into the more realistic VISSIM model is a classic case of “garbage in – garbage out.” The STA outputs input into the VISSIM model are invalid, and the VISSIM model results are invalid.

In summary, the SDEIS forecast metrics are unrealistic, and cannot be relied on for planning. In addition, while transit investments could help address I-5 congestion, the SDEIS models are not reliable in evaluating transit alternatives either.

Induced Traffic from the Proposed Project Would Increase Vehicle Miles Traveled (VMT) and Greenhouse Gas Emissions

Extensive research has demonstrated that expanding congested urban freeways induces traffic growth. A review of the induced travel research by Handy and Boarnet (2014) concluded that induced travel is real, and that the magnitude is enough to prevent capacity expansion from reducing congestion:

Thus, the best estimate for the long-run effect of highway capacity on VMT [vehicle miles traveled] is an elasticity close to 1.0, implying that in congested metropolitan areas, adding new capacity to the existing system of limited-access highways is unlikely to reduce congestion or associated GHG [greenhouse gas] in the long-run.⁶

The Rocky Mountain Institute has developed the SHIFT Calculator⁷ to estimate the induced VMT impacts of roadway expansion based on the California-specific Induced Travel Calculator developed by the National Center for Sustainable Transportation (“NCST”) and the University of California, Davis. The SHIFT Calculator uses the elasticity of 1.0 cited above. In the Portland-Vancouver-Hillsboro, OR-WA region, the SHIFT Calculator estimates that each addition lane mile of freeway capacity will result in 5 to 8 million additional VMT/year.

Most of the underlying data supporting the elasticity estimate of 1.0 is from roadways without tolls, and it is possible that tolling could affect induced travel. However, the current state of research suggests there may not be significant differences. In 2022, Volker and Handy wrote:

Overall, the available empirical evidence suggests that new HOV and HOT lanes might have similar induced travel effects as general-purpose lane expansions. Furthermore, because HOT lanes allow more vehicles than HOV lanes (high-occupancy vehicles plus drivers willing to pay to use the lane), they would logically have at least as large induced travel effects as HOV lanes. Pure toll lanes, on the other hand, could have lower elasticities.⁸

For pure toll lanes, the induced travel effects would depend on the magnitude of the tolls. However, if the roadway is expanded, and the tolls are set to allow increased throughput relative to the base year, there clearly would be induced travel.

California’s Senate Bill 743 requires highway expansion projects to mitigate their VMT impacts. It is understood that the regional travel demand models cannot be relied on for accurate estimates of induced travel. Therefore, unless the travel demand models can be shown to adequately account for induced travel, California requires that the NCST Calculator be applied.⁹ The SHIFT Calculator should be applied to estimate the induced travel impacts of the IBRP.

⁶ Handy, Susan and Marlon G. Boarnet. Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions: Policy Brief prepared for California Air Resources Board, September 30, 2014.

⁷ <https://shift.rmi.org/>

⁸ Volker, James M. B. and Susan L. Handy. Updated the Induced Travel Calculator. UC Davis Research Reports, September 1, 2022.

⁹ Caltrans. Transportation Analysis Framework First Edition: Evaluating Transportation Impacts of State Highway System Projects (September 2020).

Effective Approaches to Addressing Congestion in the I-5 Corridor

The first step in effectively addressing congestion in the I-5 corridor is rejecting the misinformation that the underlying problem is lack of capacity at the bridge. This simply is not true. The congestion is caused by bottlenecks to the south—at N. Lombard in the southbound a.m. peak and at Victory Boulevard in the p.m. northbound peak—and there is no possibility that widening the bridge can address those problems. Instead, widening the bridge likely would worsen the bottlenecks to the south while doing nothing to improve traffic flow on the bridge.

The second step in effectively addressing congestion in the I-5 corridor is recognizing that these bottlenecks are largely caused by the failure to manage I-5 efficiently. I-5 has more physical capacity than is currently being used; vehicle throughput in both directions is much lower than would be possible with better management.

The DSEIS recognizes that vehicle throughput is well below theoretical capacity when it states:

The Highway Capacity Manual (HCM) outlines a process for estimating the capacity of a freeway segment. The process begins by assuming an ideal capacity of 2,400 passenger cars per hour per lane (pc/h/ln), and then applies factors based on free-flow speed, freight mix as well as geometric elements including lane and shoulder widths, percentage of commuter drivers (understanding of the area), and interchange spacing. The application of these factors decreases the ideal capacity below 2,400 pc/h/ln. Applying the HCM process to roadways in the IBR Program Area results in estimated capacities between 2,100–2,200 pc/h/ln, approximately 10 to 15 percent less than the ideal capacity.

However, the highest throughput across the Interstate Bridge (the primary bottleneck in the study area) as well as the ramp terminals just north and south of the Interstate Bridge ranges between 1,550 and 1,850 pc/h/ln. This indicates that the capacity of the Interstate Bridge is near 1,550 to 1,850 pc/h/ln. The HCM capacity estimates of 2,100 to 2,200 pc/h/ln are 20 to 30 percent higher than the capacity of the Interstate Bridge, indicating that the HCM model is not an appropriate analysis tool in this case. The HCM process is not accounting for factors that would further reduce the ideal capacity. Some possible contributing factors not accounted for by the HCM process include the influence of limited sight distance across and approaching the Interstate Bridge, closely spaced interchanges, short merge, diverge, and weaving distances. (TTR, p. 446)

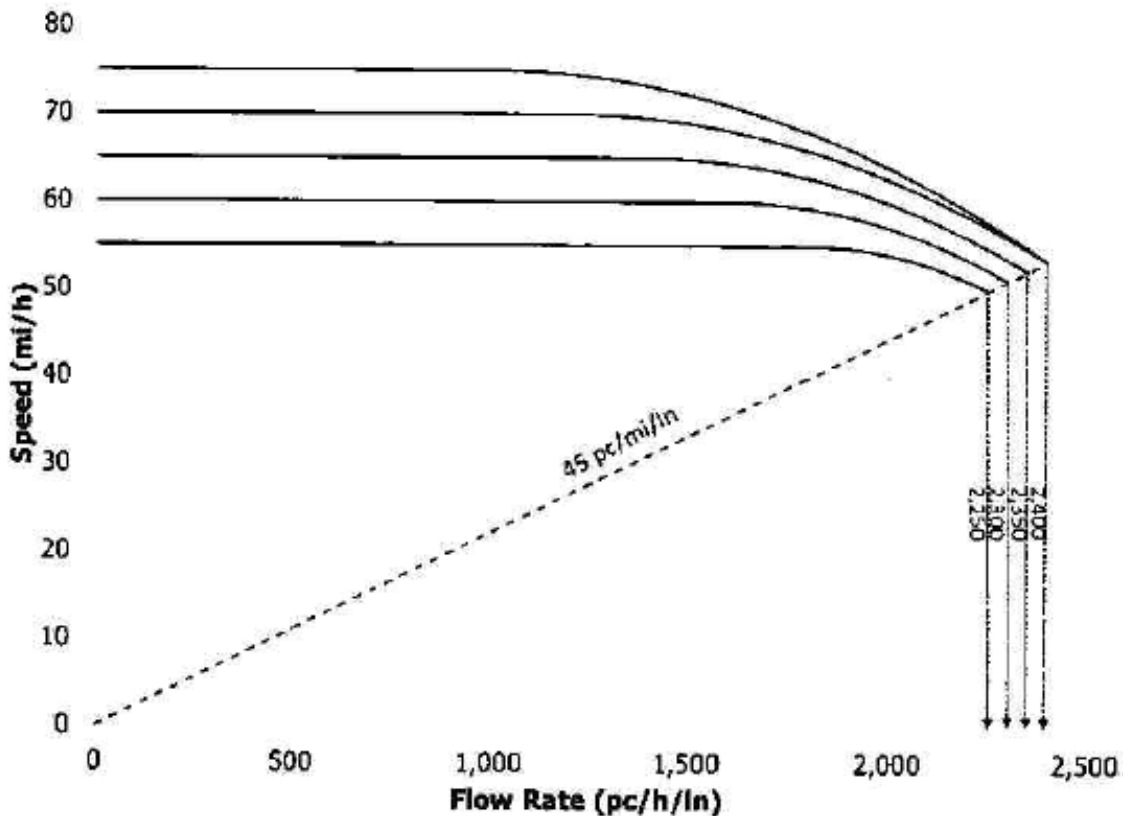
There are multiple issues with this excerpt:

- 1) As is demonstrated above, the Interstate Bridge is not “the primary bottleneck in the study area” unless the “study area” is defined narrowly as just the bridge (the SDEIS makes it clear that the study area is much larger).
- 2) The excerpt fails to acknowledge that throughput on the bridge is affected by upstream and downstream bottlenecks, apparently treating the STA assumption that each freeway segment is independent of every other as representative of reality.

- 3) The excerpt fails to acknowledge that there are three different traffic flow regimes. What it refers to as “capacity” is only relevant to the undersaturated flow state, and the range given is lower than free-flow capacity.
- 4) On the other hand, the 1,550 – 1,850 pc/h/ln [passenger car equivalents per hour per lane] range exaggerates the actual throughput in the corridor, because the corridor is chronically oversaturated due to the non-bridge bottlenecks and poor ramp metering.

The HCM provides a model that covers both undersaturated and oversaturated flow conditions (Figure 19). The solid lines at the top represent undersaturated flow for different free-flow speeds. With undersaturated flow shown in the horizontal lines in the top of the figure, the speed declines with higher traffic volumes by only a small amount for 55 mph freeways, and by a somewhat larger amount for higher-speed freeways.

Figure 19: HCM Exhibit 12-7 Speed-Flow Curves for Basic Freeway Segments

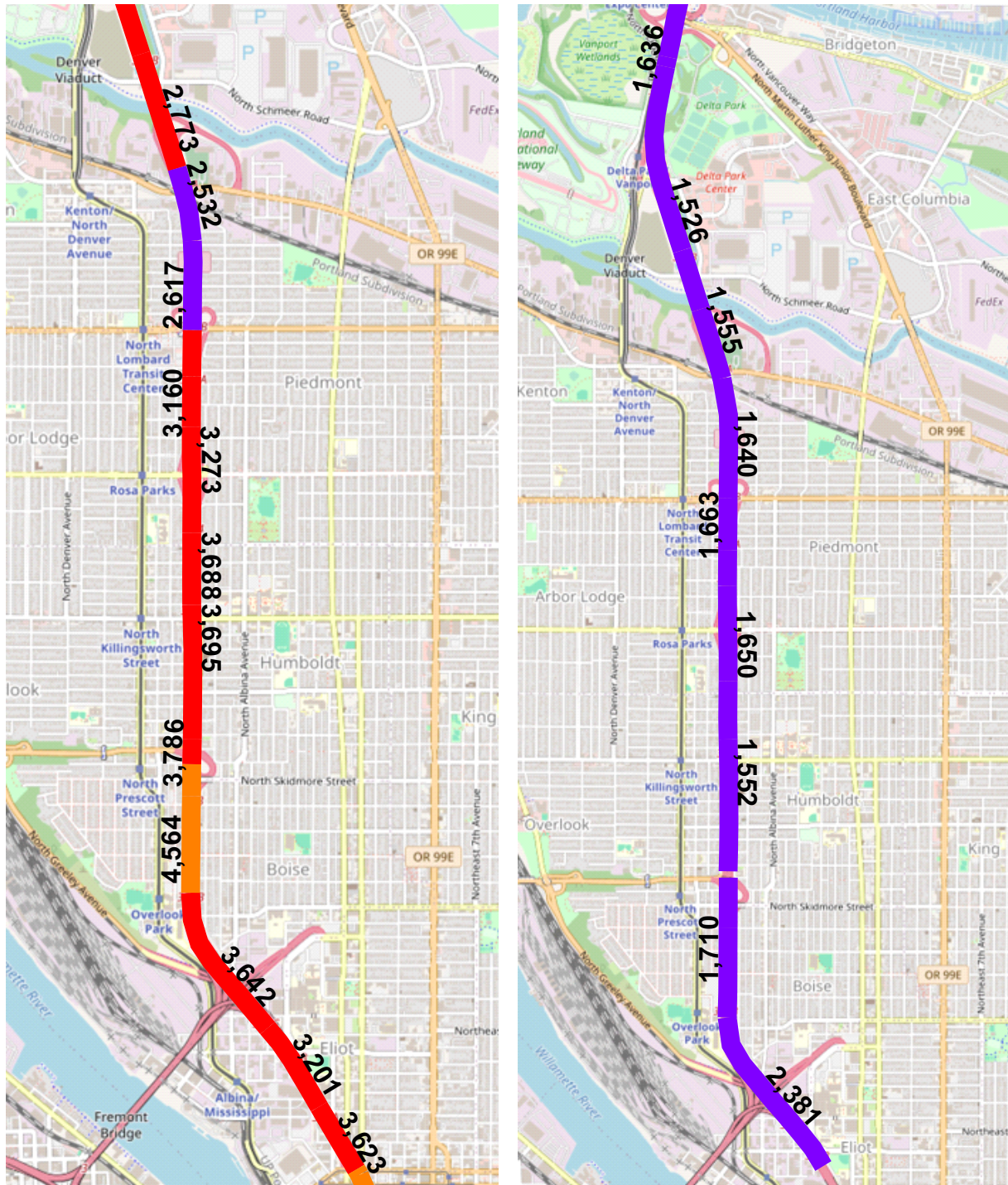


The dashed line represents oversaturated flow. The value of 45 pc/mi/ln (passenger cars per mile per lane) is the density given in the HCM for the threshold between a congested level of service (“LOS”) E condition and a failed LOS F (oversaturated) condition. At a speed of 0 mph traffic is stalled and the flow rate is also 0. At a speed of 50 mph, the flow is $45 \times 50 = 2,250$ for the 55-mph speed case. The intermediate values are all included on the dashed line. The estimated speed for a traffic flow of 1000 vehicles per lane is about 22 mph.

The capacity numbers given in the DSEIS excerpt above, 1,550 – 1,850 vehicles per lane per hour, are consistent with speeds of 30-40 mph in the HCM model (Figure 23) but are much higher than the values for the speeds observed in the bottleneck areas to the south of the bridge in both the morning and afternoon peak periods.

Figure 20 applies the HCM model shown in Figure 19 to the 2023 travel speed data mapped in Figures 2 and 4. The values shown are total for the three travel lanes in each direction. In the 8-9 a.m. hour, most of the values are less than 3,900, i.e. 1,300 per lane per hour in the peak (Southbound) direction. In the 4-5 p.m. hour, most of the values are less than 1,800, i.e. 600 per lane per hour in the peak (Northbound) direction.

Figure 20: 2023 Non-Holiday Weekday Hourly Volume Estimated from HCM Exhibit 12-7 Southbound 8-9 a.m. and Northbound 4-5 p.m.



The HCM model applied above is very simple and may underestimate vehicle throughput on some segments. However, it is very clear that the long periods of recurring oversaturated conditions represent a major failure where the I-5 system is carrying many fewer vehicles than it could during peak periods and doing so at extremely low speeds. Efficient management of I-5 requires that the roadway operate in the undersaturated flow regime rather than in this saturated flow regime. The HCM states:

Uninterrupted-flow facilities operating in a state of undersaturated flow will typically have travel speeds within 10% to 20% of the facility's free-flow speed, even at high flow rates, under base conditions (e.g., level grades, standard lane widths, good weather, no incidents). Furthermore, no queues would be expected to develop on the facility.

I-5 could operate "within 10% to 20% of the facility's free-flow speed," i.e., greater than equal to 45 m.p.h. "even at high flow rates" as long as breakdown to oversaturated flow is prevented. Oversaturated flow can be prevented by a) ramp metering, and/or b) tolling.

In theory, aggressive ramp metering would be sufficient to assure undersaturated flow. There are practical challenges including managing queue vehicles waiting to enter the facility, and there also are equity issues concerning how ramp wait times are distributed to different subareas. However, as I-5 has ramp meters, it should be operating better than it is. Paradoxically, constraining vehicle entrance more aggressively than is done presently would improve vehicle throughput significantly, and this would, in turn, decrease ramp meter wait times – a win-win. The ramp metering system should be audited to determine why it is functioning so poorly, and operations should be improved.

The ramp meter system can be improved, but it likely will be impractical to rely solely on ramp metering to achieve uninterrupted undersaturated flow on I-5. Variable tolling certainly can achieve uninterrupted flow on I-5. The sum of the monetary value of the resulting time savings would be far greater than the out-of-pocket toll expenses, and equity issues could be addressed through investments in non-auto travel modes and with targeted rebates.

ODOT's Regional Mobility Pricing Project analysis of three different options (September 11, 2023) confirms that variable pricing would improve both throughput and travel speeds on I-5. It found:

- All options result in average speeds near 45 mph and through-trip travel time savings with comparable trip costs.
- All options show reductions in vehicle miles traveled (VMT) and vehicle hours traveled (VHT) and mode shifts at the regional level, but option 1 shows the greatest mode shift.
- All options show limited diversion on a regional scale to non-tolled highways and arterials/collectors. Option 2a shows the least amount of total VMT increase on arterials and collectors.
- All options result in decreased freight traffic on local roads (tolling improves present-day freight diversion onto arterials).¹⁰

Implementing system-wide tolling on I-5 would be a game changer that actually would address the I-5 congestion that the IBR project falsely claims to address. It should be the centerpiece of one or more IBR alternatives.

¹⁰ https://www.oregon.gov/odot/tolling/Documents/RMPP_covermemo_9-2023.pdf

Resume

NORMAN L. MARSHALL, PRESIDENT

nmarshall@smartmobility.com

EDUCATION:

Master of Science in Engineering Sciences, Dartmouth College, Hanover, NH, 1982

Bachelor of Science in Mathematics, Worcester Polytechnic Institute, Worcester, MA, 1977

PROFESSIONAL EXPERIENCE: (37 Years, 23 at Smart Mobility, Inc.)

Norm Marshall helped found Smart Mobility, Inc. in 2001. Prior to this, he was at RSG for 14 years where he developed a national practice in travel demand modeling. He specializes in analyzing the relationships between the built environment and travel behavior and doing planning that coordinates multi-modal transportation with land use and community needs.

Regional Land Use/Transportation Scenario Planning

Portland Area Comprehensive Transportation System (PACTS) – the Portland Maine Metropolitan Planning Organization. Updating regional travel demand model with new data (including AirSage), adding a truck model, and multiclass assignment including differentiation between cash toll and transponder payments.

Loudoun County Virginia Dynamic Traffic Assignment – Enhanced subarea travel demand model to include Dynamic Traffic Assignment (Cube). Model being used to better understand impacts of roadway expansion on induced travel.

Vermont Agency of Transportation-Enhanced statewide travel demand model to evaluate travel impacts of closures and delays resulting from severe storm events. Model uses innovative Monte Carlo simulations process to account for combinations of failures.

California Air Resources Board – Led team including the University of California in \$250k project that reviewed the ability of the new generation of regional activity-based models and land use models to accurately account for greenhouse gas emissions from alternative scenarios including more compact walkable land use and roadway pricing. This work included hands-on testing of the most complex travel demand models in use in the U.S. today.

Climate Plan (California statewide) – Assisted large coalition of groups in reviewing and participating in the target setting process required by Senate Bill 375 and administered by the California Air Resources Board to reduce future greenhouse gas emissions through land use measures and other regional initiatives.

Chittenden County (2060 Land use and Transportation Vision Burlington Vermont region) – led extensive public visioning project as part of MPO's long-range transportation plan update.

Flagstaff Metropolitan Planning Organization – Implemented walk, transit and bike models within regional travel demand model. The bike model includes skimming bike networks including on-road and off-road bicycle facilities with a bike level of service established for each segment.

Chicago Metropolis Plan and Chicago Metropolis Freight Plan (6-county region)— developed alternative transportation scenarios, made enhancements in the regional travel demand model, and used the enhanced model to evaluate alternative scenarios including development of alternative regional transit concepts.

Developed multi-class assignment model and used it to analyze freight alternatives including congestion pricing and other peak shifting strategies.

Municipal Planning

City of Grand Rapids – Michigan Street Corridor – developed peak period subarea model including non-motorized trips based on urban form. Model is being used to develop traffic volumes for several alternatives that are being additionally analyzed using the City’s Synchro model

City of Omaha - Modified regional travel demand model to properly account for non-motorized trips, transit trips and shorter auto trips that would result from more compact mixed-use development. Scenarios with different roadway, transit, and land use alternatives were modeled.

City of Dublin (Columbus region) – Modified regional travel demand model to properly account for non-motorized trips and shorter auto trips that would result from more compact mixed-use development. The model was applied in analyses for a new downtown to be constructed in the Bridge Street corridor on both sides of an historic village center.

City of Portland, Maine – Implemented model improvements that better account for non-motorized trips and interactions between land use and transportation and applied the enhanced model to two subarea studies.

City of Honolulu – Kaka’ako Transit Oriented Development (TOD) – applied regional travel demand model in estimating impacts of proposed TOD including estimating internal trip capture.

City of Burlington (Vermont) Transportation Plan – Led team that developing Transportation Plan focused on supporting increased population and employment without increases in traffic by focusing investments and policies on transit, walking, biking and Transportation Demand Management.

Transit Planning

Regional Transportation Authority (Chicago) and Chicago Metropolis 2020 – evaluated alternative 2020 and 2030 system-wide transit scenarios including deterioration and enhance/expand under alternative land use and energy pricing assumptions in support of initiatives for increased public funding.

Capital Metropolitan Transportation Authority (Austin, TX) Transit Vision – analyzed the regional effects of implementing the transit vision in concert with an aggressive transit-oriented development plan developed by Calthorpe Associates. Transit vision includes commuter rail and BRT.

Bus Rapid Transit for Northern Virginia HOT Lanes (Breakthrough Technologies, Inc and Environmental Defense.) – analyzed alternative Bus Rapid Transit (BRT) strategies for proposed privately-developing High Occupancy Toll lanes on I-95 and I-495 (Capital Beltway) including different service alternatives (point-to-point services, trunk lines intersecting connecting routes at in-line stations, and hybrid).

Roadway Corridor Planning

I-30 Little Rock Arkansas – Developed enhanced version of regional travel demand model that integrates TransCAD with open source Dynamic Traffic Assignment (DTA) software, and used to model I-30 alternatives. Freeway bottlenecks are modeled much more accurately than in the base TransCAD model.

South Evacuation Lifeline (SELL) – In work for the South Carolina Coastal Conservation League, used Dynamic Travel Assignment (DTA) to estimate evaluation times with different transportation alternatives in coastal South Carolina including a new proposed freeway.

Hudson River Crossing Study (Capital District Transportation Committee and NYSDOT) – Analyzing long term capacity needs for Hudson River bridges which a special focus on the I-90 Patroon Island Bridge where a microsimulation VISSIM model was developed and applied.

PUBLICATIONS AND PRESENTATIONS (partial list)

DTA Love: Co-leader of workshop on Dynamic Traffic Assignment at the June 2019 Transportation Research Board Planning Applications Conference.

Forecasting the Impossible: The Status Quo of Estimating Traffic Flows with Static Traffic Assignment and the Future of Dynamic Traffic Assignment. *Research in Transportation Business and Management* 2018.

Assessing Freeway Expansion Projects with Regional Dynamic Traffic Assignment. Presented at the August 2018 Transportation Research Board Tools of the Trade Conference on Transportation Planning for Small and Medium Sized Communities.

Vermont Statewide Resilience Modeling. With Joseph Segale, James Sullivan and Roy Schiff. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

Assessing Freeway Expansion Projects with Regional Dynamic Traffic Assignment. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

Pre-Destination Choice Walk Mode Choice Modeling. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

A Statistical Model of Regional Traffic Congestion in the United States, presented at the 2016 Annual Meeting of the Transportation Research Board.

IBR contradicts region's climate commitments

By Joe Cortright | 4.11.2024

IBR Traffic Forecasts Violate Portland Region's Climate Commitments

Portland's adopted Regional Transportation Plan commits the Metro area to reduce total vehicle miles traveled by 12 percent over the next twenty-five years.

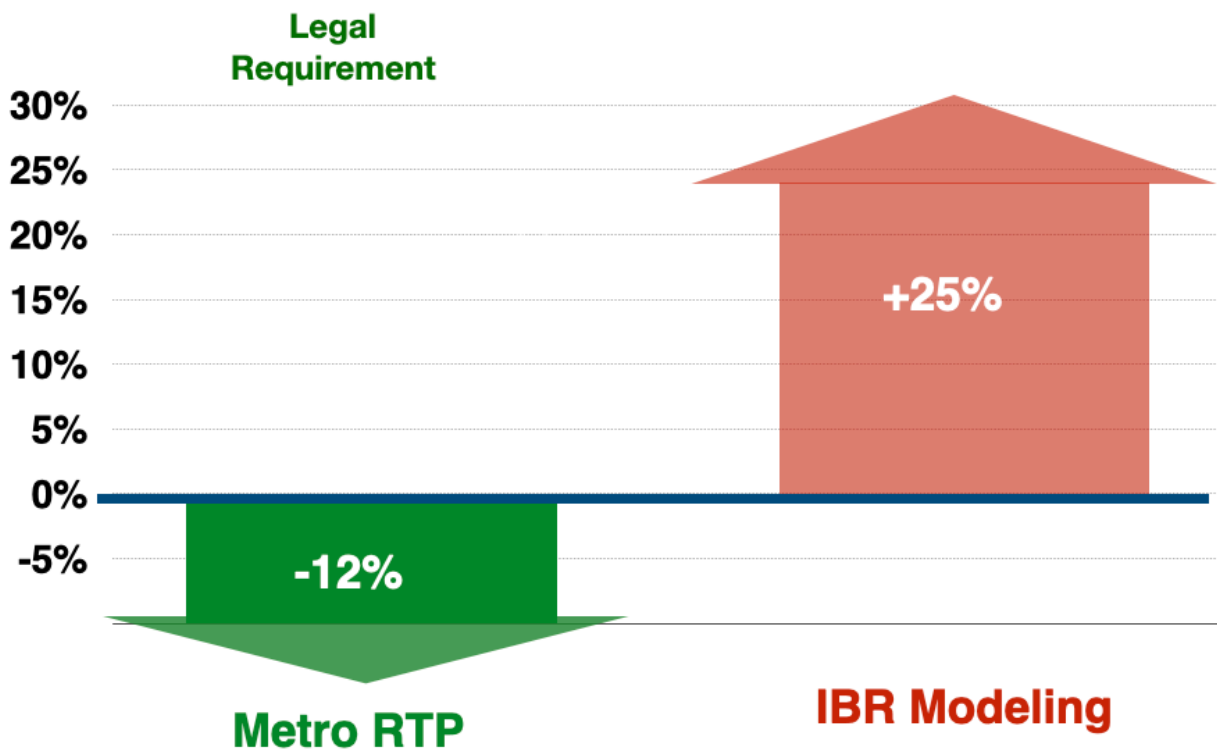
But the traffic forecasts used to justify the \$7.5 billion Interstate Bridge Replacement (IBR) Project call for more than a 25 percent increase in driving over that same time period

The RTP is required under state law to plan for a reduction in VMT per capita; the RTP is the way that regional and local governments show they comply with these state climate requirements

But the IBR planning is predicated on a world where we drive much more and not any less.

Projects like the IBR are required by state and federal law to be consistent with the adopted Regional Transportation Plan, but they are being planned for traffic levels that flatly violate that plan and state requirements.

Change in driving to 2045



https://i2.wp.com/cityobservatory.org/wp-content/uploads/2024/10/IBR_Climate_VMT_RTP.png

The Interstate Bridge Replacement project's traffic forecasts are on a collision course with reality - and with legally binding climate commitments. While the Portland region has adopted ambitious goals to reduce driving and greenhouse gas emissions, IBR's plans assume we'll do exactly the opposite, projecting a massive 26-27 percent increase in vehicle miles traveled (VMT). This disconnect isn't just poor planning - it may violate federal law.

State law and Metro's RTP commit the region to reducing total driving by 12 percent

Let's start with the legal requirements. Metro, Portland's regional government, has adopted a Climate Smart Strategy calling for a 75 percent reduction in greenhouse gases. The state's Climate Friendly and Equitable Communities (CFEC) rules require Metro to reduce per capita vehicle miles traveled by 35 percent between 2005 and 2050. These aren't aspirational goals - they're legal requirements incorporated into Metro's federally mandated Regional Transportation Plan (RTP), adopted in November 2023.

Under state land use regulations, Metro is required to adopt a Regional Transportation Plan (“RTP”) in which Vehicle Miles Traveled (“VMT”) declines by 30 percent from 2005 levels by 2045. The Climate Friendly and Equitable Communities Rule OAR 660-012-0160(6) provides:

Metro **shall** adopt a regional transportation plan in which the projected vehicle miles traveled per capita at the horizon year using the financially-constrained project list **is lower than** the estimated vehicle miles traveled per capita at the base year by an amount that is consistent with the metropolitan greenhouse gas reduction targets in OAR 660-044-0020. [emphasis added]

Metro’s adopted RTP

(<https://www.oregonmetro.gov/sites/default/files/2023/07/13/2023-RTP-Appendix-J-public-review-draft-20230710.pdf>) promises to meet this goal:

By 2045, the plan, together with advancements in fleet and technology, is expected to reduce VMT per capita of light-duty household vehicles by 39 percent (compared to 2005 levels) and by 31 percent from (compared to 2020 levels).

Metro 2023 Regional Transportation Plan, Appendix J. page 9.

The per capita reduction translates into a real reduction in total driving over the next two decades. The math is simple: to meet these targets, the region needs to hold total vehicle miles traveled at about 12 percent below current levels through 2045, even as population grows. Metro’s RTP specifically projects a 31 percent reduction in per capita VMT from 2020 levels by 2045.

IBR traffic forecasts plan for 36 percent more driving

But IBR's traffic forecasts live in an alternate universe where these policies don't exist. The project's Supplemental Draft Environmental Impact Statement (SDEIS) projects that regional VMT will balloon from 43.1 million daily miles today to 58.8 million by 2045 - a 36 percent increase that assumes driving per person will remain essentially unchanged.

Here are the details: The DSEIS

(<https://www.interstatebridge.org/media/downloads/Transportation%20Tec> claims that base level of driving in the Metro area was about 43.1 million miles in 2015:

Table 3.1-2. Regional Travel Measures – Existing 2015 Daily Vehicle Miles Traveled, Vehicle Hours Traveled, and Vehicle Hours of Delay

Area	Vehicle Miles Traveled	Vehicle Hours Traveled	Vehicle Hours of Delay ^a
Portland Metropolitan Region	43,115,600	1,225,400	19,400
Traffic Subarea (I-5, I-205, and I-84)	11,277,600	326,900	10,100

Source: Metro/RTC regional travel demand model.

a Delay is measured as time spent in congestion on network links that exceed 0.9 volume/capacity ratio.

(https://i1.wp.com/cityobservatory.org/wp-content/uploads/2024/10/IBR_total_vmt.png)

The DSEIS

(<https://www.interstatebridge.org/media/downloads/Transportation%20Tec> summarize the results of its modeling to show that the region will drive about 58.8 million miles in 2045.

Table 3.1-10. 2045 Weekday Daily Vehicle Miles Traveled, Vehicle Hours Traveled, and Vehicle Hours of Delay

Alternative	Study Area	Vehicle Miles Traveled	Vehicle Hours Traveled	Vehicle Hours of Delay
No-Build Alternative	Portland Metropolitan Region	58,835,800	1,793,400	64,000
	Traffic Subarea	14,291,000	436,400	24,300
Modified LPA (Base Scenario)	Portland Metropolitan Region	58,743,200	1,782,300	57,000
	Traffic Subarea	14,211,400	424,900	17,000

https://i0.wp.com/cityobservatory.org/wp-content/uploads/2024/10/IBR_total_vmt_2045_nb_lpa.png

This represents annual VMT growth of about 1 percent per year, and essentially no-per capita decline in VMT, completely at odds with adopted regional policy. Traffic forecasts for the area in and near the IBR project tell the same story. IBR projects VMT in the “study area” will jump from 11.7 million daily miles to 14.2-14.3 million - an increase of roughly 22 percent. This growth directly contradicts Metro’s RTP, which calls for reducing total regional VMT about 12 percent in order to achieve the mandated reduction in VMT per capita of more than 30 percent.

The SDEIS Leaves out Oregon climate regulations

Perhaps most telling is what’s missing from IBR’s climate analysis. While the SDEIS includes a lengthy inventory of state climate policies, it completely ignores Oregon’s Climate Friendly and Equitable Communities (CFEC) rules requiring Metro to reduce per capita VMT by 30 percent. This selective amnesia is hardly surprising - acknowledging these requirements would expose how fundamentally IBR’s traffic projections conflict with binding regional commitments to reduce VMT.

This isn’t just about numbers on a spreadsheet. By assuming away adopted climate policies, IBR creates a self-fulfilling prophecy: project a future of ever-increasing car dependence, then build massive infrastructure to accommodate it. This approach not only undermines regional climate goals but also violates the National Environmental Policy Act’s requirement that environmental analyses be based on reasonable assumptions consistent

with adopted plans and policies. NEPA requires that the EIS demonstrate consistency with adopted State and local statutes and plans (40 C.F.R. § 1506.2(d)). Specifically, an EIS must evaluate “[p]ossible conflicts between the proposed action and the objectives of Federal, regional, State, and local . . . land use plans, policies and controls for the area concerned.” 40 C.F.R. § 1502.16(c) (1978). “Where an inconsistency exists, the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law.” 40 C.F.R. § 1506.2(d) (1978). The Draft Supplemental Environmental Impact Statement fails to identify this conflict with Oregon climate regulations and the Metro RTP, and also therefore fails to explain how it will reconcile its proposed action to these plans.

IBR officials might argue that their much higher traffic projections are somehow more realistic forecasts of future behavior. But this misses the point entirely. The region has made legally binding commitments—codified in its federally required Regional Transportation Plan—to reduce driving to achieve climate goals. The National Environmental Policy Act and federal transportation planning regulations require that projects like the IBR be consistent with this adopted policy framework, not against a hypothetical future where we abandon our climate commitments.

The solution is straightforward but would require a fundamental rethinking of the project: IBR must revise its traffic forecasts to align with adopted regional policies as required by federal and state law. This means lowering future VMT levels to about 12 percent below today’s traffic levels, not more than 25 percent higher as in the current modeling.

Until then, IBR’s traffic forecasts remain an exercise in illegal magical thinking - assuming away binding climate commitments to justify a massive highway expansion. It’s an approach that not only fails to meet legal requirements but also locks the region into precisely the car-dependent future we’ve committed to avoiding.

The choice is clear: either revise the project to align with regional climate commitments, or admit that IBR represents an abandonment of those goals. What we cannot do is continue pretending that we can meet our climate targets while building infrastructure designed for ever-increasing levels of driving.

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IBR traffic modeling violates professional standards and federal rules

Traffic modeling is guided by a series of professional and administrative guidelines. In the case of the proposed \$7.5 I... →

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