



1/4/2023

To: Megan Channell, ODOT project director

Re: I-5 Rose Quarter Supplemental Environmental Assessment

Dear Ms. Channell,

It is with disappointment that we write to you once again (see enclosed letter from 2019, below) requesting that ODOT undertake a full Environmental Impact Statement (EIS) of the Rose Quarter Improvement Project (RQIP) so that project impacts and mitigation can be better developed and understood by the public. The goal of the NEPA process is to empower community voices which ensure a better project. ODOT's failure to heed the myriad concerns of diverse community stakeholders early in the process has caused unnecessary delays amidst ballooning project costs and increasing climate chaos.

Last year, The Street Trust was invited to participate in the Independent Covers Assessment (ICA) of the design process convened by the Oregon Transportation Commission and led by a consultant team of local and national urban design, engineering, and environmental experts. We listened deeply and learned a great deal alongside many long-time residents of Lower Albina who spent significant time envisioning a better future for their place and brainstorming how to best reconnect the neighborhood and promote economic development in their community. We are grateful for and support the local leadership of Albina Vision Trust (AVT) and the Historic Albina Advisory Board (HAAB), and also heartened that Governor Brown took seriously the health concerns of the Harriet Tubman Middle School community.

That said, while the Hybrid 3 option arrived at represents a significant improvement over previous iterations of the highway covers presented by ODOT, and while we fully support the building of developable highway covers reconnecting Lower Albina, **The Street Trust has multiple concerns about the Hybrid 3 alternative as proposed, which we believe a full EIS could help address:**

1. **Southbound off-ramp relocation impacts on safety for people walking, rolling, and bicycling.** Further study is necessary to fully understand the impacts of the relocation of the southbound off-ramp next to the Moda Center. We are particularly concerned about projected worsened conditions for people walking, rolling, and bicycling at the intersection of NE Wheeler Avenue/ N Ramsay Way/ N Williams Avenue, including decreases in safety and increases in travel times, as well as interference with the City of Portland's Green Loop project. As proposed, the Hybrid 3 option will likely exacerbate unsafe conditions for vulnerable street users along the adjacent grid. (Please see the letter from the City of Portland Bicycle Advisory Committee. ¹)

Further, we are concerned that the option of eliminating the southbound ramp at this intersection (which would also address ballooning cost concerns) was not seriously

considered in the development of Hybrid 3 or SEA. In fact, it appeared to us as ICA workshop participants that ODOT did not allow the ICA project team nor workshop participants to seriously consider elimination of the southbound off-ramp in their development and deliberation of design options over the course of the workshops, undermining the “I” (independent) in ICA.

2. **Regional congestion pricing and tolling have not been studied in SEA.** Much remains unknown about the impacts of pricing in the Portland metro area, including on I-5 (RMPP) and the Columbia River interstate bridge replacement (IBR); both of which have NEPA and other stakeholder processes underway to evaluate options and determine project specifics, including rate-setting. How pricing is enacted on both projects will significantly impact traffic modeling for RQIP. It may well be that accurately pricing the right-of-way to reduce vehicle miles traveled in the I-5 corridor will reduce the width of the highway necessary at Rose Quarter to accommodate demand (with lower project costs and GHG pollution) but we will not know without a full EIS which incorporates this pricing into the analysis.
3. **Ballooning project costs and lack of clarity from ODOT on control over buildable caps to achieve restorative justice.** It remains unclear in the current SEA how ODOT plans to guarantee to AVT, HAAB, and Portland’s Black community writ large that both the freeway widening and installation of the highway cover will be funded with equal urgency. It is also unclear how control and development benefits of the covers will be given over to Black Portlanders. Since ODOT began this project, the Biden Administration has prioritized innovation and reparative justice by reconnecting communities that were previously cut off from economic opportunities by transportation infrastructure.ⁱⁱ For this reason, a full EIS is warranted which includes analysis of building caps reconnecting Lower Albina either without widening I-5 or removing I-5 from Lower Albina altogether and returning the full inventory of developable real estate to community governance to achieve restorative justice.

In 2022, New York Governor Hochul announced over \$3B in funding to reconnect communities across her state by removing freeways rather than expanding them. She claims, “These projects will help right the wrongs of the past through safer and reliable transit networks, landscapes designed to bring communities together, and routes that are friendlier for pedestrians and bikers.” A full EIS would enable us to explore the costs and benefits of a similar path forward for Lower Albina and Oregon.ⁱⁱⁱ

4. **Oregon’s epidemic of traffic fatalities and the public health costs for Oregon’s BIPOC communities of misdirected “safety” investments.** In the first half of 2022, Oregon had the 10th highest traffic fatality rate in the U.S. with 1.45 roadway deaths for every 100 million miles traveled, according to data from the National Highway Traffic Safety Administration.^{iv} Racial disparities in traffic fatalities are pervasive with dangerous conditions and deadly roads disproportionately affecting BIPOC and low-income people.^v Locally, Multnomah County’s 2021 REACH Transportation Crash and Safety Report highlights the racial disparities in local conditions: Black residents were killed in traffic at nearly twice the rate of white residents between 2013-2017.^{vii}

The Street Trust is concerned that in terms of racial justice and equity, as currently

proposed, the Rose Quarter project could not only potentially reduce safety for public and active transportation in the immediate vicinity but also siphon off precious transportation dollars for safety investments on roadways where BIPOC people are disproportionately at risk and where more people are seriously injured or killed in traffic daily statewide. These wider public health equity impacts were not factored into the SEA but could be considered through a full EIS.

5. Finally, **our concerns from 2019 (below) about the likely impact on walking, biking and transit during the construction period and the lack of information in the EA about how this will be mitigated have not been adequately addressed through the SEA.** Solutions to the problem of disruption caused by the construction of the freeway expansion and additional caps in the Hybrid 3 option have not been proposed through the SEA. This remains a primary route between downtown and North and Northeast Portland. Disruption and harm during the construction period to current travelers (and discouragement of potential travelers) walking, biking, rolling, and riding through this area is no more an acceptable outcome in 2023 than it was in 2019.

Sincerely,



Sarah Iannarone
Executive Director, The Street Trust
P.O. Box 14745, Portland, OR 97293

Enclosed: March 2019 Letter from The Street Trust to ODOT on RQIP EA

Endnotes

ⁱ <https://www.portland.gov/transportation/bicycle-committee/documents/bac-letter-pbot-city-council-comments-i-5-rq/download>

ⁱⁱ <https://www.transportation.gov/briefing-room/biden-administration-announces-first-ever-funding-program-dedicated-reconnecting>

ⁱⁱⁱ <https://www.transportation.gov/briefing-room/biden-administration-announces-first-ever-funding-program-dedicated-reconnecting>

^{iv} <https://cdan.nhtsa.gov/tsftables/tsfar.htm>

v

<https://www.hsph.harvard.edu/news/press-releases/racial-disparities-traffic-fatalities/#:~:text=During%20evening%20hours%2C%20race%2Fethnicity,less%20stark%2C%20but%20similar%20patterns>

^{vi} <https://crashstats.nhtsa.dot.gov/Api/Public/ViewPublication/813118>

^{vii} https://multco-web7-psh-files-usw2.s3-us-west-2.amazonaws.com/s3fs-public/20210224_Final-REACH-Transportation-Safety.pdf

March 29, 2019

Oregon Department of Transportation
info@i5RoseQuarter.org
Attention Megan Channell
123 NW Flanders St.
Portland, OR 97209

Dear Ms. Channell:

I'm writing on behalf of The Street Trust to provide comment on the I-5 Rose Quarter Environmental Assessment (EA) and to request ODOT undertake an Environmental Impact Statement (EIS) so that project impacts and mitigation can be better developed and understood by the public.

The City of Portland adopted the I-5 Broadway Weidler Facility Plan in 2012 following a two-year planning process. The plan called for:

- Adding auxiliary lanes and full-width shoulders (within existing right-of-way) to reduce dangerous traffic weaves and allow disabled vehicles to move out of traffic lanes.
- Rebuilding structures at Broadway, Weidler, Vancouver and Williams and adding a lid over the freeway that will simplify construction, increase development potential and improve the urban environment.
- Moving the I-5 southbound on-ramp to Weidler to improve circulation and safety
- Improving conditions for pedestrian and bicycle travel by adding new connections over the freeway and safety pedestrian and bicycle facilities in the interchange area.

The EA indicates that the proposed project fails to achieve the objective of the Plan. In particular:

- Proposed lids are poorly conceived. There is no evidence they will increase development or improve the urban environment.
- The move of the Weidler on-ramp will not improve circulation and safety. The EA documents that project will degrade travel times for transit.
- The EA indicates no improvement in conditions or safety for bicycles and pedestrians, even though existing conditions are, in fact, quite poor. ODOT

should undertake a design effort targeted to achieve meaningful benefits for bikes and pedestrians. The bike and pedestrian facilities in the EA are only conceptual. Without an explicit commitment to improvements for these modes, they may get worse, rather than better, as the design process continues.

The Street Trust is alarmed by the likely impact on walking, biking and transit during the construction period and the lack of information in the EA about how this will be mitigated. To achieve state, regional and local goals for reducing drive-alone trips, we need to significantly increase use of walking, biking and transit. Extraordinary efforts will need to be taken to mitigate the huge disruption that will be caused by the construction of the project in an area that sees 8,000 cyclists per day and is the primary portal between downtown and North and Northeast Portland. A five-year setback is not an acceptable outcome for our climate change and growth management goals nor is it acceptable to the individuals who will be impacted.

ODOT should also undertake an EIS to address the concern and opportunity presented by the Albina Vision Plan and the project impacts on children attending Harriet Tubman Middle School. The project could contribute to redress of the negative impact of transportation facilities on people of color. The EA fails to properly address these impacts and present acceptable mitigation strategies.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Detweiler".

Jillian Detweiler
Executive Director
The Street Trust
618 NW Glisan, Suite 401
Portland, OR 97209