



Date: Monday, March 18, 2019

To: Megan Channell, Project Manager, Oregon Department of Transportation

CC: Commissioner Chloe Eudaly, City of Portland
Commissioner Jo Ann Hardesty, City of Portland
Commissioner Amanda Fritz, City of Portland
Chris Warner, Interim Director, Portland Bureau of Transportation
Joe Zehnder, Interim Director, Portland Bureau of Planning and Sustainability
Oregon Transportation Commission

From: No More Freeway Expansions Coalition

Subject: Request for Full 45 Day Public Comment Period for ODOT's Rose Quarter Freeway Expansion Environmental Assessment Document

The No More Freeway Expansions Coalition is writing to ask the Oregon Department of Transportation (ODOT) to honor their stated promise to hold a forty-five day public comment period for the community to respond to the Environmental Assessment. Many crucial documents, data sets, figures, and appendices necessary for our community group to independently verify ODOT's claims about this project were lacking from the original, incomplete version of the Environmental Assessment document originally released by ODOT on February 15.

ODOT only made these data available on March 13 - they were posted on the Rose Quarter project website a full nine days after our community group formally requested the information, which by all accounts should have been included in the original EA document.¹ The data provided (Synchro output worksheets, Alternative for the AM/PM peak periods, VISSIM model outputs and calibration report, Volume Forecasts for the I-5 mainline, Build Alternative for the AM and PM peak periods, and the full Traffic Operations Analysis Summary and full collection of Appendices) represents over 632 pages of technical, quantitative measurements about bike, transit and automobile traffic flow on the freeway itself and the surrounding neighborhood

¹ A copy of our letter to ODOT requesting this data is available here:
<https://nomorefreewayspx.files.wordpress.com/2019/03/030419-nmf-request-for-additional-ea-data.pdf>



streets.

It is difficult to overstate the centrality of these up-until-recently-missing data sets to ODOT's claims about the purported impacts this project will have on the neighboring community. Without these data, it is simply impossible to independently assess ODOT's claims about how this freeway expansion will impact the local community. ODOT's assertion that the proposed Rose Quarter Freeway Expansion will somehow improve traffic congestion, ambient air pollution or carbon emissions is a bold one - it flies in the face of decades of empirical research about urban freeway expansion projects across the country. Our community leaders believe we deserve more than nineteen days (and only thirteen business days!) to look over the six hundred and thirty two pages of data that are the heart of whether this half-billion dollar freeway expansion proposal will impact our state's carbon emissions, regional traffic congestion or local rates of asthma and diabetes.

Our community group asserts that adequate provision of forty five days to review these data sets would require ODOT to receive public comment on the Rose Quarter Freeway Expansion Project up until Saturday, April 27, 2019. We stress that we are not asking for an extension of the public comment period, but merely requesting that the agency acts in good faith and provides the forty-five days to respond to a complete Environmental Assessment document that we were originally promised by the agency. In a letter dated January 11, ODOT denied our request for an extension of the public comment period, but noted "...once the comment period begins, we will consider if an extension is necessary based on feedback received after publication of the document."²

² We also wish to emphasize that our coalition had flagged the limitations of a truncated public comment period in a letter we sent to ODOT on November 28, 2018. Our letter, cosigned by 32 elected officials, small business owners, and leaders of local nonprofit advocacy organizations, specifically asked for a sixty-day extension of the public comment period. It stated that "As community advocates, local business owners and elected officials concerned about the impacts this project may have on the North Portland community and the region as a whole, we are concerned that the 30-day public comment period will not give community advocates enough time to meaningfully review and provide feedback on ODOT's findings. By initiating a thirty-day public comment period in late January, the ability of community members and stakeholders to weigh in on the proposal is severely dampened."

Our original request for an extension can be found on the No More Freeways website:
https://gallery.mailchimp.com/33eee76771d2f4f3df7221428/files/7a9d2360-272d-4ddb-b311-c4b1081d784b/112818_60_Day_Extension_Request_Letter.pdf

ODOT didn't respond to our request for over forty-four days, and denied our request by responding at 4:35pm on Friday, January 11. A copy of ODOT's letter, in which the consideration of a potential extension due to community feedback after publication is mentioned, is available here:
https://nomorefreewayspx.files.wordpress.com/2019/03/i-5rosequarter_responseletter_01.11.19-1.pdf



Given the inadequately short amount of time between today and ODOT's original April 1st deadline for Public Comment, the overwhelming centrality of the only-recently-provided 632 pages of data to ODOT's assertions of the public impact of this proposed freeway expansion, and the overwhelming sentiments of concern about this freeway widening proposal expressed by the public at the March 12th public hearing,³ we are asking ODOT to ensure our community has a full forty-five days to review the full Environmental Assessment document with relevant and necessary data included. We welcome and encourage local elected officials to join us in asking ODOT to fulfill their promise of government transparency and meaningful opportunity for public comment in regards to a proposed \$500 million freeway expansion in the backyard of Harriet Tubman Middle School.

Aaron Brown
No More Freeway Expansions Coalition
www.nomorefreewayspx.com

³"Opponents Dominate Hearing On Portland Rose Quarter I-5 Expansion Project" *Oregon Public Broadcasting*, March 12 2019. <https://www.opb.org/news/article/portland-oregon-interstate-5-rose-quarter-expansion-hearing/>

"Rose Quarter freeway critics dominate meeting, then Chloe Eudaly throws curveball." *The Oregonian*. March 13, 2019. <https://www.oregonlive.com/commuting/2019/03/rose-quarter-freeway-critics-dominate-meeting-then-chloe-eudaly-throws-curveball.html>

A full round-up of news coverage of the public hearing on Tuesday March 12 is available here: <https://nomorefreewayspx.com/2019/03/15/overwhelming-turnout-for-the-good-guys-at-odot-hearing/>