

April 1, 2019

To: Oregon Department of Transportation  
123 NW Flanders St., Portland, OR 97209  
Re: "I-5 Rose Quarter Improvement Project"  
info@i5RoseQuarter.org

Attn:  
Megan Channell, Major Projects Manager,  
ODOT; Emily Cline, Acting Environmental  
Manager, FHA; Chris Warner, Interim  
Director, PBOT

Cc: Portland Mayor Ted Wheeler  
Transportation Commissioner Chloe Eudaly  
Commissioner Nick Fish  
Commissioner Amanda Fritz  
Commissioner Jo Ann Hardesty  
Metro Council President Lynn Peterson  
Metro Councilor Bob Stacey  
Senator Michael Dembrow  
Representative Alissa Keny-Guyer  
Congressman Earl Blumenauer  
Senator Jeff Merkley  
Senator Ron Wyden

Dear Ms. Channell, ODOT Staff, and policymakers on my behalf:

The "Environmental Assessment of the I-5 Rose Quarter Improvement Project" (RQIP) provided to the public for review on February 15, 2019, is an incomplete and inaccurate evaluation of the potential impacts of ODOT's proposed expansion of a freeway through Portland's Central City. As such, I must stand with the numerous professionals, engaged community members, neighborhoods, and organizations who have worked diligently and highlighted extensively the flaws in your methodology, findings, and public process in insisting that ODOT proceed to a more rigorous and thorough accounting of RQIP impacts by preparing a full Environmental Impact Statement followed by a valid public review and comment period.<sup>1</sup>

Contrary to your findings in the EA, public review of the RQIP has made abundantly clear that ODOT's proposed action to widen an urban freeway through a historically disenfranchised community (Lower Albina), adjacent to a middle school (Harriet Tubman), and above a waterfront multiuse path (Willamette River & Vera Katz Esplanade) will not achieve its stated goals but will negatively affect the quality of the human and natural environment in the project area. The people of Portland deserve deeper, more reliable analyses of project impacts based on complete, relevant, and accurate variables and data sets; the opportunity to thoroughly understand and comment on any potential project impacts via a comprehensive, transparent

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<sup>1</sup> These include Albina Vision Trust, Portland Public Schools, Oregon Environmental Council, Neighbors for Clean Air, the Harriet Tubman PTSA, The Street Trust, Oregon Walks, Community Cycling Center, Portland Bus Lane Project, City's of Portland Pedestrian Advisory and Bicycle Advisory Committees, Audubon Society, 350PDX, Sierra Club and many others, with special thanks to the No More Freeways coalition (led by Aaron Brown) for their advocacy in this matter.

engagement process; and the ability to shape alternative mitigation and remediation strategies currently lacking in your Environmental Assessment including but not limited to:

- **Implementing equitable congestion pricing with transit subsidies before undertaking urban freeway expansion projects, including RQIP.** Traffic is worsening as our region grows, affecting our economy, environment, and quality of life. However, the phenomenon known as induced demand means that widening I-5 as proposed will not alleviate congestion near that interchange (or in our region); it will only increase congestion, pollution, and sprawl. Thus, it is imperative that ODOT collaborate with municipal, regional, business, and community partners to thoroughly implement and evaluate congestion pricing on this stretch of I-5 prior to further consideration of the RQIP. The RQIP should be considered only as a last resort once congestion pricing has been demonstrably proven inadequate to solve congestion and improve transit service. The EA dismisses analysis of a congestion pricing alternative on the basis that it will be considered at a future time. Such an excuse is antithetical to NEPA, which requires reasonable forecasting and consideration of all reasonable alternatives
- **Closing on-ramps to reduce fender-benders and ease congestion.** Both PBOT and ODOT have acknowledged that given the principle of induced demand, the RQIP is not a project that can actually relieve congestion as proposed, so ODOT has shifted its marketing to emphasize safety concerns, noting accurately that there are a lot of fender-benders at the interchanges near Lower Albina and that reduction of these fender-benders would dramatically ease backups in the area. If reducing fender-benders and easing backup for the convenience of through-traffic is truly the problem for which we are trying to solve, a simple (much cheaper) solution is to reduce the number of cars merging onto I-5 in that area by closing adjacent on-ramps. Ramp closures have been used to reduce congestion in other cities, yet the agencies overseeing this project have failed to fully evaluate this alternative in the EA.
- **Reallocating resources away from central city freeway expansion to high crash network intersections and orphaned highways across Portland in addition to 100% build-out of the city's bicycle and pedestrian networks.** If ODOT truly cares about traffic safety and reducing the loss of life on thoroughfares in the Portland area, they would redirect the half-billion dollars allocated to this project toward safety infrastructure in places where serious injuries and loss of life to traffic violence is highest and work with PBOT on a fully-funded jurisdictional transfer of state "orphaned" highways to local control, where "Vision Zero" is the prevailing policy framework. The City of Portland's Bicycle Advisory Committee has strongly recommended the No-Build Alternative for I-5 RQIP (based on diligent analysis of very limited information provided in the EA), noting that the Build Alternative would fail to achieve the stated project goals and objectives,

especially in critical areas related to bicycling, but also including the resulting conditions for walking and transit, local connectivity, safety, equity, and climate outcomes in direct conflict with city planning goals.

- **Removal of I-5 freeway (“decommissioning”) as the best option for local communities, regional prosperity, and climate action.** Although the EA highlights a pattern of environmental injustice, racist policymaking, and displacement in lower Albina, it proposes nothing to adequately remediate the situation as it currently exists. In fact, it is likely to exacerbate dangerously poor air quality conditions adjacent to Harriet Tubman Middle School, a historically Black school that currently has a 40 percent African American student population, according to Portland Public Schools (PPS) data. As Rukaiyah Adams of the Albina Vision Trust in her comments to you on this EA points out, only “remediation is remediation.” The buildable highway covers (“caps”) as currently proposed are insufficient to achieve the Albina Vision. Adams’ observation is supported by other engineering and design experts in our community who have pointed out that the caps as proposed are wholly inadequate to support housing, quality parks and green spaces, or improved air quality. The people of Lower Albina deserve far better than window dressing; the residents of Lower Albina (past, present, and future) deserve the very best remediation efforts physically possible in support of their vision for a vibrant, prosperous neighborhood between the Willamette River and Lloyd District.

Mounting evidence from freeway removal projects around the world suggests that many of the fears involved with removing freeways are unwarranted; when considered alongside the many positive impacts of freeway removal, it’s clear that freeway removal has very little downside for cities. At this critical time in human and climate history, and given the history of inequity in Lower Albina, it is essential that ODOT consider the highest quality freeway removal option possible in an Environmental Impact Statement.

It’s clear that the public is correct in demanding an EIS process from ODOT and FHA on the proposed RQIP. But we need to think beyond that: freeway widening projects like this one do not actually reduce congestion and/or improve safety. As a state, region, and city our priorities should be providing increased mobility options and improving street safety through investments in transit, walking, and bicycling. With the resources currently allocated to freeway expansion, the City of Portland could make investments that would result in substantial progress toward ensuring our city’s streets are safer, air cleaner, neighborhoods healthier, and giving people more affordable travel alternatives to driving alone.

In the last few months, many decision-makers have reminded our local community that the money earmarked for the I-5 Rose Quarter freeway expansion project is “ODOT’s money,” the result of the HB 2017 transportation package of taxes and fees intended to “Keep Oregon

Moving” that was widely hailed as a successful measure to reduce congestion, maintain and improve infrastructure, and increase transit access statewide. Unfortunately for Portlanders, this bill was flawed for more than its regressive bike tax: no city in the 21st Century that claims to care about the health of its people, place, or prosperity can in good faith sanction freeway building through its urban core, especially in the name of “safety” and “congestion relief.” HB 2017 includes not one, but three, urban highway expansion projects.

Portland’s Transportation Commissioner asserted at a public hearing recently (March 12, 2019, at Oregon Convention Center) in response to overwhelming opposition to the project as proposed and the EA as submitted: “This isn’t a PBOT project, this is an ODOT project. This money is from the Highway Trust Fund. As much as I’d like to spend half a billion dollars elsewhere. It’s not my money, and it can only be spent on highways. We can’t take this money and spend it on Vision Zero city streets.”

With all due respect, I heartily disagree: telling ODOT that we will not permit freeway expansions in our urban areas is precisely what Portland can and should do.

Portlanders like me who care about climate action and environmental justice stand ready to reprise our Freeway Revolts of the 1960s and 70s, insisting that our local policymakers withdraw municipal and regional support of the RQIP and negotiate with state and federal governments for more racially just, operationally effective, and environmentally sound allocation of transportation resources than those currently proposed in the EA. This political about-face is necessary to ensure Portland meets its economic, equity, climate action, and transportation safety goals in the near term and for future generations.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sarah". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Sarah Iannarone  
Member, City of Portland Bicycle Advisory Committee  
Resident, Mt. Scott-Arleta Neighborhood, Portland, OR 97206