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I-5 Rose Quarter Improvement Project
Oregon Department of Transportation
% Megan Channell
123 NW Flanders Street
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350PDX would like to thank the Oregon Department of Transportation (ODOT) for the opportunity to provide public comment on the I-5 Rose Quarter freeway widening project.

350PDX works to build a diverse grassroots movement to address the causes of climate disruption through justice-based solutions. We understand that the climate crisis is upon us and that climate change is a threat to every Oregonian. Its effects are being felt immediately and severely by the most vulnerable Oregonians -- children, people of color, people with low-incomes, and people with disabilities. Immediate impacts in Oregon range from extended and intensified wildfire seasons to diminishing and uncertain water supplies to inhospitable marine ecosystems and rising sea levels. Changes in weather patterns and increases in extreme weather events are a costly threat to essential infrastructure and are forecasted to cost Oregon businesses billions of dollars in lost revenue.

The source of this climate damage is not some faraway event -- climate change is the sum result of every-day actions and our responsibility is to immediately and collectively cease contributing actions. We must make immediate and significant steps to eliminate existing sources of greenhouse gas (GHG) emissions, including eliminating the use of fossil-fuel vehicles.

"If we ended GHG emissions tomorrow, climate change effects would persist and worsen for decades to come. ... Our children, and theirs, will be living for decades with the worsening consequences of our failure to take timely action when we knew we should. Bad as that is, further delay only makes it worse." ---**2018 Biennial Report to the Legislature for the 2019 Legislative Session, Oregon Global Warming Commission**

Transportation emissions already comprise 40% of Oregon's greenhouse gas emissions. Despite increasingly rigorous GHG emissions requirements for cars and light trucks, the transportation-related GHGs contribution to the State's GHG emissions rose from 35% in 2014 due to increased vehicle-miles travelled. The region's population is forecasted to increase by 390,000 people by 2050, and it is imperative that we develop a transportation network that accommodates these new residents without any additional vehicle miles traveled and any increase in associated emissions. Incredibly, the environmental assessment (EA) of the project claims that the project will not increase vehicle miles traveled and will result in decreased GHG emissions! Such bold claims require exceptional evidence and ODOT's description of methods, results, and data in the EA to justify these findings is inadequate. To decarbonize our transportation sector, we must fully redirect our resources towards investments in walkable communities connected by frequent, reliable public transportation. As many local transportation advocacy organizations have pointed out, this project actually worsens commute times for the transit lines that pass through the neighborhood. It's simply disingenuous to invest half a billion dollars in a transportation project in the center of Oregon's densest city and claim that this project has any benefits to carbon reduction.

Building the climate movement.

When the I-5 corridor was constructed six decades ago, the Lower Albina neighborhood was destroyed and the predominantly African-American neighborhoods centered in North Portland were savagely split. The opening of I-5 initiated a cycle of decreased air quality, suburban sprawl, increased traffic and emissions, and demand for additional vehicles lanes, in turn inducing additional demand and restarting the cycle. This proposed I-5 Rose Quarter freeway widening project amplifies the same core cycle of destroying the fabric of the city for the convenience of suburban motorists travelling through the city. But now, the project cynically uses the co-opted language of environmental sustainability, active transportation, and environmental justice to describe a freeway expansion project as a boon to pedestrians, bicyclists, transit users, and motorists while “repairing” the historical neighborhood with construction leftovers.

Given the large and growing role of transportation in the State’s GHG emissions, the mandate to decrease emissions to 10% below 1990 levels by 2020 and at least 80% below 1990 levels by 2050, the inadequacy of the EA, and the history of damage to the adjacent communities inflicted by the freeway, it is the position of 350PDX that:

1. ODOT should not move forward with the I-5 Rose Quarter freeway widening project based on the Environmental Assessment and should instead complete a full Environmental Impact Statement to evaluate the effects of the project.
2. ODOT must include analysis of congestion pricing as both an alternative to reduce congestion and as a complicating factor to the build/no-build analysis. As of January 2019, ODOT has funding and permission from the Federal Highway Administration to study congestion pricing along the I-5 corridor as mandated by Section 120 of Oregon House Bill 2017. ODOT should also conduct the build/no-build analysis with the underlying assumption that a twelve-lane Columbia River Crossing is *not* built.
3. ODOT should partner with the City of Portland, Metro, and TriMet to facilitate the development of a network of dedicated and priority transit and biking facilities on all facilities under its jurisdiction.

350PDX appreciates this opportunity to provide public comment on the I-5 Rose Quarter freeway widening project. We urge you to recognize that the community is urging you to stop prioritizing the allocation of space and right-of-way to automobiles to the detriment of people walking, biking, or taking public transportation. Take this opportunity to build a positive legacy that contributes to the health, safety, and welfare of the Portland Metro Region, the State of Oregon, and the whole of the I-5 Corridor.

Sincerely,

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