
PDF To Aaron Brown - typos corrected Fwd: From Betsy and Rich Reese - Challenge to Environmental Assessment of Rose Quarter Improvement Project

1 message

Betsy <betsy.w.reese@gmail.com>
To: Betsy Reese <betsy.w.reese@gmail.com>

Wed, Apr 3, 2019 at 2:04 PM

----- Forwarded message -----

From: **Betsy** <betsy.w.reese@gmail.com>

Date: Mon, Apr 1, 2019 at 11:22 AM

Subject: From Betsy and Rich Reese - Challenge to Environmental Assessment of Rose Quarter Improvement Project

To: CHANNELL Megan <Megan.CHANNELL@odot.state.or.us>

Cc: <mayorwheeler@portlandoregon.gov>, <chloe@portlandoregon.gov>, Commissioner Saltzman <dan@portlandoregon.gov>, Commissioner Fritz <amanda@portlandoregon.gov>, Nick Fish <nick@portlandoregon.gov>, Commissioner Hardesty <JoAnn@portlandoregon.gov>, Jillian Detweiler <jillian@thestreettrust.org>, Smith Chris <chris@chrissmith.us>, Jess Thompson <jess@oregonwalks.org>, Bob Stacey <bobstacey@mac.com>, Emily Guise <emilykguise@gmail.com>, Allan Rudwick <arudwick@gmail.com>, WINDSHEIMER Rian M <rian.m.windsheimer@odot.state.or.us>

To Megan Channell and all others,

We disagree with the methodology used, the interpretation and stated implications of findings, the accuracy of findings, and the accuracy of stated facts in multiple parts of the Environmental Assessment of the Rose Quarter Improvement Plan. Additionally, we find that the EA omits some essential assessment data entirely.

In principle, we are not fans of freeway expansion. We share most of the views of those who are opposed to this entire project. Nevertheless, because this project promised to revitalize the Albina/Rose Quarter neighborhood, we have supported it. Our support has gone to the extent of participating in discussions in 2011-12 about entering into a "land-swap" agreement with the City and State that would reconfigure a parcel of land that we have owned for over 20 years through which public ROW acquisition is integral to the project. We do continue to have some hope for this project, but only if significant modifications are made in the design, and a complete Environmental Impact Statement is done that will truly address mitigation of the many adverse environmental impacts of the current plan.

As a dramatically affected private property owner, *we cooperated with the ROW acquisition of our property because we were led to believe the following:*

1. That the reason this area, which is so important to Portland, due to both it's wealth of underdeveloped close-in land and its history of successive demolitions and displacements of the African American community that once thrived here, has remained moribund for decades is because no one could agree on what to do about the freeway. We were told that the revitalization and restitution finally could begin with acceptance of the N/NE Quadrant / I-5 Rose Quarter Plan, which was developed over a period of two years by community stakeholders and an ODOT/PBOT partnership. In 2012 that plan was formally approved by City Council, the Bureau of Planning and

Sustainability, and the Oregon Transportation Commission. The funding in 2017 of the transportation portion of that plan, referred to here as the Rose Quarter Improvement Project, was to be the first step in this revitalization and restitution.

2. That creating a new bicycle and pedestrian ROW through our parking lot connecting Hancock and Dixon Streets was the solution to the notoriously dangerous Broadway/Flint/Wheeler intersection. In addition, two new MUPS, Multi-Use Paths, would be created on ODOT property to maintain the Flint Ave. route for bicyclists and pedestrians.
3. That we would be made whole with land, not money. Land equivalent to that taken from the northwest end of our parcel for the new ROW was to be added onto the east side, leaving us with a piece of land that had all the characteristics, including, size, shape, access, grade, etc., that would give it as good or better development potential as that which we would have had without the taking. This new land was to come from the Flint Ave. ROW which was being vacated, or removed, as part of the plan. This is important to us as we want to have a hand in making sure that our property is put to its highest and best use contributing to neighborhood revitalization, such as that described by the Albina Vision Trust.
4. That the areas in front of the Paramount Apartments and the Grandma's Daycare property on the north side of Broadway, would be joined and made contiguous by the vacated Flint ROW. This would create a public space described as "a broad pedestrian plaza", "the center of place in placemaking" of the newly revitalized area. The 1923 Paramount Apartments on the north side of Broadway and the 1923 Left Bank Building on the south side, two of the only 10% of structures still standing of the African American architectural heritage of this community, would be "the twin bookends to this center of place". This plaza would be designated as the 'African American Neighborhood Memorial Plaza, commemorating the neighborhood that was destroyed here.' This plaza would be marked as a testament and reminder so that Portland residents and visitors would not forget this negative chapter in our city's history.

The Environmental Assessment of the current RQIP plan shows a negative alteration or entire omission of all four of these improvements benefiting us and the people of Portland. Additionally, the RQIP deviates dramatically from many other carefully considered concepts and details of N/NE Quadrant / I-5 Rose Quarter Plan.

I focus here on two areas: A. Coordination with appropriate land use planning, and B. Development of improved active transportation routes and infrastructure.

A few examples:

A.a. Protecting existing land use: The EA methodology does not adequately measure the impacts or propose sufficient mitigation required to protect *existing* land uses. For example, neither the historic Paramount Apartments nor the Harriet Tubman School received a sufficiently detailed analysis and acceptable mitigation plan for both short and long term negative environmental impacts of noise, air pollution, vibration, architectural heritage, social and economic equity and justice, etc.

For example, the EA describes how Sound Wall 5 was determined not to be economically warranted during the construction period. The methodology used noise sensors placed inside the Compass Oncology Building located west of the Paramount Apartments. The findings showed that that building would be adequately shielded from the freeway construction noise by the "four-story apartment building" between it and freeway, therefore the sound wall would not produce significant added noise attenuation for the oncology clinic. The methodology should have placed sound

sensors inside the Paramount Apartments, instead of merely considering the Paramount Apartments as a sound wall shielding the oncology clinic. Furthermore, the EA fails to even get the number of stories of the Paramount Apartments correct, let alone do any kind of inspections, testing, etc. for impacts on this soon-to-be-100-year-old historic building that is home to over 80 people. No specific mention is made of adverse health effects or displacement of tenants due to noise, air, vibration, transportation, parking removal, the creation of a new busy street on the north side of the building, etc. during the 5-year construction period, nor of the long-term environmental impacts of these changes.

A.b. Supporting future land use development: EA methodology does not assess the project's impact on future land use development in the project area, nor does it propose mitigation of those impacts. For example, the property fragment that will be left to Paramount Parking is rendered inaccessible from the new Hancock/Dixon St. and from its historic access point off Wheeler. The proposed new access to this fragment runs on Flint, the ROW that was to be removed and dedicated to the memorial pedestrian plaza described in #4 above, thus making that plaza impossible. Additionally, Paramount Parking is inaccurately labeled in the EA as "parking for the residents of the Paramount Apartments", when in fact it is independently owned and fully leased to multiple business tenants serving the neighborhood.

The RQIP shows the entire Grandma's Daycare property being taken for new public ROW in order to create an ADA-compliant switchback MUP that will be unappealing to both pedestrian and bicyclists. This taking and paving over of land for public ROW eliminates the opportunity for private, public, or non-profit investors to develop their properties to their highest and best use and to contribute to the creation of a thriving new housing and business development at the gateway of the newly revitalized Albina neighborhood.

The RQIP has failed to design freeway lids or covers that are strong enough to create new buildable land that will help knit the Albina neighborhood back together. The lids as currently designed are ineffective at covering and healing the gash that has torn this neighborhood in two. They are destined to become unmaintained wastelands that will further divide this neighborhood and cut it off from surrounding areas.

Project staff, state and city government, environmental assessment contractors, and the people of Portland must be reminded that these transportation improvements were conceptualized in tandem with land use planning for this area by the *N/NE Quadrant - I-5 Broadway-Weidler Stakeholder Advisory Committee*. These have been but a few examples that show land use being sacrificed for transportation ROW that favors motor vehicle through-traffic at the expense of creating a walkable, bikeable, transit-oriented, renewed neighborhood.

B. Creating safe, comfortable bicycle and pedestrian routes to and through this neighborhood: The EA narrative repeatedly states that the project creates better, safer, more comfortable connectivity for bikes and pedestrians. The data contradict those assertions.

A few examples:

The new Hancock-Dixon St. cutting through our property and promised to be the solution to avoiding the dangerous Broadway/Flint/Wheeler intersection, will now be just an auto thoroughfare. It will have sidewalks and painted bike lanes, but at a 10% grade, this route is now acknowledged by ODOT as being so unappealing to and unused by cyclists and pedestrians that they are no longer even indicating it on the maps they use when presenting active transportation infrastructure upgrades.

The original 2012 plan showed two new MUPS that were to effectively replace Flint Ave. Running on ODOT property connected by the new Hancock/Dixon lid over I-5, the new off-street bike/ped paths were to connect the stubbed-off Flint at Tillamook to Broadway west of I-5.

Of these two proper MUPS, one is completely missing, and the other is not a MUP, but what I call BS, Bikes on Sidewalk. BS is what engineers sometimes propose when they can't figure out what to do with bikes. This one is an awkward and cramped 5%-grade switch-back that will pit pedestrians and bicyclists against each other, and that few cyclists will use more than once.

So instead of a safer and more comfortable bicycle route to replace Flint from North Portland to the Broadway Bridge, it's, 'Nope. Sorry. It's the Vancouver/Broadway/I-5 Freeway intersection for you, bicycle riders.'

Yes. The Vancouver route is what we are left with that most bicycle commuters will opt for. It includes a shift of the bike lane from the right side to the left side of the Vancouver, funneling cyclists into a "jug-handle" staging area for a right turn across Vancouver and the freeway off-ramps. The number of daily bike commuters on this route is the highest in the city. Especially at rush hour, they will have an uncomfortable and unsafe time switching across motor vehicle lanes and making the 90-degree turn into the jug-handle, crossing over and avoiding cyclists on the through-bike-lane on Broadway, and lining up in the too-small staging area to wait for the light. We were promised multiple routes that would be improvements over the right turn onto Broadway from Flint that we have now. What we got was only one viable route that is worse.

Multiple issues with the RQIP make this area uncomfortable and unsafe for pedestrians. Just one example is the shaved-off corners at multiple locations that were created to allow large trucks a more comfortable turn at the expense of shorter, more direct, and safer crosswalks for pedestrians. The plan was supposed to create a walkable neighborhood that would be safe and pleasant to walk to, from, and through and that would support the current and future land use that will revitalize the neighborhood. The current plan does not support that, and in many locations directly impedes that vision.

The environmental impacts to the Vera Katz Eastside Esplanade, both short and long-term, are unmitigated and intolerable. This city park and Federal Transportation Corridor cannot tolerate additional exposure to noise, air, and light-blocking from the I-5 freeway. It is an essential transportation route with no nearby detour and cannot tolerate the closures needed during the construction period and for ongoing maintenance which are described in the EA as being periodic and of unknown frequency and duration. The Esplanade has been closed just twice since it opened 18 years ago, once for exceptionally high water in the Willamette that made the floating bridge joints dangerous, and just this year for extensive and badly needed maintenance. With the current proposal, we are concerned that closures will be more frequent and prolonged.

In summary, we challenge the adequacy and accuracy of this Environmental Assessment. We recommend that issues described here, and other issues mentioned by others, be addressed with further design, and only then that an Environmental Impact Statement be done.

Thank you for taking our testimony.

Rich and Betsy Reese

Owners, Paramount Parking

1750 N. Wheeler

503-347-3634