



March 30, 2019

Oregon Department of Transportation
Attention: Megan Channell
123 NW Flanders St.
Portland, OR 97209

Dear Ms. Channell:

The Safe Routes to School National Partnership, working in Oregon via the Pacific Northwest Regional Network, is a national non-profit that works to advance safe walking and bicycling to and from schools, to improve the health and wellbeing of kids of all races, income levels, and abilities, and to foster the creation of healthy communities for everyone.

Our charge is to build policies and secure funding in the region to support students and families to be able to walk and roll to and from school and in their communities, and we work to ensure that those in our community who have the fewest options for transportation are given the most opportunities for better ways to get around. We are ever mindful that new or improved transportation opportunities must not negatively impact the health and wellbeing of the people in our communities, but rather seek ways to improve lives through transportation. For us and those we fight for, the fundamental questions we ask in 2019 of the I-5 Rose Quarter Project: *what transportation approach best relieves congestion while not ignoring the social and environmental impacts of past and current transportation projects? What transportation approach best supports our economy while also supporting the health and community of those living, working, playing, and praying nearby?*

HB 2017 directed ODOT to invest in congestion relief and freight mobility in the Rose Quarter in order to benefit the economy as measured by congestion and reliability. Past planning processes at ODOT took that directive and brought forward the proposed I-5 Rose Quarter Project as we see it today through the lens of this Environmental Assessment (EA). In our view, the past planning, needs, and intentions of this project have not been brought up-to-date with current and future considerations, including not only congestion and economic needs, but also co-benefits to climate emissions reductions; air quality, health, and safety improvements; and other local, regional, and state goals such as reducing vehicle miles traveled.

In its current iteration, the I-5 Rose Quarter Project utterly fails on environmental justice remediation, air quality, health, and safety, and appears to not even achieve the outcomes it is charged to address, namely congestion relief. Urban congestion relief has never been achieved by freeway expansion, auxiliary lanes or otherwise, because of induced demand – the EA itself indicates the congestion relief sought will not be realized.



Specifically, we are deeply concerned by the lack of depth of analysis on environmental justice, air quality, and environmental/climate emissions impacts:

- Harriet Tubman Middle School, with more than two-thirds students of color, sits directly adjacent to the stretch of I-5 in question. Students, their families, the nearby community, and Portland Public School Board have raised grave and relevant concerns about their ability to be *outside* near their school, which would naturally include walking or bicycling to and from school, something encouraged for students living within 1.5 miles of a school. A PSU study found that the carbon emission levels are *currently* so dangerous that students shouldn't be allowed to play outside. The concern is that increased vehicle emissions and closer proximity of the interstate's footprint widening will decrease the air quality to the point that it will be even more unsafe for youth to breathe or be outside at all. African American children are nearly twice as likely to have asthma than White children, and seven times as likely to die from asthma related causes than the White population (Source: US Department of Health and Human Services, Office of Minority Health). People of color have a higher rate of asthma than White people in part because their communities are historically impacted by transportation emissions of high-volume roadways in their communities. The EA does not demonstrate the full impact on this school, and warrants further and deeper investigation.
- There is a long and dirty history of environmental and social injustice to the historically Black community in the neighborhood that was once Lower Albina before it was torn apart by the construction of I-5. The community displaced will not ever have their neighborhood back, and no level of congestion relief nor freight mobility will allow this community to realize their needs, because this project doesn't allow them to build what they need – including the creation of infill development that bridges I-5 and connects Albina to existing active eastside neighborhoods, not to mention breathable air. The EA does not demonstrate the full impact on this environmental injustice, nor how it will be mitigated, and warrants further and deeper investigation.
- We were shocked by the audacity of the claim that this project will be better for the environment. It is well established that transportation is the largest source of greenhouse gas emissions in the United States and accounts for half of the total increase in U.S. emissions since 1990. The ways in which transportation can make improvements to the climate and environment include transit service, frequency, and reliability improvements, reduction in vehicle miles traveled, safe facilities that enable high uptake of walking and bicycling, and vehicle electrification including rapid shifting of diesel trucks and fleet vehicles. Adding lanes and allowing for induced demand on I-5 will only increase climate emissions directly along this corridor, adding to environmental and air quality concerns. The EA does not demonstrate the full impact on the environment, and warrants further and deeper investigation.



After review of the EA, we are left with the questions unanswered: What transportation approach best relieves congestion *while not ignoring the social and environmental impacts of past and current transportation projects*? What transportation approach best supports our economy *while also supporting the health and community of those living, working, playing, and praying nearby*?

Seeking solutions for congestion relief in this corridor must include serious discussion about the fact that there is more than one way to relieve congestion. It must include serious consideration of the climate, health, and environmental justice impacts of transportation. The corridor is congested today not because there are not enough travel or auxiliary lanes, but because those who seek to travel through it don't have enough reliable options to do so: Options such as congestion pricing have not been fully explored in the context of this project, and worse, have been set aside as not relevant to this project; opportunities such as advisory speed limits and transit- and freight-only lanes, which could meaningfully provide positive solutions for freight and the regional economy, are not meaningfully considered; ODOT facilities within the City of Portland with far greater safety needs go unfunded, as do nearly \$250m in Safe Routes to School infrastructure needs around Portland schools. We recognize that funding was allocated to make improvements on I-5, but congestion and this project do not exist in a vacuum—it must be recognized that the reason so many people must rely on a private vehicle to get around, and why so many low-income families spend a majority of their income on owning and operating a car, is because the options available to them are not safe, not convenient, and not sufficient.

Just as businesses are reliant on government agencies to invest in infrastructure to support a healthy economy, families across the city and region are counting on government agencies to invest in crucial infrastructure that will make their communities safe to live and travel in. We urge ODOT to lead the region in a sincere and comprehensive conversation about how to spend limited transportation dollars in a way that will fundamentally benefit our transportation system, our climate, and our communities; provide options that truly work for all; and tackle, not repeat, the many societal issues we face today because of past transportation decisions.

There are too many uncertainties about whether this project meets its intended goals, and far too many questions about health and environmental justice impacts left unanswered. We join with others in requesting ODOT conduct a full Environmental Impact Statement that fully investigates and addresses the numerous air quality, climate, and environmental justice concerns.

Sincerely,

Kari Schlosshauer

Senior Policy Manager, Safe Routes Partnership
Portland, Oregon