



January 4th, 2023

To: Elected Officials, ODOT, USDOT, Oregon Transportation Commission

Governor-Elect Tina Kotek

US Senator Ron Wyden

US Congressman Earl Blumenauer

Oregon Senator Frederick

Representative Sanchez

Multnomah County Chair Pederson

Multnomah County Commissioner Jayapal

Metro Council President Lynn Peterson

Sabrina Foward, OTC Coordinator

Portland Mayor Wheeler

US Senator Jeff Merkley

US DOT Secretary Pete Buttigieg

Portland Commissioner Rubio

Portland Commissioner Mapps

Portland Commissioner Ryan

Portland Commissioner Gonzalez

Metro Councilor Mary Nolan

ODOT Director Kris Strickler

Re: I-5 Rose Quarter Expansion Supplemental Environmental Assessment

This project would be a major step in the wrong direction for our city, the climate, and our neighborhood. We are asking for one of two options: a full Environmental Impact Statement (EIS) for this project that studies real alternatives to highway expansion including removing I-5 from the Eliot neighborhood, congestion tolling and lids without lane expansion. We know what the real impact of this version of the project will be already and if that study is not going to be done then we ask for the second option: that you eliminate all funding, cease all planning work, and completely abandon the I-5 Rose Quarter Project. We additionally ask that this project be removed from all Portland and Metro Transportation System Plans. Further study of the existing proposal will not substantially change the project's impacts on our city and neighborhood, which will continue the devastation that I-5 already has had here. Delaying the project only to kill it later is a waste of time and taxpayer resources that should be instead planning a better, greener future for our regional transportation system. The \$129 Million that has been allocated for the current planning process would have been a great down payment for rebuilding Lower Albina, but we can't get that money back.

Portland has a legacy of turning down ill-advised freeway projects. We removed the Harbor Drive Freeway in 1974 and canceled the Mt. Hood Freeway in 1976. Let's add to that "canceled I-5 expansion in 2023."

### **Environmental Justice**

The construction of I-5 through the Albina district, including Eliot, is symptomatic of systemic racism in public policy that destroyed Portland's Black neighborhoods. Eliot has struggled due to generations of public planning mistakes from the 1950s to 1970s especially that reduced housing in the area for large public projects with questionable benefits. One of the more recent wins that area residents had was the construction of Harriet Tubman Middle School. However, students at Tubman have to breathe toxic exhaust from cars and diesel trucks driving through Portland. While there is now talk and money to help move that school away from I-5, there will still be buildings and people walking through the area. If we care about mitigating the effects of pollution for this vulnerable population, we must discuss how to make our car and truck fleet pollute much less. We must also consider the long term goal of reducing the impacts of, and ultimately the removal of I-5 and other freeways. Our neighbors in Vancouver, BC refused to construct urban freeways in the first place and they have thrived without them. No freeway expansion has ever reduced congestion. Adding capacity to I-5 is all but guaranteed to result in increased cars and truck trips, leading to worse air quality, especially for our neighborhood and the students of Tubman.



## **Climate Change**

According to the latest data from the International Panel on Climate Change, we have 7 years to cut carbon emissions by half in order to avoid catastrophic climate change. This necessitates a dramatic shift in how our society does everything, including moving people and goods. If we are going to have any meaningful chance of addressing climate change, we need to make dramatic moves to shift trips away from cars to more sustainable modes like public transit, biking, and walking. An investment in widening our freeways is an investment in another nail in our collective coffin. If we care about human society persisting beyond the 22nd century, we must start getting cars off the roads ASAP.

## **Lack of Transportation Throughput Benefits**

The Rose Quarter widening project was initially conceived by highway planners to remove a bottleneck in the freeway system. This bottleneck is conveniently located in between several other bottlenecks. When traffic is at its worst in the evening peak hours, there are long lines of cars on I-5 north, on I-405 west, on I-84 east and occasionally on I-5 south of the project area. Essentially, all traffic getting stuck at the Rose Quarter is on its way to another bottleneck. These cars will not benefit substantially by being rushed through the Rose Quarter faster only to find themselves in the next bottleneck. If traffic were to improve in the area substantially, latent and induced demand would immediately increase traffic volumes through the area. There might be a few minutes or hours per day where cars and trucks were able to see travel time benefits, however we do not believe this will become the dominant condition on the highway.

During the 2010-12 process, we were told that the highway engineers were struggling with their computer models to show that the project had any benefits at all. Recently, we have found out that the models projecting benefits from the project are due to inclusion of all projects in the Regional Transportation Plan being built. Institutional memory shows that we have never accomplished that in the past and it is an unwise assumption to make going forward. A true “no-build” analysis would show that this project on its own will not provide substantial benefits.

## **Minority Contractors and Job Creation**

One of the main benefits touted by the ODOT project team is a large commitment to using minority contractors to do the work on this project. ODOT is conducting a large amount of work in the region and we see no reason why this project needs special minority contracting provisions for this project specifically. The ENA is very supportive of requiring diverse contractors to build public and private developments within the area. However, using this as a carrot to build an unwanted, wasteful and useless highway widening project is not what we should be spending this money on.

## **Safety**

ODOT has pitched this project to neighborhoods as a way to move more vehicles more quickly through the Rose Quarter, both on I-5 and on surface streets. Higher speeds and increased throughput on surface roads increase the chances a driver will kill or maim another road user. Our transportation network should prioritize safety instead of speed.

The latest design “hybrid 3” seems to have benefits over the previous iteration of the EA, however there are still several major problems with the designs that we expect will result in fatalities before band-aids are added after the proposed construction. We are aware the current renderings are not finalized, but it appears bikes continue to be an afterthought and will be squeezed in where it is possible at the last minute, likely leading to unsafe outcomes.



Many dangerous intersections in this area have had multiple bicycle and pedestrian crashes and deaths in the past. These include Broadway/I-5/Williams and Broadway/Flint intersections. The lives that have been lost are a testament to the bad engineering decisions made in the past; the incremental improvements made throughout the years reflect learnings on how to make the streets safer. Redesigning all of the streets in the area may place us back in a situation where we have to live with untested designs at the risk of more accidents, injuries and fatalities.

ODOT's own data indicate that the freeway section in question does not experience dangerous accidents at a higher than average rate. If safety is our priority, we the public would get the best bang for our buck by investing in major safety overhauls on surface streets which double as state highways in East Portland.

### **Fiscal Responsibility**

Half a billion dollars is a substantial amount of money. Three times that, \$1.2-\$1.5 Billion is a huge amount. America collectively and the Portland region have invested a ton of money in project after project to increase the freeway network. Locally, Portland has avoided most of these projects due to smart-minded citizens and politicians knowing that moving more traffic through an area (even if slightly faster) does not help build a stronger City, only placemaking does. The I-5 Rose Quarter project does not offer a good return on investment. It is just doubling down on the value-destroying investment of I-5 itself. As ODOT has a huge maintenance backlog, capital expenditure on additional infrastructure is irresponsible. Going deeply in debt to pay for investments with no payback is even more negligent. This is not a correct prioritization of public funds given the State's policy goals. While improving interstate commerce is a valid goal, ODOT is over a decade into pretending to develop a congestion pricing scheme which would actually solve the problem. We are incredibly disappointed to see tolling be considered as a way to pay for this project when it will have no real public benefits.

### **Urban Design Problems / Lack of Local Improvements**

At its core, the I-5 Rose Quarter project has always been a highway widening project. All of the "local improvements" are afterthoughts that may even make the local streets worse for many road users. The pedestrian and bike infrastructure in the area has been improving incrementally over the past two decades, and while there is room for improvement, this project does not directly address existing hazards. The designs ODOT and PBOT have presented give us little faith that after this project is completed, the pedestrian, transit, and bicycle setup will even be as comfortable and efficient as the current status quo.

The lids proposed by the project team have improved tremendously since the original EA, however it is unclear where money might materialize from to build on the caps, and if buildings do not go there, we doubt we will see much use of the new public space. The renderings presented by ODOT still depict several traffic islands isolated by high traffic rights-of-way. We would recommend visiting the triangular diverter where MLK and Grand merge at NE Hancock or the existing highway shoulder encampments for examples of how we can expect these spaces to be utilized. Spaces that are not accessible and have no active programming are not going to be used and seem destined to be abandoned and ignored by all but those with no other place to sleep.

If we are going to make a multi-generational investment in the Rose Quarter Area, we need to do it right. This process is coming at the urban design problem from a vehicle throughput lens which will further deteriorate the street activity in the area. The only hope coming from this project are the buildings in the



renderings that have no funding or developer attached to them. This does not feel like a realistic plan to build buildings, but just a way to use PR to sell a project to a rightly-skeptical public.

### **Project Casting a Dark Cloud over adjacent development**

Since the I-5 Expansion at the Rose Quarter was proposed in the 2011-12 timeframe during the Central City Planning process, there have been several block-scale developments proposed in the lower Broadway-Weidler corridor. None of these projects were built and we have heard that the reason is that this project being in limbo for the past decade is the reason. We would like to see clarity around this to help jump-start development of Lower Albina and the southern end of the Eliot Neighborhood.

The Eliot Neighborhood is an inner neighborhood and it was once a thriving commercial and residential place. The natural patterns of development are trying to make it back into that type of place, but the highway and large landowners in the area are preventing that vision and natural state from recurring. Buildings on top of the highway would support this vision, however we fear that empty lids without buildings will simply continue the pattern of disinvestment in the area. We have yet to see any financial plan that would put buildings on the lids. Because of that the renderings feel like a public relations stunt not a real plan.

### **Misalignment with Portland and Oregon's Stated Goals**

Portland has adopted Vision Zero, a Climate Action Plan and vehicle mode-split goals. The I-5 Rose Quarter project is anathema to all of these. The project is a 20th century transportation solution in a world of 21st century problems. The net outcome will inevitably be higher regional vehicle miles traveled (VMT), which is highly correlated with traffic fatalities. More VMT also will inevitably lead to higher CO2 emissions, which undermines our climate change goals. Making it faster and easier to drive has historically always led to more driving. This violates our mode-split goals. The direct fiscal costs of the project, while high, pale before those of the externalities and the opportunity costs of this investment.

Thank you for your consideration.

Sincerely,

The Eliot Neighborhood Association

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