



Environmental Assessment Comments

First Name Begins with B

Ordered by first name

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2019 0302 Baker Blaine

Comment: NO COMMENT PROVIDED

Attachments: N/A

2019 0331 Barbara Joy

Comment: I do not want to see additional highways built here. This ODOT \$500 million I-5 Rose Quarter expansion will just add to the high toxic pollution levels that we are breathing everyday in Portland. Portland has some of the highest pollution in the country now! Yet we continue to allow developers to destroy the trees which can help clean the air. We add more people, cars and and trucks daily to this once-small city. The continued exploding growth here is unsustainable! The \$500 million should be put toward improving the already very efficient Trimet system, including adding more security. Portland and ODOT need to pay attention to all the research of experts who have already provided facts to support an end to the crazy expansion and pollution levels here. People's lives are being affected in unhealthy ways. Read the research and stop trying to push these projects through. Our once-beautiful city is being threatened.

Attachments: N/A

2019 0305 Barbara Kinzle Christman

Comment: I am strongly against the freeway expansion project. Why waste the 500 million on a project that may not improve congestion anyway? And increase air pollution? More lanes of cars sitting in traffic. Instead I think the money should go towards public transportation. I live in East Portland, and the only way I can get anywhere without a car is by bus, which is not always reliable. Before anything gets built I think more max lines should be payed out for communities that need it. When I was in Barcelona for two weeks, I was able to get anywhere I wanted without a car, quickly and reliably, even if I was traveling to a nearby town. Max could go out to Sandy, Oregon n City, etc. Imagine the possibilities. This is the future! Let's live up to our reputation as a green city. Thank you.

Attachments: N/A

2019 0330 Barbara Krupnik-Goldman

Comment: To Whom it May Concern:

I am writing to express my opposition to the Rose Quarter Freeway Expansion Program. Building more freeways at a time when we must urgently reduce carbon emissions is an erroneous response to Portland's traffic congestion problems. 40% of Oregon's carbon emissions come from transportation, as a recent Oregonian article pointed out, Oregon simply cannot decarbonize our transportation sector without driving a lot less. If we are going to spend \$500,000,000 on a transportation project that addresses the urgent existential threat that



climate change represents, this money should be spent on improving and prioritizing public transportation and building walkable communities.

Building more freeway has not been shown to reduce congestion anyway. There are numerous examples of induced demand across the country, including most recently in Los Angeles, who spent \$1.6 BILLION on a “freeway bottleneck” widening project only to find it made traffic *worse.*

Decongestion Pricing should be implemented before expansion. Road pricing is the only policy actually proven to reduce traffic congestion; it’s also proven to improve air quality and reduce carbon emissions as well. This must be structured fairly to avoid undue impact on lower income people.

In spending transportation dollars wisely, we need to think in terms of sustainable, low carbon ways of moving people and goods, not just ways to move more vehicles.

Thank-you

Attachments: N/A

2019 0327 Barbara Scharff

Comment: Dear People: Transportation emissions account for 40% of greenhouse gas emissions in Oregon, so why would we invest \$500 million dollars in a project that would add capacity for traffic (but fail to cut congestion)? New transportation infrastructure projects must address our crises with climate change, air quality, and equity, not make them worse. Unfortunately, the proposed I-5 Rose Quarter Expansion Project-- like all other freeway expansion projects-- will increase traffic congestion, carbon emissions, and air pollution. This will happen right in the backyard of Harriet Tubman Middle School where the pollution is already so bad that public health experts recommend students forgo outdoor recess. The task should be how to get people out of cars/trucks, not how to expand the capacity for more. Thank you.

Attachments: N/A

2019 0228 Barnabas Furth

Comment: The proposal to widen the freeway is a horrible idea. It will not improve congestion, it will be bad for the environment, and it will cost \$500 million.

Expanding this freeway is climate change denial.

Attachments: N/A

2019 0401 Barry Deutsch

Comment: Please do not go forward with the I5 freeway expansion. It's an old-fashioned approach that experts agree will not work; it's ridiculously expensive; and it goes against Portland's character as a city that has good urban design.



Best wishes,

Attachments: N/A

2019 0307 Barry Pelzner

Comment: Increasing freeway capacity at the Rose Quarter runs against all we stand for as inhabitants of a forward-thinking city. As it is, congestion on I-5, I-84 and I-405 spills out onto city streets, making life less and less livable in this purportedly livable city. Increasing freeway capacity will only accelerate this trend, as it has done everywhere it is undertaken. Instead, our hard-earned tax dollars should be put to developing alternative transit options for residents who will choose to forego car travel only when efficient, economical alternatives are developed. We can never meet our climate-change goals by encouraging more car use in the region instead of pursuing alternatives.

Attachments: N/A

2019 0311 BC Shleby

Comment: First there would be an increase in air pollution. The expansion would move the right lane into the backyard of Harriet Tubman Middle School, where air pollution is already so bad that PSU's researchers recommend that students forgo outdoor recess. This is also an environmental justice issue as 40% of Tubman's students are Black.

Second Congestion won't improve. Freeway expansion has never solved traffic congestion, in any North American city, anywhere. To paraphrase a line for the cinema, "if you build it more will drive".

Instead of encouraging more cars, we need to promote more efficient transit and improved walkability, The cost for this project would be better spent on improving both particularly in the east region of the metro area where many neighbourhoods have inadequate or even no sidewalks, no controlled crosswalks, along with infrequent and spotty transit service. Transit connects neighborhoods, freeways cut them apart.

Attachments: N/A

2019 0330 Bea Readel

Comment: No Comment Provided

Attachments: N/A

2019 0331 Beatrice Prusiewicz

Comment: I am writing you to express my opposition to the proposed expansion of I-5 at the Rose quarter (or anywhere). Highway expansion never solves congestion! Please don't spend hundreds of millions of dollars on a plan that won't work! Also the ramifications for the neighboring communities is terrible!



Thank you for reading

Attachments: N/A

2019 0317 Becky Hawkins

Comment: I've lived in Portland for almost 7 years, and I'm familiar with the frustrations of traffic congestion. I agree that we need to find a transportation solution for Portland's growing population. However, there are ZERO instances where building a wider freeway has resulted in free-flowing traffic. Freeway lanes won't alleviate the traffic congestion in the city, or the shortage of parking spaces, the pollution-related health concerns, or the heartbreaking pedestrian deaths.

With scientists giving us an 11-year window to reduce carbon emissions and keep the earth habitable, Portland needs to help more people get to more places without a car. This is where half a billion dollars should be put to use: walkable neighborhoods and public transportation!

Attachments: N/A

2019 0331 Becky Morton

Comment: I would like to express my opposition to the I-5 expansion. Transportation dollars need to go toward public transit and bicycle and pedestrian infrastructure. We can't keep ignoring climate change and the affects of emissions from freeway traffic.

Thank you

Attachments: N/A

2019 0401 Belinda Miller

Comment: I agree with Audubon and feel that the proposed I-5 expansion is not beneficial for the Portland we have worked hard to build. I oppose this expansion.

- Expanding freeways is not an effective strategy for reducing congestion. ODOT has failed to make the case for why this project should move forward.

- ODOT should fully evaluate proven strategies such as congestion pricing and investment in public transportation before spending a half billion dollars to expand a short stretch of highway.

- The project is entirely at odds with the City's Climate Agenda. 40% of Oregon's emissions are from the transportation sector. We need to focus on strategies that reduce dependency on cars, not perpetuate 1950s style highway projects.

- At the same time that ODOT is proposing to spend nearly half a billion dollars on expanding I-5, the region continues to neglect serious road safety problems in East Portland.

- The project will increase air pollution in the backyard of Harriet Tubman Middle School, which already has some of the worse air quality in the state.



For a project with an estimated cost of over \$500 million, we feel the projected community benefits are just not there - while the opportunity cost of using these funds shelves other deserving projects with tangible safety improvements or opportunities to decarbonize our transportation system.

Attachments: N/A

2019 0328 ben

Comment: Please don't expand the freeway!!!

We need to have an Express max line from Lloyd to Vancouver.

I want to live in a city that discourages automobile use...

It used to be that.

Attachments: N/A

2019 0000 Ben (or Dan) Weber

Comment: My name is Ben (or Dan) Weber. I'm a resident of NE Portland. My phone number is 503-893-4999. I'm calling in regards to the I-5 Rose Quarter Project and would like to express my complete lack of support and opposition to any element of the project having to do with highway widening, adding lanes or auxiliary lanes -- anything involving the federal highway element of I-5. We have a long history of expanding roads to avoid congestion. You know as well as I do the principles of induced demand. And I encourage you to abandon and rethink this part of the project. We have a citywide climate goal that this project does not make positive contributions to. I can express support for improvements to local street connectivity and improvements to bike and pedestrian infrastructure. I do understand that those parts of the project are linked. However, I do not support the highway elements of the project. Please take those off the table. Thank you for your consideration of my comments and I look forward to participating more in this project.

Attachments: N/A

2019 0329 Ben Bliss

Comment: To whom it may concern,

As a Portlander, I'm deeply troubled by ODOT's Rose Quarter Freeway Expansion project. The project represents a clear step backward in our community's commitment to a sustainable, decarbonized future, and at comes at a time when bold policy in the opposite direction is desperately needed. There are so many better ways a half a billion dollars could be spent.

I'm acutely aware of how frustrating the traffic bottleneck in this part of I5 is. However, there are bigger problems than the frustration of commuters that travel through the pinch point daily. The expansion plan has been sold to the public with an array of bad faith arguments that are really dispiriting. I expect better from ODOT.



-There is no excuse for modeling this \$500M project's performance on a nonexistent Columbia River Crossing, and not disclosing such a giant assumption. How is the public supposed to fairly weigh the study, or alternatives, when data is spun like this? I genuinely hope this was a mistake, and not the ethical lapse it appears to be.

-The project won't meaningfully improve traffic safety in Portland. The two fatal accidents ODOT reports in this stretch-jaywalkers with mental health problems- would not have been avoided with a wider freeway. 82nd is much more dangerous, and also under ODOT's jurisdiction.

-The argument that the freeway expansion will reduce emissions is laughable (and we've been laughed at). This is such an important problem, and such a weak, blinkered argument.

-There are better, and cheaper, tools we should use before countenancing larger freeways in the age of accelerating climate change. Congestion pricing, for one.

I hope the project's assumptions and goals are reworked to suit the culture and health of the community the freeway bisects.

Thanks for your time

Attachments: N/A

2019 0313 Ben Kaiser

Comment: I am a developer and architect who has lived in NE Portland since 1993.

I'd ask that ODOT cancels, or postpones at the least, this highway expansion project.

Why open up a "pinch point" at the detriment of NE Portland neighborhoods AGAIN, when the two states of Oregon and Washington have yet to agree on even the fundamentals of expanding the true pinch point, the 4-lane, I-5 bridge crossing.

We, as two states, should focus our efforts there, particularly in light of the Cascadian Subduction zone threat, to get that bridge modernized and the only stop light on the west coast I-5 corridor, removed.

Most importantly, however, is the fact that once again, the close in neighborhoods of NE Portland will take the brunt of the disruption. It is unconscionable that, yet again, the City of Portland would entertain disrupting Harriet Tubman school, taking more of that property, and bringing the pollution generating aspects of a wider freeway, even closer to the children.

We are also in the undeniable time of climate change, which puts us all on a crash course with our own demise. We should all be truly considering where we place our \$500MM bets, as we struggle to give to our children a livable environment.

Do we take that \$500MM and bet on more cars.... or.... do we place that investment into;

- our children
- better school buildings
- our environment



- continue the train line to Vancouver
- a tolling system for the highway

We are not a wealthy state. We should truly consider every dollar spent, and where it gives the most benefit to all of the citizens of Portland.

Thank you

Attachments: N/A

2019 0000 Ben Kulp

Comment: The environmental assessment is aggressively short-sighted and ignores all of the evidence that suggests that highway widening does nothing to affect long term traffic patterns. <https://usa.streetsblog.org/2017/06/21/the-science-is-clear-more-highways-equals-more-traffic-why-are-dots-still-ignoring-it/>

As such it reaches an inherently faulty conclusion regarding the environmental impact of the proposed highway widening. More lanes == more cars on the highway == the same amount of traffic congestion and more pollution. Moving forward with this project guarantees an increase in short and long term pollution from automobiles and does nothing to improve the livability of Portland.

Please reconsider this plan.

Attachments: N/A

2019 0318 Ben Pollak

Comment: Eliminating bottlenecks is o different from increasing capacity—it will have the same result, less traffic, which always induces demand for driving. No matter how you slice it, this project is bad for the future of our city. Do the right thing and reject this absurd plan. We need more bus service, not better functioning freeways.

Attachments: N/A

2019 0401 Ben Schonberger

Comment: I am writing to comment on the environmental assessment for the Rose Quarter freeway project. I am opposed to the project.

On the basis of its own goals, the project won't work. No urban highway widening project has ever relieved congestion, and this project is no different. The project has touted "safety" as a benefit, but despite the half-billion dollar price tag, the reduction in injuries and deaths would be minor in a corridor where they are already extremely rare. Spending much less money on high-crash corridors like the ODOT owned 82nd Avenue would have a much greater impact on reducing crashes and injuries. So if the project won't reduce congestion, and it won't appreciably increase safety outcomes, why do it?



Similarly, the project will worsen air pollution adjacent to Harriet Tubman Middle School, the school that serves my neighborhood in northeast Portland. Bringing diesel exhaust even closer to the playing fields adjacent to a school is heading in the wrong direction. This also raises serious issues of environmental justice since school children, residents, and businesses through this corridor are more likely to be members of minority groups than the drivers who create the emissions. Emissions generally are a significant issue with the proposal, since building more freeway infrastructure reinforces an urban environment where burning fossil fuels is the primary mode of transportation. In order to make any headway on slowing climate change impacts, we need to invest in alternative energy and low-carbon transportation modes, not the cars and trucks that are the dirtiest and most damaging ways to get around the region.

It has also been extremely disappointing to see the way ODOT is not being fully forthcoming in its public engagement process. Data has not been shared, information has been hidden until requested from community groups, and the comment period has been made unreasonably short in spite of this. The study even assumes the construction of a new Columbia River Bridge, even though that project has been effectively canceled. A full Environmental Impact Statement process should be done to allow careful consideration of other alternatives. This EIS should include congestion pricing, and a robust assessment of a no-build alternative.

It is not too late to reverse course with this ill-advised project.

Attachments: N/A

2019 0228 Ben Weber

Comment: Please do not widen I-5, otherwise coded (auxiliary) lanes or other supposed "capacity improvements". More lanes = more VMT = more planet killing GHG. It also perverts our land use and active transportation goals in the region. Yes to walking, biking, and transit. No other choices!

Attachments: [2019 0228 Ben Weber ATT](#)

2019 0326 Ben Weber

Comment: Thank you for your consideration of my input on the I-5 Rose Quarter project. I am strongly opposed to the project as it currently is proposed. The project appears to fail in most of the metrics it purportedly sought to fix.

- Highway widening has never mitigated congestion in the long-run. Induced demand is a well-known and unavoidable consequence. The highway will fill up again.
- Claimed safety improvements are questionable at best. This section of highway has a low fatality rate and a high minor-crash rate. Adding lane miles to ramps and interchanges will induce more trips and more vehicle movements.
- Air pollution is already at unacceptable levels and will only worsen with this project. Students at the Tubman School deserve better than to be subject to life-altering particulates at a young age just in the name of vehicle throughput.



- The public process has been disappointing. The Environmental Assessment so far has been incomplete and fails to measure key health and safety measures. A full EIS is needed to understand these impacts, and the potential improvements that a highway tolling plan could instead provide. It is questionable that the project would even help reduce greenhouse gas emissions, a stated key “benefit” of the expansion.

This region has seen success in the past by saying NO to highway projects and freeway expansion. This is a wrong-header and backward-looking project that subverts climate and active transportation mode share goals, and is proven to be the type of project that is a massive money sink with dubious benefits.

Please do not proceed with implementing the I-5 Rose Quarter expansion.

Attachments: N/A

2019 0329 Benjamin Foote

Comment: To Whom It May Concern,

I am deeply concerned about the I-5 Rose Quarter Improvement Project. This project will disconnect the local street grid and will make bicycling more difficult by removing the Flint street bridge, all while espousing to significantly improve bicycling transportation. The incline necessary to accommodate bicycle traffic on the additional bike/ped bridges and on the new street Hancock (10% grade by some reports) will not be comfortable for bicycling. A third of the city or Portland's bicycle commuters go through this area every business day.

Our goals at the city, regional and state levels stipulate that we would like to improve conditions for cyclists and promote bicycling as a viable transportation option. We should be building world class facilities that prioritize bicycle transportation and make it easier to move through the city by bicycle than by motor vehicle. This project impedes those goals.

On a broader point, if we reduced the number of cars traveling through this corridor we might not need to "improve" the I-5 Rose Quarter at all. It seems like reducing the number of cars should be the first priority. Lets work on that with all the tools we have including tolling and improving the light rail and heavy rail trips between Vancouver WA and Portland.

Each year the temperature rises further and the entire scientific and academic community cautions us to take action quickly in the face of climate change. Even if we were to quickly electrify the automobile transportation system the climate impacts of the electricity production would still result in too much carbon production. We must reduce automotive vehicle miles traveled.

The historians will ask "If they knew the impact cars were having, why did they drive off the cliff?" Certainly its because we are choosing to be willfully ignorant of the impacts of the current system. The most irksome aspect of this project is the sheer scale of willful ignorance it exposes. Is this really the highest best use of these resources? Do first principles lead us to the conclusion that we need this build?



We've been talking about climate change since the 80's. When is the human change necessary to combat this crisis coming? That's the change of lanes we truly need.

Attachments: N/A

2019 0000 Benjamin Kerensa

Comment: It would be nice to see more data supporting ODOT claims of lowered greenhouse gas emissions

Attachments: N/A

2019 0327 Benjamin Kerensa

Comment: I'm writing in support of the I5 Rose Quarter project and I have reviewed the EA. I do want to point out that activists often coordinate large comment campaigns to have their voice heard loudly but while their voice is loud it's not the majority and many regular residents don't have the time to comment or know how.

This project is important for Portland and the region and should proceed.

Attachments: N/A

2019 0329 Benjamin Orwoll

Comment: Hello,

I believe that it is important to have ongoing development and improvement of the freeways in the Portland area, including and especially around the Rose Quarter, I5-I84 interchange, and at the Columbia river crossing. However, simply widening the freeway is not nearly innovative enough, nor will it help in the long term.

We need to make radical and innovative changes to the freeway infrastructure in Portland not unlike the way that Tom McCall helped to do decades ago.

I would suggest that we cover/bury all of the freeways throughout the rose quarter area, thus allowing for more available land to develop and removing an eyesore from the region. The same could be said of much of the freeway structure around the central east-side, which hampers the ability to develop on the otherwise-desirable river front along that area.

As far as the Columbia river crossing I'm all in favor of doing something iconic. We should take this opportunity to build something big, beautiful, and multi-functional. It should support car/truck/train/pedestrian/bicycle traffic and should be robust to earthquakes and tidal/river changes. I believe tax money and congestion/toll pricing could be used to finance all of these efforts, and we would end up with something we'd be proud of.

Look at San Francisco for an example. The new Bay Bridge cause years of delays and complaints about cost overruns. However, now it is a massive improvement over the previous



span and its beautiful. I never hear anyone complaining anymore. Plus there were the construction jobs created by the project for years.

Thank you for your attention. I would be happy to elaborate on any of these comments.

Attachments: N/A

2019 0401 Bernard LeTourneau

Comment: This freeway project is not good for Portland, and not good for our region. I think the following issues need to be addressed regarding the Rose Quarter freeway project.

1. Widening freeways has never alleviated congestion or brought about greater safety in any region where freeway widening has been carried out.
2. What about congestion pricing, why is this not being seriously pursued? Beyond this project, the region needs to see less vehicle mile traveled per household in order to lower carbon emission and effectively address climate change.
3. Why are we jeopardizing the lives of young people, especially those at Harriet Tubman Middle School?
4. The impacts of this project on the Eastbank Esplanade are extremely negative: increased noise pollution, a visual and aesthetic eyesore, increased air pollution.

Once again, this project is bad for Portland, and bad for the region. It should be abandoned and replaced with projects that lead us into a greener and more prosperous future.

Attachments: N/A

2019 0315 Beth Biagini

Comment: I am a high school science teacher. I am opposed the freeway expansion next to Harriet Tubman Middle School. This day in age, on the day of the youth climate march we should all pause and ask ourselves: when will we stop with these outdated ways of planning? When are we going to wake up to the fact that we are out of time? We need to act as the proverbial house (our planet) is on fire. On top of that, children of color have carried an unfair amount of this environmental burden in our country and city. The fact that children in this school can not play outside safely is proof enough.

Thank you for your consideration.

Attachments: N/A

2019 0226 Beth Levin

Comment: I oppose I-5 freeway expansion. I've lived in NE Portland for 20 years and I know the traffic gets tough, but freeway expansion doesn't help. Congestion won't improve. Freeway expansion has never solved traffic congestion, in any North American city, anywhere. Ever!



ODOT's own hired consultants admit that this project won't address recurring traffic congestion on this corridor.

ODOT's proposed freeway widening would expand I-5 into the backyard of Harriet Tubman Middle School

Increase in air pollution. This project proposes to expand a freeway into the backyard of Harriet Tubman Middle School, where air pollution is already so bad that PSU's researchers recommended that students forgo outdoor recess. This is an environmental justice issue – 40% of Tubman's students are Black.

Freeway Expansion is Climate Denialism. 40% of Oregon's carbon emissions come from transportation – as a recent Oregonian article pointed out, Oregon simply cannot decarbonize our transportation sector without driving a lot less. If we are going to spend \$500,000,000 on a transportation project that addresses the urgent existential threat that climate change represents, this money should be spent on improving and prioritizing public transportation and building walkable communities.

Opportunity Costs: Even *if* ODOT can manage to keep this project under \$500,000,000 (pretty unlikely, given the agency's track record), it's an enormously expensive undertaking whereas the revenues could be spent on a litany of other projects and needs across the region. \$500 million could build a lot of sidewalks in East Portland, bus rapid transit lines across town, or be a solid down payment towards the proposed underground light rail tunnel. And unlike a freeway widening, all of those investments would be better for air quality, carbon emissions, public health, and congestion relief.

Community Opposition: Despite ODOT's claims that this project "reconnects the community," there are numerous concerns about the surface-level bicycle and pedestrian facilities currently proposed. ODOT intends to remove the Flint Avenue crossing (one of the city's most popular bike commuting routes), the proposed "lids" over the freeway won't be strong enough to support buildings like the Albina Vision is proposing, and is opposed by all major bike/ped groups and local neighborhood organizations (we wrote a letter to Portland City Hall last year articulating the ways the surface-level street changes are not an improvement to the community)

Decongestion Pricing should be implemented before expansion. Road pricing is the only policy actually proven to reduce traffic congestion; it's also proven to improve air quality and reduce carbon emissions as well. Why is ODOT moving forward with a \$500 million boondoggle investment without first instituting congestion pricing to see if that mechanism wouldn't solve the traffic problems on the corridor *without* sinking half a billion dollars into the expansion? ODOT's studies of traffic patterns of the proposed freeway expansion *completely* ignore the reality that the state is mandated with moving forward with decongestion pricing, which will enormously impact how many people choose to drive on the corridor and greatly reduce congestion.

Attachments: N/A



2019 0311 Beth Levin

Comment: Congestion won't improve. Freeway expansion has never solved traffic congestion, in any North American city, anywhere. Ever! ODOT's own hired consultants admit that this project won't address recurring traffic congestion on this corridor.

Attachments: N/A

2019 0329 Beth Levin

Comment: Please do NOT expand the freeway in Portland. It will cause increase in air pollution. This project proposes to expand a freeway into the backyard of Harriet Tubman Middle School, where air pollution is already so bad that PSU's researchers recommended that students forgo outdoor recess. This is an environmental justice issue – 40% of Tubman's students are Black, and 73% are identified by PPS as vulnerable populations.

Freeway Expansion is Climate Denialism. 40% of Oregon's carbon emissions come from transportation, as a recent Oregonian article pointed out, Oregon simply cannot decarbonize our transportation sector without driving a lot less. If we are going to spend \$500,000,000 on a transportation project that addresses the urgent existential threat that climate change represents, this money should be spent on improving and prioritizing public transportation and building walkable communities.

Attachments: N/A

2019 0314 Beth Winter

Comment: The project should be focusing on the biking and walking connections and enhancements, rather than widening I-5 for single occupancy vehicles. There needs to be a way to fund needed improvements without add additional travel lanes to the highway. I live in North and use this section of I-5 to travel for work, when I am forced to drive. There are transit options, bike routes and pedestrian bridges that would benefit so much more with this project than by widening the highway. I also would like to express concern for the middle school students at Harriet Tubman and the impact this project would have on them. Please consider making this a biking and pedestrian improvement project and ditch the highway portion.

Attachments: N/A

2019 0327 Bev Q

Comment: I don't support the I-5 expansion project, and I do expect another 45 day comment period and a full environmental assessment.

I am a pedestrian, a biker, a driver, and a Portland resident. I love this city, and I believe in numbers and data and using true facts before spending billions of dollars on freeway congestion that won't be improved in any significant way and creates more harm than good.



We should protect the low income communities around I-5 and not create more pollution and noise in their backyard.

We should demand that ODOT to be honest and provide real data that can be independently reviewed.

Widening freeways is not the right investment for our community and it's not how I want my tax dollars spent.

I do want to see congestion pricing right now, something I would happily pay if I was dumb enough to drive during rush hour instead of taking the wide range of public transit options available to me.

Attachments: N/A

2019 0327 Beverly Quisenberry

Comment: I am calling to leave a comment on the I-5 Rose Quart expansion, which I do not support. I do support extending public comment period for an additional 45 days because ODOT did not provide the information in a timely manner. Thank you

Attachments: N/A

2019 0401 Bill Grisear & Family

Comment: I'd like to add my family's comments on the proposed half-billion dollar I-5 Rose Quarter project -

We are wholeheartedly ****AGAINST**** funding because:

1. It will not speed traffic through this area
2. It will not save lives
3. It will worsen air quality, particularly around a public middle school (Tubman)
4. It will complicate and unnecessarily extend bike and pedestrian crossing through this area
5. It is a tremendous amount of public tax money that could be better directed to smaller projects that benefit our community, increase safety, air quality, health, encourage non-auto transportation options, etc;
6. It's going to contribute to climate change
7. It is opposed by the Albina Vision Trust, the Street Trust, Betsy Reese (who notes that "Several aspects of the project that we were led to believe would improve our city are now missing or negatively altered on the current plan"<<hyperlink - see attachment>>), the Portland Bureau of Transportation's biking and walking committees and Portland Public Schools

Our clear impression of ODOT is that it's run by entrenched and privileged special interests and aimed only at serving car drivers and construction concerns with our public tax money, regardless of whether you harm the residents of diverse neighborhoods, including children, or



whether your projects are effective at addressing issues of safety, efficiency and public health (and in the case of this one, it's not).

We are also concerned that ODOT has deliberately misrepresented the scale and impact of this project <<hyperlink - see attachment>> to the public.

(Graphic: ODOT I-5 Rose Quarter Environmental Assessment) <<hyperlink - see attachment>>

PLEASE DO NOT WASTE ANY MORE TAX DOLLARS on this health-endangering, even planet endangering boondoggle of an ODOT project

Attachments: [2019 0401 Bill Griesar ATT](#); [2019 0401 Bill Griesar ATT 2](#); [2019 0401 Bill Griesar ATT 3](#);

2019 0227 Bill Michtom

Comment: I write to Express my concern with the proposed expansion of the I5 freeway at the Rose Quarter and its likely result of further poisoning the atmosphere for the students and staff at Harriet Tubman Middle School.

The conclusions presented by the Oregon Department of Transportation fly in the face of most other studies, starting with the suggestion that expansion will reduce traffic on that section of the freeway.

Secondly, and much more important, is the likelihood that the already dangerous environment for Tubman School will get even worse., especially as there are existing serious problems.

Third, as happens over and over in Portland (and around the country) the costs for black people is higher than for other populations. It is another attack on the wellbeing of African Americans brought about by systemic racism. This cannot continue.

Facing yet another very questionable death of a mentally ill person of color by the Portland Police, ongoing gentrification driving them out of their historic neighborhoods, and the literal poisoning of their children, there is no question to me and so many others Portlanders that the City of Portland and the state government are destroying the black community.

I urge you to change your plans and use the best science and the most environmentally advanced studies to end this ill-considered plan.

Thank you.

Attachments: N/A

2019 0326 Bill Stites

Comment: I am writing to oppose the I5 Freeway project in the Rose Quarter of Portland. With Climate Change progressing to dangerous levels, we need to move away from fossil fuel use, and actively deter car driving.

This project moves us in the wrong direction, with very serious consequences in the near and far future.



If at all possible, the funding for this project ought to be redirected to transit, and active transportation projects throughout the state.

At the very least, we need a full EIS to assess the real ramifications.

Thank you.

Attachments: N/A

2019 0329 Bill Volmer

Comment: I am writing to express my opposition to the proposed Rose Quarter freeway expansion project. Yes congestion is bad on the freeways, and increasingly all over town, and it's only likely to get worse with the projected population increases for the Portland metro area. However I don't feel this is the proper solution to the problem. Expanding the freeway may provide short-term relief, but in the long run it just invites more traffic to the area and ultimately we'll be just as congested but with more cars and more fossil fuel emissions polluting our skies and exacerbating global warming.

Instead, I think we should be looking into other options that are proven to reduce congestion, like Decongestion Pricing, and further investment in our public transit systems and bicycle and pedestrian routes.

Thanks for listening to me.

Attachments: N/A

2019 0000 Bjorn Warloe

Comment: We need better transit not wider freeways.

Attachments: N/A

2019 0329 Bjorn Warloe

Comment: I am writing in opposition to the planned freeway widening at the Rose Quarter. It does not appear that the project will successfully eliminate congestion, and with the enormous cost of the project it seems like alternatives like decongestion pricing should be fully explored and piloted before we even consider adding lanes. Additionally I have just learned that the freeway widening would lead to the freeway being over the eastside esplanade pathway. This is completely unacceptable. The full scope of negative consequences of this project need to be out in the open rather than ramming it through without people being able to understand what is going on. At the bare minimum a full environmental impact statement needs to be completed and alternatives need to be fully explored before moving forward with any expansion of the I5 within city limits.

Attachments: N/A



2019 0302 Blaine Baker

Comment: We don't need this. We need more bike lanes and walking paths. Get rid of them cars.

Attachments: N/A

2019 0330 Blaine Brignell

Comment: I work in northeast Portland and have lived here for 10 years. Driving congestion has gotten progressively worse and city investment consistently is poorly spent. The biggest improvement I've made in quality of life is to bike commute, and the proposed project both negatively impacts my transit (east Bank sun exposure, Flint Avenue transit to the Rose quarter) while simultaneously reminding me and other bike commuters that the city is interested in investing more in car infrastructure than cycling and public transit. This project is a waste of funds that will directly decrease the livability of Portland.

Attachments: N/A

2019 0401 Blaine Palmer

Comment: A half-billion dollar freeway expansion is a colossal investment in our destruction.

I have every hope my three adult children will be alive in 2050, and great fear they will face a world drastically different than today's. If global warming continues, their earth will have more frequent and destructive storms, floods and fires here in North America, catastrophic, tragic and destabilizing population displacement throughout the world.

Limiting global warming to 1.5°C above pre-industrial levels is the minimum requirement to forestall greater climate disasters, and requires rapid, dramatic changes in how governments, industries and societies function, according to the Intergovernmental Panel on Climate Change <<hyperlink - see attachment>> (IPCC) . Net CO2 emissions need to drop 45 percent from their 2010 levels by 2030, and reach net-zero by 2050. 40% of Oregon's carbon emissions come from transportation.

It's 2019. What sense does it make to invest \$500,000 (or more, if estimates are incorrect) in transportation infrastructure that must be rendered obsolete in the next decade if we have a chance of forestalling climate catastrophe?

Portland and Oregon must continue to lead and look to the future, not the past. Half a billion dollars can increase transit ridership by building sidewalks in East Portland, creating bus rapid transit lines across town, or could be a solid down payment towards the proposed underground light rail tunnel. Unlike a freeway widening, all of those investments would be better for air quality, carbon emissions, public health, and congestion relief.

We cannot rob our children of their future. I oppose the freeway expansion. Before going any further, ODOT must conduct a full environmental impact assessment, and explore congestion pricing.



Attachments: [2019 0401 Blaine Palmer ATT](#)

2019 0328 Blake Goud

Comment: ODOT's plan to widen the I-5 by adding two lanes now and widening the profile of the highway to accommodate up to 8 lanes is climate denialism. It is spitting into the wind of the evidence that human kind's CO2 emissions have caused a rise in the average global temperatures that affects the weather, intensifies storms and fires and will create a worse future for humanity, including my 3-1/2 year old son.

But ODOT's plan to widen a freeway isn't bad only because it contributes new infrastructure that will (despite ODOT's manipulated findings that they tried to hide from the public) induce new demand and raise CO2 emissions compared with the status quo. It is also incredibly disruptive to active and mass transit through the affected community (things that can help reduce aggregate CO2 emissions while still getting people where they need to go).

Furthermore, widening the highway into a majority-minority school that is already affected by the emissions generated by traffic passing by on I-5 is an environmental injustice that we are perpetrating on communities who were most affected by the initial construction of I-5. The community came up with an ambitious Albina Vision plan which would help reverse some of the impacts of I-5, a plan which is incompatible even with the plans today for this highway widening since it includes non-buildable caps.

In addition to the many project-related reasons this plan fails, ODOT's conduct has been disrespectful of the community participation process, their EA has been incomplete, the comment period is insufficient and they have hidden from public view the critical assumptions supporting their statements about induced demand, future traffic volumes and CO2 emissions which fly in the face of every other example where highways have been widened.

The project cost estimate today is an egregiously poor use of public resources that could be used far more effectively to affect real safety issues on ODOT roads throughout Portland that are killing and injuring people at a far higher rate than the section of I-5 that ODOT wants to widen. I have no doubt that the actual cost if ODOT is allowed to proceed will skyrocket and, based on their past track record of cost overruns, is likely to exceed \$1,000,000,000. We have much more important uses for that volume of resources, and even the portion of that which would be paid for locally.

In contrast to failed policies around highway widening, congestion pricing is consistent with addressing congestion and meeting our climate action goals. ODOT refuses to wait to see if this could be an effective solution before widening the highway.

I urge a halt to be placed on this project for all the reasons outlined above.

Attachments: N/A



2019 0327 Bo Culver

Comment: The Rose Quarter Expansion project is a waste of taxpayer dollars that could go to alternative transportation networks like busses and the MAX. Adding lanes does nothing to stop congestion due to the triple convergence theory. We do not need more freeways we need better public transportation! Please reconsider our options!

Attachments: N/A

2019 0331 Bob Chappell

Comment: To Whom It May Concern, Please do not widen I-5 in Portland. Please do not spend \$500M on roads that will significantly degrade public transit, public spaces, and walkability.

Attachments: N/A

2019 0401 Bob Dobrich & Steven Cole

Irvington Community Association

Comment: I am writing to you on behalf of the Irvington Community Association (ICA) in regard to the Oregon Department of Transportation's proposed I-5 widening project through the Rose Quarter. The ICA passed a resolution at its March 14th meeting affirming its opposition to the Oregon Department of Transportation's (ODOT) proposed highway expansion plan.

The ICA opposes spending \$500 million on expanding I-5 through the Rose Quarter through the addition of lanes and the altering of the on-ramps.

Contrary to ODOT's unsupported claims, the proposed alteration of I-5 will increase greenhouse emissions at a time when every level of government should be taking steps to curb such emissions. It is also problematic that ODOT based some of its claims on an I-5 Columbia River bridge expansion which has not been approved and thus does not exist and may never exist.

The project will further erode the condition of the Broadway-Weidler corridor at a time when the city should be looking at making the corridor a more neighborhood and business-friendly corridor.

The project will increase dangerous interactions between vehicles and cyclists/pedestrians as a result of the wide on-ramps which will encourage increasing vehicle speeds and will result in intersections which are too wide for pedestrians to safely cross.

The project will reduce the likelihood of improving the Rose Quarter by adding housing and other businesses.

The project will not reconnect the neighborhoods with the Rose Quarter as the proposed lids will be too small and will not be built in such a way as to allow for structures which could actually help in reconnecting the Rose Quarter to its neighbors. The plan to have the lids be "parks" is contradicted by the fact that there is no proposed entity to engage in upkeep. Even if there were



upkeep, it is unlikely that people would want to hang out in an area surrounded by heavy traffic directly over a highway spewing noxious fumes.

Instead of spending money on a project that will increase global warming and result in a deterioration of the pedestrian environment, ODOT should first toll I-5 for a sufficient period to gather data about the reduction of congestion which results from tolling, as has been shown, repeatedly, in other projects throughout the United States and other countries. Instead of encouraging highway expansions, the city should request that ODOT instead spend the \$500 million on other constitutionally allowed projects involving bike and pedestrian infrastructure and modifications to the roadway that make roads safer for all road users.

ODOT should be spending money on traffic calming, safety improvements and pedestrian infrastructure, targeting the arterial streets that have been shown to cause the most serious injuries and fatalities.

Instead of supporting a highway expansion through the Rose Quarter, the city should be encouraging the use of modes of transportation other than driving through the Broadway/Weidler corridor by spending on improving mass transit through the corridor and electrifying the bus fleet. The city should be adding bike and pedestrian infrastructure which will not only reduce emissions but will increase livability in the central city and create a more thriving business environment along a corridor which has languished for decades.

Finally, ODOT could utilize that money to offset the damage it has already done to N/NE Portland by paying to help build housing to replace the over 300 units of housing it demolished and never replaced when it originally built I-5. In addition, ODOT should reimburse Portland Public Schools for the \$12 million plus that PPS had to spend to make the air inside Tubman School clean enough to breathe.

Attachments: [2019 0401 Bob Dobrich & Steven Cole ATT](#)

2019 0312 Bob Sallinger

Portland Audubon Society

Comment: Good evening. My name is Bob Sallinger. I'm the conservation director for the Portland Audubon Society. I appreciate the opportunity to testify tonight. What could we do with half a billion dollars? We could address transportation inequity and safety issues in east Portland. We could investment in public transportation. We could build out our regional system of biking and walking paths. We could truly cap I-5 and bring back neighborhoods that were historically destroyed by I-5. We could do something truly innovative that addresses the most urgent issues facing our community and our planet. Things like climate change, inequity, and the health of our communities. I would ask the City of Portland, how does this advance the priorities of the city, the climate agenda, the equity agenda? The answer is that it doesn't. Instead of doing those things, we're building a time machine back to the 1950s, a very, very expensive time machine, to an era of mega-freeway projects that pollute our air, perpetuate an automobile culture and turned a blind eye to the issue of climate change. I was on the northeast quadrant committee almost a decade ago when this project was hatched. It was clear then that



this was a project in search of a purpose. And when I read the EA, it's clear that hasn't changed. It's still a project in search of a purpose. ODOT has not come close to addressing legitimate issues that have been raised by the community. It has not addressed real alternatives in the environmental assessment. And my concern is like so many mega-projects, this one will continue under its own momentum, moving forward and steamrolling community concerns rather than address them. I do believe that this project, if it continues as planned, will collapse under its own weight, but how many hundreds of millions of dollars will we spend before that happens? We all remember the fiasco that was the I-5 crossing and how community concerns were repeatedly ignored over and over again. Those community concerns were real and the problems with this project are real too. Thank you.

Attachments: N/A

2019 0402 Bob Sallinger

Audubon Society of Portland

Comment: Please accept the following comments from Audubon Society of Portland (Audubon) regarding the draft Environmental Assessment (EA) for proposed widening of Interstate 5 (I-5) at the Rose Quarter. Audubon is a 501(c)(3) public interest conservation organization with 17,000 members in the Portland Metropolitan Region. Audubon has been tracking the I-5 Rose Quarter Freeway Widening Project since it was first proposed as part of the Portland Central City NE Quadrant Planning Process nearly a decade ago. Audubon is also a member of the No More Freeway Expansions Coalition and we incorporate their comments by reference. We appreciate the opportunity to comment on this project.

Based on the information provided in the EA, we urge ODOT to select the "no-build" alternative. If the project does proceed forward, we believe that ODOT would be required to do a full Environmental Impact Statement (EIS) in order to comply with the National Environmental Policy Act (NEPA).

As currently proposed, the I-5 widening project is not consistent with local climate, equity or environmental objectives. ODOT and the Federal Highway Administration ("ODOT") have not made a compelling case that this project would substantially improve congestion on I-5 or that it should rank as a priority project in terms of addressing road safety issues. The freeway lids will offer little in terms of either providing openspace or reconnecting neighborhoods that were historically fractured by the construction of I-5 and will undermine, rather than improve, connectivity for pedestrians and bikers. A transportation project estimated to cost in the range of \$500 million should offer a compelling vision for addressing the most pressing issues of the 21st Century including climate change and equity, but as proposed, the I-5 widening appears designed primarily to perpetuate what should be a bygone era in which freeways and automobiles dominated our urban landscapes.

We would note up front that the EA raises far more questions than it answers. For a project of this cost and magnitude, the EA is remarkably superficial and sparse on details. Many of the EA's sections read more like thumbnail sketches than the detailed analysis we would expect for



a project of this cost and magnitude. The challenges in assessing this project were also unnecessarily exacerbated by the fact that ODOT failed to include many important documents, data sets, figures, and appendices necessary for a complete review of the EA when it was first released on February 15, 2019. Ultimately the complete set of information was not posted until March 13th, effectively narrowing the forty-five day comment period to just nineteen days (just thirteen business days). This project will have major impacts on our community and our environment during both the construction phase and once it is completed. It is important that ODOT strive for maximum transparency and meaningful public engagement.

We would also note that a very broad spectrum of community organizations and subject matter experts have weighed-in on this project with significant and substantive concerns. Virtually every element of this project including its congestion and safety benefits, environmental impacts, ability to redress historic inequities, and the efficacy of its surface improvements (connectivity for bikers and pedestrians and

openspace) has raised red flags from groups and individuals with significant expertise in these subject areas. Too often with these types of mega projects, the NEPA process serves more as an exercise to convince the public, or at least key decision-makers, to allow the project to proceed forward rather than as a true exploration of alternatives that will result in the least damage to the environment. The stated

purpose of NEPA is as follows:

To declare a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation... [42 USC § 4321]

We strongly urge ODOT to heed the concerns being raised by the community now as well as the hard lessons of the Columbia River Crossing where more than \$175 million of public funds was wasted <<Footnote 1>>

before the project ultimately collapsed in a process that chose to ignore rather than address concerns being raised by community stakeholders. The I-5 widening project raised very significant concerns back

when it was first proposed as part of the NE Quadrant Planning Process<<Footnote 2>> in 2010. Many of these questions and issues raised then loom even larger nearly a decade later and issues that had only limited

visibility in 2010 such as climate change and equity are of paramount importance today. It is critical that ODOT use the NEPA process to take the requisite "hard look" at this project and truly consider whether

it should proceed forward.

The following are our specific concerns:

1. A full Environmental Impact Statement is required.



An environmental assessment may either result in a finding of no significant impacts (FONSI) or a determination to proceed to a full environmental impact statement. An agency must prepare an EIS if it

is proposing a major action with a federal nexus which will "significantly affect the human environment." In determining whether an action will significantly affect the human environment, the Council on Environmental Quality (CEQ) advises that an agency must look at both the context and intensity of the proposed action. We incorporate by reference NEPA analysis submitted by attorney, Sean Malone on behalf the No More Freeway Expansions Coalition. Portland Audubon Conservation Director, Bob Sallinger is a signatory to these comments. Mr. Malone has done an outstanding job delineating the basis for why a FONSI would be inconsistent with NEPA and contrary to the law and a full EIS must be developed if the project is to advance.

We will not repeat the entirety of Mr. Malone's comments in this letter, but would note that we are surprised the ODOT did not proceed directly to a full EIS. The context for the I-5 Rose Quarter is a

publicly funded project that will cost approximately \$500 million, likely take multiple years to complete, focused on the most active transportation corridor on the West Coast. This project will have impacts at

the neighborhood, municipal, regional and national scales. It represents one of the most complex and expensive projects in the Regional Transportation Plan (RTP) which prioritized 882 projects for funding

over the next 25 years.<<Footnote 3>> The project will have significant impacts on our river environment including impacts on federally listed salmonid species and federally designated critical habitat for listed salmonids, and will potentially trigger review for compliance with other environmental laws such as the Clean Water Act and CERCLA. Further, the baseline for this project includes the Columbia River Crossing (CRC),

a \$3 billion dollar project which was abandoned in 2013, but which even standing alone required an EIS. If ODOT is going to include the CRC, which currently is not constructed and for which there are no plans

for construction, in the baseline, then it must also consider the CRC as part of the cumulative impacts analysis of this project. By any measure the I-5 expansion meets the criteria for an EIS based on the

scope, scale, complexity, controversy and cumulative impacts of the project.

2. The EA inappropriately includes the Columbia River Crossing in the baseline for this project rendering all of the traffic and pollution analysis meaningless.

ODOT has included the Columbia River Crossing (CRC) in the baseline for this project. The \$3 billion CRC project was abandoned in 2013 after nearly a decade of public process. There are no concrete plans at



this time to revive the CRC. It is unclear on what basis ODOT would include the CRC in the baseline for the I-5 Rose Quarter Widening Project. Its inclusion creates a very significant, perhaps fatal, flaw in the

EA.

If the CRC is included as part of the baseline, then ODOT must analyze the CRC as part of the cumulative effects analysis as a reasonably foreseeable action in conjunction with this project. Since the CRC

standing alone required a full EIS, then the cumulative effects of the I-5 Expansion and CRC would surely require an EIS. If ODOT chooses to decouple the CRC from the I-5 Rose Quarter Expansion Project then

all of the analysis included in the EA must be revised with the CRC removed from the baseline. Removal of the CRC from the baseline would render all of the currently included traffic calculations meaningless.

We would assert that even with decoupling of the CRC and I-5 Rose Quarter Projects, that the I-5 Rose Quarter Project would still require a full EIS. We strongly question why ODOT would include a project of

the magnitude of the CRC in the baseline for this EA when so many factors including timing, design, location and even whether it will happen at all remain purely speculative. We are also concerned that it

is not readily apparent and transparent that the CRC is in the baseline for this EA—it took a remarkable amount of digging through the initially withheld data sets in order to determine that there was an Interstate Bridge hidden in the EA.

3. The EA fails to consider a reasonable range of alternatives including congestion pricing.

NEPA requires that agencies "rigorously explore and objectively evaluate all reasonable alternatives." 40 C.F.R. § 1502.14(a) However, the EA analyzes only two alternatives: Build and No-Build. This falls far short of the agencies obligation under NEPA. In particular, we believe that the EA should have analyzed the potential of congestion pricing to address transportation concerns on this stretch of I-5.

We find ODOT's assertion that congestion pricing was not considered in the EA because it was "not among the existing strategies for use in the study area" at the time that the NE Quadrant Plan was developed (2010-2012) and that congestion pricing will be considered separately "in the future" (EA at 23) entirely unconvincing. In fact, congestion pricing is currently being evaluated for the I-5 Rose Quarter study area, in part with funding from the very same legislative package that is propelling forward the I-5 Rose Quarter Project. Basing the decision not to include an alternative analyzing congestion pricing on the fact that congestion pricing was not being evaluated nearly a decade ago when this project was first conceived, locks ODOT into a bizarre time warp. The EA should be based on present day factors, not the circumstances that existed when the project was first conceived.



Further, it is impossible to reconcile ODOT's dismissal of congestion pricing as "not a reasonable and foreseeable action" based on the fact that it is not included in the RTP fiscally restrained list (EA at 23) when it has included a far more speculative project, the Columbia River Crossing, which also is not included in the RTP fiscally restrained list, as part of the baseline for the I-5 Rose Quarter Project.

HB 2017 made congestion pricing available to ODOT as a tool to address congestion and reduce traffic emissions associated with climate change and air pollution. It specifically instructed ODOT to evaluate

congestion pricing along I-5 and I-205, including the entirety of the I-5 Rose Quarter Project area. While freeway widening has repeatedly been demonstrated to be an ineffective long-term strategy for reducing congestion due to induced demand, congestion pricing has been demonstrated to be a cost effective strategy for addressing both of these concerns. We would refer ODOT to the work of Dr. Alex Bigazzi, a professor at the University of British Columbia, who concluded after a review of sixty different peer-reviewed studies, that congestion pricing is the most effective strategy to reduce emissions (both air pollution and carbon pollution) and traffic.<<Footnote 4>> An ODOT stakeholder advisory committee in 2018 and studies commissioned by ODOT have reaffirmed the efficacy of congestion pricing to address traffic, air pollution and carbon emissions.

It is troubling that ODOT so blithely dismisses the need to evaluate congestion pricing as an alternative to freeway widening. Congestion pricing offers real potential to reduce traffic congestion, air pollution and carbon emissions far beyond the best case scenario for freeway expansion. It also presents the opportunity to save half a billion dollars in public funding for this project and actually create revenue streams to address other community needs. It needs to be evaluated in a way that engages and addresses the concerns of underserved communities that could be in-equitably impacted. If this project moves forward at all, ODOT should produce a full EIS that includes multiple alternatives for consideration including the use of congestion pricing as an alternative to address transportation issues on this stretch of I-5.

4. There are significant problems with ODOT's modelling of the transportation impacts of this project in the EA.

The No More Freeways Traffic Technical Advisory Committee comprised of Buff Brown, Joseph Cortright, Brian Davis and Jesse Lopez have done an excellent job of analyzing flaws in ODOT modelling of the

transportation impacts of this project in the "Technical Memorandum" that they have submitted into the record. We will not repeat those concerns here, but incorporate their "Technical Memorandum" by

reference.

5. The EA fails to adequately describe or analyze the impacts of the construction phase of this project.



One of the most surprising omissions in the EA is the degree to which the EA fails to disclose or analyze the impacts of construction on the community. The EA provides tidbits of information scattered throughout the EA, for example that ODOT will work with the Moda Center to deal with traffic during major events. However, nowhere in the EA is there a comprehensive or coherent discussion about what construction activities will look like or how they will affect the community. In fact, we were unable to find anywhere in the EA even a mention about how long construction activities are likely to occur. Given the \$500 million cost and the complexity of the landscape on which ODOT will be operating, it is reasonable to assume that this project will likely last many months and potentially years, but there is no way to know based on a reading of the EA. ODOT should provide a detailed description of how long construction activities are likely to occur, how they will be phased, expected impacts on traffic on I-5 including congestion, emissions and economic impacts from delays associated with construction related congestion, expected emissions and air quality issues related to the actual construction activities, impacts on pedestrians and bikers utilizing the construction area, impacts on businesses in the construction area, etc. Without a detailed description and analysis of the actual construction, the public cannot make a fully informed assessment of this project.

6. The EA fails to consider or incorporate City of Portland environmental codes.

Although ODOT lists the City of Portland as a partner on this project, the EA fails entirely to incorporate and analyze compliance with City of Portland Environmental Codes, specifically Title 11 Tree Code and Title 33 Planning and Zoning Code. It is important to note that the City of Portland has environmental codes that go beyond what is required by state and federal environmental laws and that compliance with state and federal laws is not necessarily sufficient to meet City requirements.

City of Portland Title 11 Tree Code<<Footnote 5>> provides regulations protecting trees in the City of Portland and mitigation requirements when trees meeting certain specifications are removed. It is clear from multiple figures within the EA that substantial tree removal will need to occur in order to accomplish this project. However, the EA provides no information regarding the number, species and diameter of trees proposed for removal or what mitigation will occur in order to compensate for this loss and meet city requirements. ODOT should include a full description of the trees that will be removed or impacted and

how it will mitigate for the loss to comply with city code.

City of Portland Title 33 Planning and Zoning Code<<Footnote 6>> addresses impacts to habitat as well as the Willamette River Greenway. Title 33 was recently updated to include the Portland Central City Plan including a new River Environmental (River E) Zone the will be directly impacted by in-water and riparian work associated with the I-5 Rose Quarter Widening Project. The code includes mitigation ratios and mitigation locational restrictions that go beyond what is required under state and federal law. For example Portland City Code would require 1.5:1 mitigation ratios for habitat impacts in the River E Zone (which can increase through the river review process) and that mitigation must occur within the Central Reach of the Willamette. However the EA makes no mention of Title 33, how the project will comply with Title 33, or where mitigation may be required. The EA's assertion that mitigation is likely to occur outside



the Central Reach in the Multnomah Channel (EA at 31) is in direct conflict with city code. ODOT should not assume that mitigation proposed to meet state and federal obligations will also be sufficient to meet local requirements. Specifically ODOT should describe how it will comply with City of Portland habitat mitigation requirements associated with in-water and riparian habitat, Willamette River Greenway requirements, and balance cut and fill requirements.

7. The EA provides an inadequate discussion of how stormwater impacts will be addressed.

The EA acknowledges that 30 acres of new impervious surface associated with the freeway widening and 11 acres of new impervious surface associated with the freeway lids will be created. The EA proposes to address these increased stormwater impacts at three water quality treatment facilities located at N. Mississippi Avenue, adjacent to N. Knott Street and at the Eastbank Viaduct/ Esplanade (EA at 82). Portland is a recognized national leader in green infrastructure strategies for addressing stormwater runoff. ODOT should provide a much more detailed analysis of how green infrastructure can be directly incorporated into this project to provide stormwater benefits as well as other benefits associated with green infrastructure such as wildlife habitat, carbon sequestration, reduction in urban heat island effects, reduction in air pollution, community livability and public health. We urge ODOT to carefully consider how this project can complement City of Portland grey and green infrastructure strategies.

If stormwater cannot be treated entirely on site as indicated in the EA, we also urge ODOT to consider utilizing green infrastructure on ODOT property located between the east ends of the Marquam and Hawthorn Bridges to treat other I-5 runoff as mitigation for these impacts. Stormwater from I-5 is currently released into the Willamette in this area via an outfall near the Hawthorn Bridge. This area is a priority for the City and conservation groups for restoration to increase both recreation opportunities and habitat value.<<Footnote 7>> Replacing the outfall with green stormwater infrastructure would help support this effort.

8. The EA fails to adequately analyze how this project will comply with state and federal environmental laws.

The EA provides only cursory analysis of how the project will comply with state and federal environmental laws. We are particularly concerned with the in-water and riparian work associated with this project. The EA downplays the potential impacts of the work on the river but in fact the in-water work is quite substantial including the installation of up to seventeen columns to support ramps associated with this project. Given the complexity of the river environment in this area including the presence of salmonid species and critical habitat protected under the Endangered Species Act, high levels of contamination in both the sediment, riparian areas and uplands, and other complex environmental factors, we believe that an EIS would likely be required for this aspect of the project alone. The City and its partners have spent billions of dollars working to restore health to the river, restoring salmonid habitat, reducing Combined Sewer Overflow (CSO) events and cleaning up contaminated sites. This project will occur in an area that represents some of the best restoration potential in the Central Reach. It is critical that ODOT fully discuss and access how this project will comply with state and federal environmental laws including, but not limited to the Endangered Species



Act, Clean Water Act, CERCLA, Marine Mammal Protection Act and the 2016 National Marine Fisheries Service Biological Opinion addressing floodplain development in listed salmonid habitat in Oregon.<<Footnote 8>>

We would highlight the following specific concerns:

a. The EA fails to adequately characterize listed salmonid use of the project area. The EA lists critical habitat for five ESA-listed salmonid populations: Upper Willamette River (UWR) Chinook salmon, UWR steelhead trout, Lower Columbia River (LCR) Chinook salmon, LCR steelhead trout, and LCR Coho salmon. (EA at 28) However, it is important to note that this area is also used by several out-of-basin Chinook populations. These populations may have unique habitat needs relative to those listed in the EA. Additionally, the EA statement that "Temporary effects to ESA fish would be minimized by conducting work during times when fish are not present in work areas" (EA at 28) is inaccurate. Listed salmonids can be found in the area at all times of the year including during the in-water work window.

b. The EA may mischaracterize certain in-water activities as temporary rather than permanent.

The Army Corps of Engineers and Oregon Department of State Lands categorized in-water construction activity that impacts habitat for 24 months or longer as "permanent." The EA should clearly describe the duration of its "temporary" in-water structures including concrete pour molds around drilled shafts, piles for temporary work bridges, and sheet piling all of which will impact shallow water habitat. Use of barges year-round may also qualify as permanent impacts. If in fact the duration of these structure would exceed 24 months, they may not qualify as temporary and would require different mitigation calculations.

c. It is not clear why ODOT characterizes turbidity of sheet pile installation and drilled shaft construction as "minor".

ODOT characterizes the turbidity impacts of sheet pile installation and drilled shaft construction as "minor." (EA at 29) It is unclear as to how ODOT defines the term "minor." These activities will cause significant turbidity. ODOT should fully describe and analyze the turbidity impacts and how they will be mitigated.

9. The Project will not achieve pedestrian, bicycle, openspace or equity benefits as described in the EA or in ODOT's outreach efforts.

ODOT has aggressively promoted this project based on the surface benefits for pedestrians, bikers and openspace users that it projects will be provided by the "lids." In fact in section 1.4 ODOT lists as the first project goal "enhance pedestrian and bicycle safety and mobility in the vicinity of the Broadway Weidler interchange." (EA at 4). It is safe to say that if in fact this were the primary goal there are far better and less expensive ways to accomplish this objective. It is somewhat stunning the degree to which the project goals emphasize surface improvements rather than impacts directly to the functionality of I-5 to justify this half billion dollar project. We would characterize the surface improvements more as window dressing designed to increase public support for a project that does not appear to be able to pass muster on its own merits.



As an organization with a long history of working to create public openspace, we find the openspace associated with the lids to be highly un compelling. This openspace as characterized in the EA appears to be a random assortment of odd parcels that will be located in a highly unappealing, highly polluted environment interspersed among, above and below high traffic corridors. ODOT has provided no information as to how these openspaces might be used or programmed or the potential health impacts of drawing recreational users to openspaces located within a vortex of automobile activity. We would note that the Rose Quarter Area was originally marketed as a vibrant outdoor area as well as an event center---an ambition that it has never come close to achieving. Except when events are occurring in the Rose Quarter, it is mostly a ghost town and we see nothing in the freeway lids that suggests that this project will change that situation.

We would also note that similar concerns have been raised by the Portland Parks Board. ODOT described the City of Portland as a partner in this project. However, it is not clear that ODOT has coordinated in any meaningful way with Portland Parks and Recreation on the openspace aspects of this project.

It is not even clear that the openspace depicted on ODOT renderings will occur—ODOT made conflicting statements in recent months regarding the potential to place buildings on the lids, asserting in some forums that no building construction is possible and in other forums that up to two stories could be constructed on the lids.

Perhaps the most notable openspace impact is not the lids but rather the fact that an access ramp will be extended out over the Eastbank Esplanade. The Eastbank Esplanade is one of the most popular elements of our regional system of parks, trails and natural areas. A portion of it will now be covered by the expanded freeway, increasing noise and pollution and reducing aesthetic values of this trail. ODOT should more clearly described and assess the impacts on the Eastbank Esplanade.

We would defer to groups such as the City of Portland Pedestrian Advisory Committee, Portland Bicycle Advisory Committee, Oregon Walks, and The Street Trust with regards to the implications of this project for bikers and pedestrians, but we would note that the growing chorus of concern raised by groups dedicated to improving bike and pedestrian infrastructure seriously undermines ODOT's assertions that this project will provide net benefits for these modes of transportation. Instead it appears based on the analysis of multiple stakeholders that the project will actually reduce connectivity once the project is completed and will certainly disrupt pedestrian and bike connective while the project is under construction.

ODOT also asserts that this project will help at least in part remediate inequities that were created by the construction of I-5 by reconnecting communities that were bifurcated. We see no analysis in the EA

that supports this assertion and comments submitted by the Lower Albina Vision Project which is explicitly focused on addressing these historic inequities seriously undermines this assertion.

The most significant impacts in terms of equity are the likely increased air pollution over time due to increased traffic caused by induced demand in the general project area, direct impacts to



Harriet Tubman School articulated in concerns raised by the Portland School Board, <<Footnote 9>> and delay of high priority transportation safety projects in East Portland and elsewhere due to the expenditure of half a billion dollars on this project.

It is critical if this project continues forward that ODOT actively work with openspace, conservation, bike, pedestrian and environmental justice groups, neighborhood associations and frontline communities to develop a vision for capping I-5 that is truly visionary and meets community needs. An EIS should include alternatives that provide much more robust choices for the public to weigh-in on regarding the lids. As currently proposed, the lids are more of an afterthought than a central goal of the project as ODOT asserts.

Conclusion:

We appreciate the opportunity to comment on the I-5 Rose Quarter Widening Project. The congestion that increasingly plagues our communities increases carbon emissions and other forms of air pollution, reduces quality of life and undermines our economy. However, ODOT and the Federal Highway Administration simply have not made the case in this EA for advancing this half billion dollar project. The EA is highly deficient in multiple areas, is based on inaccurate modelling, and fails to consider alternatives that could better achieve the desired outcomes in terms of I-5 traffic and surface improvements. We urge ODOT and the Federal Highway Administration to select the no-build alternative. If the project is to advance further, NEPA requires that full EIS be developed which will allow agencies and the community to fully explore potential alternatives and impacts that more fully meet the objectives of this project and the needs of our community. However, we would caution the agencies that the concerns being raised by the community are profound and serious consideration should be given as to the efficacy of continuing to spend large sums of public dollars to advance this project. We will end by asserting that a half billion dollar transportation project needs to fully embrace the most pressing challenges of the 21st Century including climate change and equity. It should offer a compelling vision for how it will make our communities healthier, fairer and more sustainable.

Thank you for your consideration of these comments.

<<FOOTNOTES>>

1 https://www.oregonlive.com/business/2013/07/columbia_river_crossing_spends.html

2 <https://www.portlandoregon.gov/bps/52841>

3 <https://www.oregonmetro.gov/news/regional-transportation-plan-numbers>

4 "Can traffic management strategies improve urban air quality? A review of the evidence" AY Bigazzi, M Rouleau Journal of Transport & Health 7, 111-124

5 <https://www.portlandoregon.gov/citycode/66002>

6 <https://www.portlandoregon.gov/citycode/28197>

7 <https://www.portlandoregon.gov/bps/article/634577>

8 https://www.westcoast.fisheries.noaa.gov/publications/habitat/2016_04-14_fema_nfip_nwr-2011-3197reducedsize.pdf



9 <https://www.oregonlive.com/education/2019/03/portland-schools-officials-arent-buying-statesenvironmental-assessment-of-rose-quarter-freeway-expansion.html>

Attachments: [2019 0402 Bob Sallinger ATT](#); [2019 0402 Bob Sallinger ATT 2](#); [2019 0402 Bob Sallinger ATT 3](#); [2019 0402 Bob Sallinger ATT 4](#); [2019 0402 Bob Sallinger ATT 5](#); [2019 0402 Bob Sallinger ATT 6](#); [2019 0402 Bob Sallinger ATT 7](#)

2019 0329 Bob Williams

Comment: I am a long time resident and bike rider in Portland. Like everyone I have seen the traffic increase. Yes, it's a problem but a bigger freeway is not the answer! Bigger freeway's simply fill up with more cars that would be going another way and the traffic just gets worse. On top of that bigger freeways mean more air pollution and more climate change damage. We must have more creative (and less expensive) solutions! Give us more bus routes, more mass transit, tolls on all existing freeways that go to Washington, etc. These are the kind of solutions that actually could do some good and they are likely much cheaper and less disruptive than a new freeway. Please cancel any plans for freeway expansion!!!

Thank You

Attachments: N/A

2019 0301 Bobbee Murr

Comment: \$500 million would provide housing for every houseless person in Portland. They are living a nightmare that should not happen to anyone in this city. I commute daily at 5 am and have witnessed people screaming in distress, suffering mutely, or babbling incoherently. I've seen numerous people sleeping in snow and ice this past February.

The air quality is so poor that the air smells terrible and irritates the lungs, affecting people at the ends of the age spectrum the most.

This deadly promotion of burning even more fossil fuels will be stopped by people like me. I have not used a car since 1979, and gave my last one away at that time.

Humanity must change or die out: We must choose life over mass death. No freeway!

Attachments: N/A

2019 0330 Bobbee Murr

Comment: Spending any amount, much less half a billion dollars, on an I-5 expansion is a nightmare of a plan:

Humanity desperately needs to stop burning fossil fuels to save itself and other species.

Funding is better spent on convincing people to stop driving ICE-powered vehicles by promoting sustainable transportation modes.

Portlanders will suffer even more respiratory problems and cancers.



The neighborhood will be ruined by concrete and vehicles.

This project, if completed, will add to traffic jams, not reduce them. Don't encourage more people to drive more.

Attachments: N/A

2019 0311 Bobby Hunter

Comment: I am opposed to the expansion of the I-5. I live right next to it and making it bigger would only be a mistake. Freeway expansion doesn't solve congestion, even ODOT's own experts agree. It will also make air pollution work. As somebody with horrible allergies and sinus problems, I'm extremely sensitive to pollution. I do not want this right in my backyard.

Attachments: N/A

2019 0312 Bonnie Jerro

Comment: Air pollution is already so bad in this area that PSU's researchers recommended that students at a nearby Middle School forgo outdoor recess <<hyperlink - see attachment>>. This is an environmental justice issue - 40% of Tubman's students are Black.

Freeway Expansion is Climate Denialism. 40% of Oregon's carbon emissions come from transportation – as a recent Oregonian article pointed out, Oregon simply cannot decarbonize our transportation sector without driving a lot less. If we are going to spend \$500,000,000 on a transportation project that addresses the urgent existential threat that climate change represents, this money should be spent on improving and prioritizing public transportation and building walkable communities.

Attachments: [2019 0312 Bonnie Jerro ATT](#)

2019 0312 Brad and Sandra Lemly

Comment: The purposed change at I5rosequarter is not worth the cost. It will not relieve congestion or lower the carbon emissions. The air quality in our neighborhoods have gone from bad to worse. We need real plans to lower emissions and get our air quality to a healthy level. This is a bandaid on an a severed artery, but a very costly bandaid to taxpayers. What necessary projects will be put on hold to do this change? What will this change do to our neighborhoods? The cost is too high for the return. It's not using our tax dollars effciently.

Sincerely

Brad and Sandra Lemly

Attachments: N/A

2019 0312 Brad Baker

Comment: Dear ODOT and all my elected representatives,



I ask that you please stop pursuing the proposed I-5 expansion through Eliot neighborhood and the Rose Quarter for the following reasons.

Environmental Justice

Constructing I-5 was a symptom of a racist society that destroyed a black neighborhood. The neighborhood has struggled for years and now has something to be very proud of, Harriet Tubman Middle School. Unfortunately for the majority minority kids at that school, they have to suck exhaust fumes from cars driving through Portland. If we cared about mitigating the effects of pollution for this vulnerable population, we'd be discussing tearing out this freeway. Expanding it will only bring in more cars and worse air quality as every other urban freeway expansion has shown us.

Climate Change

The IPCC says we have 11 years now to dramatically shift how society does things if we're going to have any meaningful chance of addressing climate change. An investment in widening our freeways is an investment in promoting cars and single occupancy vehicles which is exactly what we don't need. If we care about addressing climate change and are not climate change denialists, we must start getting cars off the roads ASAP.

Safety

From how ODOT pitches this project, it seems the main intent is to move vehicles quickly through the Rose Quarter whether they're on the highway or on the surface streets. We know that cars moving quickly is what kills and leads to an unsafe neighborhood. This project should prioritize safety and not speed.

Additionally, the removal of Flint bridge looks like it is going to put bikes onto either a very steep road or mixing with vehicles. I'm aware the designs are not finalized, but it appears bikes are an afterthought and will be squeezed in where it is possible at the last minute, leading to an unsafe outcome.

Fiscal Responsibility

\$500M is a lot of money. This is not where we need it most. The proposed goal of this project is safety. ODOT owns a lot more roads where safety is a bigger concern. Folks keep getting hit by cars and dying 82nd and also on Powell. If safety is really the priority, we should be spending this money on streets in East Portland which could be fixed for much cheaper than \$500M.

No Actual Local Improvements + The Gimmicky Lids

This project is clearly a highway widening project and all the "local improvements" are an afterthought. The current ped/bike infrastructure in the area is pretty good. From what has been shown so far, I have little faith that after this project is completed it'll be up to the level that things are now.

Additionally, the lids are gimmicky and I can't see any reasonable use for them. We are not going to want people hanging around on the lids b/c the air quality is going to be terrible on top of them. The on-ramps/off-ramps are going to have more lanes so it is going to be unsafe



walking around the area so if small buildings are put in, they will be dangerous to access. I don't really see any positive benefit that comes along with the lids.

Misalignment with Portland's Goals

Portland has adopted Vision Zero. Portland has adopted the climate action plan. Portland has adopted mode-split goals. This project goes directly against all of them. This project is a single occupancy vehicle first, everything else last, project. That will lead to more vehicle miles traveled, which we know is highly correlated with traffic fatalities. More VMT also will lead to more emissions which goes against our climate change goals. Making it faster and easier to drive will lead to more driving which goes against our mode split goals. I can't think of any of Portland's goals that this project supports.

Sloppy EA and Lack of Consideration of Congestion Pricing

The EA was sloppily executed with missing data. Some of it will supposedly be shared soon, but at this point it is too late to meaningfully address it before the close of the EA.

Also, congestion pricing is reasonably foreseeable. This should have been included in the modeling when considering both the build and no-build scenarios.

Thank you for your time and consideration and I hope you will all do what's best for Portland, for Oregon, for the environment, and for the future and stop this project from moving forward.

Attachments: N/A

2019 0325 Brad Lucks

Comment: More roads means:

More crime, more people, higher rent, worse living condition and having people move here that should of never moved here.

Attachments: N/A

2019 0312 Brad Perkins

Cascadia High-Speed Rail; Soul District Business Association Transportation Committee

Comment: Good evening. Brad Perkins, CEO of Cascadia High-Speed Rail and also Soul District Business Association Transportation Committee chair. Oregon Department of Transportation and our State Legislature have kowtowed once again to the trucking unions. 500 million designed to be spent on I-5 lane widening at the Rose Quarter is a lot of money to benefit the highly polluting trucking industry. Now they propose a project in an area that has had more than its share of destruction and injustice. When finished, it will reinforce a racial and economic and business district divides. We as the Soul District Business Association are steadfast against the trucking industry plan that will add 67 million tons of CO2 emissions during construction and not compensate for the financial loss to affected businesses. Metro, the City Council and bureaus need to stop his plan and allow for the public to offer an alternative that



relieves congestion and greatly reduces CO2 emission. Destroying five viaducts is not worth the cost but three improvements of the I-5 lane widening project do make sense. Spend 50 million of the 500 million for a new bike-ped bridge over I-5, a bike bridge under Broadway/Weidler Streets, and new southbound entry ramp from Weidler Street will safely divert pedestrians and bicyclists off the street level I-5 interchange. If a ballot initiative was voted on, the great majority of commuters would chose relieving traffic congestion by spending 450 million on a multi-modal bridge for vehicles and electrified Cascadia commuter passenger trains over the Columbia River instead of widening I-5 at the Rose Quarter. Voters would get excited for managing a new Rose Quarter transportation hub, supporting a new game-changing express train to Vancouver in six minutes. This I-5 disaster project, if built, will perpetuate the racial and economic inequalities between east and west side communities. Thank you for your time.

Attachments: N/A

2019 0402 Brad Perkins

Cascadia High-Speed Rail; Soul District Business Association Transportation Committee

Comment: I read a quote by you in the March 14, 2019, Portland Tribune Newspaper regarding ODOT's I-5/Rose Quarter "Improvement" Project. You stated that it is a "once in a lifetime opportunity to reconnect the Albina community." Instead this "Disaster" Project will do the opposite. This misunderstanding started when the City Council answered ODOT's call to support this project prematurely without ODOT completing an Environmental Assessment and before giving the public an opportunity to comment on the EA and recent design plans. Past meetings were the momentum that got us to where we are today for the future of North/NE Portland streets, but as in sports, that was the regular season, this is the playoffs.

The Portland City Council should not give the future of the Rose Quarter to ODOT. This area is the center of downtown's eastside along the Willamette River, with the region's transportation hub, Moda's entertainment venue, and Convention Center that is rooted in a good mix of racial diversity. The Rose Quarter and surrounding area will be the next town center in the region. Now is the time to plan for what is needed and be an example in helping to reverse "Climate Change."

Since the late 50's fossil fuel vehicles pushed leaders to bulldoze historic urban centers and neighborhoods for freeway development. The I-5 scar through North Portland's Rose Quarter has drastically torn the urban fabric of the area and will not miraculously come together by spending \$500 million on freeway widening and jagged-edged covers topped with poorly maintained trees and shrubs.

It is absolutely necessary to take a more intelligent "Climate Change" approach for the heart of Central Eastside Portland. ODOT's "Dinosaur" Project must be shown a better alternative by the people who live and work here. It can't be done with a limited study area, with one hearing and 45 days expressing non-effective individual comments over the internet. Portland's eastside citizens need a Refinement and Development Plan based on the City's Comprehensive Plan between MLK Jr Blvd to the Willamette River and I-84 to Russell Street.



The Albina Vision is not sanctioned by any jurisdiction. The City Council should sanction a broader group of stakeholders to study the area and Prosper Portland should provide a Request for Qualification or Proposals to developers for ideas to develop the area with a Cascadia High Speed Rail station as a catalyst. The City owns 33.5 acres of property around the Rose Quarter. This asset is a good head start for development vs. the Post Office site in NW Portland that the City had to initially pay an over-priced \$88 million to commence the development project.

Spending \$450 million of the \$500 million for the I-5/RQ Project has greater support for a new Hybrid Bridge for trains and vehicles over the Columbia River west of the BNSF Bridge. I am currently gathering support from Oregon Legislators for this transfer of money plan and will be in touch with your office after gaining significant support for this change of investment by leadership.

The State of Washington is studying ultra-high-speed rail and planning on putting together a bi-state group to guide HSR development. A new Cascadia High Speed Rail corridor and Columbia River Bridge coupled with a new Rose Quarter Transportation Hub/ Town Center is a practical "Climate Change" alternative worthy of your attention and priority. Supporting the State Highway Department (ODOT) I-5 "Bulldozing" Plan will worsen the divisions in our racially mixed environment and perpetuate the rich white man's oil based dominance of our society and fragile eco-system. The future is now!

Sincerely, Brad Perkins, CEO/CHSR, Soul District Business Assoc. Transportation Committee Chair

Attachments: [2019 0402 Brad Perkins ATT](#)

2019 0402 Brad Perkins 2

Cascadia High-Speed Rail

Comment: Petition to Oregon Legislators for Bill to Fund Hybrid Bridge over Columbia River w/Corridors

Redirect \$450 million of the \$500 million from the \$5.37 billion 2017 Transportation Funding Package, which is to pay for the unpopular I-5 Rose Quarter Improvement Project, and instead use the money to build a new multi-modal bridge 150 feet above the Columbia River, west of the BNSF Bridge that connects the Ports of Portland/Vancouver. The multi-modal bridge supports:

Four lanes on the bridge's top deck for cars and trucks.(see 1 below)

Double electrified tracks on the bridge's bottom deck for Cascadia Commuter Express and Inter City Express as two Cascadia High Speed Rail train systems. (see 2 below)

Double freight tracks on the bridge's bottom deck for both Union Pacific (UP) and Burlington Northern Santa Fe (BNSF) Railroad trains.(see 3 below)

New corridors for a four-lane expressway and CHSR: (see: cascadiahighspeedrail.com)



Going south from the new multi-modal bridge will be a widened Portland Rd. with connecting ramps to Marine Drive and Columbia Blvd.(see 1 below)

Going north from Vancouver's Fourth Plain Blvd., the four-lane expressway adjacent to BNSF right-of-way, will connect at existing NW 78th to the I-5 Interchange.(see 1 below)

CHSR will go north from the proposed Rose Quarter Station adjacent to the Union Pacific Railroad rights-of-way.(see 2 below)

- (1) Possible funding by Oregon and/or Washington
- (2) Possible funding privately and/or Feds
- (3) Possible funding by UP and/or BNSF

The remaining \$50 million of the \$500 million, I-5 Improvement Project funds, is to pay for engineering and building:

New bike/ped bridge at Clackamas Street over I-5

New southbound I-5 entry ramp from Weidler Street

Note: Washington's Transportation Committee has passed a Bill to designate \$450 million for an I-5 Replacement Bridge. This is Oregon's attempt in offering an alternative multi-modal bridge and corridor proposal with construction cost estimated to be \$1.7 billion.

Brad Perkins, CEO

Cascadia High Speed Rail, LLC

Attachments: [2019 0402 Brad Perkins 2 ATT](#)

2019 0401 Bradley A Foster

Comment: It's hard to know where to begin when commenting on such a horrible proposal. It's almost as though our state transportation department stopped learning anything in 1964, because I see no evidence that they are aware of any knowledge acquired in the field over the past fifty-five years.

Do I start with ODOT's delays and deceptions, like resisting releasing the drawings that show the extent of the damage to nearby active transportation facilities and even claiming such drawings didn't exist until threatened with legal action?

Or should I mention the fact that the no-build alternative incorporates traffic from an unplanned Columbia River Crossing? Whether that is the result of incompetence or deception is as yet undetermined, but it is definitely bad faith. However, it does demonstrate that ODOT has some understanding of induced demand since adding so many lanes upstream does indeed show greater traffic in the study area under ODOT's analysis.

Building on the effects of induced demand, adding these "auxiliary lanes" does indeed add capacity, which literally everyone with any knowledge of transportation knows will increase automobile traffic and ultimately fill up. Studies out of the University of California, Davis



conclude that such expansions fill up in less than seven years and then add to congestion at and around the site. Even the state transportation department of our southern neighbor, CalTrans, has accepted the fact that we can not build our way out of congestion by adding lanes miles.

Obviously, building these lanes won't reduce congestion as mandated. We clearly need to use tools that have some prospect of working. Again, no jurisdiction has ever reduced congestion by adding traffic lanes. There are other tools in the box like congestion pricing, dedicated freight and transit lanes, on/off-ramp closures and even improving active transportation options. How many of those cars contain people who would prefer to use alternative modes if they functioned better? Perhaps that is a question to answer before this project gets underway.

Other things that should be addressed, preferably in a complete environmental impact report, are the long-term impacts of all the increased emissions from those added lanes. Didn't the UN IPCC recently report that we must reduce our GHG emissions by 50% by 2030 if we are to maintain reasonable hope of keeping our civilization alive? Transportation is responsible for 40% (and increasing) of Oregon's climate changing emissions. Further, how is going from four lanes of stop and go traffic to six lanes of stop and go traffic adjacent to a middle school full of children of color meeting our social equity responsibility? Particulate air pollution is known to damage the brains of children and it's already so severe that these young people are required to stay indoors at the school.

If this project isn't going to be canceled outright because of its flaws and the fact that it cannot meet its mandate to reduce congestion, at least perform a complete environmental impact statement. Our grandchildren deserve at least that amount of consideration before we induce more climate-destroying traffic

Attachments: N/A

2019 0307 Bradley Baker

Comment: There are many issues with this project. 1) Congestion pricing is reasonably foreseeable and should have been considered in addition to build/no-build 2) The assertion that this will improve air quality is not borne out by and research. Induced demand will show that the new auxiliary lanes will be congested. The assumptions in your model were not shown and should be shown as a part of the EA. 3) This is a fiscally responsible project. There are many better ways to spend \$500M.

Attachments: N/A

2019 0328 Bradley Bondy

Comment: ODOT has been citing improved safety as a major reason to move forward with this project, however if we are concerned about safety then this section of freeway must not be our top priority. Rather it is ODOT's orphan highways (82nd, Powell, Lombard and McLaughlin) that need to be ODOT's top priority. These streets see more fatal collisions than this section of freeway does. These streets have massive sidewalk gaps, have no, or insufficient bicycle



infrastructure, and lack streetlights for much of their lengths. ODOT will say that the legislature set this money aside for this project, which is true. What ODOT doesn't say is that they could ask the state legislature to allow them to use the funds elsewhere.

Attachments: N/A

2019 0327 Bradley Dillingham

Comment: Do not expand the freeway system. Our country is already unable to maintain the system as it is. It does not need to expand. Widening the freeway does not alleviate congestion, it only pushes it further down stream and incentivizes people to drive. Take that money and put it towards transit oriented design credits, or even use to to upgrade the bike system. I understand that automobiles are what keep ODOT afloat, but maybe that is the problem. Maybe the state department of transportation should be focused on moving people in a financially and environmentally sustainable way instead of asking the federal government for money that it barely has for something that will need to be expanded in another 5 years. It's not sustainable. ODOT claiming that expanding the freeway system will be a boon for the environment is also a joke and a slap to the face to all Oregonians. Just because cars move faster through a corridor doesn't solve the problem: The fact that there are thousands of vehicles driving through this corridor each day. That's the problem. Stop encouraging people to drive with your actions. Give the money to someone else who can actually solve the problem. As a planner and an Oregonian, this is not the Oregon that I am proud of.

Attachments: N/A

2019 0311 Brandon Narramore

Comment: I am writing in opposition towards the proposed I5 Rose Quarter expansion. Freeway expansions have poor track records, environmental costs, and are misguided when many areas are desperate for basic sidewalk and pedestrian infrastructure.

The Rose Quarter Project will likely have little effect in reducing traffic and improving safety. We have seen examples of freeway expansion all across the country (Katy, Texas expanded to 10 lanes!) and each expansion has failed in reducing traffic. Freeway expansions lead to induced demand meaning more drivers not less traffic.

The Rose Quarter project also contradicts the strategic goals of ODOT itself. The ODOT website states that sustainability is a priority and they are "implementing strategies that lower GHG emissions from transportation sources". However, the Rose Quarter project encourages automobile dependency and additional greenhouse gas emissions.

Lastly, it is incredibly disheartening that we are proposing a \$450 million dollar expansion to the freeway when there are many streets along East Portland that lack sidewalks and basic pedestrian infrastructure. If we are actually serious about improving the safety and wellbeing of Oregonians then it would be better to address our sidewalk inequities East of 82nd.



An alternative solution that reduces congestion while still meeting our environmental goals is congestion pricing. Congestion pricing has a much stronger track record in reducing congestion and would not cost Oregonians \$450 million dollars. Revenue raised from congestion pricing could also be used to build sidewalks, bike lanes, and other infrastructure that would improve safety, address inequities, and reduce greenhouse emissions.

Thank you for your time,

Attachments: N/A

2019 0330 Brandon Van Buskirk

Comment: Instead of talking about expanding the freeway splitting the center of our city in pieces and making some of the most valuable property in the state unoccupiable, we should be talking about dismantling it or burying it. Let's move past the era of the automobile dominating our lives and our landscape and give porrlanders of all income levels, age, and capability real choices for movement and interaction in our city.

Attachments: N/A

2019 0312 Brandt Bernards

Comment: As a real estate agent, I drive frequently. Sadly, it's a necessity in my career right now but hopefully in the future that will change. I commute on this section of interstate weekly if not daily and get to experience the traffic problem here. However, I strongly believe that widening this section of interstate is a terrible idea and a complete waste of tax payer funds. Let's put this money to use on systems that remove our dependance on cars and actually provide a system of transit that gets us from point A to point B in a timely, efficient manner. Far easier and likely money making solution would be congestion pricing on this route. Often, I make decisions to pay for products that actually work vs using a free product that barely accomplishes my goal. In this scenario, let's have drivers pay a fair price to use this section of interstate resulting in a system that does not jam and gets people from point A to B efficiently all while not spending substantial amounts of money. Then take those funds you've allocated for the expansion plus the income from the congestion pricing and put them real travel solutions that work. Look at London as a great example. Don't reinvent the wheel. Or keep replacing a wheel with another broken wheel.

Attachments: N/A

2019 0311 Breesa Culver

Comment: I am writing to voice my opposition to the I5 Rose Quarter Expansion. History has taught us that expanding freeways never solves anything. It only increases air pollution and the short-term vehicle congestion relief isn't worth the induced demand that follows. I encourage the budget allocating powers-that-be to instead spend money on more sidewalks, marked crosswalks, better bicycle infrastructure. Make people feel safer when NOT traveling in cars and



make driving more inconvenient. Be courageous. We live in environmentally desperate times. Please act accordingly.

Attachments: N/A

2019 0329 Brenda Martin

Comment: As members of the City of Portland's Pedestrian Advisory Committee (PAC), we are submitting this letter in response to the I-5 Rose Quarter Improvement Project (I5RQ) Environmental Assessment (EA) published on February 15, 2019.

Following review and discussion of the Environmental Assessment (EA), as well as a briefing by ODOT and PBOT project managers, the PAC has identified several significant concerns.

Cumulative Impacts on Active Transportation & Low Mobility Users

- The proposed surface street improvements do not provide safety or connectivity benefits for pedestrians and bicycle users. Rather, due to the increase in signalized crossings, longer travel distances, and less direct access, non-vehicular trips (including public transit trips) would experience increased delays compared to current conditions. The local street designs also include numerous vehicle-centric features which present risks to the safety of active transportation users, including double turn lanes, expanded freeway ramps, and wide curb radii at intersections. These designs deprioritize pedestrians and bicycle users, which is in direct conflict with the City's Vision Zero, mode-shift, and carbon emission reduction goals.

- The project proposes removal of the Flint overpass, one of the busiest bicycle routes in the city due to its low traffic volumes and direct connection to NE Broadway, west of I-5. Neither the proposed Hancock-Dixon Crossing nor the Clackamas Bicycle & Pedestrian Crossing offer comparable connectivity to preferred bicycle or pedestrian routes.

According to the EA, the Clackamas Crossing would actually increase bicycle delay to the Steel Bridge and the Eastbank Esplanade, a signature



bicycle and pedestrian route. The PAC is particularly concerned about the proposed Hancock---Dixon

Crossing's estimated 9---10% grade, which is not ADA compliant. The steep incline renders the bridge permanently inaccessible to pedestrians using mobility devices or those with limited mobility. The EA does not propose sufficient mitigations for this impact. Further, the construction of new non---ADA compliant facilities sets a negative precedent that rates access for vulnerable and low---mobility road users below that of vehicles.

- The proposed changes have significant design flaws that do not promote walking in what the committee aspires to be a dense, walkable neighborhood.

Air Quality & Public Health

- The PAC is concerned about the adverse public health impacts this project will have on those who live, work, and travel in the Rose Quarter. Multiple studies have found that pedestrians are significantly more affected by air pollution from engine combustion than those in vehicles. City plans, including the Albina Vision, call for dense residential and commercial development in the project area. The committee does not believe the EA fully addresses the potential that exposure to decreased air quality will have on pedestrians in this urban neighborhood expected to grow substantially in the coming decades.

- The proposed project area includes Harriet Tubman Middle School, a recently reopened elementary school in a neighborhood which has historically been negatively impacted by urban renewal projects, including the construction of I---5. The school's student body is 43% African---American and more than 70% underserved. The committee is concerned about the significant near and long---term public health impacts the proposed project will have on this particularly young and vulnerable population. An independent analysis conducted by Portland State University¹ warns that the air quality will be so dangerous as a result of this project that students should not be allowed to play outside. The EA does not adequately



consider these impacts, nor does it identify sufficient mitigation measures to avoid long-term and irreversible harm to public health.

Gaps in Safety Analysis and Associated Methods

- One of the I5RQ project's primary goals is to improve safety in the project area. The Transportation Safety chapter of the EA cites ODOT crash analysis methods including the SPIS. The committee thinks that this methodology should be reviewed more closely. ODOT does not use the latest methods from the Highway Safety Manual, namely the use of an Empirical Bayes method, for understanding current safety conditions that help control for random events like crashes. Application of these methods would allow project staff to employ crash modification factors to show the change in crashes, by severity, expected in the Build Alternative. This would allow the public to understand how cost effective this project will be at reducing fatal and severe injuries and either justify or oppose the use of safety as a primary goal for this project. Additionally, it is of this committee's perspective that the current safety

conditions are not severe enough to use the improvement of safety as the primary goal of the project. From 2011 to 2015, only one fatal injury involving a pedestrian crossing I-5 (1,114 statewide in that period) and six severe injuries (4,691 in that period) have occurred in the project area.

The committee does not agree that these numbers warrant safety as the main project goal.

- Finally, the EA does not consider the safety impacts of traffic generated from this project to conditions on surface streets. Any increase in traffic in the study area would lead to an increase in traffic on facility types. Any possible changes in fatal or severe injuries on these facilities should be accounted for in the EA. The committee believes that the project should use the 2016 ODOT crash file, the most current crash data available.

Exclusion of Congestion/Value Pricing

- The committee was surprised to find that the current EA excludes the potential impact on safety and operations from congestion/value pricing.



ODOT and regional partners have been studying the impacts of congestion/value pricing on Oregon Highways, including the Interstate---5 corridor. Information from this work should be included in the EA, to determine how this policy could meet operations and safety goals. It is also important to consider how this project might influence any of the current congestion/value pricing options being considered.

Given these concerns, in particular the potential for long---term harm to vulnerable and historically marginalized populations, the PAC recommends ODOT complete a full Environmental Impact Statement (EIS). A full EIS will help the region better understand the public health, traffic safety, and environmental justice impacts of the project on local communities and identify effective mitigation options.

As the City's appointed advisory committee, tasked with providing input and perspective on how best to improve the pedestrian experience, the PAC requests representation on any steering committee established to inform the design of the I---5 Rose Quarter Improvement Project.

We appreciate the opportunity to provide feedback on the Environmental Assessment for this project.

Attachments: [2019 0329 Brenda Martin ATT](#)

2019 0315 Brendan Marnell

Comment: I am emailing to express my opposition to the I-5 Rose Quarter project during the public comments phase. I am a Portland resident who until recently commuted from North Portland to Downtown directly through the affected streets. I no longer pass through that area on a daily basis, but still drive or bike through that area several times a month.

I oppose the project because it will be massively expensive for little benefit. Past highway expansion projects have not worked at easing traffic congestion, and there is no reason to believe this one will. If cars get through faster, more cars will use the highway, more commuters will come in from the suburbs, and congestion will soon return to previous levels. Highway "improvements" increase suburban sprawl, but do not effectively address congestion.

Continuing to expand highway throughput only worsens our carbon footprint. It will also worsen air quality in close proximity to a school. Oregon needs to support sustainable methods of transportation instead of doubling down on ecologically irresponsible ones.

Thank you for considering my comments,



Attachments: N/A

2019 0312 Brendon Haggerty

Comment: Good evening. I'm Brendon Haggerty. I live in Portland. Two months from today my wife and I are expecting a baby, and as you can imagine, we are so, so excited. And we're really not excited that ODOT wants to give him a freeway expansion for his ninth birthday. We don't have the storage and they're stinky. As I've watched this project unfold, I've wondered how I could possibly explain it to someone who will be living in an altered climate. I can't help but think my son will wonder how his parents' and grandparents' generation looked around, saw a climate crisis, a chronic disease epidemic, and a legacy of racial injustice and somehow thought that spending 500 million on a freeway expansion was an appropriate response. I hope my son is a critical thinker. And if he is, he might ask above all why the environmentalist hasn't been able to evaluate the alternative. Their evidence suggests it's the most parsimonious and most effective, value pricing. You might see it as akin to jumping to a conclusion that we need a new furnace when all we really need is a sweater. With future generations in mind, my request to you is that you prioritize congestion pricing first.

Attachments: N/A

2019 0401 Brendon Haggerty

Comment: Thank you for the opportunity to comment on the I-5 Rose Quarter Environmental Assessment. While my comments below reflect the parts of the report I was able to review, I found the comment period to be too short to fully review the assessment and I request additional time for review and comment. I begin with general comments on the project and then share concerns and questions section-by-section.

I am very disappointed that the alternative of introducing value pricing before constructing the project is not considered in the EA. It is a reasonably foreseeable project that the Oregon Legislature has directed ODOT to undertake, and evidence suggests it is the most effective and most efficient way to address peak hour congestion. I join the many community groups calling for a full environmental impact statement, and I strongly support one that includes an analysis of value pricing implemented before construction.

I am dismayed to see that the EA apparently does not account for induced demand. This effect is so well established and documented that it has been dubbed, "The Fundamental Law of Road Congestion."¹ Our collective understanding of induced demand is informed by Anthony Downs' theory of triple convergence, articulating that travelers will alter the time of day, mode, or route to minimize their generalized travel cost.² As observed on projects across the country, the effect causes any improvement in travel time to be quickly eclipsed by increased traffic volume and congestion as people switch to routes, time of day, and mode. I request that ODOT explain why this project is different from all others. What is it about this project that exempts it from observed effects so foundational to transportation planning that they are referred to as a "law"?

Purpose and need



I dispute the stated need "I-5 safety"; the need is not adequately documented for the portion of the project on I-5. In comparing crash rates among segments of urban interstate, the EA makes a compelling case that there is a lot of personal property damage occurring on the stretch of I-5 in the Rose Quarter; there appear to be many crashes. However, the performance of this section of roadway in terms of safety is a success story. In terms of actual fatal and severe injury crashes, it performs well, especially compared to the most dangerous streets in the region. For example, SE Division St. saw 19 fatalities and 129 serious injuries in the past decade (<https://www.portlandoregon.gov/transportation/74204#whydivision>), making this stretch of I-5 look enviably safe, especially on a per-trip or per-mile traveled basis. I-5 in the Rose Quarter has nearly met Vision Zero, the highest aspiration for traffic safety that our regional and local governments have adopted.

Environmental Justice

I dispute the conclusion of the EA that there are no disproportionate impacts to people of color and low income groups. The census tract near the project, tract 23.03, is home to people who already experience disproportionate burdens from harmful environmental exposures. According to the 2014 National Air Toxics Assessment from the US EPA, this tract has an estimated cancer risk from air toxics of 40 cases per million, one of the highest in the City of Portland. Induced demand will result in a greater total quantity of fuel combusted in the area, further exposing low income households and people of color who live nearby. Most importantly, any benefits of this project will accrue to travelers from across the region who are whiter and wealthier than the local population, whereas nearly all of the burdens of this project will affect the nearby populations. This is, on its face, a disproportionate impact.

I dispute the conclusion that there will be improved local connectivity benefits or "enhanced pedestrian and bicycle facilities" benefitting groups of concern. The proposed changes are a mix of positive and detrimental changes to local streets that can be best characterized as neutral, and they do not mitigate any additional burdens to nearby residents. Among the detrimental changes that include: prohibitively steep grades, dangerously large turning radii, slower bus service, circuitous ramps, and exposure to fast moving traffic. The aggregate travel delay or travel time savings among people walking, cycling, and using transit was not presented in the EA; we do not have the information necessary to determine whether there is an improvement for these groups.

Air quality

I dispute the conclusion of the EA that "the Build Alternative is not expected to have air quality impacts." The information presented in the EA is not sufficient to make this determination. No quantitative modeling of criteria pollutants was undertaken, precluding the ability to estimate localized impacts. Even if National Ambient Air Quality Standards are met for the airshed as a whole, it is possible that this project could affect pollutant concentrations in the project area, especially if structural elements such as sound walls or freeway covers affect the dispersion of pollutants. High localized concentrations of pollutants could result in significant impacts on human health in the short term and long term. The safest assumption is that the build option will result in greater total pollution and higher concentrations of pollutants near the project, since



induced demand is likely to result in a greater quantity of fuel combusted. These would be significant unmitigated impacts.

I dispute the EA conclusion, "Although the area is still considered a maintenance area, it is recognized that it is not likely to revert to nonattainment." The EA does not elaborate on who recognizes this, but the statement conflicts with parts of the most recent Annual Air Quality report from the Oregon Department of Environmental Quality (Oregon Air Quality Annual Report 2017, available from: <https://www.oregon.gov/deq/FilterDocs/2017aqannualreport.pdf>). That report includes data indicating that Portland exceeded ozone standards 9 times in 2017, and expressed the concern about the likelihood of an increasing trend in ozone days, stating, "With global warming we expect more fires in the Northwest and higher temperature days; this will result in more elevated ozone days." Whether these days result in nonattainment or not, health effects will occur. This is a crucial trend in criteria pollutants that was evident from real time monitor data in 2017 and formally published more than 4 months before the EA, so it is puzzling that it is not presented. At a minimum it warrants discussion in the EA, but it also should temper our confidence in statements such as the one above and prompt more detailed analysis of the project.

I dispute the EA conclusion that construction impacts "would be temporary and limited to the immediate area surrounding the construction site and are not expected to exceed ambient air quality standards." The proposed mitigation, essentially meeting the standards that are adopted current policy, is inadequate to mitigate the significant impacts to the human environment likely to result from construction. The evidence that diesel particulate is harmful is plentiful, as recognized by various city, county, and state level efforts to increase regulation of off-road equipment. For example, the City of Portland and Multnomah County adopted cleaner diesel contracting requirements in recognition of the inadequacy of current state standards. The impacts of construction on air quality could significantly impact human health; a localized spike in particulate matter or other pollutant could lead to acute respiratory disease.

I request responses to the concerns related to air quality enumerated below:

1. Please explain whether any dispersion modeling was undertaken. If not, why? What are the likely effects of structural changes and topography on pollutant concentrations in the area?
2. Were estimates of changes in criteria pollutants calculated as part of the MOVES runs for the EA? If not, why? If so, why weren't they published as part of the EA?
3. Please explain why the EA does not include the most recent (2017) published data from DEQ on trends in criteria air pollutants, especially ozone. Would inclusion of this data change the conclusions of the EA? Why?
4. Why is value pricing not considered part of the list of reasonably foreseeable future actions in Appendix D?
5. For how many hours does ODOT anticipate heavy diesel equipment emitting pollution in the area during construction? What types of engines would be used, and how many?



6. What are the names of pollutants that correspond to the pollutant ID numbers listed in the tables in Appendix C?

7. Section 3.2 lists compounds that are contributors to cancer and non cancer risks identified in the 2011 National Air Toxics Assessment. Are these the same compounds identified in the 2014 National Air Toxics Assessment? What is the justification for citing the older of the two studies?

Climate change

I dispute the EA conclusion that greenhouse gas (GHG) emissions will be slightly lower under the build alternative. The information presented in the EA is not adequate to make this determination. Although no confidence interval or margin of error is provided, the difference between the two scenarios appears to be so small as to be attributable to error in modeling. The safest assumption is that with induced demand, a greater total quantity of fuel will be combusted, leading to higher GHG emissions in the build scenario.

I request responses to the following questions regarding greenhouse gas emissions:

1. What confidence interval or range can be estimated for the estimates of GHG emissions for each alternative?

2. Please explain the justification for the threshold of a +/- 5% change in traffic volume, travel time, or delay for including links in the model. Does "traffic" and "travel delay" include all modes?

3. Why is the City of Portland's resolution to use 100% renewable energy by 2050 (<https://www.portlandoregon.gov/auditor/article/642811>) not included in the discussion in section 3.3.2?

4. Please explain the justification for the assumption of a 30 year life span for a highway project. Does this mean that the highway will be entirely rebuilt after 30 years? Is that typical in Oregon? Are there highways in Oregon that have been decommissioned after 30 years?

5. Please explain the decision not to include land use changes associated with either alternative in estimates of indirect GHG impacts.

6. In section 6.3.2, why is value pricing not included in the list of reasonably foreseeable actions?

7. In the same section, why is the 2014 Regional Transportation Plan referenced instead of the adopted 2018 plan?

8. The 2018 Regional Transportation Plan estimates that the Columbia River Crossing would be built in the 2028-2040 time period. Is that consistent with the modeling used for greenhouse gas emissions?

The estimated benefits of this project are based on tenuous modeling assumptions. In all aspects of the project except for travel times on I-5, the estimated difference between the two scenarios in the EA is very small. In comparison to small and questionable benefits, the costs



are certain and large. This dynamic calls for greater certainty about the benefits, and the highest level of scrutiny regarding any additional or disproportionate harms. I therefore request a full Environmental Impact Statement.

1 Duranton, G., & Turner, M. A. (2011). The fundamental law of road congestion: Evidence from US cities. *American Economic Review* , 101 (6), 2616-52.

2 Downs, A. (2000). *Stuck in traffic: Coping with peak-hour traffic congestion* . Brookings Institution Press.

Attachments: [2019 0401 Brendan Haggerty ATT](#); [2019 0401 Brendan Haggerty ATT 2](#); [2019 0401 Brendan Haggerty ATT 3](#); [2019 0401 Brendan Haggerty ATT 4](#)

2019 0305 Brent Chapman

Comment: Please approve this expansion as the road system needs major work and improvement.

Attachments: N/A

2019 0401 Brett Yost

Comment: Please perform a complete Environmental Impact Statement for this project. Please find and pursue other methods of congestion reduction such as tolling. Please help people transition to other forms of transportation such as busses and rail. Please do not prioritize automobile use at this point in history. Now is the time to lead us to a more efficient, safer, cleaner and more equitable future. Break the cycle of automobile dependency; it is a tragedy of the commons. Government's role is to solve this type of problem and the easiest time to do so is now. Removing the bottleneck as planned will only make the larger problem worse.

Attachments: N/A

2019 0312 Brian Allen Martinez

Comment: Please accept these as part of your public comments regarding the above referenced project.

Briefly, as a country, we've invested millions, if not billions of dollars on car infrastructure over the past several decades. Many of these projects made promises of increased efficiency and safety, much like this project is promising today -- these were all false promises and they still. At the same time, we've also measured significant negative effects on the environment for which car travel and infrastructure has been a leading cause of.

We can invest the same money this project is proposing and spend it on bike/pedestrian/public transportation infrastructure which could possibly alleviate congestion issues facing the I-5 today, but we need to have the courage to do so. We can change the course towards environmental catastrophe if we do not fund and proceed with this project. Spend the money, but consider our children's future while doing so.



Thank you.

Attachments: N/A

2019 0225 Brian Amer

Comment: I am opposed to freeway expansion. 40% of Oregon's carbon emissions come from transportation -- as a recent Oregonian article pointed out, Oregon simply cannot decarbonize our transportation sector without driving a lot less. If we are going to spend \$500,000,000 on a transportation project that addresses the urgent existential threat that climate change represents, this money should be spent on improving and prioritizing public transportation and building walkable communities.

Attachments: N/A

2019 0219 Brian Belica

Comment: Please do not proceed with this project. We want Portland to be a model green city, and more highways is not how to make progress. The study cites reduced emissions due to less idling, however countless studies cite additional highways only result in additional cars until similar traffic is reached as prior to construction. Therefore, this will not reduce idling in the long term, only short. PLEASE DO NOT DO THIS!

Attachments: N/A

2019 0326 Brian Belica

Comment: Please do not expand our freeways! I'm so saddened by the false information being spread that more highways will reduce pollution. This will only be temporary at best until the freeway becomes congested again - then the pollution will be worse! As someone who doesn't drive because of traffic - I can confirm induced demand is real!! Please do not build this freeway!

Attachments: N/A

2019 0304 Brian Click

Comment: Hi, my name is Brian. I'm a longtime Portland resident currently living in Seattle, and I'll be heading back home for good this fall. I'd prefer not to see any construction going on in the Rose Quarter when I get back!

I'm opposed to the widening project because freeway expansions typically lead to nothing but more cars on the road and more emissions while doing little to solve congestion.

I'm sure that as transportation experts you've heard of induced demand, but I just witnessed a great illustration of the principle here in Seattle. The Alaskan Way Viaduct closed a little before the new 99 tunnel opened, temporarily leaving Seattle with only one highway running through the city - and traffic volumes stayed roughly the same! People took public transit or adjusted their commuting times. When the tunnel opened up, they got behind the wheel again, and once



again traffic barely changed. Seattle could easily have scrapped the viaduct with no replacement. I'm aware that ODOT has estimated the widening project will reduce emissions by speeding up journeys - but urbanists and environmental scientists have suggested that the induced demand phenomenon will quickly do away with any time savings and result in even bigger snarls and more pollution.

In a world on the brink of catastrophic climate change, we need to be reducing fuel consumption and car traffic, not encouraging it. ODOT should be looking into which roads we can remove. Once upon a time, Portland made history with the first great highway removal project and the revolt against the Mount Hood Freeway - let's keep that legacy alive!

Thank you for the opportunity to comment,

Attachments: N/A

2019 0313 Brian Dinda 2

Comment: It appears to be a well thought out plan and I support moving forward with the project. This improvement is much needed.

Attachments: N/A

2019 0401 Brian Enigma

Comment: As a tech worker who has lived in SE for 20 years, works downtown, and tries to take transit everywhere, expanding the I-5 feels like a step in the wrong direction. At the very least, we need to step back and re-evaluate, in light of the recent findings of flawed data. This push to expand the freeway doesn't feel like a "Portland" move at all, and stinks of politics and cover-up -- not to mention, pollution. If we need better north/south traversal in that area, we should look toward more green solutions like improving Max service, bus service, and bike corridors.

Attachments: N/A

2019 0313 Brian Dinda

Comment: I just wanted to take a few minutes to express my support for the I-5 Rose Quarter Improvement Project. It is long overdue. The environmental impact report seems to be well done and provides several key factors that justify this much needed improvement. I support the work you are doing and hope you are able to bring this project to fruition.

Attachments: [2019 0313 Brian Dinda ATT](#)

2019 0327 Brian Gefroh

Comment: I believe that our transportation priorities should be placed on de-congesting our existing roadways by building and encouraging alternate transportation and tolling. Building new infrastructure will only bring increased usage and more air pollution and greenhouse emissions.



I am firmly against expanding freeways in Portland.

Attachments: N/A

2019 0326 Brian Gjurjevich

Comment: I'm writing today in opposition to the I-5 freeway expansion at the Rose Quarter.

I live in North Portland (with two vehicles in my family) and have certainly been frustrated with heavy traffic getting around our growing city—particularly when it occurs outside of "regular" rush hours. I'm concerned about the daily bottleneck of emissions-spewing vehicles within a few hundred yards of my home, but based on the information I've gathered on this expansion (and highway expansions in general) along with the community opposition I've seen, it's clear expanding the freeway is not the answer.

The incredibly high cost of the plan combined with real concerns about its effectiveness and true, long-term environmental impact, are reasons enough for me to oppose this project. Additionally, the way this project has been sold by ODOT—with misleading stats about safety and without a full environmental impact statement—is especially concerning.

I assume ODOT is familiar with the volume of research that clearly shows building more roads provides only temporary relief. If the goal is truly to reduce traffic congestion, ODOT should explore alternatives to a \$500m investment in mid-20th-century infrastructure that's not likely to address the problems. Alternatives like tolling (particularly focusing on suburban/Clark County commuters while carving out exemptions for lower-income folks in town) should be explored first before we break ground on anything so expensive. That approach will certainly be the harder way given tolling's political baggage, but big problems like congestion, pollution, and climate change demand we consider alternatives instead of sleepwalking toward the "same way it's always been done."

I hope ODOT will reconsider this path and take a more targeted approach to spending these needed funds. The surface-street/safety improvements, capping, and other smarter/nimble projects that are more squarely in line with Portland's needs should be prioritized—not widening a road that mainly caters to residents of neighboring suburbs who use the freeway at the highest rate, but invest least in the roads they're driving on daily.

I'd also like to say how disappointing it is that ODOT would put forth a half-baked environmental assessment (as opposed to a full environmental impact study, which is sorely needed) and misleading statistics about safety in order to convince a busy public to support this project. At a time when institutions are under attack from the highest levels, it's frankly shameful that a state agency would potentially erode public trust further by claiming the Rose Quarter is the "#1 crash location in Oregon" without proper context. I hope the folks who green-lit that messaging do some soul searching and re-think their approach in future projects.

Thank you for your time and consideration.

Attachments: N/A



2019 0311 Brian Hall

Comment: I think this project is badly needed. Please build the auxiliary lanes. However I think the cost of capping the freeway here is too much with little public benefit. I don't like the removal of the flint ave overpass as this is a heavily used biking and walking route that avoids busy Williams and Vancouver aves.

Attachments: N/A

2019 0401 Brian Henry

Comment: The City of Sacramento recently (March) awarded \$1000 towards a proposal to remove I-5 running through the city. Please don't make things worse in Portland. Expanding the I-5 is the wrong choice.

Attachments: N/A

2019 0329 Brian L. Davis

Comment: Thanks for your work - but there are so many other things you can do with 500 million to better our roads in our State.

No thanks to the freeway expansion by the Rose Quarter please.

Thanks for listening,

Attachments: N/A

2019 0311 Brian Larrow

Comment: With all due respect to ODOT, this project is a waste of taxpayer resources considering there will be no measurable long term improvement (not just my thoughts, but echoed throughout the +national+ planning community).

A smaller price tag could justify the trial and error approach, but 500 million is a good down payment on transformational change that would achieve the safety goal through reduced demand AND deliver tangible community benefits/increased development (e.g. getting local traffic off this stretch of freeway by extending the Broadway streetcar and/or MAX infill station at 28th).

The freeway caps excluded, this project will also devalue the taxable value of adjacent property in effect costing the city revenues indefinitely.

Time to scrap this project and meet the goals through CURRENT best practices.

Attachments: N/A



2019 0331 Brian Martin

Comment: I oppose the project to widen I-5 in the Rose Quarter. Please consider the following information.

-- Price road use correctly first.

Building additional road capacity will result in additional driving and the same congestion because of induced demand. The added capacity will reduce the time+cost of using the freeway, encouraging people to take peak-hour freeway trips that they otherwise would accomplish through another route, through another mode (such as transit) or at another time of day. Or a driver might take a trip that they otherwise would not take. That is why instituting pricing (whether you call it a toll or Decongestion Pricing) is the only effective way to deal with congestion. Road pricing should occur first before any additional freeway widenings occur in the central city. Increasing road capacity provides a benefit for a few drivers who want to pass through the area while harming people who live nearby and further damaging the urban fabric itself.

-- Spend money on safety where it matters

This stretch of road is not where the largest safety problems lie. ODOT should invest money if fixing its urban arterials, such as 82nd Avenue and Powell Boulevard. These are the areas where so many bicyclists, pedestrians and motorists are being injured and killed. Then ODOT should transfer road jurisdiction to cities that understand how to deal with urban conditions.

--This project needs serious, in-depth study with appropriate assumptions

ODOT needs to start over and do a full Environmental Impact Study. The EA process has been secretive and flawed. The public deserves a full study with greater transparency about the data and assumptions.

Overall, this is a flawed project that will increase pollution and greenhouse gasses while not improving congestion.

Attachments: N/A

2019 0331 Brian Mock

Comment: Please do not widen I-5 in Portland. Please do not spend \$500M on roads that will significantly degrade public transit and public spaces.

Attachments: N/A

2019 0312 Brian O'Grady

Comment: My name is Brian O'Grady. I live one block north of another ODOT project so I think I can give the committee perspective on what it looks like in Sellwood, a block north from the Sellwood bridge, which I'm sure was pitched as a way to improve through-flow through Sellwood and across the river. What we see now is morning backup that begins a full hour



before it used to. Idling cars, lots of cars, people ripping through residential neighborhoods, running stop signs in order to try to make a quick cut around to jump in farther down the line in front of the traffic. What was once a great pedestrian neighborhood is now becoming frequently more dangerous to cross the street. Bicycle travel -- I live on a greenway and I can sit out on my porch and watch people run the stop sign and almost take out bicycles on a daily basis. So I would caution everybody to think about what will really happen based on induced demand if this project goes through. It will not improve the safety for other users in this area. We will have more cars running through at faster speeds. The accident rate will go up, much like it did in Woodburn, which was another project that ODOT pitched as being a solution to crashes. And actually, there have been more dangerous crashes in that area. This money would be much better used on your streets like 82nd Street that you own that are actually very dangerous streets. I yield the rest of my time. Thank you.

Attachments: N/A

2019 0325 Brian O'Grady

Comment: I am a father, husband and a resident of Portland. I oppose the expansion of I-5 through the Rose Quarter for a number of reasons. First of all, the proposed expansion won't solve the any of the constantly changing set of problems that ODOT has thrown our way.

It won't improve safety, because this is not an unsafe section of road, particularly when you compare it to 82nd St., US 26 and other sections for which ODOT is responsible. If ODOT was truly concerned with safety the money it proposes to spend on widening I-5 could have an immense impact on reducing traffic fatalities.

It won't reduce congestion. No freeway widening project has ever reduced congestion. ODOT ignores induced demand in its traffic projections which allow it to claim improvements that will not be met. Then ODOT hid the supporting documentation so its math could not be checked.

ODOT claims that this project will reduce pollution. These claims were made using questionable estimates and the supporting data was withheld so ODOT's math could not be checked.

The \$.5B ODOT proposes to spend on this project could achieve it goals if it was allocated to projects designed to get single occupancy vehicles off the road. That would require investing infrastructure for alternatives such as dedicated bus lanes and separated bicycle lanes.

ODOT has proven to be a poor steward of taxpayer money. Based on previous projects the true cost of this is more likely to \$1B.

The footprint for this "auxiliary lane" project actually supports an eight lane freeway if configure similarly to I-84 in Portland. All ODOT would have to do is buy some paint. ODOT does not provide air quality estimates for this configuration. The expansion of this freeway moves I-5 closer to Harriet Tubman Middle School imperiling the health of the children who attend school there. It is a continuation of the racist policies that put I-5 through the Rose Quarter in the first place.



There are lots of reasons to not expand this freeway and not a single good reason to do it. This is why ODOT has worked very hard to deceive the public and limit its input.

Attachments: N/A

2019 0328 Brian Setzler

Comment: I work and live in downtown Portland. I have lived in Portland since 1986 and downtown since 2010. I'm in the process of purchasing a downtown condo and plan to be here for many decades to come. I own a small CPA business that operates downtown as well. I am opposed to the freeway expansion project for a number of reasons which I'll spell out below.

First, I don't believe freeway expansion will have any long-lasting impact on automobile congestion during rush hour. No city has ever built their way out congestion by expanding freeways. Induced demand is real and I believe this expansion will actually make traffic worse both in the construction area and at other points throughout the transportation system.

I believe this project will harm air quality by increasing auto pollution from additional drivers and more congestion. Construction alone will add tons of pollution to the region's air, land and water.

This project will add to CO2 emissions and will not help us meet our climate emissions reduction goals. Increased road capacity is a dead end investment when we need to be making significant changes in how we live and get around that don't rely on single occupancy automobiles.

This project will not help us improve public health or traffic safety. The area under consideration is relatively safe while Portland has experienced scores of pedestrian and bicyclist deaths over the past 12-18 months. That stretch of I-5 hasn't had a single traffic fatality in the last decade.

There are so many better ways to invest \$450 million that would actually make Portland more mobile and safer for everyone while reducing greenhouse gasses, air pollution, and congestion.

Lastly, I don't have any faith that this project won't cost more and take longer than is proposed. Please shift the proposed funds to projects that will actually make our entire city more mobile, cleaner, more just, and invests in the transportation needs of the future.

I could write more but am busy with tax season and slammed with work.

Thank you for your consideration.

Attachments: N/A

2019 0301 Brian Wenzl

Comment: I am disappointed to learn that the Rose Quarter Expansion Project committee is recommending freeway expansion as the cornerstone of its project to improve traffic in the I-5 corridor.



Freeway expansions never work to reduce congestion. Everywhere, always, every freeway expansion project results in more cars on the road, and in nearly every case the induced demand results in comparable traffic across more lanes.

More cars across more lanes of traffic, with the same amount of congestion and same average travel times, is no way to reduce pollution. The only effect will be to drive people off the bus and off their bikes and into cars...and to spend a ton of money doing it.

For your reference:

<https://www.citylab.com/transportation/2018/09/citylab-university-induced-demand/569455/>

Don't use public money to make pollution worse and lock us into single-mode transportation through this corridor.

Attachments: [2019 0301 Brian Wenzl ATT](#)

2019 0305 Bridget Underwood

Comment: I am writing to express my opposition to the Rose Quarter freeway expansion project. Having grown up in the Portland area, the difference in climate between my childhood and recent years is really stark. Several summers ago was the first time in my life I ever saw Mt Hood without any snow. It's deeply scary to be looking ahead to a future that will be increasingly unlivable due to the impacts of climate change. We only have a few years left to massively course-correct from the systems and choices that led us here; and spending 500 million on a freeway expansion is wasting a vast sum of money on a project that only entrenches us further in the same destructive systems that are killing us. That money could make a huge difference in moving us away from car dependence and traffic congestion if it was fully applied to transit, housing, and safer walking and biking infrastructure. Please make the right choice and help us move towards a more survivable future!

Attachments: N/A

2019 0401 Brook Hagler

Comment: I am opposed to the freeway expansion. In the long run it will make congestion worse and increase emissions.

It's ridiculous to spend hundreds of millions of dollars on new expansions when the existing roads under ODOT's purview are crumbling. Fix the roads we have, and put money into expanding access to mass transit.

Attachments: N/A

2019 0307 Brooke Kavanagh

Comment: I am skeptical that adding more freeway lanes will reduce emissions. It would seem that "if you build it, they will come," and more vehicles especially diesel trucks will be using this area for travel. We desperately need to mitigate the number of vehicles traveling, not make



more space for them. We have only 11 years to make drastic changes to stop raising our GHG emissions build good bike lanes and sage sidewalks – not freeways.

Attachments: N/A

2019 0403 Bruce Butner

Comment: I would like to know why are freeways are lack of law enforcement and semi-trucks are allowed in the fast lane and can run in the middle lane for as long as they want are traffic is way too heavy to allow this anymore when these trucks get in all three lanes they hold up traffic and make for a bigger traffic jam they can't start from a dead stop like a car and that causes delay which just one of the things that is the problem half the trucks speed about 70 mph which if this is not stop there is going to be an very bad accident and could kill a lot of people. Our freeways need a lot of help and the max line isn't going to help the freeway system.

Attachments: N/A

2019 0303 Bruce Hellemn

Comment:

I would like to applaud the ODOT decision to widen the I-5 freeway from I-84 to I-405 at the Rose Quarter.

I have lived in Portland since 1968 and this bottleneck is a traffic nightmare pretty much all day long until after the evening rush hour.

The southbound entrance from the Rose Quarter area and merging onto I-5 while other cars are trying to get into the same lane to exit I-5 and take I-84 eastbound is dangerous at best.

Traffic also backs up northbound on I-5 from the Morrison Bridge on ramp onto I-5 northbound all the way to the Fremont Bridge most of the day until the evening as well. The same problem with the I-84 westbound traffic merging onto I-5 Northbound and others wanting to get into that lane to exit I-5 at the Rose Quarter / Weidler St. exit is also dangerous.

I certainly hope you move forward and complete this upgrade which many people are calling a freeway expansion but I would term a bottle neck relief widening. It's not like you are widening the entire I-5 freeway through Portland but are hopefully ending this dreaded bottleneck.

Thank you for listening to my comments.

Attachments: N/A



2019 0331 Bryan Blanc

Comment: The Rose Quarter is a bottleneck in Portland's freeway system -- that much is self evident to anyone driving in our region. But I think we need to ask the question -- do we have a responsibility to alleviate every bottleneck and limit on freeway capacity? I don't think that we do. We have ten years to develop a radical solution to make up for decades of inaction that are the fault of our federal, state, and local policy makers, as well as the institutions (and the people that comprise them) that have been infected by a cynical conservatism that says we can't do anything about the world we live in. We are not left to just staunch the bleeding of an economy and a transportation system that depends upon destroying the planet -- we can change it. But that means making hard decisions, and telling people that the systems we all depend on have to change. That means driving has to be harder -- much, much harder -- than it is today. We need to discourage single occupancy vehicle traffic. At the same time, transportation is a vital cog in the machinery of our economy. We need to provide alternative transportation through a radical investment in transit, bicycle, and pedestrian infrastructure and to address the crimes of manifest destiny so self evident in a land use pattern designed to dominate and exploit the landscape and its people. The Rose Quarter has traffic -- that can be addressed to some extent with congestions pricing -- but we also need to change the paradigm in which we react to every traffic bottleneck. Our planet and our futures depend on making hard decisions to change the way we live. A freeway expansion that won't be finished until we have nearly hit the deadline for changing our economy is not a hard decision -- it is a status quo that will doom us to generations of hardship upon a people and a planet who did not choose for that to be the case. Let's make some hard choices together.

Attachments: N/A

2019 0312 Bryan Chu

Comment: My name is Bryan Chu. I work at Harriet Tubman Middle School. I teach children and have been doing so for over 20 years. Working for Portland Public Schools you quickly learn that the school boards and superintendents continually make decisions about the input in the communities that their decisions affect.

Ask Jefferson High School students about school resource officers.

Ask Rosa Parks Elementary students about their year-round schedule.

Ask Ockley Green and Harriet Tubman Middle School about pretty much everything.

It's clear that institutions such as school districts, school boards, or departments of transportation are not broken. They are working extremely well.

Portland Public Schools and the Oregon Department of Transportation seem to be highly proficient at perpetuating white supremacy, environmental racism and placing profit over people and planet while claiming to have our best interests at heart, but we know better. My eighth graders at Harriet Tubman Middle School are aware of the I-5 freeway because of our proximity to it. They see it when they look out the classroom windows. They understand the connection



between environmental injustice, police brutality, and black lives. They understand the connection between asthma, a choke hold, and the murder of Aaron Gardner, rest in power.

The thoughts and ideas that course through the minds of eighth grade students when they are told the air is perfectly safe to breathe, but see the \$10 million HVAC filtration system that sits on top of our building. The thing about my students is that they understand we are a frontline community and that we have always been the ones who are made to pay the price of Portland's progress.

They know about the proposed I-5 freeway expansion because it was being discussed long before Harriet Tubman Middle School reopened this past fall. They were told that if the I-5 expansion was to happen that students of HTMS could not remain in the building. It would be moved to a different location during construction. We want to know if this is true.

If so, then PPS should explain why we were rushed to open Harriet Tubman Middle School only to have it closed down. Where would we be housed? I'm assuming PPS doesn't know nor do they have a plan I'm aware of. I'm also assuming that ODOT does know either. In closing, I'd like to say that black lives matter, black students matter, black schools matter, black lung matters. Thank you for your time.

Attachments: N/A

2019 0327 Bryan Huitt

Comment: Are you really tying CRC funding to this monstrosity?

Do better...

Attachments: N/A

2019 0401 Bryn

Comment: There is no evidence that expanding freeways helps congestion. This is a wasteful project that will have a significant negative effect on air quality and quality of life for residents. Improved public transit could solve many of these issues!

Attachments: N/A